

Appendix A

Notice of Preparation and Scoping Comments

Appendix A.1

Notice of Preparation



NOTICE OF PREPARATION



Date: July 7, 2020

To: California Office of Planning and Research, Responsible and Trustee Agencies and Interested Parties

Subject: Notice of Preparation and Scoping Meeting for a Draft Program Environmental Impact Report

Project: 2020 LA River Master Plan

Lead Agency: County of Los Angeles

Review Period: July 7, 2020, through August 6, 2020

The County of Los Angeles (County), through the Department of Public Works (Public Works), is the Lead Agency and will prepare a Program Environmental Impact Report (PEIR) for the proposed 2020 LA River Master Plan (Project) identified in this notice. The Project description, location, and the probable environmental effects are discussed below. An Initial Study was not prepared since the County determined that a PEIR would be necessary.

We need to know the views of you or your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed Project. This Notice of Preparation (NOP) has been prepared to notify responsible and trustee agencies, the Office of Planning and Research, the County Clerk, and other interested parties that Public Works is beginning preparation of a PEIR pursuant to the California Environmental Quality Act (CEQA) for its proposed 2020 LA River Master Plan.

Public and Public Agency Comments

Public Works is soliciting the views of interested persons and agencies as to the scope and content of the environmental information to be evaluated in the 2020 LA River Master Plan PEIR. In accordance with CEQA, agencies are requested to review the Project description in this NOP and provide their comments on environmental issues related to the statutory responsibilities of the agency. The PEIR will be used by the County's governing Board — the Los Angeles County Board of Supervisors — when considering approval of the proposed 2020 LA River Master Plan as well as any related discretionary actions.

Due to the time limits mandated by state law, all comments on the NOP are due no later than 30 days after receipt of this notice which will be 5:00 pm on August 6, 2020. Please send your comments in writing to the physical address or e-mail address shown below.

Include a return address or e-mail address and a contact name in your agency with your comments.

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
833-993-1739
LARiverCEQA@pw.lacounty.gov

Scoping Meeting

Due to restrictions under State of California Executive Order N-33-20, an online scoping meeting will be held for this Project. One online scoping meeting will be held to receive comments from the public and other interested parties regarding the scope and content of the proposed 2020 LA River Master Plan PEIR. The scoping meeting will include a brief presentation providing an overview of the proposed Project and the CEQA process. After the presentation, a Q&A session will be held followed by submission of oral comments by previously registered commenters. Written comment forms will be supplied for those who wish to submit comments in writing at the scoping meeting. The scoping meeting will be held as follows:

DATE: Wednesday, July 29, 2020
TIME: 6:00 p.m. to 8:00 p.m.
LOCATION: Visit <http://pw.lacounty.gov/go/larmpceqa>

Project Location and Background

The proposed Project is located along a 51-mile-long, 2-mile-wide corridor (i.e., 1 mile on each side) of the LA River in Los Angeles County and spans through 17 cities and unincorporated Los Angeles County (18 total jurisdictions). The river encompasses an 834-square-mile watershed and flows from its headwaters at river mile 51 in Canoga Park within the City of Los Angeles to river mile zero at Long Beach, where the river meets the Pacific Ocean (Figure 1). The LA River was channelized between the late 19th and mid-20th centuries to protect lives and property from flooding as the LA region rapidly grew and transformed to a largely urbanized area. Today, 1 million people live within 1 mile of the river.

1996 LA River Master Plan

In 1996, Los Angeles County approved the first LA River Master Plan, which expanded the originally single-purpose flood control efforts on the river to a multi-benefit community amenity that reflects aesthetic, environmental, economic, and recreational values of residents. The 1996 Master Plan identified ways to revitalize public rights-of-way along the LA River while ensuring the continued primary purpose as a flood risk reduction facility. The 1996 Master Plan was a first step in developing an inclusive vision of shared open spaces and parks, stewardship of water resources, and safety from hazardous floods.

Proposed 2020 LA River Master Plan

The LA River Master Plan Update process began in 2018 and involved numerous stakeholders. The update process has been led by Public Works and supported by several other Los Angeles County departments as well as a 41-member steering committee representing agencies, non-profit organizations, and other governmental and non-governmental entities providing input and technical expertise related to the Project's three integrated themes: water, people, and the environment. The update process also included numerous opportunities for public engagement and input on the future of the river. The Project themes of water, people, and the environment captured the 1996 Master Plan key issues, as well as other regional planning studies, and recognized that infrastructure planning cannot be isolated from equally important social and environmental needs. The Project website provides more detailed information on the proposed Project and the extensive public outreach conducted to date: <http://www.larivermasterplan.org/>.

2020 LA River Master Plan Objectives

The proposed 2020 LA River Master Plan builds on the adopted 1996 Master Plan and other regional planning studies prepared since then. It is intended to improve 51 miles of connected open space along the LA River to improve health, equity, access, mobility, and economic opportunity for the diverse communities of Los Angeles County while still providing flood risk management. The 2020 LA River Master Plan has the following nine objectives:

1. Reduce flood risk and improve resiliency.
2. Provide equitable, inclusive, and safe parks, open space, and trails.
3. Support healthy connected ecosystems.
4. Enhance opportunities for equitable access to the river corridor.
5. Embrace and enhance opportunities for arts and culture.
6. Address potential adverse impacts on housing affordability and people experiencing homelessness.
7. Foster opportunities for continued community engagement, development, and education.
8. Improve local water supply reliability.
9. Promote healthy, safe, clean water.

The aim of the 2020 LA River Master Plan objective number 6, "Address potential adverse impacts on housing affordability and people experiencing homelessness," is to maintain strategies for ensuring continuing housing affordability in LA River adjacent communities. Therefore, the use of "impacts" in this objective is distinct from the use of "impacts" under CEQA where, per CEQA Guidelines Section 15358 (b), impacts analyzed under CEQA must be related to a physical change in the environment.

Proposed 2020 LA River Master Plan Elements

To achieve multiple objectives at potential sites along the LA River, the 2020 LA River Master Plan proposes six elements, or "Kit of Parts" categories:

1. Trails, Access Gateways, and Shelters
2. Channel Modifications
3. Crossings and Platforms
4. Diversions
5. Floodplain Reclamation
6. Off Channel Land Assets

Under each of these "Kit of Parts" categories, multiple components — including benches, bridges, platforms, trails, shelters, diversion pipes, storage facilities, terraced banks, and affordable housing — are being proposed to serve as a menu of options to provide multiple benefits at any given potential location along the LA River. Future projects/actions proposed under the 2020 LA River Master Plan would range from extra-small (XS) (1-acre or less) to extra-large (XL) (150+ acre/10+ miles) and would include implementation of these design components individually or in combination as multi-benefit projects in the future. The proposed 2020 LA River Master Plan also includes Design Guidelines for all projects/actions to be implemented to present a unified identity while promoting best practices and resiliency for the LA River corridor.

Program-Level Analysis, Tiering, and Later Activities

At the time of preparation of the PEIR, design information for the proposed 2020 LA River Master Plan is at a conceptual level; therefore, the environmental impacts analysis will be presented at a program level and will not include site-specific locations of any of the "Kit of Parts." In addition, at this stage, informed assumptions regarding construction and operations scenarios can be reasonably made for only select design components. Accordingly, the environmental impacts analysis for these design components will be presented in detail as analysis of "typical projects" in the PEIR while the remaining design components will be analyzed qualitatively at a high-level in the 2020 LA River Master Plan PEIR.

It is anticipated that the County or other agencies may use the PEIR in considering subsequent discretionary actions. The PEIR will serve as the first-tier analysis for later, more detailed project-specific and site-specific environmental reviews. When later activities are proposed after the PEIR is certified and the 2020 LA River Master Plan is approved, a determination will be made at that time by the agency: a) whether the activity is covered "within the scope" of the PEIR; and b) if new or worsened significant effects not previously examined in the PEIR could occur. Factors that an agency may consider in making the determination of being within the scope of the PEIR could include the geographic area analyzed in the PEIR, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, and covered infrastructure described in the PEIR (CEQA Guidelines Section 15168[c][2]).

If an agency determines that a later activity is covered in the scope of the PEIR and new or substantially more severe significant impacts would not occur, no further environmental documentation would be required. If new or more severe impacts beyond those disclosed in the PEIR could occur, the agency would prepare the appropriate level of subsequent CEQA documentation needed (e.g., mitigated negative declaration, or a site-specific supplemental or subsequent EIR) and the subsequent CEQA review would focus solely

on new or substantially more severe significant effects that were not considered in the original PEIR (CEQA Guidelines Section 15168[d][2]).

Alternatives to the Proposed Project

Pursuant to CEQA Guidelines 15126.6(e), Public Works anticipates that the 2020 LA River Master Plan PEIR will include a No-Project Alternative and one or more feasible "build" alternatives to the proposed 2020 LA River Master Plan. These alternatives will be refined and screened based on agency and public input and based on their ability to reduce or avoid significant environmental impacts identified for the proposed Project.

Schedule

Public Works expects to circulate the Draft 2020 LA River Master Plan PEIR for public review in summer 2020 and recommend for the Los Angeles County Board of Supervisors to certify the Final PEIR and adopt the 2020 LA River Master Plan by the end of 2020.

2020 LA River Master Plan PEIR Scope and Probable Environmental Effects

The purpose of the PEIR will be to disclose the environmental impacts of the proposed Project, which is the 2020 LA River Master Plan. Potential environmental effects to be examined in the PEIR are those related to aesthetics, air quality, biological resources, cultural resources, energy, geology/soils, greenhouse gas (GHG) emissions, hazards & hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation, tribal cultural resources, utilities/service systems, and wildfire. Cumulative impacts, alternatives to the Project, and growth-inducing impacts will also be analyzed. Agriculture and forestry resources will not be analyzed in the PEIR because these resources are not present in the study area.

Where feasible, detailed impacts resulting from both short-term construction and long-term operation of elements of the 2020 LA River Master Plan will be identified in the PEIR; all elements will be analyzed at a program level, and some impacts will be identified qualitatively. A brief discussion of the anticipated environmental impacts and environmental topics that will be examined in the PEIR is presented below. Feasible mitigation measures also will be identified in the PEIR to minimize the Project's significant impacts. (CEQA Guidelines 15126.4(a))

Aesthetics

The PEIR will describe the existing visual character of the proposed Project study area and surrounding areas, and it will identify key visual resources and scenic views. The LA River transverse a variety of communities, each with its own unique visual character on the riverfront. The river corridor is a highly urbanized area of the Los Angeles Basin, spanning through from the San Fernando Valley and eastern Los Angeles County, through Central Los Angeles, and ending at Long Beach on the Pacific coast. Except for Sepulveda Basin, Griffith Park, and Glendale Narrows, few intact natural communities of the river corridor remain within or adjacent to the river. The probable impacts of the Project include substantial adverse effects on key visual resources and scenic vistas, potential conflicts with applicable zoning, and the potential to create new sources of

substantial light or glare affecting day or nighttime views. These impacts, and their level of significance, will be assessed in detail in the PEIR.

Air Quality

The PEIR will describe the existing air quality conditions in the South Coast Air Basin and will evaluate the impacts of the proposed Project in accordance with current South Coast Air Quality Management District (SCAQMD) CEQA Guidelines. The probable air quality impacts of the Project include the potential to conflict with the air quality plan, potential to cause cumulatively considerable net increase in a criteria pollutant for which the Project region is a nonattainment area, potential to expose sensitive receptors to substantial pollutant concentrations, and the potential to result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. These impacts, and their level of significance, will be assessed in detail in the PEIR.

Biological Resources

The PEIR will describe the existing biological resources in the river corridor across the County and 17 cities, discuss the impacts of the proposed Project on biological resources (plants, wildlife, and waters), and identify any conflicts with applicable local policies and ordinances protecting biological resources, such as impacts on protected or heritage trees. Specifically, the probable biological resources impacts of the Project include the potential to have a substantial adverse effect on either any candidate, sensitive, or special-status species or riparian habitat or other sensitive natural community identified in State, Federal, local, or regional plans, policies, or regulations. Other probable impacts could include a substantial adverse effect on State or Federally protected wetlands through direct removal, filling, hydrological interruption, or other means; substantial interference with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Additionally, probable impacts related to conflicts with local policies or ordinances protecting biological resources or the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan could occur. These impacts, and their level of significance, will be assessed in detail in the PEIR.

Cultural Resources

The cultural resources (archaeology and built environment) analysis in the PEIR would analyze the potential impacts of the 2020 LA River Master Plan, including establishing a process for future cultural resources identification and analysis at the project level, once project-specific locations are known, to ensure compliance with CEQA. The PEIR will describe steps to establish the locations of known cultural resources; recommend research and documentation steps needed to determine significance of resources in specific locations; and establish procedures for addressing local requirements. These impacts, and their level of significance, will be assessed in detail in the PEIR.

Energy

The PEIR will include an analysis of energy consumption and consistency of the proposed 2020 LA River Master Plan with State and local plans for renewable energy and energy efficiency. Potential energy impacts include the potential to waste energy from inefficient

or unnecessary consumption of energy resources during Project construction or operation. Additionally, potential impacts could include the potential to conflict or obstruct a State or local plan for renewable energy or energy efficiency. The PEIR will analyze the Project's estimated consumption of energy resources, where feasible, during construction and operation, and would evaluate its consistency with State and local plans for renewable energy and energy efficiency. These impacts, and their level of significance, will be assessed in detail in the PEIR.

Geology/Soils

The PEIR will describe the geologic and soil impacts that may affect the Project design, including seismicity, landslide, lateral spreading, subsidence, liquefaction, and potential for expansive soils as well as paleontological resources. The PEIR will determine whether paleontologically sensitive geologic units are within the study area and will analyze the potential impacts on paleontological resources. These impacts, and their level of significance, will be assessed in detail in the PEIR.

Greenhouse Gas Emissions

The construction and operational GHG emissions in the proposed Project vicinity related to implementation of typical projects under the proposed Project will be quantified. Potential impacts related to climate change will be addressed consistent with the SCAQMD's current guidance. The proposed Project's consistency with the County of Los Angeles Community Climate Action Plan (CCAP) will also be discussed. These impacts, and their level of significance, will be assessed in detail in the PEIR.

Hazards & Hazardous Materials

The PEIR will describe the existing conditions on and adjacent to the proposed Project study area within the County and 17 cities — including the potential for existing soil or groundwater contamination in the Project study area — and will identify hazardous impacts from both construction and operations, where feasible. Specifically, the PEIR will analyze whether the Project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. These impacts, and their level of significance, will be assessed in detail in the PEIR.

Hydrology/Water Quality

The PEIR will analyze the differences between the existing conditions and the future conditions with respect to Hydrology and Water Quality. The analysis will take into consideration pollutant sources, changes in the impervious surfaces (increase or decrease), application of stormwater infrastructure (number of stormwater and dry weather runoff best management practices (BMPs), new technologies, effectiveness), and discharges into impaired waters. Specifically, the PEIR will evaluate the Project's potential to violate any water quality standards or waste discharge requirements that the Project could potentially degrade pertaining to surface or groundwater quality standards. Potential impacts also include the potential to substantially decrease groundwater supplies or substantially interfere with groundwater recharge. Additionally, the PEIR will analyze existing drainage patterns of the Project area and assess whether the Project will result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff that would result in flooding, create or contribute runoff water

which would exceed the capacity of existing or planned stormwater drainage systems, or impede or redirect flood flows. The PEIR will analyze the risk from releasing pollutants in flood hazard, tsunami, or seiche zones due to Project inundation as well as the Project's potential to conflict or obstruct a water quality control plan or sustainable groundwater management plan. These impacts, and their level of significance, will be assessed in detail in the PEIR.

Land Use/Planning

A variety of land uses occurs adjacent to the LA River in the County and within each of the 17 cities. The PEIR will evaluate the compatibility of the proposed Project with neighboring areas within the 18 jurisdictions, change to or displacement of existing uses, compliance with zoning regulations, and consistency of the project with relevant local land use policies that have been adopted in land use documents in the County and 17 cities. Specifically, the PEIR will analyze the Project's potential to physically divide an established community or cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. These impacts, and their level of significance, will be assessed in detail in the PEIR.

Mineral Resources

The PEIR will use the California Geologic Survey's guidelines and will consult the areas known as Mineral Resource Zones to determine if the proposed Project lies within a zone(s) that contains mineral resources across the 18 jurisdictions. The PEIR will describe any identified zones and summarize the relevant information from the state mandated Surface Mining and Reclamation Act of 1975 as part of the proposed Project's regulatory setting in relation to Mineral Resources. In addition, for the County and 17 local jurisdictions in the study area, applicable general plans, municipal codes, and any other specific or land use plan will be reviewed to determine if they delineate any locally important mineral resources within the study area. The PEIR will assess whether the Project will result in the loss of availability of a known mineral resource that would be of value to the region and residents of the State as well as the potential to lose the availability of locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. These impacts, and their level of significance, will be assessed in detail in the PEIR.

Noise

The PEIR will identify sensitive noise receptors and sources of noise and vibration in the Project area and will analyze short-term construction and long-term operational noise and vibration impacts, where feasible. The construction analysis will use established modeling methodology (e.g., the Federal Highway Administration Roadway Construction Noise Model and the Federal Transit Administration Noise and Vibration Manual), along with typical construction equipment information. Operations noise analysis will use modeling software, such as the most recent version of SoundPLAN, to identify potential distances at which inclusion of these actions could affect nearby noise sensitive receptors. The analysis will provide generalized distances at which noise from specific construction equipment would attenuate to below any thresholds of significance. The PEIR will analyze the Project's potential to generate substantial temporary or permanent

increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies. Additionally, the PEIR will analyze the Project's potential to generate excessive ground borne vibration or ground borne noise levels. These impacts, and their level of significance, will be assessed in detail in the PEIR.

Population/Housing

The EIR will address the proposed Project's potential for inducing population growth and displacing people and housing within the County and 17 incorporated jurisdictions. Analysis of population and housing along the 51-mile-long river will assess the differences between forecasts based on existing general plans of the County and 17 cities and regional growth projections. Specifically, the PEIR will assess whether the Project would induce substantial unplanned population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). Additionally, the PEIR will analyze whether the Project would displace substantial numbers of existing people or housing necessitating the construction of replacement housing elsewhere. These impacts, and their level of significance, will be assessed in detail in the PEIR.

Public Services

The PEIR will determine, at a program-level, if the improved access and anticipated increase in visitors in the Project area would result in impacts on Public Services — including fire protection, police protection, schools, parks, and other public facilities — by considering response times and increased demands, as applicable. The PEIR will assess available information on the current demand for public services against any new demand that is created by Project improvements. In addition, emergency access impacts during construction and operations would be analyzed. These impacts, and their level of significance, will be assessed in detail in the PEIR.

Recreation

The PEIR will address the proposed Project's potential impact on notable recreation areas; regional, neighborhood, and local parks; trails; and other local recreational facilities and uses — such as water recreation and equestrian uses — within and near the study area across the 18 jurisdictions. Specifically, the PEIR will analyze the Project's potential to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Additionally, the PEIR will analyze whether the Project includes recreational facilities or would require the construction or expansion of recreation facilities which might have an adverse physical effect on the environment. These impacts, and their level of significance, will be assessed in detail in the PEIR.

Transportation

A transportation impact analysis will be prepared for the PEIR to describe the existing local and regional transportation network and to evaluate the proposed Project's construction- and operations-related traffic impacts, where feasible, for vehicular, transit, bike, and pedestrian circulation. The PEIR will analyze whether the Project will conflict with a program, plan, ordinance, or policy addressing the circulation system. The

transportation analysis for the PEIR will be conducted using a uniform approach based on the draft County transportation assessment guidelines, including application of the project screening criteria and the Vehicle Miles Traveled (VMT) thresholds. Senate Bill (SB) 743, which replaces vehicle level of service (LOS) as the CEQA metric of significance with VMT, goes into full effect on July 1, 2020. The County has developed a draft update to the Transportation Section of the County CEQA Thresholds Guide that includes a comprehensive methodological approach to the assessment of transportation impacts, including VMT-based thresholds of significance and a process to screen out projects which will not require VMT analysis (due to their size, location, or other factors). These draft guidelines and thresholds are expected to be adopted by the LA County Board of Supervisors in June 2020, ahead of both the SB 743 implementation deadline and the anticipated publication of the draft PEIR in late summer 2020. The draft County VMT threshold is 16.8 percent below existing VMT per capita, which is more conservative than the threshold recommended by the California Office of Planning and Research or that adopted by the City of Los Angeles, both of which are set at 15 percent below existing. Considering the approach of the PEIR, including the absence of any specific sites or projects under the proposed 2020 LA River Master Plan to be analyzed in the PEIR, the County has determined that its uniform set of VMT guidelines will best serve the transportation analysis for the PEIR considering the 17 cities in the study area are in various stages of transitioning from LOS to VMT. Accordingly, the PEIR transportation analysis approach will use the County transportation assessment guidelines, including the project screening criteria and the VMT thresholds. These impacts, and their level of significance, will be assessed in detail in the PEIR.

Tribal Cultural Resources

In accordance with Assembly Bill 52 (Govt. Code Section 65352.4), the Native American Heritage Commission (NAHC) and any tribes it identifies will be contacted and consulted about the presence of traditional lands or cultural places in the proposed Project vicinity; potential tribal cultural resources impacts will be identified in the PEIR. These impacts, and their level of significance, will be assessed in detail in the PEIR.

Utilities/Service Systems

The PEIR will describe the existing utilities in the Project study area within the County and 17 local jurisdictions and will address the ability of existing and planned public facilities and service systems to meet demands generated by the project and physical impacts on public utilities — including sanitary sewers, storm drains, and solid waste. The PEIR will analyze whether the Project would require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities; the construction or relocation of which could cause significant environmental effects. The PEIR will assess whether the Project would result in a determination by the wastewater treatment provider, which serves or may serve the Project, that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. Additionally, the PEIR will analyze whether the Project would generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals and whether the Project would comply with Federal, State, and local management, and reduction statutes and regulations related to

solid waste. The PEIR will describe the existing water supply serving the proposed Project study area and will evaluate the impacts of the proposed Project on water supply at a program level, including whether the Project would have sufficient water supplies available to serve the Project. These impacts, and their level of significance, will be assessed in detail in the PEIR.

Wildfire

The PEIR will analyze the consistency of proposed improvement actions under the 2020 LA River Master Plan with current wildfire hazard programs and regulatory documents within the County and 17 cities. Specifically, the PEIR will analyze whether the Project would substantially impair an adopted emergency response plan or emergency evacuation plan. These impacts, and their level of significance, will be assessed in detail in the PEIR.

Cumulative Impacts

Consistent with CEQA, this section will address the impacts of implementing the proposed Project in combination with other past, present, and reasonably foreseeable future projects in the Project vicinity.

Growth-Inducing Impacts

The PEIR will discuss the ways in which the proposed Project could foster growth in the surrounding environment; growth-related secondary impacts also will be discussed.

Mandatory Finding of Significance

The PEIR will analyze whether the Project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. The PEIR will discuss if the Project has impacts that are individually limited, but considered cumulatively significant. Additionally, the PEIR will analyze whether the Project has environmental effects which cause substantial adverse effects on human beings, either directly or indirectly.

Other CEQA-Required Analysis

Additional issues to be analyzed in the PEIR include, but are not limited to, Significant Unavoidable Impacts, Significant Irreversible Environmental Change, Persons Consulted and List of Preparers, References, and technical appendices.

Si desea obtener más informacióno necesita que la notificación sea traducido a otro idioma, por favor llame al (626) 300-2363.



Upon 72 hours' notice, Public Works can provide program information and publications in alternate formats or make other accommodations for people with disabilities. In addition, program documents are available at our main office in Alhambra (900 S. Fremont Ave.), which is accessible to individuals with disabilities. To request accommodations ONLY or for more Americans with Disabilities Act information, please contact our departmental Americans with Disabilities Act Coordinator at (626) 458-4081 or by TDD (626) 282-7829, Monday through Thursday, from 7:00 a.m. to 5:30 p.m.

Appendix A.2

Scoping Comments

DEPARTMENT OF TRANSPORTATION
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100 S. MAIN STREET, SUITE 100
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*Making Conservation
a California Way of Life.*

August 3, 2020

Ariana Villanueva
LA County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

RE: 2020 LA River Master Plan – Notice of
Preparation (NOP)
SCH# 2020070128
GTS# 07-LA-2020-03308
Vic. LA Multiple

Dear Ariana Villanueva,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed 2020 LA River Master Plan builds on the adopted 1996 Master Plan and other regional planning studies prepared since then. It is intended to improve a two-mile wide corridor along 51 miles of the LA River to improve health, equity, access, mobility, and economic opportunity for the diverse communities of Los Angeles County while still providing flood risk management. The 2020 LA River Master Plan proposes six categories of project improvements, or "kit of parts" over the next 25 years:

1) Trails, Access Gateways, and Shelters; 2) Channel Modifications; 3) Crossings and Platforms; 4) Diversions; 5) Floodplain Reclamation; 6) Off Channel Land Assets.

After reviewing the NOP, Caltrans has the following comments:

The size and scope of the proposed Master Plan provides a unique opportunity for the various communities along the LA River to identify their needs and provide feedback for the type of public realm they want when making their daily trips. Caltrans requests that the 2020 LA River Master Plan clearly identify all locations where improvements can be made for people walking, biking, rolling or taking transit along, across, or adjacent to State facilities within the Plan area. Please be specific on the locations within Caltrans right-of-way where improvements are desired and what type of infrastructure is preferred. Some examples include protected Class IV bikeways, wider sidewalks, curb extensions, pedestrian refuge islands, landscaping, street furniture, reduced crossing distances, roadway narrowing, pedestrian and bicycle signage, flashing beacons, and refreshed or new crosswalks. Plans that incorporate significant public engagement, like the one proposed, are used to identify and develop future State transportation projects.

Caltrans' Strategic Management Plan has set targets of tripling trips made by bicycle, doubling trips made by walking and public transit, as well as a 15% reduction in statewide, per capita, vehicle miles traveled (VMT). Similar goals are embedded in California Transportation Plan, the Southern California Association of Governments' (SCAG) Regional Transportation Plan, legislation such as AB 32 and SB 375, as well as Executive Orders S-3-05 and N-19-19. By helping to identify where the barriers to walking, biking, and taking transit exist, this Plan can make transportation mode shift easier for Californians and help the State meet its policy goals to reduce the number of trips made by driving, reduce Greenhouse Gas (GHG) emissions, and encourage alternative modes of travel.

In addition, please consider the following when developing the Draft Program Environmental Impact Report (PEIR):

- Objective 2 and Elements 1 and 3, should consider accessibility for any and all users. At present, LA River Trail access points are primarily limited to major roads, which inhibits the neighborhood accessibility for residents and workers. Streets that run alongside the trail are good candidates for numerous access points at predetermined intervals, allowing users to walk, bicycle, scooter, skateboard or roll to and from their destination without taking a circuitous route to the nearest major roadway.
- The plan should consider lighting and other elements that create an environment where all users can feel safe to use the river path, in any neighborhood and at any time of day/night.
- The LA River Master Plan PEIR should consider and incorporate LA County transportation plans, including Vision Zero, the Bicycle Master Plan, Metro plans, and the 17 adjacent city transportation plans insure all jurisdictions have safe transportation routes to the LA River.
- Partner with adjacent cities and public bodies to adopt complete streets policies to better connect neighborhoods to the river and prioritize access to the river from schools, and other public gathering spaces.
- Implement signage along the river as markers of physical activity (such as ¼ mile or ½ mile markers). Signage should also be informational to highlight the rivers connectivity to nearby destinations, informing the community of its use as a viable route to certain locations.
- Include methods for raising awareness in the adjacent communities of the potential uses of the river for physical activity, arts, and culture. Infrastructure like benches, drinking water stations, bicycle parking, bathroom/reststops, and sufficient pedestrian level lighting should be included to encourage these uses.

- To assist people experiencing homelessness, identify sites within the plan area for development of supportive housing. These sites should be mixed-use to provide housing as well as other goods and services that benefit the community.
- When possible, reduce the Effective Impervious Area in the watershed. Limiting the possibility of constructing surface parking lots would be a highly effective way to reduce the heat-island effect and the amount of non-beneficial impervious area.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2020-03308.

Sincerely,



MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
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(858) 467-4201
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



August 5, 2020

Ms. Ariana Villanueva
Los Angeles County Public Works
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
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Comments on the Notice of Preparation of a Draft Programmatic Environmental Impact Report for 2020 LA River Master Plan, SCH #2020070128, Los Angeles County

Dear Ms. Villanueva:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Notice of Preparation (NOP) of a Draft Programmatic Environmental Impact Report (DPEIR) for the 2020 LA River Master Plan (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

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

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

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Project Description and Summary

Objective: The County of Los Angeles (County), through the Department of Public Works (LACPW), is proposing the Project, which would provide program-level direction for development along the Los Angeles River (LA River) over 25 years. The Project proposes multiple components within 6 categories: (1) trails, access gateways, and shelters; (2) channel modifications; (3) crossings and platforms; (4) diversions; (5) floodplain reclamation; and (6) off channel land assets. Examples include public open spaces, parks, benches, bridges, platforms, trails, shelters, diversion pipes, storage facilities, terraced banks, and affordable housing. Future actions or component projects proposed under the Project would range from “extra-small” (1-acre or less) to “extra-large” (150+ acre/10+ miles). Examples of extra-small projects include pavilions, lighting, environmental graphics, bike racks, and benches. Examples of extra-large projects include regional parks and water recharge areas.

Location: The Project addresses approximately a 2-mile wide corridor along 51 miles of the LA River from the San Fernando Valley to Long Beach on the Pacific Ocean. The Project provides program-level regional planning and does not include any site-specific locations for individual actions or component projects.

Comments and Recommendations

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

Specific Comments

- 1) Lake and Streambed Alteration Agreements: As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow; or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream; or use material from a streambed. For any such activities, the project applicant (or “entity”) must provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration (LSA) Agreement (Agreement) with the applicant is required prior to conducting the proposed activities. CDFW’s issuance of an Agreement for a project that is subject to CEQA will require related environmental compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document prepared by the local jurisdiction (Lead Agency) for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the DPEIR should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the Agreement.
 - a) The Project area supports aquatic, riparian, and wetland habitats; therefore, a preliminary delineation of the lateral extent of the streams should be included in the DPEIR. Activities in the streams subject to 1600 *et seq.* of the Fish and Game code may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers’ Section 404 permit and Regional Water Quality Control Board Section 401 Certification.

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- b) In areas of the Project site which may support ephemeral streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of ephemeral channels and help maintain natural sedimentation processes; therefore, CDFW recommends effective setbacks be established to maintain appropriately-sized vegetated buffer areas adjoining ephemeral drainages.
 - c) Project-related changes in drainage patterns, runoff, and sedimentation should be included and evaluated in the DPEIR.
 - d) As part of the LSA Notification process, CDFW requests a hydrological evaluation of the 100-, 50-, 25-, 10-, 5-, and 2-year frequency storm event for existing and proposed conditions. CDFW recommends the DPEIR evaluate the results and address avoidance, minimization, and/or mitigation measures that may be necessary to reduce potential significant impacts.
- 2) Wetlands Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's policies. The Wetlands Resources policy (<https://fgc.ca.gov/About/Policies/Miscellaneous#Wetlands>) of the Fish and Game Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement and expansion of wetland habitat in California. Further, it is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values."
- a) The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, the Project must include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions for the benefit to on-site and off-site wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the DPEIR and these measures should compensate for the loss of function and value.
 - b) The Fish and Game Commission's Water policy guides CDFW on the quantity and quality of the waters of this state that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this state;

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prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & Game Code, § 5650).

- 3) Nesting Birds. Based on a review of satellite imagery, there is scattered vegetation throughout the Project location that may provide potential habitat where Project activities may impact nesting birds. Project activities occurring during the breeding season of nesting birds could result in the incidental loss of fertile eggs, or nestlings, or otherwise lead to nest abandonment in trees directly adjacent to the Project boundary. The Project could also lead to the loss of foraging habitat for sensitive bird species.
 - a) CDFW recommends that measures be taken to avoid Project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).
 - b) Proposed Project activities including (but not limited to) staging and disturbances to native and non-native vegetation, structures, and substrates should occur outside of the avian breeding season which generally runs from February 1 through September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, CDFW recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300-feet of the disturbance area (within 500-feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
- 4) Bat Species. A review of the California Natural Diversity Database (CNDDB) indicates occurrences of several bat species within the Project vicinity. These species include but are not limited to the big free-tailed bat (*Nyctinomops macrotis*), hoary bat (*Lasiurus cinereus*), pallid bat (*Antrozous pallidus*), western yellow bat (*Lasiurus xanthinus*), and western mastiff bat (*Eumops perotis californicus*). The pallid bat and the western mastiff bat are both California Species of Special Concern. Bridges, buildings, trees, and scattered vegetation throughout the Project location may provide potential habitat where Project activities may impact bats. Activities that will result in the removal of trees, buildings or other habitat for bats should consider avoiding adverse impacts to bats.

Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & Game Code § 4150, California Code of Regulations § 251.1). A DPEIR should provide a thorough discussion of potential impacts to bats from construction and operation of the Project to adequately disclose potential impacts and to identify appropriate avoidance and mitigation measures. The CEQA document shall

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describe feasible measures which could minimize significant adverse impacts (CEQA Guidelines §15126.4[a][1]).

- 5) Impacts to sensitive species. The Project location is within the floodplain and active channel of the LA River. CDFW is concerned the Project may affect sensitive species that occur within the LA River and areas adjacent to the Project. Areas of particular concern include reaches of the LA River near the Sepulveda Basin, Griffith Park, and Glendale Narrows where the occurrence of the endangered least Bell's vireo (*Vireo bellii pusillus*), has been documented. Other sensitive or special status species may include (but are not limited to) Crotch bumble bee (*Bombus crotchii*), southwestern willow flycatcher (*Empidonax traillii extimus*), coastal California gnatcatcher (*Polioptila californica californica*), burrowing owl (*Athene cunicularia*), American badger (*Taxidea taxus*), Los Angeles pocket mouse (*Perognathus longimembris brevinasus*), big free-tailed bat (*Nyctinomops macrotis*), hoary bat (*Lasiurus cinereus*), pallid bat (*Antrozous pallidus*), western yellow bat (*Lasiurus xanthinus*), western mastiff bat (*Eumops perotis californicus*), western spadefoot (*Spea hammondi*), western pond turtle (*Emys marmorata*), coast horned lizard (*Phrynosoma blainvillii*), southern California legless lizard (*Anniella stebbinsi*), mesa horkelia (*Horkelia cuneata* var. *puberula*), Parish's brittle scale (*Atriplex parishii*), Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*), and Peruvian dodder (*Cuscuta obtusiflora* var. *glandulosa*). Grading, vegetation removal, and other ground disturbances could crush and bury listed or sensitive plants and animals, resulting in direct mortality. The Project may also affect adjacent habitat by loud noises, lighting, increased human presence and activity, fugitive dust, increased temperatures from asphalt (heat island effect), hydrocarbons from asphalt paving within the LA River floodplain, and spreading invasive weeds, resulting in stress, displacement, and mortality of these species. CDFW recommends to following:
 - a) The Project should use alternatives to hydrocarbon-based asphalt paving. Asphalt pavement continues to leach hydrocarbons and heavy metals, becoming a significant point source of environmental contamination (Sadler, 1999).
 - b) Given this Project is proposed for a sensitive location (within the LA River channel and floodplain), the potential for direct and indirect impacts to sensitive, listed, and fully protected species should be further addressed. The DPEIR should include specific information on species locations, and specifically how the project will be sited to avoid impacts to this species or vegetation communities. If the Project will impact a sensitive species or vegetation community, specific mitigation to offset the loss of habitat (acreage and type) should be included in the DPEIR. Any mitigation proposed should be covered under a conservation easement, include a long-term management plan, and ensure funding to manage the mitigation land in perpetuity.
- 6) Landscaping. The NOP includes parks, open spaces, and trails among the Project objectives. Habitat loss and invasive plants are a leading cause of native biodiversity loss. Invasive plant species spread quickly and can displace native plants, prevent native plant growth, and create monocultures. CDFW recommends using native, locally appropriate plant species for landscaping on the Project site. CDFW recommends invasive/exotic plants, such as pampas grass (*Cortaderia selloana*) and salt cedar (*Tamarisk* spp.), be restricted from use in landscape plans for this Project. A list of invasive/exotic plants that

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should be avoided as well as suggestions for better landscape plants can be found at <https://www.cal-ipc.org/solutions/prevention/landscaping/>

- 7) Tree Removal. Satellite imagery indicates the presence of trees in areas of the Project site that might be developed for parks, trails, channel modifications, or other Project components. Habitat loss is one of the leading causes of native biodiversity loss. To compensate for any loss of trees, CDFW recommends replacing all non-native trees removed as a result of the proposed work activities at least a 1:1 ratio with native trees. CDFW recommends replacing native trees at least a 3:1 ratio with a combination of native trees and/or appropriate understory and lower canopy plantings.

Due to tree removal, Project activities have the potential to result in the spread of tree insect pests and disease into areas not currently exposed to these stressors. This could result in expediting the loss of oaks, alders, sycamore, and other trees in California which support a high biological diversity including special status species. To reduce impacts to less than significant the final environmental document should describe an infectious tree disease management plan and how it will be implemented to avoid significant impacts under CEQA. All trees identified for removal resulting from the Project should be inspected for contagious tree diseases including but not limited to: thousand cankers fungus (*Geosmithia morbida*), see <http://www.thousandcankers.com/>; polyphagous shot hole borer (*Euwallacea* spp.), see <https://anrcatalog.ucanr.edu/pdf/8590.pdf> and <https://www2.ipm.ucanr.edu/agriculture/avocado/polyphagous-shot-hole-borer-and-kuroshio-shot-hole-borer/>; and goldspotted oak borer (*Agrilus auroguttatus*), see <http://ipm.ucanr.edu/PMG/PESTNOTES/pn74163.html>. To avoid the spread of infectious tree diseases, diseased trees should not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed.

- 8) Biological Direct, Indirect, and Cumulative Impacts. The NOP states that the Project location broadly includes “a 51-mile-long, 2-mile-wide corridor (i.e., 1 mile on each side) of the LA River in Los Angeles County”. The LA River is a major riparian corridor in the Los Angeles Basin and serves as an important wildlife movement corridor connecting much of the open spaces through the rapidly urbanizing city. It is essential to understand how these open spaces and the biological diversity within them may be impacted by Project activities. This should aid in identifying specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends providing a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. The following should be addressed in the DPEIR:
 - a) A discussion regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Plan (NCCP, Fish & Game Code, § 2800 *et seq.*). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DPEIR;
 - b) A discussion of potential adverse impacts from lighting, noise, human activity, and exotic species and identification of any mitigation measures;

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- c) A discussion on Project-related changes on drainage patterns and downstream of the Project site; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and, post-Project fate of runoff from the Project site. The discussion should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included;
- d) An analysis of impacts from land use designations and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DPEIR; and,
- e) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

General Comments

- 1) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DPEIR:
 - a) A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas and access routes to the construction and staging areas; and,
 - b) A range of feasible alternatives to Project component location and design features to ensure that alternatives to the proposed Project are fully considered and evaluated. The alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas.
- 2) Biological Baseline Assessment. The Project site consists of land developed with a variety of uses, as well as vacant land, undeveloped land containing native and non-native vegetation. Undisturbed land may be considered sensitive habitat or may provide suitable habitat for special status or regionally and locally unique species. CDFW recommends providing a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project area, with emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project. CDFW also considers impacts to Species of Special Concern a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures. The DPEIR should include the following information:

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- a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The DPEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts. Project implementation may result in impacts to rare or endangered plants or plant communities that have been recorded adjacent to the Project vicinity. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, S3 and S4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting <https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>;
- b) A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <https://wildlife.ca.gov/Conservation/Plants>);
- c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
- d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by the project. CDFW's California Natural Diversity Database (CNDDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. CDFW recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>;
- e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California SSC and California Fully Protected Species (Fish & Game Code §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (see CEQA Guidelines § 15380). Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the USFWS; and,
- f) A recent, wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame, or in phases.

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- 3) California Endangered Species Act. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or CESA-listed rare plant species that results from the Project is prohibited, except as authorized by State law (Fish & Game Code, §§ 2080, 2085; California Code of Regulations, tit. 14, § 786.9). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
- 4) Avoidance, Minimization, and Mitigation for Sensitive Plants. The DPEIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts. CDFW considers these communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in the *Manual of California Vegetation*.
- 5) Compensatory Mitigation. The DPEIR should include mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement, financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code section 65967, the lead agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.
- 6) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, the DPEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water

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pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.


- 7) Translocation/Salvage of Plants and Animal Species. Translocation or transplantation is the process of moving an individual from the Project site and permanently moving it to a new location. CDFW generally does not support the use of, translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.
- 8) Moving out of Harm's Way. The proposed Project is anticipated to result in clearing of natural habitats that support many species of indigenous wildlife. To avoid direct mortality, we recommend that a qualified biological monitor approved by CDFW be on-site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or Project-related construction activities. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. If the Project requires species to be removed, disturbed, or otherwise handled, we recommend that the DPEIR clearly identify that the designated entity should obtain all appropriate state and federal permits.
- 9) Revegetation/Restoration Plan. Plans for restoration and re-vegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.
 - a) CDFW recommends that local on-site propagules from the Project area and nearby vicinity be collected and used for restoration purposes. On-site seed collection should be initiated in the near future to accumulate sufficient propagule material for subsequent use in future years. On-site vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various Project components as appropriate.
 - b) Restoration objectives should include providing special habitat elements where feasible to benefit key wildlife species. These physical and biological features can include (for example) retention of woody material, logs, snags, rocks, and brush piles (see Mayer and Laudenslayer, 1988).

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CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the County of Los Angeles in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact David T. Lin, Senior Environmental Scientist (Specialist), at (562) 430-0097 or by email at David.Lin@wildlife.ca.gov.

Sincerely,

DocuSigned by:

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Erinn Wilson
Environmental Program Manager I

cc: CDFW
Victoria Tang – Los Alamitos
Karen Drewe – Los Alamitos
Baron Barrera – Los Alamitos
David T. Lin – Los Alamitos
Susan Howell – San Diego
CEQA HQ – Sacramento

State Clearinghouse

References

- California Department of Fish and Wildlife (CDFW). March 20, 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <https://www.wildlife.ca.gov/Conservation/Plants>).
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Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
via-email: LARiverCEQA@pw.lacounty.gov

RE: LA River Master Plan PEIR, Public Comment, Glendale Water & Power

Dear Ms. Villanueva,

Please accept this letter, sent electronically via e-mail to LARiverCEQA@pw.lacounty.gov, as Glendale Water & Power's comments to the LA River Master Plan Draft Program EIR.

The Program EIR should include information related the sources of water in the LA River during dry-weather flow conditions. The Program EIR should indicate that water in the river during dry-weather flows is derived from urban runoff and discharges from reclamation plants and that urban runoff will be diminishing due to the Enhanced Watershed Management Plan. The Program EIR should list the reclamation plants that discharge to the river and their relative average volumes of discharge. The Program EIR should acknowledge that these waters are primarily derived from water that is imported to Southern California from the State Water Project, the Colorado River, and the Los Angeles Aqueduct. Finally, the Program EIR should note specifically that the City of Glendale plans to beneficially re-use all of its water from the Los Angeles-Glendale Water Reclamation Plant and will no longer be discharging its share of water to LA River from this plant in the future.

The Program EIR should note that specific projects which are not reliant on dry-weather flows would not be affected by flow reductions, so that the project specific CEQA processes can be completed more expeditiously. The Program EIR should indicate that projects reliant on dry-weather flows need to address how those projects would account for reduced flows in the future.

Please feel free to contact me directly at (818) 548-2107, or mdeghetto@glendaleca.gov, if you need any additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael E. De Ghetto".

Michael E. De Ghetto, P.E.
Chief Assistant General Manager - Water
Glendale Water & Power

**BOARD OF PUBLIC WORKS
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HYPERION EXECUTIVE PLANT MANAGER

WASTEWATER ENGINEERING SERVICES DIVISION
2714 MEDIA CENTER DRIVE
LOS ANGELES, CA 90065
FAX: (323) 342-6210
WWW.LACITYSAN.ORG

July 16, 2020

Ms. Ariana Villanueva
Los Angeles County Public Works
Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

Dear Ms. Villanueva,

**2020 LA RIVER MASTER PLAN - NOTICE OF PREPARATION AND SCOPING
MEETING FOR A DRAFT PROGRAM ENVIRONMENTAL IMPACT
REPORT**

This is in response to your July 7, 2020 Notice of Preparation and Scoping Meeting for a Draft Program Environmental Impact Report for the proposed project located along a 51-mile-long, 2-mile-wide and spans through 17 cities. The river encompasses an 834-square-mile watershed and flows from its headwaters at river mile 51 in Canoga Park within the City of Los Angeles to river mile zero at Long Beach. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. At this stage, your project description lacks sufficient detail for us to conduct a thorough capacity analysis as descriptions for individual proposed developments are needed to assess sewage generation. Please notify our office in the instance additional information for environmental review is available for this project.

zero waste • zero wasted water

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

File Location: CEQA Review\FINAL CEQA Response LTRs\FINAL DRAFT\832 and 837 Project - Request for WWSI.2020 LA River Master Plan -
NOP and Scoping Meeting for dPEIR.doc

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at chris.demonbrun@lacity.org

Sincerely,

A handwritten signature in blue ink, appearing to read "Ali Poosti".

Ali Poosti, Division Manager
Wastewater Engineering Services Division
LA Sanitation and Environment

AP/CD: sa

c: Shahram Kharaghani, LASAN
Michael Scaduto, LASAN
Wing Tam, LASAN
Christopher DeMonbrun, LASAN



Metro

August 6, 2020

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
Sent by Email: lariverceqa@pw.lacounty.gov

RE: 2020 LA River Master Plan
Notice of Preparation of Program Environmental Impact Report (PEIR)

Dear Ms. Villanueva:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed 2020 LA River Master Plan (Master Plan) located in Los Angeles County (County). Metro's aim is to create and maintain a world-class transportation system that focuses on providing the best customer experience possible and enhancing the quality of life for those who live, work, and play within the County. As transportation planner and coordinator, designer, funder, builder and transit operator, Metro is constantly working to deliver a regional system that supports increased transportation options and associated benefits, such as improved mobility options, air quality, health and safety, access to goods and services, and quality of life.

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the County with specific detail on the scope and content of environmental information that should be included in the Program Environmental Impact Report (PEIR) for the Master Plan. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.¹

PEIR Project Description

The proposed Master Plan encompasses an area along a 51-mile-long, 2-mile-wide corridor (i.e., 1 mile on each side) of the LA River in Los Angeles County and spans through 17 cities and unincorporated Los Angeles County (18 total jurisdictions). The proposed 2020 LA River Master Plan builds on the adopted 1996 Master Plan and other regional planning studies prepared since then. It is intended to improve 51 miles of connected open space along the LA River to improve health, equity, access, mobility, and economic opportunity for the diverse communities of Los Angeles County while still providing flood risk management.

Recommendations for PEIR Scope and Content

Metro Planning Efforts

Metro would like to advise the County that it has adopted three plans of interest that are within the Master Plan's area of study. Metro encourages the County to review these plans and identify synergies with the Master Plan and opportunities to support and implement their goals and recommendations:

¹ See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

1. Connect US Action Plan: Completed in 2015, the Connect US Action Plan's fundamental goal is to provide pedestrians and cyclists a safe and pleasurable passage to transit between Los Angeles Union Station, 1st/Central Station and the adjacent historic neighborhoods. Enhancing walkability and bikeability will facilitate a second goal, connecting people who live and work in adjacent neighborhoods to one another. More information is available at: <https://www.metro.net/about/union-station/connect-us-action-plan/>
2. Active Transportation Strategic Plan (ATSP): Adopted in 2016, the ATSP is Metro's county-wide effort to identify strategies to increase walking, bicycling and transit use in Los Angeles County. The ATSP's focuses on improving first and last mile access to transit and proposes a regional network of active transportation facilities, including shared-use paths and on-street bikeways, and develop a funding strategy for implementation. More information is available at: <https://www.metro.net/projects/active-transportation-strategic-plan/>
3. First/Last Mile Strategic Plan: Completed in 2014 and authored by Metro and the Southern California Association of Governments (SCAG), the First/Last Mile Strategic Plan an approach for identifying barriers and planning and implementing improvements for the first/last mile portions of an individual's connection to transit. The plan is available at: <https://www.metro.net/projects/first-last/>

Metro Corridor Planning Efforts

Metro is studying the following new corridor projects which are within the Master Plan's study area. These projects should be incorporated into the PEIR's analysis. In addition, the County should consult with the Southern California Regional Rail Authority, which operates Metrolink, on their capital planning efforts.

1. Metro's LA River Path Project: Funded by Measure M, Metro is evaluating a new bicycle and pedestrian path along an approximately eight-mile stretch of the Los Angeles River from Elysian Valley through Downtown Los Angeles to the City of Maywood. Metro released a Notice of Preparation for this project in October 2019 with a target operation date by 2027. More information may be found online at: <https://www.metro.net/projects/lariverpath/>.
2. West Santa Ana Branch Project: Metro is evaluating a potential new transit system connecting southeast Los Angeles County to downtown Los Angeles via the abandoned Pacific Electric Right-of-Way/West Santa Ana Branch Corridor (PEROW/WSAB) and a combination of local streets and private and Metro-owned rail ROW. This project crosses over the Los Angeles River in the City of South Gate. For additional information, please see <https://www.metro.net/wsab>.

Adjacency to Metro-owned Right-of-Way and Facilities

The Master Plan's study area includes Metro-owned ROW and transit facilities for Metro Rail, Metro Bus, and Metro Bus Rapid Transit operations. In particular, these lines cross over the Los Angeles River: the G Line (Orange), in the San Fernando Valley; and the A Line (Blue), to the north of Long Beach in between Del Amo and Wardlaw Stations. In addition, the Metrolink commuter rail service is adjacent to parts of the Los Angeles River, operated by the Southern California Regional Rail Authority (SCRRA), portions of which use Metro-owned ROW. Buses and trains operate 24 hours a day, seven days a week in these facilities.

The PEIR's transportation section should analyze potential impacts on Metro and Metrolink facilities within the Master Plan's study area, and identify mitigation measures or project design features as appropriate. Critical impacts to be studied should include (without limitation): impacts of construction and operation of future projects to the structural and systems integrity of rail tracks, bridges, and related infrastructure; and disruption to bus or rail service.

The following provisions should be used to develop mitigation measures and/or project design features that address these potential impacts to Metro Bus and Metro Rail infrastructure. Additional information is available from the Metro Development Review Team at <https://www.metro.net/devreview>.

1. Technical Review: The Project Sponsor shall submit engineering drawings and calculations, as well as construction work plans and methods including any crane placement and radius, to evaluate any impacts to Metro's infrastructure in relationship to the Project. Before commencement of any construction activities, the Project, the Project Sponsor shall obtain Metro's approval of final construction plans.
2. Construction Safety: The construction and operation of the Project shall not disrupt the operation and maintenance activities or the structural and systems integrity of Metro's transit infrastructure. Not later than one month before Project construction, the Project Sponsor shall contact Metro to schedule a pre-construction meeting with all Project construction personnel and Metro Real Estate, Construction Management, and Construction Safety staff. During Project construction, the Project Sponsor shall:
 - a. Work in close coordination with Metro to ensure that Station access, visibility, and structural integrity are not compromised by construction activities or permanent build conditions;
 - b. Construct a protection barrier to prevent objects, material, or debris from falling onto the ROW;
 - c. Notify Metro of any changes to demolition construction activities that may impact the use of the ROW;
 - d. Permit Metro staff to monitor demolition and/or construction activity(ies) to ascertain any impacts.
3. ROW Entry Permit: For temporary or ongoing access to Metro Rail ROW for demolition, construction, and/or maintenance activities, the Project Sponsor shall complete Metro's Track Allocation process with Metro Rail Operations and obtain a Right of Entry Permit from Metro Real Estate. Approval for single tracking or a power shutdown, while possible, is highly discouraged; if sought, the Applicant shall apply for and obtain such approval from Metro not later than two months before the start of Project construction.

The following provisions should be used to develop mitigation measures and/or project design features that address these potential impacts to Metrolink infrastructure:

1. Technical Review: The Project Sponsor shall submit engineering drawings and calculations, as well as construction work plans and methods including any crane placement and radius, to evaluate any impacts to the Metrolink infrastructure in relationship to the Project. Before issuance of any building permit for the Project, the Project Sponsor shall obtain SCRRA's approval of final construction drawings.
2. Construction Monitoring: The Project Sponsor shall permit Metro and/or SCRRA staff to monitor construction activity to ascertain any impact to the ROW. During construction, the Project Sponsor shall construct a protection barrier to prevent objects, material, or debris from falling onto the ROW. The Project Sponsor shall notify Metro and SCRRA of any changes to the construction/building plans that may or may not impact the ROW.
3. ROW Access: The Project Sponsor should contact SCRRA for Right-of Entry requirements. Information can be found at www.metrolinktrains.com. Other requirements may include permits for construction of buildings and any future repairs, painting, graffiti removal, etc., including the use of overhead cranes or any other equipment that could potentially impact railroad operations and safety. Frequent access for maintenance tasks such as graffiti removal, will necessitate an active license agreement.

Other NOP-related Comments


1. Transportation: For the EIR's transportation section, the County should clarify whether its analysis of Vehicle Miles Traveled (VMT) will (or will not) use data that incorporates the effects of the recent coronavirus pandemic. The County should also advise on the status and use of the pending update to the County's transportation assessment guidelines.

2. NOP page 3, "Proposed 2002 LA River Master Plan Elements": Recommend including Environmental Graphics in Kit of Parts.
3. NOP page 4, "Program Level Analysis, Tiering, and Later Activities": Consider "future projects" to replace "later activities".

If you have any questions regarding this letter, please contact me by phone at 213-922-2671, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely,



Shine Ling, AICP
Manager, Transit Oriented Communities

August 13, 2020

Attention: Ariana Villanueva
Los Angeles County Public Works,
Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

Los Angeles River Master Plan EIR Preparation Scoping Comments

LARiverWorks Group, Mayor's Office of City Services, City of Los Angeles

To the project team:

Please accept these scoping comments to inform the CEQA analysis for the Los Angeles River Master Plan EIR. They draw from prior comments on the Plan itself to highlight critical environmental issues to be fully considered for impacts and mitigations. Any questions regarding these comments may be directed to Michael Affeldt, Director, LARiverWorks, michael.affeldt@lacity.org, 310-982-3358 (mobile).

General

- The scope of analysis should include development of a robust complete hydraulic model of the LA River and its tributaries as a necessary foundation for understanding cumulative impacts of the LA River Master Plan, and this model should be made available to public agencies for peer review and use in project planning.
- The scope of analysis should include watershed-scale approaches to peak flow reduction, as this is a fundamental need for many of the LA River Master Plan's objectives.
- The scope of analysis should include prioritization of advancement and completion of LA River projects that are already publicly-adopted, such as within the LA River Revitalization Master Plan (City of Los Angeles, 2007) and the Los Angeles River Ecosystem Restoration Feasibility Study and Recommended Plan (United States Army Corps of Engineers, 2016). Actions considered in the LA River Master Plan must not preclude or inhibit these plans and rather should directly implement their proposals.
- The scope of analysis should include funding strategies and proposed funding sources as the source of funds often influences characteristics of project implementation.
- The scope of analysis should include governance options and strategies and analyze their impacts on how LA River Master Plan projects will be implemented and therefore their environmental impacts.

Aesthetics

- The scope of analysis should include impacts and ramifications of the County's Significant Ecological Area (SEA) Program and Ridgeline Preservation program, and other programs meant to protect viewsheds and natural aesthetics.
- The scope of analysis should include the variety of existing art at and along the LA River, how to preserve and enhance it, and how to encourage the proliferation of much more art of all kinds at, along, and pertaining to the LA River.

- The scope of analysis should include the impact of existing and future scenic vistas by covering portions, and blocking views, of the LA River.

Air Quality

- The scope of analysis should include consideration of the need for additional vegetation at the LA River to improve regional air quality.
- The scope of analysis should include the benefits of minimizing the use of concrete to meet objectives, to the extent feasible, as its production is a source of GHG.

Biological Resources

- The scope of analysis should include impacts to native plant species, particularly those of riparian and riparian upland habitats, as well as foothill habitats and connections between such habitats.
- The scope of analysis should include impacts to fish including native fish species. Some measures proposed in the Kit of Parts appear potentially impactful and harmful to fish and deleterious to planned projects by other agencies and proponents that aim to improve fish habitat and fish passage.
- The scope of analysis should include potential impacts to flow levels, temperatures, turbidity and other water quality elements as they related to the health of current and future habitat and wildlife.
- The scope of analysis should include strategies for streamlined, coordinated, and effective regular maintenance of areas along either banks of the River to prevent harmful pollutants from entering the River which may have impacts on wildlife. The area of analysis would necessarily include consideration of stormwater and drainage systems throughout urban areas 1 mile from each bank.
- The scope of analysis should include the potential legal restrictions on certain LA River Master Plan proposals that would create conditions for the LA River that would be more akin to a buried storm drain, for these may be in violation of various regional, state, and federal laws, rules, and regulations.
- The scope of analysis should include impacts and ramifications of the County's Significant Ecological Area (SEA) Program.
- The scope of analysis should include sufficient thresholds of native habitat populations in both public and private spaces to allow native species to thrive and propagate.
- The scope of analysis should include consideration of evolving and emerging understanding of microbiomes, microclimates, and their associated native species in proposing plant palettes and habitat approaches.
- The scope of analysis should evaluate impacts of the Master Plan on the adopted and authorized Los Angeles River Ecosystem Restoration Feasibility Study and Recommended Plan.

Cultural Resources

- The scope of analysis should include the fundamental premise that access to and views of the LA River itself and its banks are a paramount goal for cultural purposes.

Hazards & Hazardous Materials

- The scope of analysis should include a wide range of tools and approaches regarding reduction of flood risk, including distributed community and watershed-scale mitigations and tactics, and major investments such as bypass tunnels of various sizes and locations. Different approaches will carry their own related impacts and mitigations which should be analyzed in the scope of the PEIR.
- The scope of analysis should include consideration of the use, restriction, or prohibition of herbicides, insecticides, and rodenticides in the LA River or in locations that may drain to the LA River.
- The scope of analysis should include a prioritization of flood risk reduction approaches in which nature-based, habitat-enhancing, and similar tactics are held in high regard and heavy-infrastructure or habitat-harming approaches are held in low regard -- of course in the context of severity of risk and feasibility. Financial, acquisition-based, and insurance solutions must also be included in analyses and approaches to risk reduction.
- The scope of analysis should include the absolute importance of providing for cleanup of brownfield sites along the River, especially for in-progress projects.

Hydrology/Water Quality

- The scope of analysis should include strategies for stormwater and drainage system improvements, including “green streets” and other nature-based infrastructure throughout urban areas 1 mile from each bank of the River and throughout the watershed as necessary. Because the majority of stormwater that reaches the River is not collected in the 1-mile area of proposed analysis for the PEIR, the scope of analysis, at least for this topic, must be expanded to include the entire LA River watershed. Impacts, mitigations, and programmatic strategies should be considered at the watershed scale.
- The scope of the analysis should include evaluation of upstream watershed opportunities to address peak flood flows.
- The scope of analysis should include preservation, reconnection, daylighting, and renaturalization of historic streams.

Land Use/Planning

- The scope of analysis should include the impacts of any proposals to change zoning or other land use designations or definitions. The project team should make contact with the City of Los Angeles Department of City Planning to discuss this topic in detail and should be aware and familiar with the City’s ReCode initiative which is an ongoing project to modernize and streamline the City’s zoning system.
- The scope of analysis should include a full understanding of the various special planning areas that exist along the LA River including but not limited to the Cornfield Arroyo Specific Plan (CASP), Warner Center Specific Plan, and the LA River Improvement Overlay (LA-RIO). Any impacts to the intentions or efficacy of these and other planning tools should be analyzed and mitigated.
- To the extent that the goals of the LA River Master Plan will be heavily influenced by the ability of local jurisdictions to help effectuate them, the scope of analysis should include mitigations to that impediment that include technical help, capacity building, and direct financial support to

municipalities and community-based organizations to foster a robust and effective collaborative working landscape.

Noise

- The scope of analysis should include the use of sound barriers along freeways to mitigate impacts to human and wildlife at the River.

Population/Housing

- The scope of analysis should include cumulative impacts of other actions or inaction by Los Angeles County to enhance housing availability and affordability along the Los Angeles River in the corridor of analysis.
- The scope of analysis should include cumulative impacts of other actions or inaction by Los Angeles County to mitigate the existence and growth of the population of people experiencing homelessness in and along the Los Angeles River and in the corridor of analysis.
- The scope of analysis should include a finer-grained understanding of communities in the City of Los Angeles than has been present in the LA River Master Plan process thus far.

Public Services

- The scope of analysis should include impacts to tax revenue and special revenue tools such as Enhanced Infrastructure Finance Districts, several of which are being planned and studied along the Los Angeles River corridor. Any impacts should be mitigated.

Recreation

- The scope of analysis should include the fundamental premise that access to the LA River itself and its banks are a paramount goal for recreational purposes.

Transportation

- The scope of analysis should include the urgent need to expand active transportation options along, and connecting to, the LA River.
- All PEIR elements, projects, and proposals must analyze potential impacts to long-planned and in-progress projects to complete the active transportation system along the LA River, especially in the San Fernando Valley, where significant gaps in the system remain, despite the expressed intentions of the prior and first edition of the LA River Master Plan from 1996.
- The scope of analysis should include cumulative impacts from California High Speed Rail and propose coordinated mitigations.
- The scope of analysis should include impacts to public transit of all forms, including potential expansions or changes in services or facilities.

Tribal Cultural Resources

- The scope of analysis should include the fundamental premise that access to the LA River itself and its banks are a paramount goal for tribal cultural purposes.

Utilities/Service Systems

- The scope of analysis should include an inventory of and potential impacts to the many utilities that run along the LA River and through the proposed corridor of analysis. Potentially hazardous utilities such as oil pipelines, should be the subject of specific analysis and potential relocation.

###

Los Angeles Unified School District

Office of Environmental Health and Safety

AUSTIN BEUTNER
Superintendent of Schools

CARLOS A. TORRES
Director, Environmental Health and Safety

JENNIFER FLORES
Deputy Director, Environmental Health and Safety

August 7, 2020

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

Dear Ms. Villanueva,

Thank you for the opportunity to provide comment on the Notice of Preparation for the 2020 Los Angeles County River Masterplan (Masterplan). The Masterplan is a comprehensive approach covering all 51 miles of the Los Angeles River. The County of Los Angeles, through the Department of Public Works (Public Works), is the Lead Agency and is preparing a Program Environmental Impact Report (PEIR) to evaluate any potential impacts on the environment.

The Masterplan stipulates the program will encompass one mile on either side of the entire LA River, a vast expanse that includes numerous schools. We would like to ensure that these facilities are adequately considered in the environmental analysis for projects implemented as part of the Masterplan. We are available to assist you in identifying schools within the program area that may be impacted.

The Office of Environmental Health and Safety's charge is to protect the District's students and staff, and the integrity of the learning environment. While the District supports the intent of the Masterplan, we also need to ensure that their welfare is maintained.

Thank you for your attention to this matter. If you need additional information, please contact me at Alexis.Campbell@LAUSD.net.

Regards,



Alex Campbell
Assistant CEQA Project Manager

Ariana Villanueva

From: Karen Barnett <karenbarnett@atwatervillage.org>
Sent: Monday, August 17, 2020 9:03 AM
To: PW-LA River CEQA
Subject: Re: AVNC comments, LA River Master Plan CEQA (PEIR)

CAUTION: External Email. Proceed Responsibly.

Hi Ariana,

Thank you for confirming.

Best,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

On Mon, Aug 17, 2020 at 7:00 AM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Hi Karen,

I am confirming receipt of AVNC's comments on the NOP.

Thanks,

Ariana Villanueva

Environmental Engineering Specialist

Los Angeles County Public Works

(626) 458-7146

From: Karen Barnett <karenbarnett@atwatervillage.org>
Sent: Friday, August 14, 2020 3:03 PM
To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Subject: Re: AVNC comments, LA River Master Plan CEQA (PEIR)

CAUTION: External Email. Proceed Responsibly.

Did you confirm receipt of Courtney's NOP/PEIR comments email last night?

Thanks,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative
River Committee Chair
E-mail: KarenBarnett@atwatervillage.org
Message Phone: 323-230-3406
www.atwatervillage.org

On Thu, Aug 13, 2020 at 10:32 PM Courtney Morris <courtney@atwatervillage.org> wrote:

Dear Council Member O'Farrell, Council Member Ryu and Mayor Garcetti,

The AVNC is submitting the following comments for the scoping of the Los Angeles County's Draft 2020 LA River Master Plan CEQA Programmatic Environmental Impact Report (PEIR). As a riverfront community with a 4 mile border along the LA River we have seen the changes since the passing and implementation of the Los Angeles River Revitalization Master Plan (LARRMP). With the benefits and improvements everyone has enjoyed there have been impacts to the community. We see this as an opportunity to share our ground level experience with you and the county to make the LA River a better place for all.

We appreciate all your work to improve the LA River and the support you have provided for our community lead initiatives and projects. Please do not hesitate to reach out if you have any questions.

Thanks,

Courtney Morris, Co-Chair

Atwater Village Neighborhood Council

Ariana Villanueva

From: Karen Barnett <karenbarnett@atwatervillage.org>
Sent: Friday, August 14, 2020 3:03 PM
To: PW-LA River CEQA
Subject: Re: AVNC comments, LA River Master Plan CEQA (PEIR)

CAUTION: External Email. Proceed Responsibly.

Hello Adriana,

Did you confirm receipt of Courtney's NOP/PEIR comments email last night?

Thanks,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

On Thu, Aug 13, 2020 at 10:32 PM Courtney Morris <courtney@atwatervillage.org> wrote:

Dear Council Member O'Farrell, Council Member Ryu and Mayor Garcetti,

The AVNC is submitting the following comments for the scoping of the Los Angeles County's Draft 2020 LA River Master Plan CEQA Programmatic Environmental Impact Report (PEIR). As a riverfront community with a 4 mile border along the LA River we have seen the changes since the passing and implementation of the Los Angeles River Revitalization Master Plan (LARRMP). With the benefits and improvements everyone has enjoyed there have been impacts to the community. We see this as an opportunity to share our ground level experience with you and the county to make the LA River a better place for all.

We appreciate all your work to improve the LA River and the support you have provided for our community lead initiatives and projects. Please do not hesitate to reach out if you have any questions.

Thanks,

Courtney Morris, Co-Chair

Atwater Village Neighborhood Council

Ariana Villanueva

From: Deborah Bloome <dbloome@accelerateresiliencia.org>
Sent: Friday, August 14, 2020 1:46 PM
To: PW-LA River CEQA
Subject: Re: Where is a copy of the Plan to review?

CAUTION: External Email. Proceed Responsibly.

Hi Ariana,
Would it be possible to set up a brief call for a few follow-up logistical questions?
All the best
Deborah

On Mon, Jul 27, 2020 at 4:34 PM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Hi Deborah,

The CEQA Program EIR for the 2020 LA River Master Plan is still being prepared, but when the draft is ready for circulation and public review, we will file a Notice of Availability with the required agencies, post an ad in newspapers, and we will send another email so you know it is ready and where you can find the full draft Program EIR document. The information we currently have available about our Program EIR process is provided in the Notice of Preparation (NOP, found here: <https://pw.lacounty.gov/swq/peir/doc/NOP-2020.06.26-draft.pdf>); the NOP provides notification to the public and interested parties that we have initiated the CEQA process, and the purpose of the upcoming virtual public scoping meeting on July 29 is to share information on how the County proposes to prepare the CEQA environmental document (Program EIR) and to help answer any clarifying questions you may have about the CEQA process. We welcome any written comments about the scope and content that you'd like us to consider in the Draft Program EIR.

The Draft Program EIR will be made available alongside the Draft 2020 LA River Master Plan sometime in late summer/early fall. In the meantime, there are materials from the steering committee meetings and community meetings as well as progress memos on the existing data used to prepare the 2020 LA River Master Plan, which is the proposed project for the Program EIR under CEQA. These documents about the 2020 LA River Master Plan are available at www.larivermasterplan.org and can help you with a head start on familiarizing yourself with the contents of the Master Plan.

We look forward to your participation in the meeting to learn more about the proposed CEQA approach for the LA River Master Plan.

Please let me know if you have further questions and reach out to my number below. Due to the pandemic, I am not currently in the office, but your calls will be forwarded to me. If I cannot get to your call, feel free to leave a voicemail as I check my voicemails often.

Thank you!

Ariana Villanueva

Environmental Engineering Specialist

Los Angeles County Public Works

(626) 458-7146

From: Deborah Bloome <dbloome@accelerateresiliencela.org>

Sent: Tuesday, July 21, 2020 10:39 AM

To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>

Subject: Where is a copy of the Plan to review?

CAUTION: External Email. Proceed Responsibly.

Hi...I am interested in the PIER scoping for the Plan, but I don't actually see a link to the Plan in the information sent. Perhaps I just missed it. Could you please share it with me?

Thank you!

--

Deborah Bloome

Senior Director of Policy

Accelerate Resilience L.A. (ARLA)

310-400-6715

Ariana Villanueva

From: J Surmi <jsurmi@hotmail.com>
Sent: Friday, August 14, 2020 8:56 AM
To: PW-LA River CEQA
Subject: Attn: Ariana Villanueva - LA River Scoping Mtg. comment
Attachments: LA River Scoping Mtg - Comment.doc

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Villanueva-

Please accept my public comment submission regarding the recent LA River Scoping Meeting as attached.

Thanks, kindly, for your consideration.

Janet Surmi

From: Janet Surmi
818.232.6626
jsurmi@hotmail.com

To: Ariana Villanueva
(626) 458-7146
LARiverCEQA@pw.lacounty.gov

Aug. 6, 2020

I have viewed the Scoping meeting from July 29, 2020 and would like to submit my comments as follows.

I am a native of Los Angeles and have lived in the San Fernando Valley for over 37 years, and as a homeowner in West Toluca Lake for the past 22 years. As Treasurer of our HOA for 10 years, I oversaw our Association during an adjacent, 55-unit housing construction project in 2014. As our property is part of the LA RIO, I was interested in how the large construction project would impact our area which is adjacent to the LA River along Riverside Drive and had been in contact with the LA River Project Team.

As an interested member of the community during your LA River Master Plan Scoping process, I would like to suggest consideration of a pedestrian bridge walkway to connect the River at Moorpark Street and is adjacent, on the east-side, to the 101 Freeway overpass and freeway on-ramp.

This area of the River has long been neglected and it would offer an important cross-over to connect the River as well as a safe pass-way for pedestrians in an ever increasing dense area of people on foot and who walk their dogs and bike in the area.

Additionally, another pedestrian walkway to connect the River would be along Riverside Drive across Tujunga Avenue where it meets the southern tip of North Hollywood Park that runs along Tujunga Avenue. This would provide access to the park and to the Amelia Earhart Regional Library. (This library is also on the National Register of Historic Sites of Los Angeles.) This would also be a perfect location for a cross-over that would provide safe public access to the park as a destination and offer a connection along the River from Moorpark Street and up along Riverside Drive and through to the park.

Not only would these cross-overs provide a way to connect the River and provide safe pedestrian access from and across heavily trafficked areas, they would also serve as a way to compliment the River and act as gateways to and for the community.

For suggestion, please see examples below (on page 2) of a pedestrian bridge in Seattle, WA and further details found on the website:

<https://www.seattlebikeblog.com/2013/12/02/microsoft-offers-to-fund-walkbike-bridge-over-520-near-overlake-transit-center/>



Ariana Villanueva

From: Miroslava Munguia Ramos <mnmungui@ucla.edu>
Sent: Friday, August 14, 2020 12:02 AM
To: PW-LA River CEQA
Cc: Protecting River
Subject: PEIR: Biodiversity Scoping Comments
Attachments: LARiverPEIR_PouRcomments.pdf

CAUTION: External Email. Proceed Responsibly.

Hello Ariana,

Attached are comments on behalf of Wai-Yin Kwan and I from [Protecting our River](#). If there is anything else we should attach to our comments, feel free to reach out.

Thank you,
Miroslava

Miroslava Munguia Ramos (she, her, hers)
[CALeDNA Project Manager](#)
mnmungui@ucla.edu



August 13, 2020

The LA River Master Plan meetings have provided the community the opportunity to voice their concerns over the overall program and its proposed projects. Despite the river being almost entirely concretized, meeting attendees selected the ecology and the environment of the river as top concerns, regardless of where the ULART or Master Plan meetings were held.

Hundreds of people and dozens of local organizations have been working to better understand the biodiversity of the river. New projects along the river should take note of what lives in the area and incorporate the natural ecosystem into these plans. The community has made it clear that top priorities include the natural environment. Program efforts should make sure that biodiversity monitoring for the local flora, fauna, and the microbial community is conducted and reviewed regularly. These results can help determine the efficacy and longevity of local projects to best serve their respective communities. In addition, program transparency of monitoring plans will not only encourage the community to remain engaged but allow local organizations to collaborate with the City and ensure time and funds are used efficiently.

For example, the public interest in the ecology of the LA River helped shape the formation of Protecting Our River (ProtectingOurRiver.org), a community science project from the University of California that aims to study the biodiversity of the LA River using environmental DNA (the DNA organisms shed into the environment). This project is a collaboration between UCLA, UC Santa Cruz, conservation groups, government agencies, local high schools, and the public. Environmental DNA results are later posted online for free to allow the community, policymakers, and researchers to access the data and see the list of organisms identified on the river. Community members are encouraged to join the Protecting our River team for (virtual) field gatherings along different sites of the entire river to give their perspectives on what researchers are observing. While the PouR team collects environmental DNA samples from the river, community scientists can share their own experiences to help better understand the biological community. This interactive project allows researchers to provide valuable data to collaborators while accepting input from the community to help structure future research. In return, these data can be used to help structure programs that'll best fit the local communities.

Our urban river has the unique opportunity to unite millions of LA County residents. Updates to the Master Plan should transparently reflect the community's interests; dozens of local organizations have spent years of work doing just this. Before any of the proposed projects begin, the program needs to have a thorough understanding of potential ecosystem impacts as a whole and keep the community engaged through it all. An emphasis on biodiversity monitoring is critical in maintaining the river's health and the LA River Master Plan as a whole. An unhealthy ecosystem can lead to failed projects, but taking the initiative now can lead to years of an active and engaged LA County riverine community.



Wai-Yin Kwan, Software Engineer
Miroslava Munguia Ramos, Project Director
Protecting Our River
protectingourriver.org
protectingourriver@gmail.com

Ariana Villanueva

From: Courtney Morris <courtney@atwatervillage.org>
Sent: Thursday, August 13, 2020 10:32 PM
To: PW-LA River CEQA; David Ryu; Mitch O'Farrell; mayor.garcetti@lacity.org
Cc: Edward Morrissey; Karen Barnett
Subject: AVNC comments, LA River Master Plan CEQA (PEIR)
Attachments: River_NOP comments (8-13-20).pdf

CAUTION: External Email. Proceed Responsibly.

Dear Council Member O'Farrell, Council Member Ryu and Mayor Garcetti,

The AVNC is submitting the following comments for the scoping of the Los Angeles County's Draft 2020 LA River Master Plan CEQA Programmatic Environmental Impact Report (PEIR). As a riverfront community with a 4 mile border along the LA River we have seen the changes since the passing and implementation of the Los Angeles River Revitalization Master Plan (LARRMP). With the benefits and improvements everyone has enjoyed there have been impacts to the community. We see this as an opportunity to share our ground level experience with you and the county to make the LA River a better place for all.

We appreciate all your work to improve the LA River and the support you have provided for our community lead initiatives and projects. Please do not hesitate to reach out if you have any questions.

Thanks,

Courtney Morris, Co-Chair

Atwater Village Neighborhood Council



3371 Glendale Blvd.
P.O. Box: 105, Los Angeles, CA 90039
Email: Board@AtwaterVillage.org
Message Phone: 323 230-3406
www.AtwaterVillage.org



AVNC Officers Co-Chairs: Courtney Morris, Edward Morrissey • Treasurer: Josh Hertz • Secretary: Karen Knapp

August 13, 2020

RE: AVNC comments, scoping Draft 2020 LA River Master Plan CEQA Programmatic Environmental Impact Report (PEIR)

Dear Councilmember O'Farrell, Council Member Ryu and Mayor Garcetti,

The AVNC is submitting the following comments for the scoping of the Los Angeles County's Draft 2020 LA River Master Plan CEQA Programmatic Environmental Impact Report (PEIR). As a riverfront community with a 4 mile border along the LA River we have seen the changes since the passing and implementation of the Los Angeles River Revitalization Master Plan (LARRMP). With the benefits and improvements everyone has enjoyed there have been impacts to the community. We see this as an opportunity to share our ground level experience with you and the county to make the LA River a better place for all.

We appreciate all your work to improve the LA River and the support you have provided for our community lead initiatives and projects.

Sincerely,

Courtney Morris
Co-Chair

Edward Morrissey
Co-Chair

CC: LA County CEQA team @ LARiverCEQA@pw.lacounty.gov
Honorable Supervisor Sheila Keuhl Third Supervisorial District County of Los Angeles
Honorable Supervisor Hilda Solis First Supervisorial District County of Los Angeles
Honorable Congressman Adam Schiff 28th Congressional District United States House of Representatives
Honorable State Senator Anthony Portantino
Honorable State Assemblymember Laura Freidman

NOP Descriptions with comments in blue:

Project Location and Background

The proposed Project is located along a 51-mile-long, 2-mile-wide corridor (i.e., 1 mile on each side) of the LA River - 834-square-mile watershed and flows from its headwaters at river mile 51 in Canoga Park within the City of Los Angeles to river mile zero at Long Beach, where the river meets the Pacific Ocean (Figure 1). The LA River was channelized between the late 19th and mid-

20th centuries to protect lives and property from flooding as the LA region rapidly grew and transformed to a largely urbanized area

1996 LA River Master Plan

The 1996 Master Plan was a first step in developing an inclusive vision of shared open spaces and parks, stewardship of water resources, and safety from hazardous floods.

COMMENT:

Flood safety was not addressed in 1996 for Atwater Village. Based on 1992 LACDA flood risk was assessed in Glendale Narrows, *no action was taken based on Cost/Benefit analysis. As quoted from County Representative at 2016 Glendale Narrows Potential Special Flood Hazard Area (SFHA)*

2020 LA River Master Plan Objectives

The proposed 2020 LA River Master Plan builds on the adopted 1996 Master Plan and other regional planning studies prepared since then. It is intended to improve 51 miles of connected open space along the LA River to improve health, equity, access, mobility, and economic opportunity for the diverse communities of Los Angeles County while still providing flood risk management.

The 2020 LA River Master Plan has the following nine objectives:

1. Reduce flood risk and improve resiliency.
2. Provide equitable, inclusive, and safe parks, open space, and trails.
3. Support healthy connected ecosystems.
4. Enhance opportunities for equitable access to the river corridor.
5. Embrace and enhance opportunities for arts and culture.
6. Address potential adverse impacts on housing affordability and people experiencing homelessness.
7. Foster opportunities for continued community engagement, development, and education.
8. Improve local water supply reliability.
9. Promote healthy, safe, clean water.

Future projects/actions proposed under the 2020 LA River Master Plan would range from extra-small (XS) (1-acre or less) to extra-large (XL) (150+ acre/10+ miles) and would include implementation of these design components individually or in combination as multi-benefit projects in the future. The proposed 2020 LA River Master Plan also includes Design Guidelines for all projects/actions to be implemented to present a unified identity while promoting best practices and resiliency for the LA River corridor.

COMMENT:

LA River - County elements and design cohesiveness: Los Angeles River Revitalization Master Plan (LARRMP) has implemented elements, which may not be “unified” with future Los Angeles County Los Angeles River Master Plan (2020) elements. The “kit of parts” should be flexible in developed LA River Areas.

Community identity: The “kit of parts” elements seek to present a “unified identity” along the river which could be at the expense of “community identity” for residents of Atwater Village which is fully in the 1 mile radius of the river border. Atwater Village currently has a specific

look with the iron gates and benches. Furthermore Atwater Village community elements include tile work to evoke its history with the local, historic Franciscan Tile Factory.

Program-Level Analysis, Tiering, and Later Activities

At the time of preparation of the PEIR, design information for the proposed 2020 LA River Master Plan is at a conceptual level; therefore, the environmental impacts analysis will be presented at a program level and will not include site-specific locations of any of the "Kit of Parts."

In addition, at this stage, informed assumptions regarding construction and operations scenarios can be reasonably made for only select design components. **Accordingly, the environmental impacts analysis for these design components will be presented in detail as analysis of "typical projects"** in the PEIR while the remaining design components will be analyzed qualitatively at a high-level in the 2020 LA River Master Plan PEIR.

COMMENT:

Your typical project for trail as presented at the virtual meeting is not typical – your analysis for a trail should include an additional “typical” situation, which is more realistic for implementation. (Example: in Atwater Village, which is an equestrian district, we do not have 40’ of access for shared use path as presented)

More typical path: 12’ of area with pedestrians and bikes (equestrians in Atwater Village)

1. Most river paths trails do not have 40 feet to accommodate 3 separate users.
2. Levee path and trails have 12-16’ of useable area
3. Equestrian users are not “typical” in most areas.
4. **include option** of physical separation of users along east and west banks (similar to beach paths)

The PEIR will serve as the first-tier analysis for later, more detailed project-specific and site-specific environmental reviews. When later activities are proposed after the PEIR is certified and the 2020 LA River Master Plan is approved, a determination will be made at that time by the agency: a) whether the activity is covered "within the scope" of the PEIR; and b) if new or worsened significant effects not previously examined in the PEIR could occur. Factors that an agency may consider in making the determination of being within the scope of the PEIR could include the geographic area analyzed in the PEIR, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, and covered infrastructure described in the PEIR

If an agency determines that a later activity is covered in the scope of the PEIR and new or substantially more severe significant impacts would not occur, no further environmental documentation would be required. If new or more severe impacts beyond those disclosed in the PEIR could occur, the agency would prepare the appropriate level of subsequent CEQA documentation needed (e.g., mitigated negative declaration, or a site-specific supplemental or subsequent EIR) and the subsequent CEQA review would focus solely on new or substantially more severe significant effects

that were not considered in the original PEIR

COMMENT:

Projects in the LARRMP have used that Master Plan's PEIR for Negative Declarations. We want to ensure that the community's concerns are heard by our commenting on the County's NOP PEIR and in future projects, which will specifically and/or cumulatively impact Atwater Village.

Create a kit of rules and regulations to match physical kit of parts and projects

We recommend that the PEIR study include a top level discussion of "introduction of open space, open space improvements and access improvements" from a programming perspective. How will new and/or revisited open spaces impact existing residential, equestrian communities, businesses, and etc.

community impacts: a program EIR should address and provide a common set of rules and regulation along the river: hours of operation, common rules for signage, set of signage examples (mixed-use: ped/bike + ped/bike/equestrian), potential "walk only" zones and potential "residential zones". Include new and/or additional use impacts such as trash, safety, parking and maintenance operations.

Create a general understanding of responsibility for increased access and open space in residential, equestrian and other communities along the LA River.

Aesthetics

COMMENT:

The "kit of parts" elements seek to present a "unified identity" along the river which could be at the expense of "community identity" for residents of Atwater Village which is fully in the 1 mile radius of the river border.

Atwater Village currently has a specific look with the iron gates and benches along the LA River. Furthermore Atwater Village community elements at entry and elements on streets include tile work elements that evoke our local history with the historic Franciscan Tile factory.

Air Quality

COMMENT:

Atwater Village: Census tracts comprising much of Atwater rank in the 95-100% percentile of the CalEnviroScreen, meaning that they are in the top 5% of environmentally burdened census tracts in the State of California.

The current LA River bike path is adjacent to I5, separated by a chain link fence. Most if not all, future trails, access points and projects will be within 500' of the highways surrounding Atwater Village (I5, 134 and 2 fwys) and other similarly situated communities.

We request that you study and mitigate the Air Quality in Atwater Village; diesel particulates impact on bike path and other trail users. This needs to be studied in depth for the safety of current and future LA River amenity users. We have a sample mitigation measure: mulch wall <https://drive.google.com/drive/u/0/folders/1NmNjaXA1u3FIUAHZducTbpR1MU5NYeE>

High Speed Rail Construction: Include cumulative impacts on air quality due to the HSR construction projects. High Speed Rail Corridor to be completed within the same period as County's LA River Master Plan timeline. Atwater Village's east border, the HSR corridor is within 1 mile of the LA River.

Energy:

COMMENT:

Alternative energy sources should be integrated into projects for multibenefits i.e. parking shade solar panels, picnic tables shade structure with solar panels. PEIR should explore all energy sources hydro, solar and wind, to achieve carbon neutral, zero emission goals.

Hazards & Hazardous Materials

COMMENT:

The whole of Taylor Yard is a brownfield site, this should be included, and construction and haul routes could negatively impact Atwater Village residents.

Hydrology/Water Quality

COMMENT:

LA River water quality in Atwater Village (Glendale Narrows):

North Atwater Village to Fletcher Drive has not been studied in depth over a significant period of time. Historically, there have been high E. coli levels, which were said to be due to the Verdugo Wash and Equestrian Community.

We recommend that the PEIR include an in depth study of water quality in the Glendale Narrows. Studying the water quality is important to analyze before any project recommendations that include water sports or water activities for public safety, in Atwater Village (Glendale Narrows)

Request based current situation at RattleSnake Park (South of Fletcher Dr) and Heal the Bay LA River Report card "Water Quality in the Upper L.A. River Watershed decreased slightly from

*2018 to 2019 with a two percentage point decrease in Green grades issued. This watershed also had three sites on the Honor Roll and three sites on the Freshwater Fails list.” **Freshwater Fails #3 Rattlesnake Park L.A. River Watershed: Recreation Zones.***

We feel this situation requires that the County study Atwater Village (and Glendale Narrows) as it is upstream from Rattlesnake park and could have water related activities in it’s Master Plan.

Water quality standards or waste discharge requirements: in order to protect water quality for human and wildlife use, we request that you study redirecting all LA River sewer and storm drains to water treatment facilities before discharging into the LA River. [Hudson River, The Clean Rivers Project in DC, and others, which address the current and future impacts of the **Clean Water Act (CWA)**]

PEIR should Integrate water testing and provide a continuous water quality reporting and monitoring plan.

Request based on aforementioned water quality fail and documented case of Avian Botulism in 2019. This case of Avian Botulism killed most of the bird and duck populations in Atwater Village. As of today, they have begun to return but in less numbers. This outbreak doesn’t have a documented start but there were several storm drain and sewer cleanings prior to and during summer/fall 2019.

Ground Water: EPA currently studying Atwater Village ground water and vapor contamination in SFV area 4(?) to Pollock Area. This should be included in your PEIR as it will impact any projects in the region.

Flood Risk/Mitigation: We recommend that you use your LA County Master plan findings from “mile 28” for all LA River projects in Atwater Village – not current FEMA maps.

Flood mitigation for the Atwater Village area was not addressed in the 1996 County Master Plan. While flood risk was acknowledged in 1992 LACDA Study, no action has been taken to correct or mitigate flood safety issues. *(The county is responsible for all flood matters in Los Angeles County, deferring the issue to USACE is not a corrective measure.)*

Population/Housing

The PEIR will address the proposed Project's potential for inducing population growth and displacing people and housing within the County and 17 incorporated jurisdictions. Analysis of population and housing along the 51-mile-long river will assess the differences between forecasts based on existing general plans of the County and 17 cities and regional growth projections. Specifically, the PEIR will assess whether the Project would induce substantial unplanned population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). Additionally, the PEIR will analyze whether the Project would displace substantial numbers of existing people or housing necessitating the construction of replacement housing elsewhere. These impacts, and their level of significance, will be assessed in

detail in the PEIR.

COMMENT:

Address connectivity of both banks for the LA River. Atwater Village has been seeking to connect the East Bank of the LA River for a safe multi use corridor and community “riverwalk” alternative to the West Bank “bike path”.

Flood Housing/Rental: Building and development along the LA River you must acknowledge areas of flood and “potential flood” hazard, note the requirements of Assembly Bill 646 flood hazard disclosures

Public Services

The PEIR will determine, at a program-level, if the improved access and anticipated increase in visitors in the Project area would result in impacts on Public Services — including fire protection, police protection, schools, parks, and other public facilities — by considering response times and increased demands, as applicable. The PEIR will assess available information on the current demand for public services against any new demand that is created by Project improvements. In addition, emergency access impacts during construction and operations would be analyzed. These impacts, and their level of significance, will be assessed in detail in the PEIR.

COMMENT:

We would like to have you include the HSR projects impacts on access and isolation when assessing public safety. One of our HSR mitigation requests is to place a fire/swift rescue substation in North Atwater Village (upon HSR land not used for project(s)). Atwater Village currently has limited access now and less in the future, increased access and open spaces along the river will bring more people, businesses, and visitors which will increase the need for emergency response services to be localized.

Recreation

The PEIR will address the proposed Project's potential impact on notable recreation areas; regional, neighborhood, and local parks; trails; and other local recreational facilities and uses — such as water recreation and equestrian uses — within and near the study area across the 18 jurisdictions. Specifically, the PEIR will analyze the Project's potential to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Additionally, the PEIR will analyze whether the Project includes recreational facilities or would require the construction or expansion of recreation facilities which might have an adverse physical effect on the environment. These impacts, and their level of significance, will be assessed in detail in the PEIR.

COMMENT:

When analyzing the recreational uses at current and future parks and access points we believe that you should analyze the impacts of traffic, parking and quality of life issues for local riverfront communities. Many communities along the LA River are adjacent to other

infrastructure, such as rail or highways, which limits accessibility to the LA River resources.

Atwater Village is an isolated community with 4 miles of river frontage but only 3 major streets crossing the community to Glendale/Los Angeles and no contiguous street at its length. In the future all access to Atwater Village will be via, bridge, overpass and underpass. Currently there are limited public transportation options to reach the LA River in Atwater Village.

Traffic: burden of bringing city wide and regional access to the LA River should not burden the local streets or residential communities without mitigation

Parking: burden of parking should not fall upon residential streets at LA River access points. City wide and regional projects should include parking.

Increased LA River use in residential communities: we recommend the use of Residential Quiet Zones, (as seen at beach communities and Greek Theatre-Los Feliz Hills residential area)

Areas of high mixed use: These areas need to be considered walk only and slow zones designated by signage

Require street bike path connectivity to LA River Bike Paths: to reduce congestion and parking issues, study alternative access, bike paths, to LA River recreation opportunities and access points.

Study the use and purchase of HSR excess property for LA river opportunity sites, example solar operated Bike Share Station.

Transportation

A transportation impact analysis will be prepared for the PEIR to describe the existing local and regional transportation network and to evaluate the proposed Project's construction- and operations-related traffic impacts, where feasible, for vehicular, transit, bike, and pedestrian circulation. The PEIR will analyze whether the Project will conflict with a program, plan, ordinance, or policy addressing the circulation system. The transportation analysis for the PEIR will be conducted using a uniform approach based on the draft County transportation assessment guidelines, including application of the project screening criteria and the Vehicle Miles Traveled (VMT) thresholds. Senate Bill (SB) 743, which replaces vehicle level of service (LOS) as the CEQA metric of significance with VMT, goes into full effect on July 1, 2020. The County has developed a draft update to the Transportation Section of the County CEQA Thresholds Guide that includes a comprehensive methodological approach to the assessment of transportation impacts, including VMT-based thresholds of significance and a process to screen out projects which will not require VMT analysis (due to their size, location, or other factors). These draft guidelines and thresholds are expected to be adopted by the LA County Board of Supervisors in June 2020, ahead of both the SB 743 implementation deadline and the anticipated publication of the draft PEIR in late summer 2020. The draft County VMT threshold is 16.8 percent below existing VMT per capita, which is more conservative than the threshold recommended by the California Office of Planning and Research or

that adopted by the City of Los Angeles, both of which are set at 15 percent below existing. Considering the approach of the PEIR, including the absence of any specific sites or projects under the proposed 2020 LA River Master Plan to be analyzed in the PEIR, the County has determined that its uniform set of VMT guidelines will best serve the transportation analysis for the PEIR considering the 17 cities in the study area are in various stages of transitioning from LOS to VMT. Accordingly, the PEIR transportation analysis approach will use the County transportation assessment guidelines, including the project screening criteria and the VMT thresholds. These impacts, and their level of significance, will be assessed in detail in the PEIR.

COMMENT:

City of Los Angeles Mobility Plan should be addressed, LA River connectivity to alternative transportation routes, bike trails, bus and rail to LA River. There should be a seamless integration of all plans for transportation.

Bus stops must be provided for projects and access areas that have more than 20 parking spaces

Street bike paths should connect to the LA River Bike Path. Safe access for river users which lowers VMT.

Cumulative Impacts

COMMENT:

Include **all HSR related projects** along with other projects in Atwater Village

HSR Rail Corridor Projects impacting Atwater Village:

Verdugo Wash Overcrossing J-Hook (NEW/Metro project)

Doran Street: At-Grade Closed (NEW/Metro project)

Salem/Sperry St: Overcrossing (NEW/Metro project)

Brazil Street/Broadway: At-Grade Closed (NEW/Metro project)

Riverwalk Path Bridge: LA River/Verdugo Wash Bridge (NEW/Metro project)

Doran Street: San Fernando Rd. pedestrian Overpass (NEW/Metro project)

Colorado Street: Undercrossing (modified)

Goodwin Avenue: Undercrossing (new)

Chevy Chase Drive: At-Grade Closed

Chevy Chase Drive: Pedestrian Bridge (new)

Los Feliz Boulevard: Undercrossing (modified)

Storage Etc: Demolition rerouting of rail line (new)

Glendale Boulevard: Undercrossing (modified)

Include the proposed HSR projects:

Doran St:

Stand alone Communication tower (SEE VOL 4 DWG NO. CO-O4003)

Signal house (SEE VOL 4 DWG NO. TC-O4104)

West San Fernando Rd (mid): Stand alone Communication tower (SEE VOL 4 DWG NO. CO-F4002)
Verdant/New Life Vision Church: Switching Station (SEE VOLUME 4 DWG NO. TP-04101)
South of Glendale Blvd/Hehr International Inc.: Signal house (SEE VOL. 4, DWG. NO. TC-04106s)
South of Glendale Blvd/Hehr International Inc.: Communication tower (SEE VOL. 4, DWG. NO. CO-F4004)
South of Glendale Blvd/West Casitas LLC: Interlocking site (SEE VOL. 4, DWG. NO. TC-04002)
South of Glendale Blvd/West Casitas LLC: Interlocking site (SEE VOL. 4, DWG. NO. TC-04003)

The required HSR electrical needs will permanently change the Atwater Village view:
Cantilever Structures: 84 to 105 along the Atwater Village border
Overhead contact system (OCS): A simple two-wire system consisting of a messenger wire and a contact wire that are supported by cantilever structures and attached to poles installed alongside the rail tracks.

Additional known construction projects:

Glendale-Los Angeles Water Treatment Plant Campus Update
Glendale-Hyperion Bridge Seismic Retrofit Project

Potential Project:

2800 Casitas Avenue Project (AKA True North Landing)

This list is not comprehensive, there are and will be other “land use” projects, in the 25 year period.

Growth-Inducing Impacts

The PEIR will discuss the ways in which the proposed Project could foster growth in the surrounding environment; growth-related secondary impacts also will be discussed.

Mandatory Finding of Significance

The PEIR will analyze whether the Project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. The PEIR will discuss if the Project has impacts that are individually limited, but considered cumulatively significant. Additionally, the PEIR will analyze whether the Project has environmental effects which cause substantial adverse effects on human beings, either directly or indirectly.

COMMENT:

The PEIR should have an Environmental Justice Effects section:

This is warranted under the County's LA River Master Plans 9 stated goals. Analyze the distribution of benefit/burden of County's LA River Master Plan on riverfront communities.

Equity investment and inclusion along the LA River:

PEIR should look at broadening access to the LA River's publicly funded projects to open opportunities and access to a wider and more diverse selection of companies, non-profits and vendors.

Ariana Villanueva

From: Andy Lipkis <alipkis@accelerateresiliencela.org>
Sent: Thursday, August 13, 2020 10:06 PM
To: PW-LA River CEQA
Cc: Deborah Bloome; Zenya Prowell; Jennifer Bravo
Subject: Issues I'd like to address: Urban Watershed Management for Climate and Social Resilience

CAUTION: External Email. Proceed Responsibly.

Dear LA County Public Works River team:

I made many attempts to log onto the LA River Master Plan CEQA briefing, but was unsuccessful. Therefore I'm glad that you have invited written followup input. I understand from your request that you are seeking the topic/subject of our desired input, as opposed to a full briefing, at this time.

I wish to address two combined subjects that the LA River Master Plan **APPEARS** not to have **fully** addressed: that is *managing the entire urban watershed of the LA River as both a watershed, and as source and resource for climate, social, and economic safety, sustainability and resilience*.

The promotional materials and videos for the LA River Master Plan mention conserving water resources and rainwater to augment local supplies. They mention using "low-impact development" to help clean and conserve some of the water, but they do not mention goals and objectives that include "maximize" and "optimize" the water and watershed resources and their potential to create much greater equity of health, safety, and economic opportunities.

With a County that is plagued with substantial inequitable vulnerabilities to climate and other threats to health, safety and security, including extreme heat, air and water pollution, flooding, water shortages and fire, **it is imperative that this plan include "enhancing equitable climate resilience" as one of its primary goals.**

The water, soil, plants, land, residents, businesses and government agencies that comprise the LA River Watershed represent a tremendous resource and opportunity for health and a better future that should be acknowledged, quantified and addressed by the Master Plan.

Please let me know how I can elaborate on these concerns so they can be addressed in the Master Plan and its Programmatic Environmental Impact Report.

Thank you for your consideration.

Sincerely,

-Andy

--

Andy Lipkis
Project Executive
Accelerate Resilience L.A. (ARLA)
Founder, TreePeople
ALipkis@AccelerateResilienceLA.org
Telephone: +1-310-400-6008

Executive Assistant: Zenya Prowell
ZProwell@AccelerateResilienceLA.org
Telephone: +1-310-400-6083

Ariana Villanueva

From: Sharon Brewer <sbrewerz@live.com>
Sent: Thursday, August 13, 2020 9:36 PM
To: PW-LA River CEQA
Subject: LA River trail

CAUTION: External Email. Proceed Responsibly.

August 13, 2020

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

Dear Ariana,

By way of introduction, my name is Sharon Brewer. I am a concerned citizen in the Long Beach area. My son and his friends use the LA River Trails quite extensively to get across town and train for the next bike race whenever that is given the bleak sports forecast. They use the trails to avoid being hit by cars.

The trail usually chosen is the Long Beach to San Gabriel route because it is cleaner. He rides the Long Beach loop and found that the homeless are taking up more than half of the trail with their cabana like structures to keep them out of the sun.

The problems of the LA River Trail are many and stretch over 51 miles. .

1. Homeless living in the area. If displaced from the river they will find another area. The example is best understood when cleaning the area near the DTLA police station area when one area is cleared for cleaning the homeless are displaced for a day but return quickly.
2. Medical waste along the river is a huge problem. Needles and drug paraphernalia are strewn in the river and areas surrounding the area. If parks are to be built this area must be clean and remain clean for the children.
3. Human waste is also a problem for the river and the areas surrounding the river.
4. Garbage not included in the last two categories. Shopping carts, bicycles and just lots of every day garbage.
5. Water stations are currently being used for showers. Water stations have cloudy and murky water.
6. Flooding issue every time it rains under the tunnel at the 605 near Alhambra.

The environment and River have taken a beating along the river. The trails are largely unpoliced and are always a worry as the homeless put up wires to catch the cyclist or jogger and steal from their catch.

Kayakers use the river but the thought of overturning in the LA river is just gross. Fish from the LA River is should not be used for human consumption due to the human waste and garbage.

To improve the experience of the LA River it would take a huge effort but the people displaced will still not be able to afford housing. Mental institutions have closed and the need to rehabilitate or just deal with the mental issues of the homeless is no longer available.

Respectfully submitted,
Sharon Brewer

Ariana Villanueva

From: Michael Affeldt <michael.affeldt@lacity.org>
Sent: Thursday, August 13, 2020 3:33 PM
To: PW-LA River CEQA
Subject: Re: Scoping comments for Draft 2020 LA River Master Plan PEIR due today
Attachments: LA River Master Plan EIR Scoping Comments - LARiverWorks.pdf

CAUTION: External Email. Proceed Responsibly.

Hello,

Please find comments attached from the LARiverWorks team.

Best regards,
Mike

On Thu, Aug 6, 2020 at 8:57 AM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Hello,

Thank you for joining us last week for the 2020 LA River Master Plan CEQA Program EIR Scoping Meeting. For those who were unable to make it, the recording from the event is now available online at <http://pw.lacounty.gov/go/larmpceqa>.

Public participation is a key component of the CEQA process, and we appreciate your comments for consideration for the Draft Program EIR. You will receive a Notice of Availability when the Draft Program EIR is available for public review and comment. We will also provide notice about the Draft Program EIR public meeting when those details are available.

You can still submit comments on the scope or issues of concern you would like considered for the Draft Program EIR until August 6, 2020 (the end of the 30-day scoping period). Please send your comments in writing to the physical address or e-mail address shown below, and include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva

Los Angeles County Public Works, Stormwater Quality Division

900 South Fremont Avenue, 11th Floor

Alhambra, CA 91803

LARiverCEQA@pw.lacounty.gov

Attention: Ariana Villanueva
Los Angeles County Public Works,
Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

Los Angeles River Master Plan EIR Preparation Scoping Comments

LARiverWorks Group, Mayor's Office of City Services, City of Los Angeles

To the project team:

Please accept these scoping comments to inform the CEQA analysis for the Los Angeles River Master Plan EIR. They draw from prior comments on the Plan itself to highlight critical environmental issues to be fully considered for impacts and mitigations. Any questions regarding these comments may be directed to Michael Affeldt, Director, LARiverWorks, michael.affeldt@lacity.org, 310-982-3358 (mobile).

General

- The scope of analysis should include development of a robust complete hydraulic model of the LA River and its tributaries as a necessary foundation for understanding cumulative impacts of the LA River Master Plan, and this model should be made available to public agencies for peer review and use in project planning.
- The scope of analysis should include watershed-scale approaches to peak flow reduction, as this is a fundamental need for many of the LA River Master Plan's objectives.
- The scope of analysis should include prioritization of advancement and completion of LA River projects that are already publicly-adopted, such as within the LA River Revitalization Master Plan (City of Los Angeles, 2007) and the Los Angeles River Ecosystem Restoration Feasibility Study and Recommended Plan (United States Army Corps of Engineers, 2016). Actions considered in the LA River Master Plan must not preclude or inhibit these plans and rather should directly implement their proposals.
- The scope of analysis should include funding strategies and proposed funding sources as the source of funds often influences characteristics of project implementation.
- The scope of analysis should include governance options and strategies and analyze their impacts on how LA River Master Plan projects will be implemented and therefore their environmental impacts.

Aesthetics

- The scope of analysis should include impacts and ramifications of the County's Significant Ecological Area (SEA) Program and Ridgeline Preservation program, and other programs meant to protect viewsheds and natural aesthetics.
- The scope of analysis should include the variety of existing art at and along the LA River, how to preserve and enhance it, and how to encourage the proliferation of much more art of all kinds at, along, and pertaining to the LA River.

- The scope of analysis should include the impact of existing and future scenic vistas by covering portions, and blocking views, of the LA River.

Air Quality

- The scope of analysis should include consideration of the need for additional vegetation at the LA River to improve regional air quality.
- The scope of analysis should include the benefits of minimizing the use of concrete to meet objectives, to the extent feasible, as its production is a source of GHG.

Biological Resources

- The scope of analysis should include impacts to native plant species, particularly those of riparian and riparian upland habitats, as well as foothill habitats and connections between such habitats.
- The scope of analysis should include impacts to fish including native fish species. Some measures proposed in the Kit of Parts appear potentially impactful and harmful to fish and deleterious to planned projects by other agencies and proponents that aim to improve fish habitat and fish passage.
- The scope of analysis should include potential impacts to flow levels, temperatures, turbidity and other water quality elements as they related to the health of current and future habitat and wildlife.
- The scope of analysis should include strategies for streamlined, coordinated, and effective regular maintenance of areas along either banks of the River to prevent harmful pollutants from entering the River which may have impacts on wildlife. The area of analysis would necessarily include consideration of stormwater and drainage systems throughout urban areas 1 mile from each bank.
- The scope of analysis should include the potential legal restrictions on certain LA River Master Plan proposals that would create conditions for the LA River that would be more akin to a buried storm drain, for these may be in violation of various regional, state, and federal laws, rules, and regulations.
- The scope of analysis should include impacts and ramifications of the County's Significant Ecological Area (SEA) Program.
- The scope of analysis should include sufficient thresholds of native habitat populations in both public and private spaces to allow native species to thrive and propagate.
- The scope of analysis should include consideration of evolving and emerging understanding of microbiomes, microclimates, and their associated native species in proposing plant palettes and habitat approaches.
- The scope of analysis should evaluate impacts of the Master Plan on the adopted and authorized Los Angeles River Ecosystem Restoration Feasibility Study and Recommended Plan.

Cultural Resources

- The scope of analysis should include the fundamental premise that access to and views of the LA River itself and its banks are a paramount goal for cultural purposes.

Hazards & Hazardous Materials

- The scope of analysis should include a wide range of tools and approaches regarding reduction of flood risk, including distributed community and watershed-scale mitigations and tactics, and major investments such as bypass tunnels of various sizes and locations. Different approaches will carry their own related impacts and mitigations which should be analyzed in the scope of the PEIR.
- The scope of analysis should include consideration of the use, restriction, or prohibition of herbicides, insecticides, and rodenticides in the LA River or in locations that may drain to the LA River.
- The scope of analysis should include a prioritization of flood risk reduction approaches in which nature-based, habitat-enhancing, and similar tactics are held in high regard and heavy-infrastructure or habitat-harming approaches are held in low regard -- of course in the context of severity of risk and feasibility. Financial, acquisition-based, and insurance solutions must also be included in analyses and approaches to risk reduction.
- The scope of analysis should include the absolute importance of providing for cleanup of brownfield sites along the River, especially for in-progress projects.

Hydrology/Water Quality

- The scope of analysis should include strategies for stormwater and drainage system improvements, including “green streets” and other nature-based infrastructure throughout urban areas 1 mile from each bank of the River and throughout the watershed as necessary. Because the majority of stormwater that reaches the River is not collected in the 1-mile area of proposed analysis for the PEIR, the scope of analysis, at least for this topic, must be expanded to include the entire LA River watershed. Impacts, mitigations, and programmatic strategies should be considered at the watershed scale.
- The scope of the analysis should include evaluation of upstream watershed opportunities to address peak flood flows.
- The scope of analysis should include preservation, reconnection, daylighting, and renaturalization of historic streams.

Land Use/Planning

- The scope of analysis should include the impacts of any proposals to change zoning or other land use designations or definitions. The project team should make contact with the City of Los Angeles Department of City Planning to discuss this topic in detail and should be aware and familiar with the City’s ReCode initiative which is an ongoing project to modernize and streamline the City’s zoning system.
- The scope of analysis should include a full understanding of the various special planning areas that exist along the LA River including but not limited to the Cornfield Arroyo Specific Plan (CASP), Warner Center Specific Plan, and the LA River Improvement Overlay (LA-RIO). Any impacts to the intentions or efficacy of these and other planning tools should be analyzed and mitigated.
- To the extent that the goals of the LA River Master Plan will be heavily influenced by the ability of local jurisdictions to help effectuate them, the scope of analysis should include mitigations to that impediment that include technical help, capacity building, and direct financial support to

municipalities and community-based organizations to foster a robust and effective collaborative working landscape.

Noise

- The scope of analysis should include the use of sound barriers along freeways to mitigate impacts to human and wildlife at the River.

Population/Housing

- The scope of analysis should include cumulative impacts of other actions or inaction by Los Angeles County to enhance housing availability and affordability along the Los Angeles River in the corridor of analysis.
- The scope of analysis should include cumulative impacts of other actions or inaction by Los Angeles County to mitigate the existence and growth of the population of people experiencing homelessness in and along the Los Angeles River and in the corridor of analysis.
- The scope of analysis should include a finer-grained understanding of communities in the City of Los Angeles than has been present in the LA River Master Plan process thus far.

Public Services

- The scope of analysis should include impacts to tax revenue and special revenue tools such as Enhanced Infrastructure Finance Districts, several of which are being planned and studied along the Los Angeles River corridor. Any impacts should be mitigated.

Recreation

- The scope of analysis should include the fundamental premise that access to the LA River itself and its banks are a paramount goal for recreational purposes.

Transportation

- The scope of analysis should include the urgent need to expand active transportation options along, and connecting to, the LA River.
- All PEIR elements, projects, and proposals must analyze potential impacts to long-planned and in-progress projects to complete the active transportation system along the LA River, especially in the San Fernando Valley, where significant gaps in the system remain, despite the expressed intentions of the prior and first edition of the LA River Master Plan from 1996.
- The scope of analysis should include cumulative impacts from California High Speed Rail and propose coordinated mitigations.
- The scope of analysis should include impacts to public transit of all forms, including potential expansions or changes in services or facilities.

Tribal Cultural Resources

- The scope of analysis should include the fundamental premise that access to the LA River itself and its banks are a paramount goal for tribal cultural purposes.

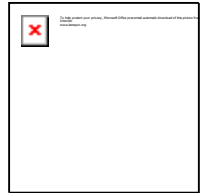
Utilities/Service Systems

- The scope of analysis should include an inventory of and potential impacts to the many utilities that run along the LA River and through the proposed corridor of analysis. Potentially hazardous utilities such as oil pipelines, should be the subject of specific analysis and potential relocation.

###

Information and updates about the CEQA process for the Draft Program EIR at <http://pw.lacounty.gov/go/larmpceqa>.

For questions or concerns about the 2020 LA River Master Plan document, please visit www.larivermasterplan.org or submit your comments to LARiver@pw.lacounty.gov.



Michael Affeldt

Director, LARiverWorks
Mayor's Office of City Services
213-978-2225
www.lariver.org

Ariana Villanueva

From: Rosalind Helfand <rozhelfand@gmail.com>
Sent: Wednesday, August 12, 2020 9:45 PM
To: PW-LA River CEQA
Subject: NOP Scoping Comments

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Villanueva,

Please accept my NOP scoping comments. Thank you for your time!

Rosalind Helfand
Independent Environmental and Social Policy Advisory
rozhelfand@gmail.com
310-869-5749

NOP Scoping Comments:

*** Climate change should be included at multiple points in the PEIR, not just under "Greenhouse Gas Emissions" and not just as an emissions discussion**

Impacts, including cumulative impacts, shouldn't be assessed without considering the current and projected impacts of climate change on the following:

- Wildlife, including species of special concern, that currently relies on the stability of LA River water and habitat to endure climate change impacts.
- Wildlife, including species of special concern, that will come to rely on the LA River during and following the project completion due to range and habitat changes tied to climate change (includes species that are projected to become vulnerable, not just those that are currently considered vulnerable).
- The impact of the LA River project overall on urban forest as critical for cooling both people and wildlife and providing habitat for climate impacted wildlife.
- Impacts on hydrology and water quality due to possible cumulative effects of the project in relation to climate change impacts.
- Current and projected climate change impacts on the effectiveness of the LA River plans for flood mitigation (seeing that floods may be enhanced by climate change).
- Accounting for the climate change plans of cities (not just the county) through which the river runs.
- Potential climate impacts of project construction phases.

*** Human traffic impact on wildlife**

- Regarding public services and recreation, how will increases in human traffic in some areas where wildlife reside, as well as new human traffic post-project completion, impact wildlife that depend on the river for habitat, food, and water?

*** Total urban forest impact** (adding to the discussion of trees in Land Use/Planning)

- Align with overall urban forest planning such as with the City of Los Angeles, and consider: Impact to overall canopy; impact to healthy mature tree numbers overall; impact to tree types that wildlife and birds often rely upon overall; impact on the capacity for the urban forest to mitigate stormwater runoff; impact on the urban forest capacity to mitigate heat island effects and climate change impacts; impact on urban forest capacity to mitigate air pollution and sequester carbon (loss of mature trees again a concern).

*** Light pollution impact on wildlife**

- Will the project during construction and after completion increase light pollution in sensitive areas for wildlife?

*** Changes to hydrology and water quality impacts on wildlife**

- How important is overall stability for many species currently relying on especially habitat rich areas? (relates to climate change questions)
- Look at the cumulative impact of wetland loss/lack in relation to wetland need for species in the region.

*** Sourcing and end life of construction materials and waste**

- How will the ecosystem and climate impacts of construction materials sources and waste be accounted for?
- Is there an end life plan for reuse/recycling of waste and materials?

*** For "Growth-Inducing Impacts"**

- How will "growth" be defined? Differentiate between desirable and undesirable types of growth.

*** Transportation**

- How will the project minimize future transportation emissions that contribute to poor air and climate change by aligning with climate change mitigation planning?

Ariana Villanueva

From: Bedros . <bedrosb@msn.com>
Sent: Wednesday, August 12, 2020 7:49 PM
To: PW-LA River CEQA
Subject: mosquitoes

CAUTION: External Email. Proceed Responsibly.

How do you plan to deal with the drought issue?

How do you deal with the mosquitoes issue?

Thank you,
Bedros

Ariana Villanueva

From: Andrea Dell'Apa <adellapa@watershedhealth.org>
Sent: Wednesday, August 12, 2020 3:55 PM
To: PW-LA River CEQA
Subject: NOP Scoping Comments
Attachments: CWH_PEIR comment letter_Aug12.pdf; LAR_FPHS Project Stakeholder Workshop_6 22 20_FinalVersion.pdf

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Villanueva,

I hope this email finds you doing well. Please find attached a comment letter in regard to the scoping process for proposed 2020 LA River Master Plan PEIR.

As additional attachment, I also included a pdf copy of a recent presentation (given on June 22nd) on the Los Angeles River Fish Passage and Habitat Structures Design (LAR FPHS) Project, and a link (see the link in the letter) to a video recording of that presentation. Hopefully, these attachments will provide a more insightful context for the nature of the comments that were included in this letter.

I look forward to receiving your response, and if you have any questions please do not hesitate to contact me to either the email or phone number that are provided below.

Thank you for the opportunity to provide comments to this really important planning process for the County of Los Angeles.

Best regards,
Andrea Dell'Apa

--

Andrea Dell'Apa, PhD
Project Manager
Council for Watershed Health
177 E. Colorado Blvd, Suite 200
Pasadena, CA 91105
www.watershedhealth.org
adellapa@watershedhealth.org
Phone: 213-229-9945 - ext. 5

Ariana Villanueva

From: Alyssa Boyle <gumbyzmom@hotmail.com>
Sent: Tuesday, August 11, 2020 6:08 PM
To: PW-LA River CEQA
Subject: LA River Toxicology Report

CAUTION: External Email. Proceed Responsibly.

Hello,

I am a resident of Encino and am very concerned about river bike and walking paths opening up in neighborhoods that border the river. The current bike path along the river at Canoga Park/Winnetka has encampments of homeless people living in the culverts that have grown from 15 to 50+ during quarantine. The LAPD now considers that area too toxic to patrol. How will those areas be evaluated for the EIR? How will we keep the river safe once it's all opened up in the future? As it is, people and animals are seen in the water on a daily basis. It is very concerning as it is dangerous as well as illegal.

--

Sincerely,
Alyssa Boyle

--

Sincerely,
Alyssa Boyle

Ariana Villanueva

From: Byron Friday <bhfriday@gmail.com>
Sent: Tuesday, August 11, 2020 10:47 AM
To: PW-LA River CEQA
Subject: Re: CEQA PEIR for 2020 LA River Master Plan PEIR - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Please remove me from this mailing list Thank you

Thank you,

Byron Friday

1-818-614-4638

www.byronsbike.com

www.indoorcyclingrepair.com

On Tue, Jul 7, 2020, 6:02 PM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

The County of Los Angeles, through Los Angeles County Public Works, will prepare a Program Environmental Impact Report (PEIR) pursuant to the California Environmental Quality Act (CEQA) for its proposed 2020 LA River Master Plan. The PEIR will assess the environmental impacts of implementing the 2020 LA River Master Plan. As part of this PEIR process, Public Works is soliciting input from members of the public, organizations, and government agencies on the scope and content of the information to be included and analyzed in the PEIR.

A Notice of Preparation (NOP) has been prepared to notify responsible and trustee agencies, the Office of Planning and Research, the County Clerk, and other interested parties that Public Works is beginning preparation of this PEIR, and starts the 30-day scoping period. The NOP for the 2020 LA River Master Plan PEIR can be viewed at <http://pw.lacounty.gov/go/larmpceqa>.

The community is invited to participate in an online scoping meeting for the PEIR, which is being held virtually due to restrictions under State of California Executive Order N-33-20.

DATE: Wednesday, July 29, 2020

TIME: 6:00 p.m. to 8:00 p.m.

LOCATION: Details about the CEQA online scoping meeting are available at <http://pw.lacounty.gov/go/larmpceqa>

Registration for the event is available at <http://www.eventbrite.com/e/online-scoping-meeting-2020-la-river-master-plan-program-eir-tickets-112158469000>

Scoping comments on the PEIR are due no later than August 6, 2020, which marks the end of the 30-day scoping period. Please send your comments in writing to the physical address or e-mail address shown below. If sending an e-mail, please include "NOP Scoping Comments" in the subject line. Include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva

Los Angeles County Public Works, Stormwater Quality Division

900 South Fremont Avenue, 11th Floor

Alhambra, CA 91803

LARiverCEQA@pw.lacounty.gov

Thank you and we look forward to your participation in the process.

Ariana Villanueva

From: Katherine Pease <kpease@healthebay.org>
Sent: Monday, August 10, 2020 6:04 PM
To: PW-LA River CEQA
Subject: Heal the Bay Comment letter on NOP for PEIR for LA River Master Plan
Attachments: 08-10-2020 HtB to LA County PW_NOP for PEIR for LARMP.pdf

CAUTION: External Email. Proceed Responsibly.

Hello,

Please find attached Heal the Bay's comment letter on the NOP for the PEIR for the LA River Master Plan. Let me know if you have any questions.

Thank you.

Best, Katherine Pease



KATHERINE PEASE, PH.D. | DIRECTOR OF SCIENCE & POLICY

She/Her/Hers ([What does this mean?](#))

Heal the Bay

1444 9th Street

Santa Monica, CA 90401

T: 310.451.1500 **x** 141 | **F:** 310.496.1902





Heal the Bay

1444 9th Street
Santa Monica, CA 90401

ph. 310-451-1500
fax 310-496-1902

info@healthebay.org
www.healthebay.org

August 10, 2020

Ariana Villanueva
Los Angeles County Public Works
Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

Submitted via email to: LARiverCEQA@pw.lacounty.gov

**RE: Comments on the Notice of Preparation (NOP) for the Draft Program
Environmental Impact Report (PEIR) for the LA River Master Plan**

Dear Ariana Villanueva:

Heal the Bay is a non-profit environmental organization with over 30 years of experience and 15,000 members dedicated to making the coastal waters and watersheds of California safe, healthy, and clean. Heal the Bay has a long history of work on the Los Angeles River; we have advocated for improved habitat, water quality, and recreation by weighing in on numerous policies and permits concerning the Los Angeles River such as TMDLs, the Recreational Use Reassessment (RECUR) study, permits for dredging and clearing vegetation, and other regulatory actions.

Heal the Bay has actively participated in the development of the LA River Master Plan as a Steering Committee member. Throughout that two-year process we have provided feedback and expressed concerns over the process and the content of the Plan.

After reviewing the NOP for the Draft PEIR and attending the public CEQA scoping meeting, we are concerned about two specific issues, namely the lack of commitment to public participation and the limitation of the assessment of impacts to only two very specific typical projects.

1. **Public Participation Must Be Prioritized.** We are concerned that the timing of the request for public comments on the NOP and the PEIR does not allow for adequate public participation. Given that the LA River Master Plan has not yet been released, the public cannot adequately comment on the NOP. It will be even harder for the public to comment on the Draft PEIR when it is out in summer 2020, again, given that the Draft LA River Master Plan may still not be out then. During the scoping meeting, it was



Heal the Bay

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estimated that the Draft Master Plan will be released in the late summer or early fall. It is unfair to expect people to provide meaningful comments on the PEIR in the absence of the draft Plan itself. Further, due to COVID-19 and the need to conduct outreach and public participation virtually, additional thought, care, and time must be devoted to ensure adequate public participation. Public participation must be made as easy as possible. The CEQA scoping meeting did not make public participation easy. For instance, the comments provided during that meeting were not even considered as official comments or on the record; people were taking the time to attend the meeting, type out their comments and questions, and yet those written questions and comments were routinely dismissed by stating that the comments needed to be emailed in order to be considered. The description of the scoping meeting was not what actually happened at the meeting: "After the presentation, a Q&A session will be held followed by submission of oral comments by previously registered commenters. Written comment forms will be supplied for those who wish to submit comments in writing at the scoping meeting."¹ Comments were not received orally, nor through a registration process and written comment forms were not supplied for those wishing to submit comments at the scoping meeting.

We ask for a commitment to true public participation by delaying the release of the Draft PEIR until *after* the release of the Draft LA River Master Plan. We also ask for additional time for public review of the Draft PEIR, additional public meetings in multiple languages once the PEIR is released, that comments be received in meetings as well as in written formats, and that additional creative ways of engaging the public be explored (e.g. a virtual post-it-note board, virtual open house.)

2. The PEIR needs to evaluate impacts of all six elements in the kit of parts.

The NOP states that the PEIR will evaluate two typical projects, which are the common elements and a multi-use trails and access gateways project. We are concerned with this limited evaluation primarily because these two types of projects are likely to be less impactful than other types of projects that will not be evaluated in the same depth. Heal the Bay, in addition to other groups, has routinely expressed concern over the platform parks element and the potential for this design to have significant negative environmental impacts. Focusing the PEIR on two projects that are considerably less impactful than other proposed project types is disingenuous and not representative of the actual Master Plan. We understand that specific projects will not be examined in the

¹ <https://pw.lacounty.gov/swq/peir/doc/NOP-2020.06.26-draft.pdf>



Heal the Bay

1444 9th Street
Santa Monica, CA 90401

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fax 310-496-1902

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www.healthebay.org

PEIR but a range of potential impacts should be examined for each of the six project types in the kit of parts.

We ask for a detailed evaluation of impacts for *all* six elements of the kit of the parts in the PEIR, not merely a high level analysis.

Thank you for your consideration of these comments. Please feel free to contact us at kpease@healthebay.org or 213-631-8495 with any questions.

Sincerely,

Katherine M. Pease, PhD
Director of Science & Policy

Ariana Villanueva

From: Jeff Kaemmerling <jeffkaemm@gmail.com>
Sent: Monday, August 10, 2020 6:31 AM
To: PW-LA River CEQA
Subject: Ceqa scoping meeting inclusions

CAUTION: External Email. Proceed Responsibly.

Hi there,

I would like the scope to include a safe connection of all the bike paths along the LA River, because right now it's difficult to enjoy or reap benefits.

Thanks!

jeffkaemm@gmail.com

Ariana Villanueva

From: Matt Horns <getplanted.native@gmail.com>
Sent: Friday, August 7, 2020 6:17 PM
To: PW-LA River CEQA
Subject: NOP Scoping Comments

CAUTION: External Email. Proceed Responsibly.

PUBLIC COMMENT

2020 LA RIVER MASTER PLAN

REGARDING THE DOWNTOWN LOS ANGELES AREA

CONCERN:

Constructing high-rise buildings along the river near Downtown Los Angeles would impact environmental conditions, quality of life, and public safety in adjoining areas.

Streamside neighborhoods in the Downtown Los Angeles area already have some of the highest population densities in Southern California. Adding high-density housing units would displace current residents. It would also place additional stress on infrastructure that is already overwhelmed and in need of serious maintenance.

Numerous commercial properties lie vacant. Additional commercial space is not needed in the river corridor.

One aspect of the 2020 MP is establishing riparian ecosystems on the river bed and banks. Large structures adjacent to the river would create extensive shade that could limit the growth of riparian vegetation.

SUGGESTED MITIGATION:

Refine zoning and building codes to limit new construction in the river corridor.

Disallow new construction of buildings with more than two above-ground floors within 200 feet from the top of the river bank.

For single-family residences, limit the lot size and square-footage of new construction in an effort to prevent the river corridor from transforming to an exclusive luxury community.

From

Matthew Horns

310-562-9465

getplanted.native@gmail.com

127 S. Park View St. #207, Los Angeles CA 90057

Ariana Villanueva

From: Matt Horns <getplanted.native@gmail.com>
Sent: Friday, August 7, 2020 6:10 PM
To: PW-LA River CEQA
Subject: NOP Scoping Comments

CAUTION: External Email. Proceed Responsibly.

PUBLIC COMMENT

2020 LA RIVER MASTER PLAN

REGARDING THE DOWNTOWN LOS ANGELES AREA

CONCERN:

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For single-family residences, limit the lot size and square-footage of new construction in an effort to prevent the river corridor from transforming to an exclusive luxury community.

Ariana Villanueva

From: Campbell, Alexis <cp-alexis.campbell@lausd.net>
Sent: Friday, August 7, 2020 1:08 PM
To: PW-LA River CEQA
Subject: NOP Scoping Comments
Attachments: Comment_Letter_LA_River_Masterplan_NOP_gmg.pdf

CAUTION: External Email. Proceed Responsibly.

Good Afternoon,

The Los Angeles Unified School District's Office of Environmental Health and Safety would like to submit comments on the proposed 2020 LA River Master Plan PEIR. If you have any questions please feel free to contact me.

Kindly,

Alex Campbell

CEQA Assistant Project Manager | CP

LAUSD | OEHS

(d) 213.241.4210

(c) 323.286.7377

<http://achieve.lausd.net/ceqa>



Los Angeles Unified School District

Office of Environmental Health and Safety

AUSTIN BEUTNER
Superintendent of Schools

CARLOS A. TORRES
Director, Environmental Health and Safety

JENNIFER FLORES
Deputy Director, Environmental Health and Safety

August 7, 2020

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

Dear Ms. Villanueva,

Thank you for the opportunity to provide comment on the Notice of Preparation for the 2020 Los Angeles County River Masterplan (Masterplan). The Masterplan is a comprehensive approach covering all 51 miles of the Los Angeles River. The County of Los Angeles, through the Department of Public Works (Public Works), is the Lead Agency and is preparing a Program Environmental Impact Report (PEIR) to evaluate any potential impacts on the environment.

The Masterplan stipulates the program will encompass one mile on either side of the entire LA River, a vast expanse that includes numerous schools. We would like to ensure that these facilities are adequately considered in the environmental analysis for projects implemented as part of the Masterplan. We are available to assist you in identifying schools within the program area that may be impacted.

The Office of Environmental Health and Safety's charge is to protect the District's students and staff, and the integrity of the learning environment. While the District supports the intent of the Masterplan, we also need to ensure that their welfare is maintained.

Thank you for your attention to this matter. If you need additional information, please contact me at Alexis.Campbell@LAUSD.net.

Regards,



Alex Campbell
Assistant CEQA Project Manager

Ariana Villanueva

From: Carrie Sutkin <carrieasutkin@gmail.com>
Sent: Thursday, August 6, 2020 8:10 PM
To: PW-LA River CEQA
Subject: Comments on Scoping notice for PEIR
Attachments: Los Angeles County Department of Public Works.pdf

CAUTION: External Email. Proceed Responsibly.

Los Angeles County
Department of Public Works
900 Fremont Avenue
Alhambra, CA
Email: lariverceqa@pw.lacounty.gov

To whom it may concern:

RE: Comments on scoping Program EIR for the 2020 LA County River Master Plan

Thank you for inviting our community to submit comments. Several of us, active in the Elysian Valley area have attended the master plan meetings, up and down the river but we have not seen the Program DEIR which makes it impossible to respond to this notice, in detail. This is not a technical response, and I hope it's not used as such. Rather, this is a broad list of issues, I have raised at each meeting I attend, and have written about in the surveys and letters to you over the years.

Community Input/Outreach: This is a very important project for our community and yet the complexity of the task, a 52 mile master plan, affecting dozens of jurisdictions, that our city council or city department have not presented to us, in a detailed fashion to explain what the City of Los Angeles plans to do in light of this County Master Plan for the Los Angeles River/Flood Control District's properties in the Right of Way and adjacent to it. Where is the PEIR? What will it really say? And Why aren't you sharing that with us? It's odd and it feels rushed. Please send us the completed Program EIR. Have it translated into Spanish and other languages and really provide workshops on sections and facilitate comments on each section. I heard your webinar was not an effective outreach method for listening to public input, as it was noticed.

In the absence of a document to comment on (Where is the PEIR?) I'm providing this list of impacts that should be analyzed; this is my initial check list.

- i. Analyze impact on City of Los Angeles (and the other 22 cities along the 51 miles)
 1. land use
 2. lack of affordable housing,
 3. lack of off-site improvements in the older industrial areas,
 4. lack of funding and maintenance plans for ongoing operations of naturalized right of way for recreation uses
 5. lack of an anti- gentrification policy.

ii. The PEIR should analyze impact of The County Master Plan on county owned properties.

iii. PEIR should Analyze and mitigate Green infrastructure investments on low income housing and working-class households;

iv. It should analyze and mitigate impact of increased use of River, on narrows streets, and zero street or off-street parking to accommodate visitors on weekends, or evenings.

v. It should provide some guidance to Cities and residents for mitigating Flood concerns with Flood Plain Mapping: City and US Army Corps of Engineers need guidance on flood maps. How should ZIMAS be updated and how should Building and Safety and Planning integrate enforcement.

vi. It should show Environmental impact of Flood maintenance roads being converted to bike-pedestrian shared path.

viii. Should provide guidance to local municipalities and the US Army maintenance requirements for new improvements on the main stem and public access requirements (open street ends, ensure street lighting, etc..).

ix. Green Streets standards should be required of all residential and commercial streets that run into a body of water to ensure it is clean before going into the channel.

x. Street Ends: each street ends needs signage, ada access, and safety markings and maintenance. At the end of each street, there should be public access for multiple benefits of storm water capture, and recreation, and public safety as many people need the shared path to get around.

xi. River/Flood Control System -storm water monitoring should be increased. We have residents who would like to participate in citizen water quality monitoring programs to better understand this issue.

xii. Maintenance, habitat restoration and Arundo removal needs to be funded for the main stem of the LA River/Flood Control Channel. If it is not funded, what will the impact be?

xiii. Maintenance of trails. LA River Greenway is a linear park intended for passive recreational uses, like walking, hiking, and cycling. What will the impact of the updated county master plan be on the demand for: patrols, garbage collection services, permit use of the river ROW.

xiv. Public Education: Flood Control District- Water Safety. Distribute “No way-out videos for our local schools (as we do not have a public library in our community).

Please return to the local neighborhood Councils and the Alliance of River Communities once you begin the CEQA process for the PEIR and EIR in earnest.

Respectfully,

Carrie Sutkin, DPPD
2438 Gatewood Street
Los Angeles, CA 90031
(323) 868-5383

Cc: LA County Supervisor Hilda Solis, First District

Ariana Villanueva

From: Gina Thornburg <ginat.cfvn@gmail.com>
Sent: Thursday, August 6, 2020 6:14 PM
To: PW-LA River CEQA
Subject: Re: Scoping period extended to August 13: Input on scope of Draft 2020 LA River Master Plan PEIR

CAUTION: External Email. Proceed Responsibly.

Thanks.

On Thu, Aug 6, 2020, 5:36 PM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Hi Gina,

Yes, we are accepting comments until the end of the day on August 13.

Thank you,

Ariana Villanueva

Environmental Engineering Specialist

Los Angeles County Public Works

(626) 458-7146

From: Gina Thornburg <ginat.cfvn@gmail.com>
Sent: Thursday, August 6, 2020 4:12 PM
To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Subject: Re: Scoping period extended to August 13: Input on scope of Draft 2020 LA River Master Plan PEIR

CAUTION: External Email. Proceed Responsibly.

Dear Ariana,

Will comments be accepted up to the end of the day on August 13?

Thank you.

Sincerely,

Gina

On Thu, Aug 6, 2020, 3:39 PM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

The scoping period has been extended to August 13, 2020. Please send your input on the scope or issues you'd like considered in writing to the physical address or e-mail address shown below, and include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

For those who were unable to join us in the scoping meeting last week, the recording from the event is available online at <http://pw.lacounty.gov/go/larmpceqa>. Information about the CEQA process for the Draft Program EIR will continue to be updated on the website.

For questions or concerns about the 2020 LA River Master Plan document, please visit www.larivermasterplan.org or submit your comments to LARiver@pw.lacounty.gov.

Ariana Villanueva

From: Karl Guder <kgguder@gmail.com>
Sent: Thursday, August 6, 2020 6:10 PM
To: PW-LA River CEQA
Subject: LA River PEIR

CAUTION: External Email. Proceed Responsibly.

You must integrate the Arroyo Seco bikeway with this project and extend to the Rose Bowl.
This will actually add a viable non-car commuter option.

Thank you for your attention to this matter.



"Failing to prepare, is preparing to fail" — John Wooden

Ariana Villanueva

From: Wolfgang Brardt <wolfgangbrardt@gmail.com>
Sent: Thursday, August 6, 2020 5:35 PM
To: PW-LA River CEQA
Subject: Comments about LA River project

CAUTION: External Email. Proceed Responsibly.

Hello, My name is Wolfgang Brardt, I'm a Owner of a skateboard Magazine called 86'D Magazine. I have a great idea on how we could use tons of the space of the old river.

Essentially placing a skate obstacle along the river to form sort of a trail for Skateboarders, BMX'ers and all persons on any type of wheels to use. Skateboarding in LA as I'm sure you know is a worldwide destination and hot spot. It's a fact that now more children pick up Skateboards than baseball. In 20 years it's predictable that America's pastime will be Skateboarding. LA's River project could turn LA into that much more of a travel destination for people from all over the world.

I have tons of Design ideas that would be so simple and cheap to create and build. The best part is the LA River is already perfect for all activities with wheels. adding a fe supplemental obstacles would just breathe so much creative life into what is currently a kind of dark place.

Thank you so much for reading, looking forward to hearing back!

Sincerely, Wolfgang

--

Wolfgang Brardt

[@wolfgangbrardt](#)

[\(562\)513-9951](#)

wolfgangbrardt@gmail.com

Ariana Villanueva

From: Gina Thornburg <ginat.cfvn@gmail.com>
Sent: Thursday, August 6, 2020 4:12 PM
To: PW-LA River CEQA
Subject: Re: Scoping period extended to August 13: Input on scope of Draft 2020 LA River Master Plan PEIR
Attachments: image002.png

CAUTION: External Email. Proceed Responsibly.

Dear Ariana,

Will comments be accepted up to the end of the day on August 13?

Thank you.

Sincerely,

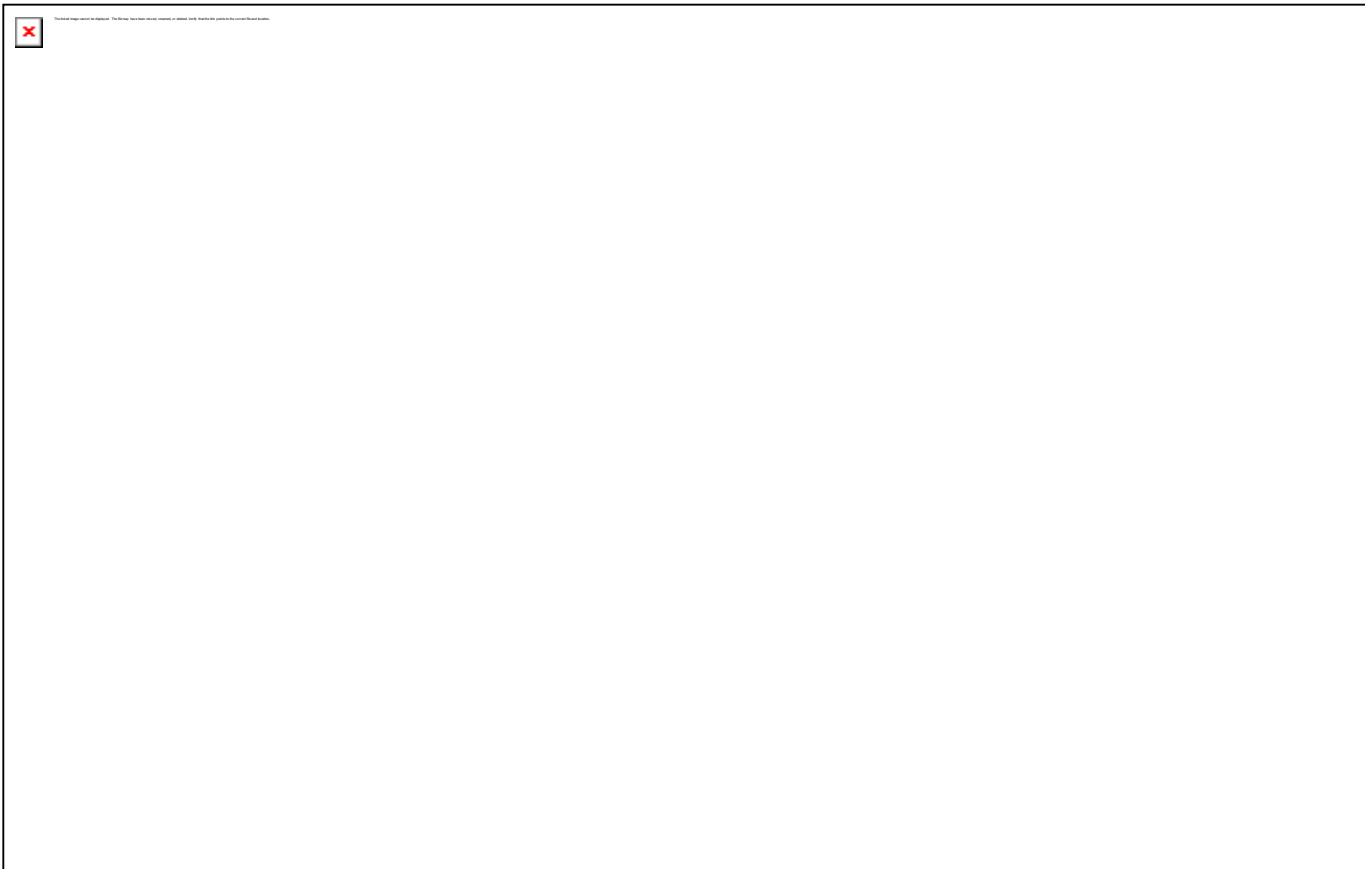
Gina

On Thu, Aug 6, 2020, 3:39 PM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

The scoping period has been extended to August 13, 2020. Please send your input on the scope or issues you'd like considered in writing to the physical address or e-mail address shown below, and include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

For those who were unable to join us in the scoping meeting last week, the recording from the event is available online at <http://pw.lacounty.gov/go/larmpceqa>. Information about the CEQA process for the Draft Program EIR will continue to be updated on the website.



For questions or concerns about the 2020 LA River Master Plan document, please visit www.larivermasterplan.org or submit your comments to LARiver@pw.lacounty.gov.

Ariana Villanueva

From: annalee chandler <intrepid1@dslextreame.com>
Sent: Thursday, August 6, 2020 4:12 PM
To: PW-LA River CEQA
Cc: david ryu; Erin Baranko; ted@davidryu.com
Subject: input / questions

CAUTION: External Email. Proceed Responsibly.

You folks have done an **INCREDIBLY** awesome job of making the LA River more and more beautiful! Truly. The water is flowing more freely, the birds abound. I am interested in the longer term improvements, as I ride a bike every other day along the river. I know that in the future will be re-connected to the now end of the bikeway by the freeway overpass. And when that connection is made, when will that end connect to the eventual like to be able to ride to Long Beach.

And the homeless issue along the bike way. Seems every other day their trash is removed, etc, but they return again and again to trash what you have improved. Last week they set fire to a heap of trash and the fire department had to come to put it out, snarling untold amount of the 5 fwy.

Please, please let's not make your efforts be in vain! They spoil it at an unbelievable pace!

William Lovelace
7311 Pacific View Drive
Los Angeles, CA 90068
(310) 387-5012 cell

Ariana Villanueva

From: Abraham Huie <abrahamhuie@gmail.com>
Sent: Thursday, August 6, 2020 3:34 PM
To: PW-LA River CEQA
Subject: Re: Scoping period extended to August 13: Input on scope of Draft 2020 LA River Master Plan PEIR

CAUTION: External Email. Proceed Responsibly.

[unsubscribe](#)

On Thu, Aug 6, 2020 at 2:49 PM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

The scoping period has been extended to August 13, 2020. Please send your input on the scope or issues you'd like considered in writing to the physical address or e-mail address shown below, and include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva

Los Angeles County Public Works, Stormwater Quality Division

900 South Fremont Avenue, 11th Floor

Alhambra, CA 91803

LARiverCEQA@pw.lacounty.gov

For those who were unable to join us in the scoping meeting last week, the recording from the event is available online at <http://pw.lacounty.gov/go/larmpceqa>.

Information about the CEQA process for the Draft Program EIR will continue to be updated on the website.



For questions or concerns about the 2020 LA River Master Plan document, please visit www.larivermasterplan.org or submit your comments to LARiver@pw.lacounty.gov.

--

Abraham Huie

[LinkedIn](#) | [GitHub](#) | [Twitter](#)

abrahamhuie@gmail.com

| (760) 791-6909

UC Berkeley '13, B.A. Political Economy

Ariana Villanueva

From: Karen Barnett <karenbarnett@atwatervillage.org>
Sent: Thursday, August 6, 2020 3:21 PM
To: PW-LA River CEQA
Cc: River Committee; Courtney Morris; Edward Morrissey
Subject: Fwd: Scoping period extended to August 13: Input on scope of Draft 2020 LA River Master Plan PEIR

CAUTION: External Email. Proceed Responsibly.

Hello Ariana,

What time is it due in by on the 13th? We have our board meeting at 7 PM on the 13th. If it's midnight we might be able to have it in. Please let us know.

Thanks,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

----- Forwarded message -----

From: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>

Date: Thu, Aug 6, 2020 at 2:48 PM

Subject: Scoping period extended to August 13: Input on scope of Draft 2020 LA River Master Plan PEIR

To:

The scoping period has been extended to August 13, 2020. Please send your input on the scope or issues you'd like considered in writing to the physical address or e-mail address shown below, and include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva

Los Angeles County Public Works, Stormwater Quality Division

900 South Fremont Avenue, 11th Floor

Alhambra, CA 91803

LARiverCEQA@pw.lacounty.gov

For those who were unable to join us in the scoping meeting last week, the recording from the event is available online at <http://pw.lacounty.gov/go/larmpceqa>.

Information about the CEQA process for the Draft Program EIR will continue to be updated on the website.



For questions or concerns about the 2020 LA River Master Plan document, please visit www.larivermasterplan.org or submit your comments to LARiver@pw.lacounty.gov.

Ariana Villanueva

From: Erik Van Breene <vanbreene@laconservancy.org>
Sent: Thursday, August 6, 2020 2:59 PM
To: PW-LA River CEQA
Cc: Adrian Fine
Subject: 2020 Los Angeles River Master Plan NOP Comments
Attachments: LAC_Comments-LA_River_MasterPlan_NOP-Sent-2020.08.06.pdf

CAUTION: External Email. Proceed Responsibly.

Ms. Villanueva,

Please find the Los Angeles Conservancy's comments on the 2020 Los Angeles River Master Plan Notice of Preparation. If you have any questions please do not hesitate to reach out to me.

Best,
Erik

Erik Van Breene

Preservation Coordinator

Los Angeles Conservancy
523 West Sixth Street, Suite 826
Los Angeles, CA 90014
(213) 430-4206 | vanbreene@laconservancy.org

Pronouns: He / His / Him / Mr.

laconservancy.org

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Membership starts at just \$40

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LOS ANGELES
CONSERVANCY

523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

August 6, 2020

Sent Electronically

Ms. Ariana Villanueva
Los Angeles County Public, Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
Email: lariverceqa@pw.lacounty.gov

RE: 2020 Los Angeles River Master Plan Notice of Preparation (NOP)

Dear Ms. Villanueva:

On behalf of the Los Angeles Conservancy, I am writing to comment on the 2020 Los Angeles River Master Plan Notice of Preparation (NOP). The Los Angeles River is one of the County's most important natural and historic resources with a complex and layered history.

As a Program EIR (PEIR) the 2020 Los Angeles River Master Plan will be the guiding document for an estimated 107 projects over a period of 25 years. As stated in the NOP, the Master Plan study area spans fifty-one miles of river from Canoga Park to Long Beach and extends one mile from either side of the river's banks. The study area encompasses seventeen cities and unincorporated L.A. County communities.

In 1996, the Los Angeles River Master Plan expanded its vision from the originally single-purpose flood control into a multi-benefit amenity that reflects aesthetic, environmental, economic, and recreational values of residents. The 2020 Master Plan further expands on the 1996 vision through its nine objects and "kit of parts."

- I. The Los Angeles River Viaducts are significant historic resources and should be preserved

The Los Angeles River is home to a unique collection of the City's most iconic civic monuments. Constructed between 1909-1939 by the City of Los Angeles, the Los Angeles River Viaducts tell the story of the city's growth from a second-tier city into a burgeoning economic center.



The viaducts primary function was to serve as a permanent safe means of transportation for motorists and street cars to cross the river. Beyond their primary function, these bridges acted as a beacon of the City's City Beautiful urban design. To all those who arrived from the east by train, the viaducts conveyed a progress not only relating to economics but to progressive thinking and sophistication. The bridges were a way to let tourists, businessmen, and new residents know that Los Angeles was equal to San Francisco and the metropolitan cities on the east coast.

Because of their significance, several of the bridges have been designated City of Los Angeles Historic-Cultural Monuments (HCM). As a component of the PEIR, we urge the County to fully collaborate with the City of Los Angeles Bureau of Engineering to assess each bridge in relation to any proposed projects and overarching goals for access and modes of travel either at grade or below the spans along the river. An overall historic preservation plan should be incorporated for these resources and others as part of the PEIR, to better understand the needs of this important collection and ensure their longevity and viability.

II. Many historic resources lie outside the banks of the Los Angeles River and within the Study Area and therefore should be surveyed

As stated in the PEIR, the study area extends one mile in either direction from the river's banks along its fifty-one-mile course. Stretching from Canoga Park to Long Beach, there are countless historic resources within the project study area. Development along the river is integral to the story of Los Angeles and its history. The communities that have formed along the river's banks are as diverse as the County itself with unique stories and experiences.

To fully understand the Study Area's historic and cultural resources, the Conservancy urges the County to conduct a historic resources survey (incorporating existing inventories, such as SurveyLA) that fully aligns with the area affected and included within the PEIR.

Historic resources are not only architectural, but are often related to art, culture, and important events. The 2020 Los Angeles River Master Plan NOP lists nine objectives, the Conservancy believes historic preservation directly relates to the following three objectives:

- Objective #2 - Provide equitable, inclusive, and safe parks, open space, and trails;
- Objective #5 – Embrace and enhance opportunities for arts and culture; and
- Objective #7 – Foster opportunities for continued community engagement, development and education.

Incorporating historic preservation into the Master Plan has many community benefits. Preservation empowers communities through saving historic places that tell community history. Connection to the historic built environment provides an important tangible link to history that cannot be achieved through history books alone. Historic preservation is an equitable solution to history telling and through community engagement.

The PEIR should also acknowledge existing historic resources and sites of important events, including those that have already experienced the loss of built-environment features. One



example is the site of the Sleepy Lagoon along the L.A. River near Commerce, and the murder that took place there. This event and a series that followed sparked concern about the treatment of Mexican-American youth. It is also considered a key event in the lead up to Los Angeles' [Zoot Suit Riots](#) of 1943.

While we often celebrate the good, it's important to recognize our more difficult histories too. While this story and others is a difficult history ripe with racism and injustices, we can learn from it and grow in a positive way. Fully acknowledging these physical places as part of the PEIR is important.

III. The Conservancy requests a meeting with the County's 2020 Los Angeles River Master Plan representatives.

The Conservancy requests a meeting with the County's 2020 Los Angeles River Master Plan team. After reviewing the Master Plan's Steering Committee, there does not appear to be a high level of historic preservation expertise represented. We hope a meeting with County representatives will facilitate a meaningful dialogue and help to create a more well-rounded 2020 Master Plan.

IV. Conclusion

The Conservancy looks forward to the 2020 Los Angeles River Master Plan update. We see the river as an important resource for all Angelenos and a place for equitable engagement. Throughout its fifty-one miles, the Master Plan Study Area encompasses countless historic resources. Therefore, the Conservancy urges the County to conduct a historic resources survey throughout the entirety of the Study Area. Within the river's banks, the collection Los Angeles River Viaducts tells an important history unto itself. To ensure the longevity of these bridges, the County should complete a comprehensive historic preservation plan as part of and to be included within the larger master plan. Lastly, the Conservancy requests a meeting with Master Plan representatives to better understand and ensure historic preservation is fully incorporated within the 2020 Master Plan.



About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,

Adrian Scott Fine

Adrian Scott Fine
Director of Advocacy



Ariana Villanueva

From: Jill Sourial <jill.sourial@TNC.ORG>
Sent: Thursday, August 6, 2020 2:51 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan CEQA Program EIR Scoping

CAUTION: External Email. Proceed Responsibly.

Thank you for the opportunity to comment on the scope of the Draft Program EIR. While it is difficult to comment without a draft of the Master Plan yet available to the public, I would like to see an analysis of governance and proposed implementation mechanisms addressed in the Programmatic EIR.

In addition, my understanding is that the Programmatic EIR will be addressing impacts of two typical projects, which seems limited given the 51 miles covered in the plan and the number of interventions that are being proposed, as well as the distinct environmental justice considerations of many communities along the corridor. In particular, upstream projects have the ability to either facilitate or create an obstacle to downstream restoration and enhancement opportunities, so it is important to consider these impacts holistically.

Sincerely,
Jill Sourial

Jill Sourial
Director, Urban Conservation
Direct Line: (213) 787-9414
Cell: (213) 926-4785
jill.sourial@tnc.org

The Nature Conservancy
445 South Figueroa Street
Suite 1950
Los Angeles, CA 90071



nature.org
mundotnc.org

Ariana Villanueva

From: Milton Hallin <milton.hallin@me.com>
Sent: Thursday, August 6, 2020 2:50 PM
To: PW-LA River CEQA
Subject: Re: Scoping period extended to August 13: Input on scope of Draft 2020 LA River Master Plan PEIR

CAUTION: External Email. Proceed Responsibly.

Unsubscribe

Sent from my iPhone

On Aug 6, 2020, at 14:48, PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

The scoping period has been extended to August 13, 2020. Please send your input on the scope or issues you'd like considered in writing to the physical address or e-mail address shown below, and include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

For those who were unable to join us in the scoping meeting last week, the recording from the event is available online at <http://pw.lacounty.gov/go/larmpceqa>. Information about the CEQA process for the Draft Program EIR will continue to be updated on the website.

<image002.png>

For questions or concerns about the 2020 LA River Master Plan document, please visit www.larivermasterplan.org or submit your comments to LARiver@pw.lacounty.gov.

Ariana Villanueva

From: Sarah Rascon <sarah.rascon@mrca.ca.gov>
Sent: Thursday, August 6, 2020 2:25 PM
To: PW-LA River CEQA
Subject: MRCA Comments RE: 2020 LA River Master Plan Draft Program Environmental Impact Report
Attachments: LARMP_MRCA PEIR Comment Ltr_final.pdf

CAUTION: External Email. Proceed Responsibly.

Hello,

Please find attached the following comments from the Mountains Recreation and Conservation Authority regarding the Notice of Preparation for the proposed 2020 LA River Master Plan (Project) Program Environmental Impact Report (PEIR). Thank you for your review and consideration.

Sarah Rascon
Urban River Program Officer
Mountains Recreation and Conservation Authority
Los Angeles River Center and Gardens
570 W. Ave. 26, Los Angeles, California 90065
O: (323) 221-9944, Extension 109
C: (323) 354-2003
[Visit us on Facebook](#)



MOUNTAINS RECREATION & CONSERVATION AUTHORITY
Los Angeles River Center & Gardens
570 West Avenue Twenty-Six, Suite 100
Los Angeles, California 90065
Phone (323) 221-9944 Fax (323) 221-9934

August 5, 2020

Ms. Ariana Villanueva
Los Angeles County Public Works
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

<< Transmitted via electronic mail: LARiverCEQA@pw.lacounty.gov >>

RE: 2020 LA River Master Plan Draft Program Environmental Impact Report

Dear Ms. Villanueva:

The Mountains Recreation and Conservation Authority (MRCA) respectfully submits the following comments to the County of Los Angeles, Department of Public Works (Public Works) on the Notice of Preparation (NOP) for the proposed 2020 LA River Master Plan (Project) Program Environmental Impact Report (PEIR) which seeks to evaluate any potential impacts on the environment pursuant to the California Environmental Quality Act (CEQA). The proposed Project is located along the Los Angeles River (LA River) a 51-mile-long, 2-mile-wide corridor (1-mile on each side) of the LA River in Los Angeles County and spans 17 cities and unincorporated Los Angeles County (18 total jurisdictions). Although the LA River was channelized between the late 19th and mid-20th centuries to protect lives and property from flooding as the LA region rapidly grew and transformed to a largely urbanized area, habitat and wildlife have flourished throughout and along the river. Currently, an estimated 1 million people live within 1 mile of the river.

The MRCA is a public agency which was established in 1985 pursuant to the Joint Powers Act and is a partnership between the Santa Monica Mountains Conservancy (SMMC), the Conejo Recreation and Park District, and the Rancho Simi Recreation and Park District. The MRCA manages more than 75,000 acres of parkland and is dedicated to the preservation and management of local open space and parkland, wildlife habitat, watershed lands, and trails as well as ensuring public access to public parkland. As advocates for the Los Angeles River, we have actively acquired and developed open spaces adjacent to the River. We have and continue to develop and provide planning of River and tributary path greenways and existing parks and planned future parks. Additionally, the MRCA also operates and manages the only two River Recreation Zones, which were areas designated for in channel use, upon the river being deemed a traditional navigable waterway by the U.S. Environmental Protection Agency in 2010, which created protections throughout the river's watershed. The MRCA has been an active participant throughout the Project planning process serving on the LA River Master Plan steering committee.

We have compiled below a list of items which we would like to share with you and hope will be thoroughly addressed before the draft PEIR is approved.

Geography

Currently, this analysis is limited to the 51 miles of the LA River, beginning in Canoga Park within the City of Los Angeles, extending to Long Beach where the river meets the Pacific Ocean. Furthermore, the proposed project area extends up to 1-mile wide on each side of the river corridor, for a total of 2 miles, one on each side of the river, being defined as the study area. As subject experts know, the river does not begin at the headwaters in Canoga Park, but rather at the tributaries which originate in the mountain ranges in the Los Angeles Basin. The watershed is vast and although we realize it would be challenging to include all tributaries in the Los Angeles River watershed, there are significant tributaries which account for majority of the water in the river which should be considered for incorporation. The Upper Los Angeles River and Tributaries (ULART) Revitalization Plan analyzes and plans for major tributaries within the watershed; given that opportunities identified in the ULART plan are congruent with Public Work's mission, it would be highly beneficial to expand the County's reach to include tributaries within ULART under the PEIR, which would truly produce a cumulative analysis and regional impact, which the County has stated as being a goal of the Project.

Other planning efforts underway also include the CA High Speed Rail (HSR) project. The proposed alignment from Burbank to Los Angeles is currently in its planning process and poses significant and long-term impacts to the river and adjacent lands, including the threat to impede public access. Another project along the river with substantial beneficial impacts is the Los Angeles River Path project by Metro, which closes a significant 8-mile gap on the river path between the cities of Los Angeles and Vernon. The PEIR should have the foresight to include HSR cumulative impacts and address adverse impacts, as well as LA River Path alternatives included in the project analysis.

Aesthetics

Not only has public perception changed toward the LA River because of its navigable designation, but also because of its visual characteristics. When water, vegetation, habitat and wildlife are found in the river, like many river's outside of Los Angeles, it is then that people realize the value of a natural resource that once existed, a natural and wild river. The PEIR is expected to describe the existing visual character of the proposed Project study area and surrounding areas, and will identify key visual resources and scenic views. There are few naturalized areas in the LA River which remain and should be preserved, including the Sepulveda Basin, Griffith Park, and the Glendale Narrows. The probable impacts of the Project should not include substantial adverse effects on key visual resources and scenic vistas. Although one of the primary functions of the Flood Control District is to maintain flood capacity, it is our hope and expectation that many of the existing characteristics will not be compromised for flood control purposes, but rather will be preserved and enhanced to further create a thriving, riparian ecosystem. The mission

of the Flood Control District has since been expanded to include maximum environmental and ecological benefits, as well as recreation - all of which contribute to river aesthetics.

Biological Resources

The LA River contains an abundance of biological resources, existing both in the river channel and adjacent to the river within the 2-mile-wide study area of the river corridor. The rich riparian habitat that thrives off the existing water sustains vegetation, plants and wildlife along with their habitat. The river and its adjoining areas is home to aquatic and non-aquatic invertebrates, endangered species, such as the Least Bell's Vireo, the red-legged frog, and more than 20 species of birds. Additionally, the river is a significant stop along the Pacific flyway being essential for migratory birds. In order to best evaluate the impacts of the project, all of the following should be taken into consideration and assessed in the PEIR, along with appropriate consultation with the Department of Fish and Wildlife. Additionally, should the PEIR be sufficient to allow for channel modifications, such as those proposed in the City of Los Angeles Fish Passage Study led by Stillwater Sciences and funded by Wildlife Conservation Board, endemic and native endangered fish could be reintroduced.

Hydrology/Water Quality

An opportunity presented by the PEIR includes the ability to analyze the differences between the existing conditions and the future conditions with respect to Hydrology and Water Quality in the river. Analysis should thoroughly analyze pollutant sources and concentration of pollutants- how such pollution concentration levels would impact habitat, wildlife and human uses, thus affecting compliance with the Federal Clean Water Act and safe water quality uses. Also, changes in the impervious surfaces, application of stormwater infrastructure, and discharges, affecting sensitive habitats such as the estuary. Given the potential for reduced discharges, water quality standards could be affected, specifically as it pertains to water quality standards of surface/groundwater that could be degraded. Also, currently underway is a study by the State Water Resources Control Board analyzing river flows; the PEIR should include analysis for how the LA River Flows Study will be incorporated.

Land Use/Planning/Air Quality

There are a variety of land uses that occur adjacent to the LA River in the County and within each of the cities that which the study area analyzes. The PEIR should evaluate the compatibility of the proposed Project with neighboring areas within all of the jurisdictions, analyze and mitigate change to or displacement of existing uses. The proposed Project is located in such a publicly important area that public access should be a priority when planning for uses, while creating a cadence of accessways, access points and amenities. These opportunities offer current and future restored habitat on urban public lands which are scarce.

Given the scale of projects in the Kit of Parts, many of which are listed in the Project, those that specifically are related to housing should only consider transit-oriented

developments (TODs) that are adjacent to public transportation, in order to reduce vehicle miles traveled (VMT) and to mitigate the potential to drastically increase traffic congestion in already dense neighborhoods where air quality by the single largest polluter, being vehicles, would be exacerbated further contributing to Greenhouse Gas (GHG) emissions.

Public Services

It is anticipated that use of the river will increase and the PEIR should determine, at a program-level the impacts and need for Public Services — including fire protection, public safety which should be provided by the appropriate law enforcement, such as a Ranger, homelessness assistance and encampment cleanups, as well as other public facilities. The PEIR should assess available information on the current demand for public services against any new demand that is created by Project improvements. The PEIR should review the 2019 Los Angeles River Ranger Program Establishment Plan in order to ascertain the issues and recommendations provided through community consensus.

Recreation

Stakeholders and leaders have worked years to allow for recreation, both in channel and along the river. Today, passive recreation is one of the most popular uses of the river which include walking, running, biking, fishing and kayaking. The river offers opportunities for mental and physical health for the 18 jurisdictions throughout the study area, serving not only the estimated 1 million people who live within 1 mile of the river, but also those who travel from far distances to experience an urban river. The PEIR should address the proposed Project's potential impact on notable recreation areas and the river recreation zones; impacts to regional, neighborhood, and local parks and those in planning; trails; and other local recreational facilities and uses. The PEIR should analyze the Project's likelihood to increase the use of existing neighborhood and regional parks or other recreational facilities and the substantial physical deterioration that could be accelerated. Additionally, the PEIR should consider any adverse physical effects on the environment. Recreation access should only be enhanced for public use while fostering natural, recreation areas, and protecting existing investments that have been made in the river.

Population/Housing

While the state is in a housing crisis, the proposed Project's potential for inducing population growth and displacing people within the County remains a threat to both government and existing communities. As a member of the Los Angeles Regional Open Space and Housing (LAROSAH) Collaborative, the MRCA does not believe that affordable housing and open space protection need to be mutually exclusive; however, when planning for housing, we must propose solutions for the appropriate type of housing- affordable and low income, while maintaining protections for open space. The MRCA supports investments in communities which also protect the social fabric of respective neighborhoods. Other considerations should include the land use analysis, additional infrastructure and construction that would be required, as well as potential adverse effects to the environment and wildlife while undergoing improvements for

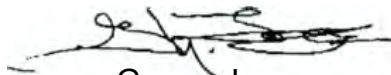
Ms. Ariana Villanueva
August 5, 2020

Page 5

population growth. Los Angeles is already a highly urbanized County, lacking open space, parks, sufficient habitat for wildlife, and permeable surfaces which should be championed throughout the PEIR for a cumulative analysis and regional environmental impact.

Thank you for your consideration of our comments. Please address any future documents, notices, and questions to myself at the above letterhead address, by phone at (323) 221-9944 x 109, and email at sarah.rascon@mrca.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "George Lange", with a horizontal line drawn through it.

George Lange
Chairperson

Ariana Villanueva

From: Truong, Cassie <TruongC@metro.net>
Sent: Thursday, August 6, 2020 2:03 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan - PEIR Comments
Attachments: 200806_LA Master Plan (1).pdf

CAUTION: External Email. Proceed Responsibly.

Greetings,

Thank you for the opportunity to comment on the 2020 LA river Master Plan in the County of Los Angeles. Attached are Metro's comments. **Please kindly reply to confirm receipt.**

Please contact Shine Ling at 213.922.2671 or lings@metro.net if you have any questions.

Best,

Cassie Truong

LA Metro

Transportation Associate II

Transit Oriented Communities

213.418.3489

metro.net | facebook.com/losangelesmetro | [@metrolosangeles](https://twitter.com/metrolosangeles)

Metro's mission is to provide world-class transportation for all.



Metro

August 6, 2020

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
Sent by Email: lariverceqa@pw.lacounty.gov

RE: 2020 LA River Master Plan
Notice of Preparation of Program Environmental Impact Report (PEIR)

Dear Ms. Villanueva:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed 2020 LA River Master Plan (Master Plan) located in Los Angeles County (County). Metro's aim is to create and maintain a world-class transportation system that focuses on providing the best customer experience possible and enhancing the quality of life for those who live, work, and play within the County. As transportation planner and coordinator, designer, funder, builder and transit operator, Metro is constantly working to deliver a regional system that supports increased transportation options and associated benefits, such as improved mobility options, air quality, health and safety, access to goods and services, and quality of life.

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the County with specific detail on the scope and content of environmental information that should be included in the Program Environmental Impact Report (PEIR) for the Master Plan. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.¹

PEIR Project Description

The proposed Master Plan encompasses an area along a 51-mile-long, 2-mile-wide corridor (i.e., 1 mile on each side) of the LA River in Los Angeles County and spans through 17 cities and unincorporated Los Angeles County (18 total jurisdictions). The proposed 2020 LA River Master Plan builds on the adopted 1996 Master Plan and other regional planning studies prepared since then. It is intended to improve 51 miles of connected open space along the LA River to improve health, equity, access, mobility, and economic opportunity for the diverse communities of Los Angeles County while still providing flood risk management.

Recommendations for PEIR Scope and Content

Metro Planning Efforts

Metro would like to advise the County that it has adopted three plans of interest that are within the Master Plan's area of study. Metro encourages the County to review these plans and identify synergies with the Master Plan and opportunities to support and implement their goals and recommendations:

¹ See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

1. Connect US Action Plan: Completed in 2015, the Connect US Action Plan's fundamental goal is to provide pedestrians and cyclists a safe and pleasurable passage to transit between Los Angeles Union Station, 1st/Central Station and the adjacent historic neighborhoods. Enhancing walkability and bikeability will facilitate a second goal, connecting people who live and work in adjacent neighborhoods to one another. More information is available at: <https://www.metro.net/about/union-station/connect-us-action-plan/>
2. Active Transportation Strategic Plan (ATSP): Adopted in 2016, the ATSP is Metro's county-wide effort to identify strategies to increase walking, bicycling and transit use in Los Angeles County. The ATSP's focuses on improving first and last mile access to transit and proposes a regional network of active transportation facilities, including shared-use paths and on-street bikeways, and develop a funding strategy for implementation. More information is available at: <https://www.metro.net/projects/active-transportation-strategic-plan/>
3. First/Last Mile Strategic Plan: Completed in 2014 and authored by Metro and the Southern California Association of Governments (SCAG), the First/Last Mile Strategic Plan an approach for identifying barriers and planning and implementing improvements for the first/last mile portions of an individual's connection to transit. The plan is available at: <https://www.metro.net/projects/first-last/>

Metro Corridor Planning Efforts

Metro is studying the following new corridor projects which are within the Master Plan's study area. These projects should be incorporated into the PEIR's analysis. In addition, the County should consult with the Southern California Regional Rail Authority, which operates Metrolink, on their capital planning efforts.

1. Metro's LA River Path Project: Funded by Measure M, Metro is evaluating a new bicycle and pedestrian path along an approximately eight-mile stretch of the Los Angeles River from Elysian Valley through Downtown Los Angeles to the City of Maywood. Metro released a Notice of Preparation for this project in October 2019 with a target operation date by 2027. More information may be found online at: <https://www.metro.net/projects/lariverpath/>.
2. West Santa Ana Branch Project: Metro is evaluating a potential new transit system connecting southeast Los Angeles County to downtown Los Angeles via the abandoned Pacific Electric Right-of-Way/West Santa Ana Branch Corridor (PEROW/WSAB) and a combination of local streets and private and Metro-owned rail ROW. This project crosses over the Los Angeles River in the City of South Gate. For additional information, please see <https://www.metro.net/wsab>.

Adjacency to Metro-owned Right-of-Way and Facilities

The Master Plan's study area includes Metro-owned ROW and transit facilities for Metro Rail, Metro Bus, and Metro Bus Rapid Transit operations. In particular, these lines cross over the Los Angeles River: the G Line (Orange), in the San Fernando Valley; and the A Line (Blue), to the north of Long Beach in between Del Amo and Wardlaw Stations. In addition, the Metrolink commuter rail service is adjacent to parts of the Los Angeles River, operated by the Southern California Regional Rail Authority (SCRRA), portions of which use Metro-owned ROW. Buses and trains operate 24 hours a day, seven days a week in these facilities.

The PEIR's transportation section should analyze potential impacts on Metro and Metrolink facilities within the Master Plan's study area, and identify mitigation measures or project design features as appropriate. Critical impacts to be studied should include (without limitation): impacts of construction and operation of future projects to the structural and systems integrity of rail tracks, bridges, and related infrastructure; and disruption to bus or rail service.

The following provisions should be used to develop mitigation measures and/or project design features that address these potential impacts to Metro Bus and Metro Rail infrastructure. Additional information is available from the Metro Development Review Team at <https://www.metro.net/devreview>.

1. Technical Review: The Project Sponsor shall submit engineering drawings and calculations, as well as construction work plans and methods including any crane placement and radius, to evaluate any impacts to Metro's infrastructure in relationship to the Project. Before commencement of any construction activities, the Project, the Project Sponsor shall obtain Metro's approval of final construction plans.
2. Construction Safety: The construction and operation of the Project shall not disrupt the operation and maintenance activities or the structural and systems integrity of Metro's transit infrastructure. Not later than one month before Project construction, the Project Sponsor shall contact Metro to schedule a pre-construction meeting with all Project construction personnel and Metro Real Estate, Construction Management, and Construction Safety staff. During Project construction, the Project Sponsor shall:
 - a. Work in close coordination with Metro to ensure that Station access, visibility, and structural integrity are not compromised by construction activities or permanent build conditions;
 - b. Construct a protection barrier to prevent objects, material, or debris from falling onto the ROW;
 - c. Notify Metro of any changes to demolition construction activities that may impact the use of the ROW;
 - d. Permit Metro staff to monitor demolition and/or construction activity(ies) to ascertain any impacts.
3. ROW Entry Permit: For temporary or ongoing access to Metro Rail ROW for demolition, construction, and/or maintenance activities, the Project Sponsor shall complete Metro's Track Allocation process with Metro Rail Operations and obtain a Right of Entry Permit from Metro Real Estate. Approval for single tracking or a power shutdown, while possible, is highly discouraged; if sought, the Applicant shall apply for and obtain such approval from Metro not later than two months before the start of Project construction.

The following provisions should be used to develop mitigation measures and/or project design features that address these potential impacts to Metrolink infrastructure:

1. Technical Review: The Project Sponsor shall submit engineering drawings and calculations, as well as construction work plans and methods including any crane placement and radius, to evaluate any impacts to the Metrolink infrastructure in relationship to the Project. Before issuance of any building permit for the Project, the Project Sponsor shall obtain SCRRA's approval of final construction drawings.
2. Construction Monitoring: The Project Sponsor shall permit Metro and/or SCRRA staff to monitor construction activity to ascertain any impact to the ROW. During construction, the Project Sponsor shall construct a protection barrier to prevent objects, material, or debris from falling onto the ROW. The Project Sponsor shall notify Metro and SCRRA of any changes to the construction/building plans that may or may not impact the ROW.
3. ROW Access: The Project Sponsor should contact SCRRA for Right-of Entry requirements. Information can be found at www.metrolinktrains.com. Other requirements may include permits for construction of buildings and any future repairs, painting, graffiti removal, etc., including the use of overhead cranes or any other equipment that could potentially impact railroad operations and safety. Frequent access for maintenance tasks such as graffiti removal, will necessitate an active license agreement.

Other NOP-related Comments


1. Transportation: For the EIR's transportation section, the County should clarify whether its analysis of Vehicle Miles Traveled (VMT) will (or will not) use data that incorporates the effects of the recent coronavirus pandemic. The County should also advise on the status and use of the pending update to the County's transportation assessment guidelines.

2. NOP page 3, "Proposed 2002 LA River Master Plan Elements": Recommend including Environmental Graphics in Kit of Parts.
3. NOP page 4, "Program Level Analysis, Tiering, and Later Activities": Consider "future projects" to replace "later activities".

If you have any questions regarding this letter, please contact me by phone at 213-922-2671, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely,



Shine Ling, AICP
Manager, Transit Oriented Communities

Ariana Villanueva

From: Renee Lawler <Renee_Matt@live.com>
Sent: Thursday, August 6, 2020 1:57 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan CEQA Program EIR comments
Attachments: 1977EIREquestrianZoneMapSanFranciscoAve.pdf; sample docs for OOI and 2020 DEIR arguments July 29 2020.pdf

CAUTION: External Email. Proceed Responsibly.

August 6, 2020

To: Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

Re: Scoping comments for Draft 2020 LA River Master Plan

The language of the law, AB530, is primary in understanding the scope and objective for those working on this DEIR and in order to be aligned with the State Law and the reason and purpose of this entire Lower Los Angeles River Revitalization process. The revision of the LA River Master Plan for the South LA River, sovereign land, is stated in AB530 – that due to the linear nature of the river, no one entity could consider all the complex issues when planning along the river corridor, therefore, a regional approach to project review and planning was necessary. The chosen “Program” EIR may at this point in the process, may not achieve those stated objectives and the purpose of the law that initiated the entire effort.

Past performance by key participants in the LA River Revitalization Master Planning effort, members of the Task Force, (entities and municipalities, such as the City of Long Beach and LA County Flood Control District), have exhibited resistance to cooperate when tasked with addressing flood control mitigation both site specific and broader reaching areas. The necessity for cooperation between various entities, public or private, for the LA River corridor which includes the lands on either side is the essence of the law, AB530. During the CEQA DEIR review, the concept of collaboration and accountability for planning and project review within the corridor to be inclusive of more entities on a larger scale, not just in the hands of the local entities – to be in keeping with the primary objective and legislative intent.

There are additional guiding documents such as the 1999 Maintenance and Use Agreement between the LA Co Flood Control District and the Army Corps of Engineers that must be considered in this DEIR process to understand where the responsibilities lie with regard to the primary objective of flood control. Flood impacts to the river lands and their established and adjoining communities, animals and historic equestrian trail network are also a regional concern. The 1999 agreement, for instance, outlines responsibility of the “District” and local entities with respect to flood control infrastructure, reporting, response, project review and impact assessment for projects of all sizes within the region. When a project is proposed in the corridor (including one mile on either side or more if/as needed, site specific or broad-scale), LACFCD should be involved in review of the storm drain infra-structure. Regardless of what City or the immediate jurisdiction any storm drain is in, those structures are all ancillary to the flood control channel should be reviewed on a project by project basis for their effectiveness to control flooding within the vicinity, their effectivity to support the purpose of the flood control system on the whole and to address any gaps or deficiencies existing or that would add to cumulative negative impacts should there be a project or no action taken. This is an obligation of LACFCD and terms for their existence when established as a necessary entity in the region for flood control management on a cooperation basis with the Federal entity the Army Corps.

By using the Program EIR and placing responsibility on a local level review the goal and objective of AB530 may not be actualized. Based on past history, local level project review in the LA River corridor is insufficient, thus the legislation, so to propose through a Program DEIR the continuation of local level site specific CEQA review will likely result in more un-mitigated cumulative negative impacts for the historic equestrian trails, lands and established communities with concerns, features, issues that are layered, regional in nature and require a more complex review than the local entities have traditionally conducted.

The DEIR is using the assumption that the local entity would use a “kit of tools” or review in 5 mile segments. The problem with that is that the river has features that should not be broken into segments – such as the historic equestrian trail. Much of the trail demise and un-mitigated cumulative impacts to the equestrian lifeline, is due to local level planning and no real review/accountability on a larger linear scale for the horse trail. The horse trail, and the flood control channel and the storm drains which are supporting ancillary systems, and the open space in channels, outer channel and adjoining vacant or open lands that support this wildlife, trail and recreation and historic community corridor needs to be considered in this DEIR.

The horse trail along the LA River and vicinity was dedicated in 1944, for the purpose of preserving a culturally significant example of CA history. The bridle/riding/hiking trail (different from the bike path which was the utility road on top of the berm converted to a bike path in the 1970s). The horse trail is still used today for recreation was a connector feeder trail that ultimately merged with the Anza Trail at the Rio Hondo and was used by the Spanish and Ranchos. The trail has been compromised, obstructed, built upon, encroached upon by trash, motorcycles and homeless. The trail is a linear feature, just as the river is and it is a prime example, along with control of flooding why in order to address all the complex issues when planning a project large or small, broad or site specific along the LA River corridor a regional “committee” approach is needed instead of business as usual leaving it to the local level to “do the right thing” through Program EIR – so maybe there is some other approach needed. The essence of AB530 – the legislation that prompted the 41 member steering committee, the Lower Los Angeles River Revitalization Plan and the reason this DEIR is being conducted, conveys that because history has proven many local entities don’t have or use the tools to adequately address these many concerns and the result is impacts accumulate and go un-mitigated. The State legislation, that passed unanimously under Speaker, Anthony Rendon acknowledged the fact that a regional approach for the river corridor(s) that includes the river lands and 1 mile on either side, was needed, and that no one single entity could possibly anticipate or take all the proper steps to adequately review CEQA impacts for the linear LA River lands that include the linear/parallel historic equestrian trail and the associated open spaces. The idea that a single entity, such as the City of Long Beach could properly mitigate or proceed with “no project” for the South LA River lands and 1 mile on either side on a project basis is opposite to the law that prompted this process and needs to be addressed in this DEIR from that perspective and if another type of CEQA review is required to achieve the objectives of AB530 primarily and secondarily the Revitalization Steering Committees’ primary objectives, which I will address individually.

2020 LA River Master Plan Objectives:

Flood control risks – The storm drain infrastructure is currently incapable of handling the rain run off for current density in the City of Long Beach vicinity. The City communicated that fact to the County and denied taking corrective action despite known flooding conditions. “Pipes are too small” was stated from City to County, both well aware of the known deficiencies and yet the City of Long Beach opted not to cooperate with LA Co Flood Control District in correcting, documenting, reporting or cooperating in mitigating, despite both parties having combined responsibility via storm water NPDES permit requirements, 1999 Maintenance and use Agreement with the Army Corps of Engineers, 1996 & 2006 & 2020 LA River Master Plans etc. Due to the fact that they have not upgraded the most of the storm drain infrastructure, despite knowledge and notice to do so, in more than just a “site specific location” any additional density along the flood control river corridor, in the City of Long Beach for instance, or more site specific such as the proposed OOI Integral development at what has been proposed regional parkland and historic equestrian zone for decades of master plans, will stress an already under-sized flood control storm drain system for the storm pump station SD6. This proposed development will cause reoccurrence of the known flooding, likely with increased intensity and adding more properties for the negative impacts that the City and Flood Control district recently mediated over. The rain run-off from Wardlow/OOI parcels, Wrigley Heights and the Los Cerritos neighborhood flows southward and through Wrigley North (south of Wardlow). While one of the intended destinations for run off is to Storm Drain

Station #6 at Willow & 26th, the problem is that most rain run-off never makes it to the drain pipes, which the City recognizes. But because they know their piping and system is sub-standard and in many locations undersized, they are ok with the excess (due to more and more density and impermeable surfaces compounds) being diverted to the river lands instead of to the pipes. That excess routes to flood properties that are river adjacent where there is no infra-structure to handle that cumulatively increased excess density run-off and subsequently is never reported accurately as to the capacity for the pump and pipe systems. This is an example of a complex issue that AB530 referred to, one that has much larger impact but left in the hands of the local entity and the District is not being adequately reviewed for conduct, procedure and mitigation.

Safe equitable, inclusive parks, open space, and trails – The 2020 LA River master plan and prior have outlined the OOI property as necessary open space to enhance the park poor needs of the south LA River and the citizens who reside in the west side of Long Beach. Also this property combined with the vacant golf driving range to the north and the Wrigley Greenbelt south of Wardlow represent the largest swath of land along the river adjacent to the historic horse bridle-equestrian/hiking trail. That horse trail (not the utility road turned bike path in 1970 on top of the berm that crosses and merges the older historic trail), is the one of the oldest recognized features in the vicinity that represents 2 historic periods in CA history and the life line for culturally significant minority group and several river-adjacent residential, commercial and open space equestrian zones. The integrity of the trail from an historic mobility necessary function as well as more recent history to include recreational use will be negatively impacted if the land ear-marked for the past 30 years for parkland/equestrian zone at Wardlow and the LA River is developed and not retained open space. The trails and open spaces are the life-line for the horse culture in the LA River vicinity and we must rely on un-obstructed trail passage, safe mobility as any other user group (biking or walking). In addition it is open space adjacent to the trail and to the few remaining equestrian housing horse-overlay zones that need large 8,000 s.f., minimum lot sizes with set-backs, and trail access easements for the health, safety and protection for the historic lifestyle, animals and integrity of the trail from negative impacts brought by non-compatible uses such as high density development. The City of Long Beach conducted an in-depth EIR review in 1977 for the protection of these river-adjacent zones and that EIR should be considered in this DEIR process.

Support healthy connected ecosystems. – The OOI parcels are not site specific due to their connection to the linear historic horse trail and open space still present to the north and south and adjacent direct proximity to the trail and river lands and flood control channel. It is part of the large linear environmental corridor that many species depend upon and so this land within the one mile zone, ear-marked to be preserved open space for the last 3 decades of master plans is subject to development without considering for past or present master plan and this DEIR. The river environmental corridor, as a resource, has been vastly and negatively altered since it was deeded to the State of CA. The south LA River, sovereign land - owned by the people of the State of CA, as acknowledged by AB530 and the courts, continues to experience negative impact every time development occurs on or adjacent to the river lands. The corridor ecosystem is not defined by the man-made parcel lines. The river corridor and trails were once all open space; however with the present day man-made flood control channel and short term memory of what should be, is being eaten up by development right up to the flood control berm edge. That type of encroachment on the corridor is just as negative an impact as building right up to the edge of any wetlands or coastal protected zone.

Enhance opportunities for equitable access to river corridor. – The corridor includes wild species and domestic horses and historic and established communities that are being squeezed out of the corridor due to being overrun by density development and encroachments, biking, trash, motorcycles, homeless and flooding. It is not equitable that the biking community and housing density should overtake the needs of the historic occupants, horses and wildlife that require open space and low density.

Embrace and enhance opportunities for arts and culture. – The cultural significance of the horse and rancho lifestyle is being extinguished by this proposed OOI development on 20 acres river and trail adjacent. The OOI area was zoned Horse overlay zone in 1977 requiring large 8000 s.f. minimum lots, set-backs for the health and safety of the horses and residents, and with detailed CEQA review for the purpose of preserving and protecting the horse culture and adjacent trail network of significance. Furthermore, the City of LB indicated in their new Land use Element of the General Plan “LUE” that the “Wrigley Heights equestrian zone” would remain and Councilman Uranga and Linda Tatum re-iterated so during the LUE debates; yet the City continues to omit and ignore the horse overlay zoning low density requirements to protect that culture. They

would rather not acknowledge the Horse Overlay in their “other zones” and intentionally assigned the “founding and contemporary” place type to this horse-overlay zone so they could set the stage for this higher density project in what should be a lower density Horse overlay zone or entirely open space with a compatible parkland multi-use (walk/bike/horseback ride) user group format. This is another example of a local entity not considering the master plan prior or present or the complex negative impacts this type of development (large enough to consider it outside the limits of DEIR self-imposed “site specific” exception) as it poses cumulative negative impacts for a large area that includes but is not limited to flooding, wildlife, historic equestrian, traffic, noise, air, dust pollution and more.

Address potential adverse impacts on housing affordability and people experiencing homelessness. – How is this type of development going to address adverse impacts on housing when developing the OOI will further the extermination of a protected minority community that was supposed to be protected in this horse overlay zone?

Foster opportunities for continued community engagement, development and education. – The community has engaged over this property for decades. Even when included in 3 master plans spanning decades including a lengthy environmental review in 1977 that pre-dates CEQA resulting in the protective 20 page horse overlay zoning the City of Long Beach actively ignores those historic efforts. Furthermore, Al Austin and the City of Long Beach were participants of the 2020 LA River Master planning process and agreed to the concept of retaining the 58 acres that include the OOI parcels for open space but instead they continue to make spot zoning and LUE changes and to suit their development desires and have exhibited no intention of listening to the needs and wishes of the people and environmental concerns of which they are all well aware, driven instead by development dollars.

Improve local water supply reliability – The deficient storm drain pipes that allow the excess to flow and not make it to the pump stations continue to pose many risks and non-compliance concerns.

Promote healthy, safe clean water – same as above.

Documents to be considered in the DEIR process that relate to the LA River should include, but not limited to:

- 1972 Clean Water
- 1977 Horse Overlay zoning and EIR requirements
- 1996 LA River Master Plan
- 1999 Operation, Maintenance, Repair, Replacement & Rehabilitation agreement between LA County Drainage Area “District” and the Army Corps of Engineers
- Integrated Regional Water Management Plan – Greater Los Angeles Region
- Municipal NPDES Storm Water Permit Requirements of the City of Long Beach
- City of Long Beach Land Use Element (LUE) of the General Plan

Thank you for your consideration.

Respectfully,

Renee Lawler
renee_matt@live.com

F I N A L

environmental impact report

DEPARTMENT OF CITY PLANNING

LONG BEACH, CALIFORNIA

DATE

JULY 28, 1977

(CERTIFIED BY CITY
PLANNING COMMISSION)

TO

CITY PLANNING COMMISSION

FROM

CITY PLANNING DEPARTMENT

SUBJECT

PROPOSED HORSE OVERLAY ZONE
(E-7-77)

ADDRESS

CITY-WIDE

APPLICANT

CITY OF LONG BEACH

ZONE

R-1, R-2, C-3, M-1, M-2A

- (6) On industrial premises located southerly of Willow Street, northerly of Pacific Coast Highway, and westerly of the Terminal Island Freeway (M-2A zone).

Project Goals and Objectives

1. Protect the existing horse-keeping areas.
- ➔ 2. Protect land uses proximate to equestrian activities from potentially detrimental impacts.
3. Protect land uses in the vicinity of horse-keeping activities from future intrusions.

Principal Elements of the Project

The elements of the project consist of the conditions and requirements which would be imposed by the Municipal Zoning Ordinance for a Horse-Overlay Zone, the objectives which would be accomplished by application of the regulations, and the plans and petitions which delineate the properties to be zoned.

Approximately 50 - 60 acres of private land within the City of Long Beach are utilized for equestrian purposes, usually in conjunction with a single-family residence. Certain rights-of-way are also utilized for horse related activities.

The proposed ordinance would delete existing Section 9120.17 of the Zoning Regulations pertaining to fallout shelters in all use districts and replace it with a new set of regulations establishing the Horse District (H) land-use category. The proposed regulations are based on the concept of establishing horse overlay districts on the existing Zone Districts Map of the City. An overlay zone is a mapped zone that imposes a set of requirements in addition to those of the underlying zoning district. In an area where an overlay zone is established, property is placed simultaneously in two zones, and the land may be developed only under the conditions and requirements of both zones.

Overlay zones are described in the zoning text, mapped, and adopted by the governing body in a manner similar to conventional zoning. Provisions are administered through the usual zoning process. The provisions of this ordinance are summarized in Table 1.

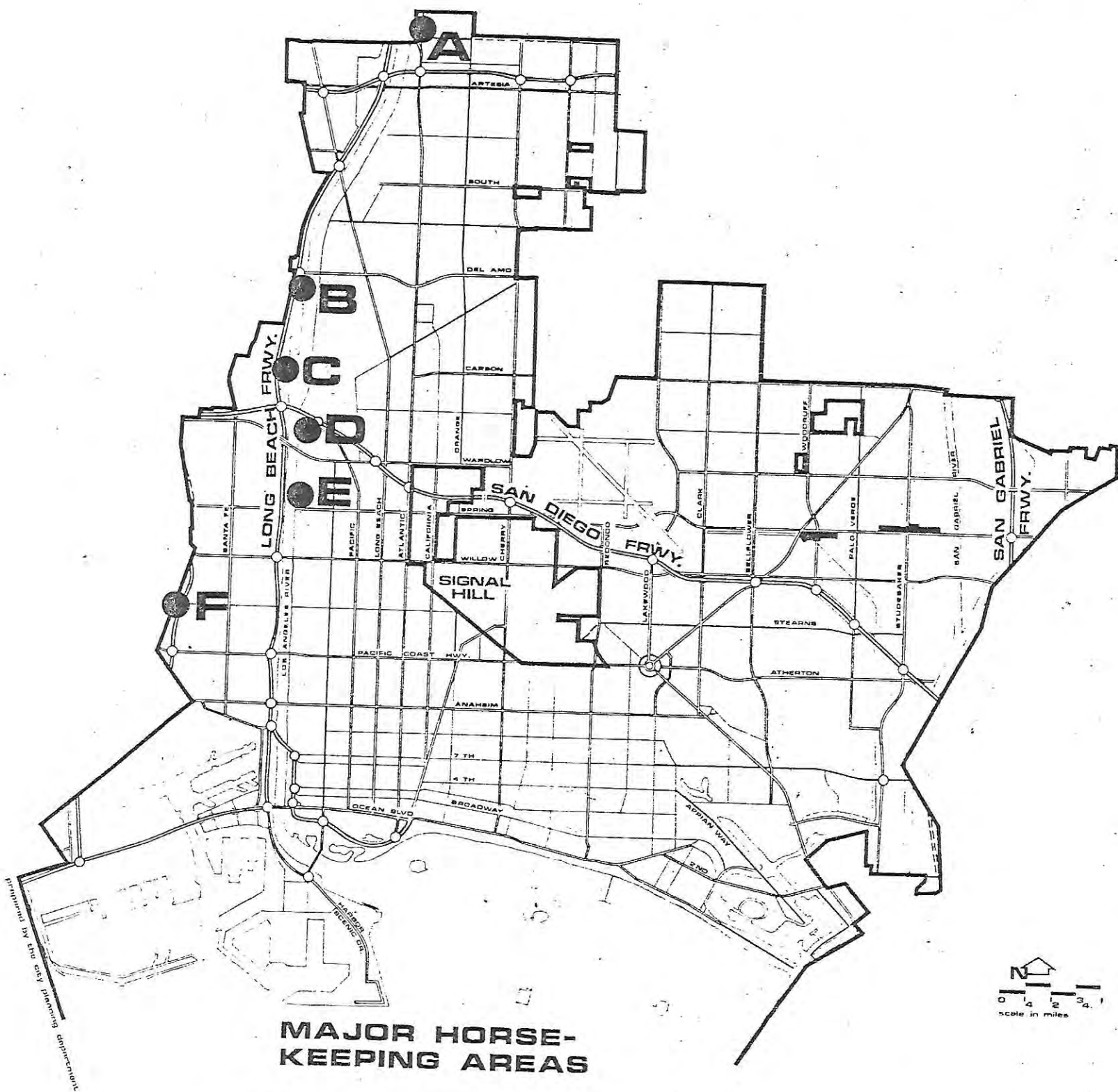


FIGURE 2

to the disadvantage of proximate land uses which are not protected by specific horse keeping regulations, as indicated by the complaint data in Table 3.

Persons living adjacent to equestrian facilities are generally not subject to any known health hazards. Although horses may be carriers of diseases carried primarily by insects, they are generally less susceptible than species more common to an urbanized setting. Further, local climate does not permit the harboring of encephalitis. Horses are less likely carriers of ringworm disease than are cats and dogs. Most of the population is adequately inoculated against contraction of tetanus. Manure stockpiling is controlled and enforced by the Health Department; this effectively controls related nuisances. In the opinion of Robert Hale, Director of Environmental Health, Long Beach Health Department, horse keeping is generally conducted in sanitary conditions, with no known detriment to public health.

Anticipated Impacts

→ The proposed ordinance would confer legal status to equestrian land uses and thus protect opportunities for equestrian-related recreation and lifestyles. The standards of the ordinance would, however, limit quartering of horses on specific areas of private parcels.

LAND USE

Environmental Setting

Current equestrian areas are indicated on Figures 3 through 8. An environmental inventory and assessment of the land use dynamics are presented in Table 6.

Anticipated Impacts

Implementation of the proposed ordinance would protect the legal status of existing equestrian areas and encourage eventual upgrading of related structures. Adjacent land uses would be protected by the standards of development and by the prohibition of equestrian activities in areas other than those designated in the overlay zone. Control over the number of horses and quarters for their keep would provide increased compatibility between equestrian and non-equestrian uses.

LVE

October 2019

10. Improve quality of life, health and overall livability through the implementation of the West Long Beach Livability Implementation Plan.
11. Respect and maintain the equestrian uses within Wrigley Heights and promote shared use and maintenance of the area trail system.



5

Implementation



OPERATION, MAINTENANCE, REPAIR, REPLACEMENT, AND REHABILITATION MANUAL

**LOS ANGELES COUNTY DRAINAGE AREA
CALIFORNIA**

DECEMBER 1999

**LOS ANGELES DISTRICT, CORPS OF ENGINEERS
LOS ANGELES, CALIFORNIA**

RECREATION

16. Various local recreation and planning agencies whose jurisdictions include parts of the flood control system may become increasingly interested in the recreational possibilities of the flood control rights-of-way. Since these lands are likely to remain in their present condition for some time, investment in the development of recreation facilities on them for public use seems justified; the Government's attitude encourages such use. Any proposed recreational facilities that involve discharges of dredged or fill material (including excavation) into waters of the United States, or involves work or structures in or affecting navigable waters of the United States, shall be authorized by the Regulatory Branch in a Corps permit.

17. Recreational features have been or can be developed within the basins of flood control dams and along the berm roadways of the channels in the form of bicycle, hiking, and equestrian trails. This development generally involves special berm and invert access ramps, under crossings and protective fencing, and occasionally more extensive recreational features.

18. Such uses generally do not interfere with flood control activities; some concern must be given, however, for the maintenance of proper access control to prevent unauthorized access to areas beyond the recreation limits, particularly during the storm season. Recreation proposals are evaluated through the usual review procedures, coordinated with the Recreation Resource Specialists of the District.

DEVELOPMENT FOR INCREASED LAND UTILIZATION

19. There has been an increased interest in private development within flood control rights-of-way to increase the utilization of lands adjacent to these rights-of-way. This increased utilization may involve the construction of a building or bridge which spans the channel, although proposals to use the berm roadway space for parking or loading are more common. The most significant proposals for development, however, involve covering the channel itself in order to connect both sides of the channel right-of-way. This type of development creates the question of maintenance for the channel cover. Since the cover is built by and for private interests, a public agency such as the United States Government or the Local Sponsor cannot be expected to maintain the cover, yet it is difficult to assign the responsibility for maintenance to a private interest. Current policy states that each proposal for development of this type will be reviewed on an individual basis.

20. In any event, a proposed development must be compatible with existing land use zoning. Since the United States does not establish zoning regulations, the responsibility for insuring compatibility of existing zoning with a proposed land use lies with the applicant, and any conflicts must be resolved before approval is granted by the United States. Any proposed private developments that involve discharges of dredged or fill material (including excavation) into waters of the United States, or involves work or structures in or affecting navigable waters of the United States, shall be authorized by the Regulatory Branch in a Corps permit.

MISCELLANEOUS

21. Proposals are frequently made for temporary use of flood control facilities or rights-of-way for a variety of purposes other than those previously discussed. Such proposals are highly diverse, ranging

LOS ANGELES RIVER

MASTER PLAN
JUNE 1996

Los Angeles County Departments of
Public Works
Harry W. Stone, Director

Parks and Recreation
Rodney E. Cooper, Director

Regional Planning
James Hartl, Director

National Parks Service
Rivers, Trails and Conservation
Assistance Program

and the
Los Angeles River Advisory Committee

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages 13

To

Renee Lawler

From Peg Henderson

Dept/Agency

Phone #

Fax #

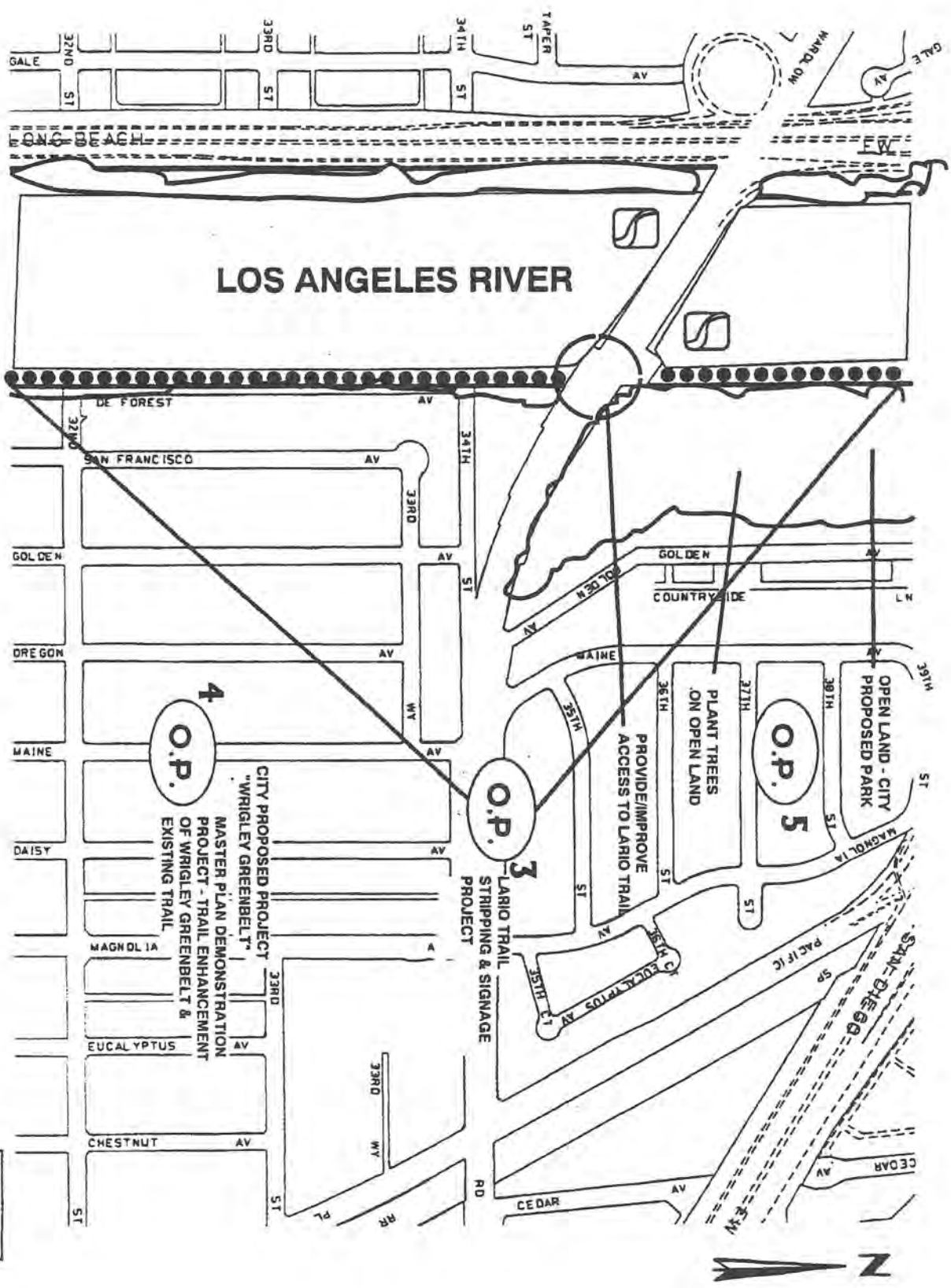
Fax #

NSN 7540-01-217-7388

5099-101

GENERAL SERVICES ADMINISTRATION

SCALE
1 inch equals
500 feet



F I N A L

environmental impact report

DEPARTMENT OF CITY PLANNING
LONG BEACH, CALIFORNIA

DATE

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(CERTIFIED BY CITY
PLANNING COMMISSION)

TO

CITY PLANNING COMMISSION

FROM

CITY PLANNING DEPARTMENT

SUBJECT

PROPOSED HORSE OVERLAY ZONE
(E-7-77)

SCOPE

CITY-WIDE

APPROVED BY

CITY OF LONG BEACH

DATE

R-1, R-2, C-3, M-1, M-2A

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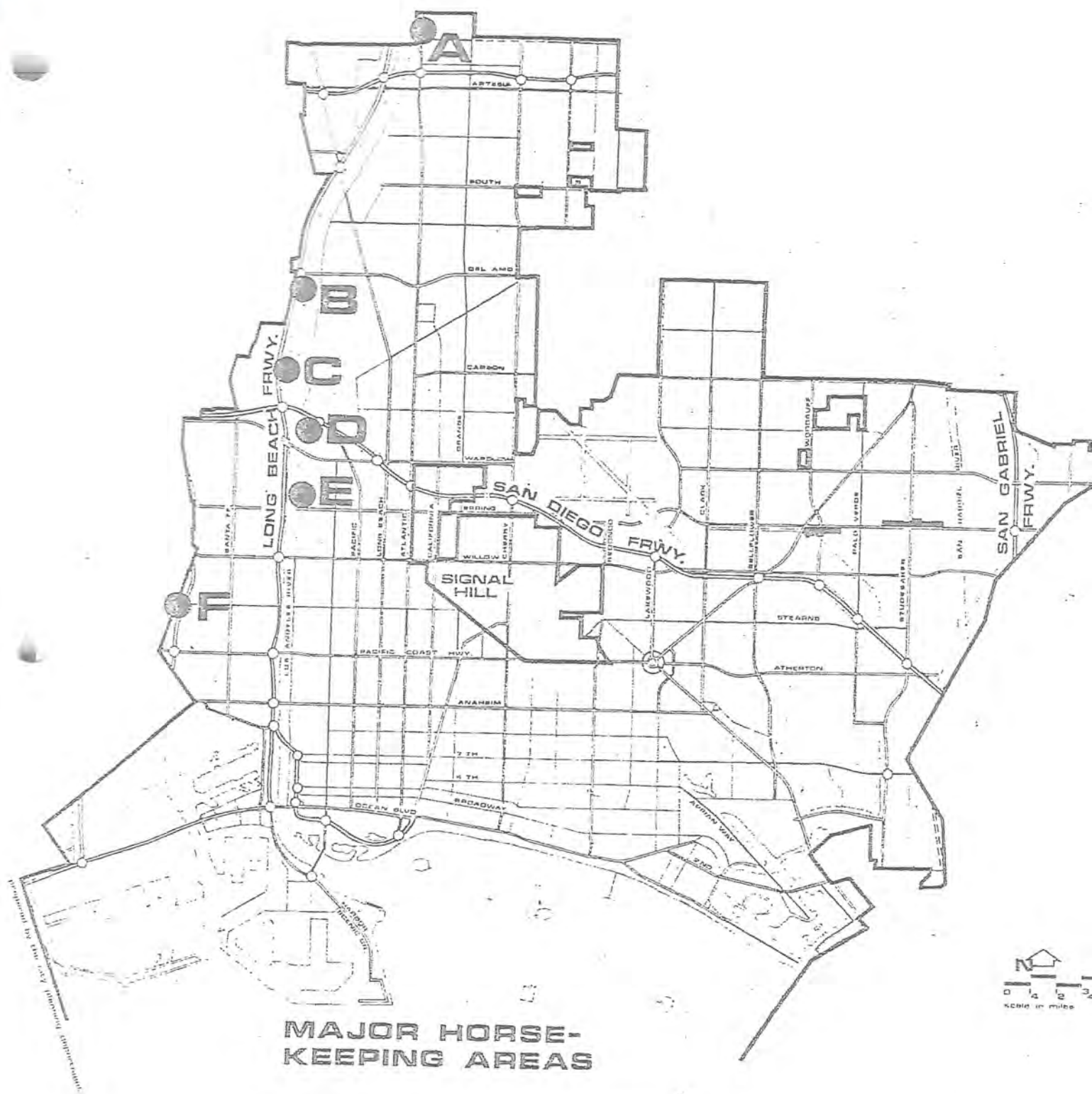


FIGURE 2



CITY OF LONG BEACH

DEPARTMENT OF PUBLIC WORKS

333 WEST OCEAN BOULEVARD • LONG BEACH, CA 90802 • (562) 570-6383 • FAX (562) 570-6012

May 23, 2017

Mr. Ryan Butler

Civil Engineer
Los Angeles County Public Works
900 South Fremont Avenue
Alhambra, CA 91803

Re: Connection to Storm Water Inlet – Public Equestrian Rest Area

Dear Mr. Butler,

Please be advised that your request to connect to the City of Long Beach storm drain has been denied.

We received your request to connect the proposed 18" ADS HP storm drain pipe into the city's storm water system at the intersection of Spring St. and San Francisco St.

During the recent rains, the City of Long Beach experienced flooding issues in multiple locations due to drainage deficiencies. The main problem is that our storm drain pipes are undersized. After reviewing your project, we found that the 60" main storm drain pipe in which you proposed to connect is undersized, therefore no connection is allowed as this time. (Please see attached exhibit).

However, if we upgrade the pipes later, you may re-submit your application for consideration in the future.

If you have further questions, please contact Christian Perez directly at (562) 570-6679 or by email at Christian.perez@longbeach.gov.

Regards,

Alvin Papa
Assistant City Engineer
City of Long Beach

FCD_001273

From: Terri Grant
Sent time: 11/03/2015 01:39:52 PM
To: Mark Lombos; Cung Nguyen; Paul Shadmani
Subject: RE: Thank you

That flooding issue is a good point. If we can address the drainage behind their homes in our project, we should include that in the presentation too

From: Sziebl, Connie [mailto:CSziebl@labcos.org]
Sent: Tuesday, November 03, 2015 12:38 PM
To: Moore, Julie; Terri Grant
Cc: Mark Lombos; Cung Nguyen; Paul Shadmani
Subject: Thank you

Hello all...

Thank you for arranging the conference call. I believe we were able to get much accomplished as we move forward with this issue. I appreciate your flexibility regarding the concerns we have about the schedule. I think once we begin the process, we will be able to tell if we can move at a little faster pace or not.

I am getting ready to forward the two flyers regarding the meeting on the 18th. That is all I will be e mailing. Once you finish with the revised schedule, I will forward that document.

To DPW. I will send to Ara Malovan and Derek Wieske. When Derek contacted me after I wrote to Sean, Derek asked that I copy Dennis Jue the project manager in all my correspondence to them on this issue. I figure he might be a consultant since his e mail address is not @longbeach.gov. Derek also copied Sean Crumby and George Kerr. Who is George Kerr, do any of you know? I take it you will send them the flyers?

To Parks Rec and Marine, I will e mail Stephen Scott, the Acting Director and Valerie Davis his assistant. She knows everything. Should I copy Meredith Reynolds or will you copy her?

I will also be in touch with the City Manager's' office.

So as soon as you tell me to whom I send the flyers – I do not want to step on your toes – I will send out my e mail. Thanks.


Connie

P.S. Do any of you remember if the City of Long Beach did any work on San Francisco Street to alleviate the flooding that takes place in the encroached area plus their garages during the rainy season? I understand it has been knee deep. If anything, the flooding that might take place during this rainy season will play a major role in the design.

From: Daniel B. Sharp
Sent time: 04/09/2016 04:23:10 PM
To: Amir Ibrahim
Cc: Terri Grant; Paul Shadmani
Subject: Public Equestrian Rest Area - Request for assistance with drainage design

Hi Amir,

I'm not sure if you have heard of the Public Equestrian Rest Area project....it's about a 1-acre project in Long Beach that has been encroached upon for years by the adjacent residents. The plan is to remove the encroachments, add some equestrian amenities, and open the site to the public. This project has come about because the City of Long Beach is completing the Wrigley Greenbelt Project both north and south of this project location.

 There have been local drainage issues at the location historically, and AED thought they could handle it with some simple re-grading. However, as they have gotten deeper into the design, we realize that the adjacent properties drain to the site so their proposed solution isn't workable.

We would like to have DES take a look and see if there are some reasonable solutions that don't involve pumps or a major new drain.

If that sounds reasonable, let us know who we should be working with on your staff and we will set a meeting to go over the specifics.

Let me know if you would rather have more info before we set up a larger meeting. Thanks. Dan.

Daniel B. Sharp, P.E.

Watershed Management Division
County of Los Angeles Department of Public Works
(818) 458-7353 ext. 400
(626) 759-0559 mobile
dsharp@dpw.lacounty.gov

future. How can development services adequately monitor or the public be aware of something that is not properly listed or mapped for reference?

This overt omission opens the door for further cumulative negative impacts to properties such as mine, in a recognized equestrian/minority community and this LUE and your response does not satisfy the legal protections as intended by Horse Overlay decision of 1977.

Respectfully, I urge the City of Long Beach to immediately make the necessary changes and include the horse overlay zones in all documents with transparency.

Sincerely,
Renee Lawler

From: Christopher Koontz [mailto:Christopher.Koontz@longbeach.gov]
Sent: Thursday, December 5, 2019 4:17 PM
To: renee_matt@live.com; Hoorae1@aol.com
Cc: Celina Luna <Celina.Luna@longbeach.gov>
Subject: Horse Overlay

Ms. Lawler and Ms. Gabelich,

I wanted to follow-up on your communications to Councilmember Uranga regarding the horsekeeping zoning within the City. As we have discussed on a few occasions over the last several years, the General Plan does not map individual overlays or zoning characteristics, however those zoning details are an important implementation tool for our many neighborhoods in the City.

During the General Plan (LUE) process, in response to your comments, we added a specific policy related to horsekeeping. The following is listed on [page 146 of the LUE](#).

11. Respect and maintain the equestrian uses within Wrigley Heights and promote shared use and maintenance of the area trail system.

As to the actual zoning, which is the regulatory teeth that allows equestrian efforts. There is no intention from the Department of Development Services to modify those existing regulations. I am not aware of any interest from City Council to modify those regulations. A map of those existing horse-overlay properties is attached for your reference. The General Plan recognizes the policy-direction to maintain the existing equestrian uses and shared use of the trail system.

Thank you again for contacting the City of Long Beach. I hope this email provides greater clarity and assurance regarding your concerns.

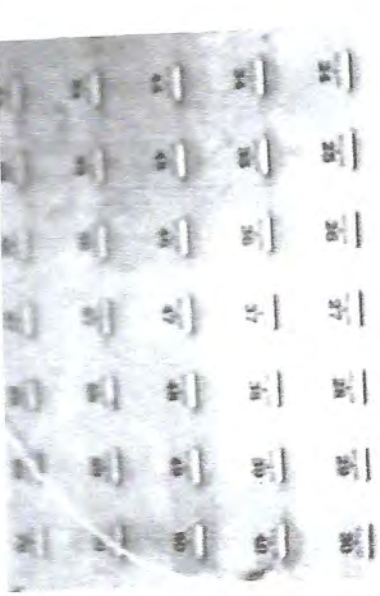
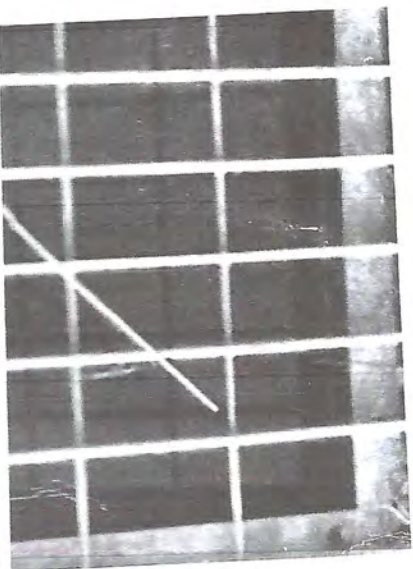
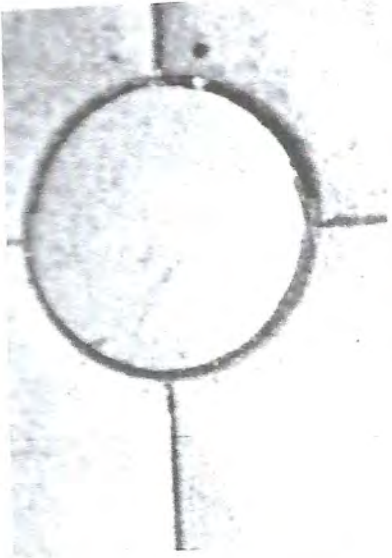
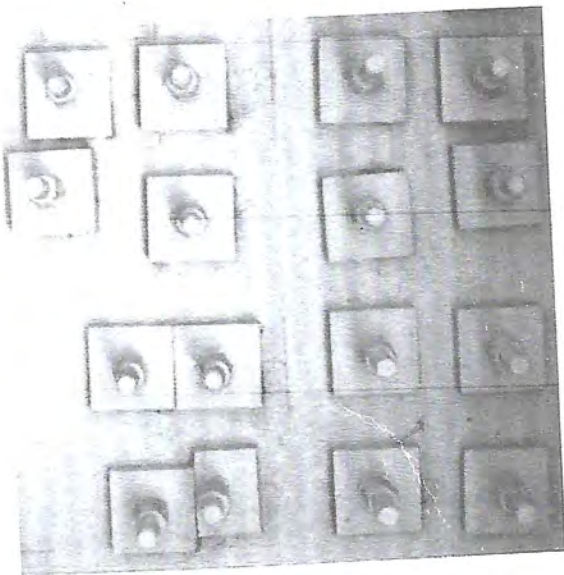
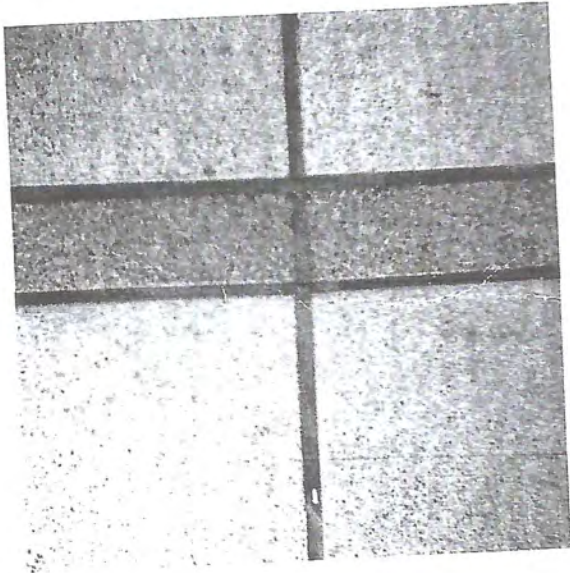
Christopher Ira Koontz, AICP
Planning Bureau Manager

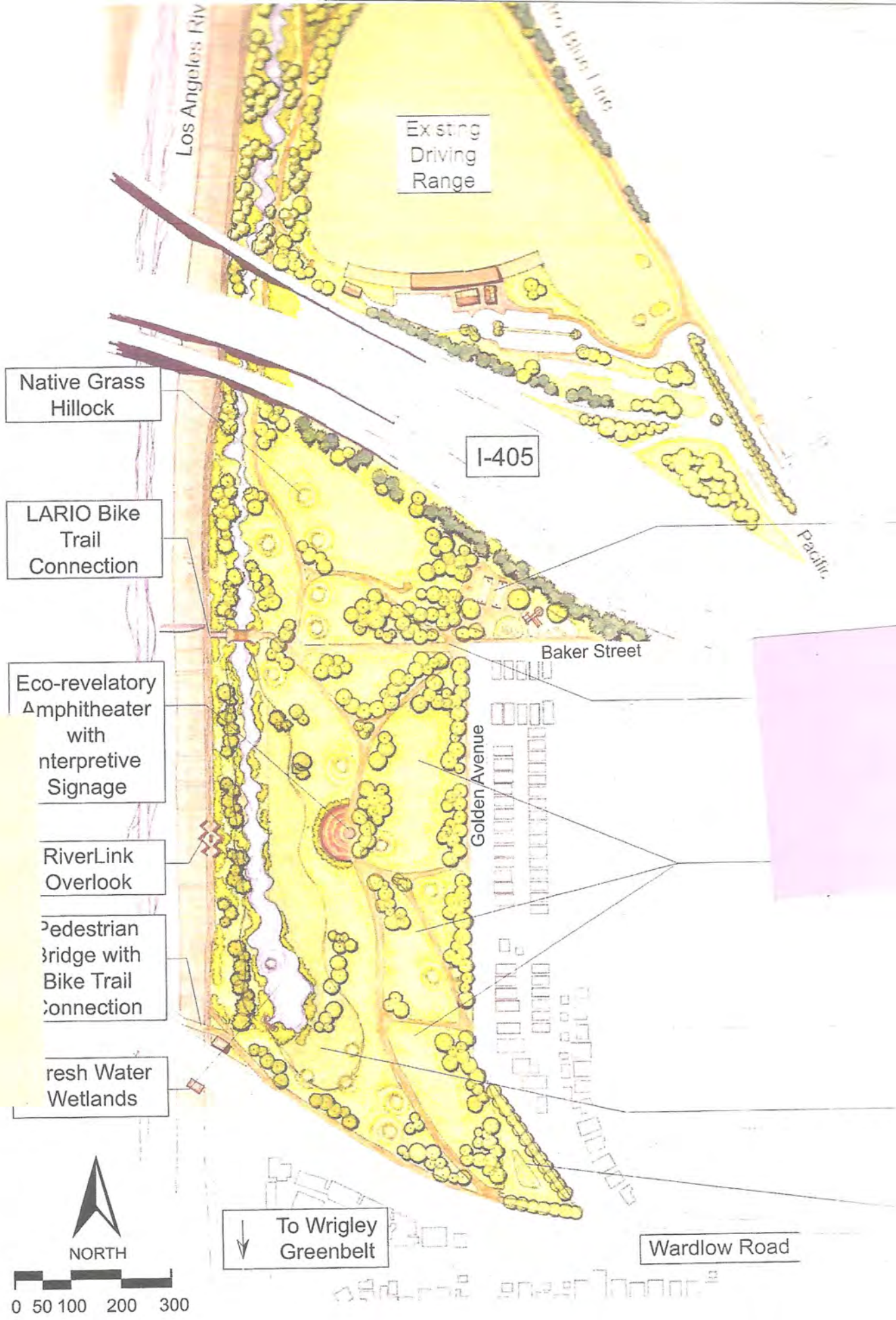
Long Beach Development Services
411 W. Ocean Blvd., 3rd Fl. | Long Beach, CA 90802
Office: 562-570-6288



LONG BEACH RIVERLINK

CONNECTING CITY TO RIVER





OPEN SPACE AND RECREATION ELEMENT

Recreation Vehicle Campground has a small pool. There are four swimming pools at Long Beach Unified School District (LBUSD) high schools that are open

to the public in the summer through City/LBUSD joint use agreements. Also, the City Colleges and California State University at Long Beach add an additional four pools to the public pool inventory.

5. Golf Courses

There are five City-owned golf courses in Long Beach at Heartwell, El Dorado, Recreation and Skylinks. All together they have four driving ranges, three 18-hole courses, one 9-hole course and one 18-hole par three lighted course, encompassing 568 municipal golf acres. The City contracts with private concessionaires who operate the courses. There are also two private golf courses and one private driving range in the City. The courses are an 18-hole course at Virginia Country Club and a 9-hole course at Bixby Ranch. A new, publicly accessible driving range is located at the intersection of the I-405 San Diego Freeway and the Los Angeles River.

6. Equestrian, Bicycle, Walking and Skating Trails

There remains a segment of equestrian trail on the floodplain adjacent to the Los Angeles River, but only a handful of properties along the river allow horses to be kept. These trails lie on County of Los Angeles flood control property, which is being studied for various open space enhancements under the Los Angeles River Master Plan.

According to the 2001 Long Beach Bicycle Master Plan, the City has an estimated 64 miles of bikeways, 35 of which are completely separated from roadway traffic. The shoreline, river and park trails accommodate pedestrians, skate boarders and skating as well. Although this chapter contains a policy and program recommending the development of an open space linkage and trails plan, the bicycle map and policies pertaining to walking and cycling in the community are largely contained in the Transportation (Circulation) Element.

7. Long Beach Museum of Art

Recently renovated and expanded, the Long Beach Museum of Art is located in Bluff Park at 2300 E. Ocean Boulevard. The Museum is very reasonably priced and is open to the public five days a week. It features applied and decorative arts including paintings, sculpture, video and children's art. Summer concerts are performed in the courtyard area overlooking the Pacific Ocean.

8. Beaches

Located between the Los Angeles and San Gabriel rivers, Long Beach has approximately 247 acres of beaches and 11 miles of shoreline. Although the beach property is owned by the State, the City retains responsibility for

collaborative efforts to increase opportunities to fund those projects, has greatly enhanced the willingness of these entities to seek mutually beneficial solutions to problems that historically were a source of conflict.

Subregional Characteristics

Given the size and complexity of the GLAC Region and the number of stakeholders and agencies that could participate in Plan development and other planning activities, to manage stakeholder input and acknowledge geographic variation, five subregional planning areas were established, as discussed in Chapter 1.

Lower San Gabriel and Los Angeles Rivers Subregion

The Lower SG & LA is comprised of 37 cities, 27 in the Gateway IRWM Region and 10 in the Santa Ana Watershed Project Authority IRWM Region (which includes the Orange County portion of the Coyote Creek watershed). Dozens of water agencies/companies and other entities which have an interest in a variety of water management issues serve the Lower SG & LA's three million residents. The Lower SG & LA faces significant ground and surface water quality challenges, as well as flood

control issues, due to its location in the lower reaches of two major watersheds and intense urban development changes.

It has the greatest water recharge capacity in the GLAC Region due to the recharge basins in the vicinity of the Whittier Narrows. Further, it has the most densely developed commercial and industrial land uses coupled with the least amount of open space on a per acre basis in the GLAC Region; notably several cities in the Lower SG & LA are over 100 years old. Further, the Lower SG & LA is in the lower reaches of a vast metropolitan area and, therefore has significant water quality issues along with tremendous opportunities for conjunctive use, recycled and reclaimed water use, desalination and wetlands restoration in the estuaries of the San Gabriel River and Los Angeles River. The cities in the Lower SG & LA face many competing financial needs, including complying with stormwater regulations, replacing aging infrastructure, providing affordable housing and increasing public safety. A considerable number of the cities have experienced and will continue to experience severe funding shortages for infrastructure repair, maintenance and installation along with high household poverty rates.



The Los Angeles River is fed by the largest drainage area in the Region.

Ariana Villanueva

From: De Ghetto, Michael <MDeGhetto@Glendaleca.gov>
Sent: Thursday, August 6, 2020 12:43 PM
To: PW-LA River CEQA
Subject: FW: LA River Master Plan PEIR Comments Glendale Water & Power
Attachments: LA River Master Plan PEIR Comment Glendale.pdf

CAUTION: External Email. Proceed Responsibly.

Hello Ms. Villanueva,

I'm resending this e-mail from earlier today because there was an issue with our outbound e-mail server earlier and I wanted to make sure you have the comment letter.

Best regards,

Michael De Ghetto, P.E.

Chief Assistant General Manager – Water • City of Glendale • Glendale Water & Power
141 N. Glendale Ave., 4th Floor Room 450 • Glendale, CA 91206 • (818) 551-3023 • mdeghetto@glendaleca.gov



From: De Ghetto, Michael
Sent: Thursday, August 06, 2020 10:38 AM
To: 'LARiverCEQA@pw.lacounty.gov' <LARiverCEQA@pw.lacounty.gov>
Subject: LA River Master Plan PEIR Comments Glendale Water & Power

Dear Ms. Villanueva,

I have attached comments to the LA River Master Plan PEIR from Glendale Water & Power for your use.

Feel free to contact me if you need any additional information or clarification.

Best regards,

Michael De Ghetto, P.E.

Chief Assistant General Manager – Water • City of Glendale • Glendale Water & Power
141 N. Glendale Ave., 4th Floor Room 450 • Glendale, CA 91206 • (818) 551-3023 • mdeghetto@glendaleca.gov



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City of Glendale, California
Glendale Water & Power
Administration

141 N. Glendale Ave., Level 4
Glendale, CA 91206-4975
Tel 818.548.2107 Fax 818.552.2852
www.glendaleca.gov

August 6, 2020

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
via-email: LARiverCEQA@pw.lacounty.gov

RE: LA River Master Plan PEIR, Public Comment, Glendale Water & Power

Dear Ms. Villanueva,

Please accept this letter, sent electronically via e-mail to LARiverCEQA@pw.lacounty.gov, as Glendale Water & Power's comments to the LA River Master Plan Draft Program EIR.

The Program EIR should include information related the sources of water in the LA River during dry-weather flow conditions. The Program EIR should indicate that water in the river during dry-weather flows is derived from urban runoff and discharges from reclamation plants and that urban runoff will be diminishing due to the Enhanced Watershed Management Plan. The Program EIR should list the reclamation plants that discharge to the river and their relative average volumes of discharge. The Program EIR should acknowledge that these waters are primarily derived from water that is imported to Southern California from the State Water Project, the Colorado River, and the Los Angeles Aqueduct. Finally, the Program EIR should note specifically that the City of Glendale plans to beneficially re-use all of its water from the Los Angeles-Glendale Water Reclamation Plant and will no longer be discharging its share of water to LA River from this plant in the future.

The Program EIR should note that specific projects which are not reliant on dry-weather flows would not be affected by flow reductions, so that the project specific CEQA processes can be completed more expeditiously. The Program EIR should indicate that projects reliant on dry-weather flows need to address how those projects would account for reduced flows in the future.

Please feel free to contact me directly at (818) 548-2107, or mdeghetto@glendaleca.gov, if you need any additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael E. De Ghetto".

Michael E. De Ghetto, P.E.
Chief Assistant General Manager - Water
Glendale Water & Power

Ariana Villanueva

From: Liliana Griego <liliana@folar.org>
Sent: Thursday, August 6, 2020 11:12 AM
To: PW-LA River CEQA
Subject: [Caution: Message contains Redirect URL content] Request to Extend Scoping Comments Deadline

CAUTION: External Email. Proceed Responsibly.

Hello,

FoLAR respectfully requests that the deadline for LA River Master Plan PEIR scoping comments be extended. Several entities have been extending their traditional comment period deadlines with the understanding that community members are currently facing challenging times. There was also only one PEIR Scoping Meeting to present to the public and provide an opportunity for Q&A. The recording of that meeting was just released this morning, a day before comments are due. This is not efficient time for someone to watch the recording and submit their comments.

Due to these reasons, we ask that you extend the scoping comments deadline and provide adequate time for public participation.

Thank you for your consideration.

Liliana Griego



Liliana Griego
Sr. Manager of Policy, Advocacy & Engagement
570 West Avenue 26, Suite 250
Los Angeles, CA 90065
223 - 223 - 0585 liliana@folar.org
www.folar.org



From: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Sent: Thursday, August 6, 2020 8:57 AM
Subject: Scoping comments for Draft 2020 LA River Master Plan PEIR due today

Hello,

Thank you for joining us last week for the 2020 LA River Master Plan CEQA Program EIR Scoping Meeting. For those who were unable to make it, the recording from the event is now available online at <http://pw.lacounty.gov/go/larmpceqa>.

Public participation is a key component of the CEQA process, and we appreciate your comments for consideration for the Draft Program EIR. You will receive a Notice of Availability when the Draft Program EIR is available for public review and comment. We will also provide notice about the Draft Program EIR public meeting when those details are available.

You can still submit comments on the scope or issues of concern you would like considered for the Draft Program EIR until August 6, 2020 (the end of the 30-day scoping period). Please send your comments in writing to the physical address or e-mail address shown below, and include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

Information and updates about the CEQA process for the Draft Program EIR
at <http://pw.lacounty.gov/go/larmpceqa>.

For questions or concerns about the 2020 LA River Master Plan document, please
visit www.larivermasterplan.org or submit your comments to LARiver@pw.lacounty.gov.

Ariana Villanueva

From: Michael J. Connor <connor.michaelj@gmail.com>
Sent: Thursday, August 6, 2020 11:04 AM
To: PW-LA River CEQA
Cc: L.A. River Walkers and Watchers; Evelyn Aleman; Bob Akre; Alyssa Boyle; Michael J. Connor; Dorian Gunning; Sandra Knapton; Bonnie Lavin; Pam Loeb; Joe Macias
Subject: Scoping comments for the Draft 2020 LA River Master Plan PEIR
Attachments: 08-06-20-LARiverCEQA.pdf

CAUTION: External Email. Proceed Responsibly.

Dear Planners:

Attached are scoping comments for the Draft 2020 LA River Master Plan PEIR submitted by L.A. River Walkers and Watchers, Evelyn Aleman, Bob Akre, Alyssa Boyle, Michael J. Connor, Dorian Gunning, Sandra Knapton, Bonnie Lavin, Pam Loeb, and Joe Macias.

We thank you for this opportunity to assist the County in this important process.

--

Michael J. Connor, Ph.D.
connor.michaelj@gmail.com

August 6, 2020

Sent via Email to: LARiverCEQA@pw.lacounty.gov

Attn: Ariana Villanueva
Los Angeles County Public Works
900 South Fremont Ave., 11th Floor
Alhambra, CA 91803

Re: Scoping Comments for the Draft Program Environmental Impact Report, 2020 LA River Master Plan

Dear Planners:

These scoping comments for the Draft Program Environmental Impact Report, 2020 LA River Master Plan ("DEIR") are submitted by the L.A. River Walkers and Watchers and by the individuals listed below.

The L.A. River Walkers and Watchers ("LARWW") is a group of residents and neighbors who volunteer to help preserve the Bike Path along the Los Angeles River in the west San Fernando Valley, including the park-underserved communities of Reseda and Canoga Park. LARWW works to ensure that local government agencies, state conservancies, and joint power authorities with Los Angeles River jurisdiction provide public safety, maintenance and resource-management services, enforce regulations, address health concerns, and care for the overall wellbeing of resources along the Los Angeles River Bike Path. Since 2017, LARWW has held a monthly walk along the river. Community residents and volunteers engage in trash and graffiti removal, monitor problem areas, and identify and report concerns. LARWW volunteers on these monthly walks have devoted thousands of man hours to cleaning up the LA River Bike Path and making this key resource safer and more user-friendly for all. More information can be found on our facebook page <<https://www.facebook.com/LARiverWW>> and website <<http://www.larww.org>>.

The Los Angeles River is a unique geographical feature that winds its way through Los Angeles County, with the vast majority of the river flowing through the City of Los Angeles. The draft working plan ("GAMWP")¹, the only document that the directly impacted public can access at this time, refers to the river as an "open space spine" ... "unique within the county" ... "providing park space to underserved adjacent communities with little room to site new parks, while serving as a destination for the entire county and beyond, offering a variety of experiences from one mile to the next." GAMWP at 10.

¹ 2020 Proposed WORKING DRAFT VERSION 6: Los Angeles River Master Plan Update August 2019, last visited August 1, 2020 at: https://d3n8a8pro7vnm.cloudfront.net/larmp/pages/315/attachments/original/1569626307/Proposed_GAM_WORKING_DRAFT_VERSION_6-10_Changes_since_July.pdf?1569626307

The draft working plan also states, “Members of the community identified walking and bicycling as the top two activities they participate in along the river—with participation in these two activities together greater than the participation all other activities combined. Yet, 61% said they do not use the river due to safety concerns.” GAMWP at 10.

Similar sentiments are echoed by our neighbors who come on LARWW monthly walks. Many ONLY walk on the Bike Path at our monthly walks because going alone is too scary an excursion. As residents who are directly impacted by recently installed (within the last 5 years) facilities along the river, we can assure the planners that the agencies have a long way to go to make this either a desired destination for visitors or a safe place for local residents.

Lighting that was installed along the LA River Bike Path was designed for appearance not for utility. The lamps were vandalized within weeks of the path being opened. Five years later, long stretches of these street lamps are still prone to failure. Fences are often inadequate, and frequently cut or pushed down. Illegal encampments abound. Illegal camp fires have burned adjacent private properties. On several of our monthly walks, walkers have had to step over the bodies of individuals strung out on drugs. We have removed hundreds of used needles and syringes on our monthly cleanups, as well as human excrement. Members of our community have been assaulted by illegal campers and gang members that use the Bike Path to distribute illegal drugs.

Over the last three years, we have worked closely with the Office of Los Angeles City Council Member Bob Blumenfield to address these challenges. As a result, the City will soon implement a pilot project to use Mountains Recreation and Conservation Authority (“MRCA”) Park Rangers along the river between its source in Canoga Park and Lindley Avenue in Reseda. We strongly feel that MRCA Park Rangers ought to patrol all 51 miles of the river since the current public safety situation is untenable.

THE DEIR MUST REVIEW IMPACTS TO PUBLIC SAFETY

The California Environmental Quality Act (“CEQA”) is meant to give the community a voice in land use decisions. Under CEQA, an EIR must analyze the project’s potential impacts on land use and public safety. We urge you to make public safety a key issue in the CEQA analysis.

All alternatives and proposed actions should be analyzed for their impacts on public safety. Many of the existing facilities along the river offer significant, basic challenges for fire and emergency services personnel that need to be addressed. All too frequently we have seen projects proposed, implemented and then left unmaintained and unpatrolled. Until members of LARWW took the initiative and numbered the street lamps along the Bike Path there was no mechanism to even report the location of issues. We feel that it is critical that the County learn from its own and its sister agencies’ experiences as it addresses ongoing challenges along the river so as not to repeat the same costly mistakes.

For any project approved under the PEIR, there should be a requirement for annual public reporting regarding implementation of any required mitigation measures. The public should have a simple mechanism to report mitigation measure failures. Both could be

facilitated by a dedicated phone app or website that tracks projects along the river and allows the public to report any issues that arise from a given project's implementation.

OBJECTIVES

LARWW generally supports the Objectives listed in the Notice of Preparation ("NOP") although we have serious reservations that any will be achieved over the life of the plan were the County to ignore the experiences and challenges facing residents living along the LA River and the LA River Bike Path.

However, we strongly suggest you modify Objective 6 "Address potential adverse impacts on housing affordability and people experiencing homelessness." to: Objective 6. "Address potential adverse impacts on existing residential housing, housing affordability, and people experiencing homelessness." Otherwise, in failing to mention impacts to existing residents, the Plan is essentially leaving out or ignoring a significant portion of the community.

ALTERNATIVES

The DEIR should assess the viability of the components of each alternative it reviews over the proposed 25 year plan period. For each alternative, the DEIR should explain how projects will or will not be maintained over the life of the plan. For each alternative, the DEIR should assess if any basic challenges for fire and emergency services personnel need to be addressed.

Because jurisdiction is so fragmented along the river with multiple agencies, the DEIR should assess how each alternative resolves or does not resolve jurisdictional issues.

Review of the "no action" alternative should include a critical review of current management. How effective is the existing plan? Has it achieved any of its desired objectives? If not, what can be done to assure that the new plan will?

PREFERRED ALTERNATIVE

Our experience working to preserve the LA River Bike Path has frequently been frustrating because jurisdiction along the river is so heavily fragmented. The multi-jurisdictional oversight of the LA River and the Bike Path means that local communities don't just have to deal with Los Angeles County and Los Angeles City, but with multiple departments within the County and the City. There are also other state and federal entities that are involved. This fragmented jurisdiction creates a management nightmare, wastes public funds, and exasperates local communities. Accordingly, we would like to see the preferred alternative include turning over Los Angeles River management to a single, park-oriented, agency such as the MRCA. We see this as the only viable alternative that will allow the plan to meet the listed 2020 LA River Master Plan Objectives.

“KIT OF PARTS”

According to the Notice of Preparation (“NOP”), “Under each of these “Kit of Parts” categories, multiple components — including benches, bridges, platforms, trails, shelters, diversion pipes, storage facilities, terraced banks, and affordable housing — are being proposed to serve as a menu of options to provide multiple benefits at any given potential location along the LA River.” These terms “benches, bridges, platforms, trails, shelters, diversion pipes, storage facilities, terraced banks, and affordable housing” must be clearly defined in the Plan. The full suite of environmental impacts, including impacts to public safety, should be analyzed for each option in the DEIR.

The DEIR should review the monitoring that will be required to ensure the ongoing review of the utility and effectiveness of the proposed “Kit of Parts” options.

The Plan should incorporate adaptive management principles so that design deficiencies can be rectified and mitigated once identified. The LARWW can vouch for the failure of similar attempts to installed “unified features” by the City of Los Angeles along the existing LA River Bike Path where ornamental street lamps were installed that were vandalized within weeks of installation. Years later, adequate lighting along the Bike Path still remains a significant concern. Yet the City used the same inadequate design when it developed the Confluence Park at the junction of Aliso Creek and the Los Angeles River. The lamps are off far more often than they are on. Rigid approaches are an unnecessary waste of public funds and a risk to public safety.

To better assure public safety, access points to river should be at existing main streets only. This restriction would help protect private property along the river and would provide street parking for visitors.

The Plan should require that each “Kit of Parts” option installed along the river must be georeferenced and made available on all agency maps so that the locations are clear to all especially fire and emergency services. The City of Los Angeles has an excellent phone/internet app (“MyLA311”) but unfortunately it requires a street address on input. As we can attest, this does not work in park settings or along the river where there are no street numbers. The DEIR must address this concern so that the locations of “Kit of Parts” options are known to fire and emergency services and to the local communities along the river to assure public safety.

Several of us attended the July 29, 2020 scoping meeting. In the presentation, one of the graphics showed that the proposed shared walking/running paths are to be a single 6 feet wide path, whereas the proposed bike lanes are to be split (for obvious safety reasons). However, a single 6 feet wide walking path is inadequate for runners and families to share during times of heavy use. Runners have to veer into the bike lanes to get around parents with strollers and small children. Families are not to be blamed for wanting to walk together and this is a behavior the agencies should be encouraging anyway. The need for wider walkways has become increasingly clear during the current pandemic when social distancing is critical. The adequacy of the 6 feet wide walking/running paths is a safety concern that should be examined and addressed in the DEIR.

The “Kit of Parts” does not list bioswales. If these are being covered, the DEIR must include a full and complete analysis of impacts to river flow and any increased risks for local flooding.

WATER QUALITY

The DEIR is reviewing a master plan for the Los Angeles River with an estimated 25 year lifespan. Water quality is a key issue. On our monthly walks, the LARWW frequently see both humans and pets (especially dogs) wading, paddling, and bathing in the river. And of course the wildlife along the river is dependent on that water too.

The people living in illegal encampments in the river channel often dump trash and human waste directly into the river. LARWW members frequently encounter humans using river culverts as living spaces, setting up encampments and lighting open camp fires. We have had agency staff tell us that they will not enter some of the culverts because of unspecified risks of “toxicity”. We have been unsuccessful in locating water quality data for our local reaches of the river. We expect the Master Plan to help make basic information such as water quality more readily available to the public.

We ask that each alternative include water quality monitoring along the river. Implementation of “Kit of Parts” options should include a water quality monitoring requirement as mitigation. The results should be posted on the Los Angeles River Plan website so that they are easily accessible to members of local communities. This would disclose the actual impact of “Kit of Parts” options, further public transparency and support for the plan, and help assuage public safety concerns.

The L.A. River Walkers and Watchers and the individuals listed below thank you for providing this opportunity to submit comments. Please include the individuals listed below in future emails for the Los Angeles River Master Plan EIR process.

Yours sincerely,

L.A. River Walkers and Watchers <lariverww@gmail.com>

Evelyn Aleman <evelyn@mipr.net>

Bob Akre <agentschoice@aol.com>

Alyssa Boyle <gumbyzmom@hotmail.com>

Michael J. Connor <connor.michaelj@gmail.com>

Dorian Gunning <dorian.gunning@gmail.com>

Sandra Knapton <sandraknapton@yahoo.com>

Bonnie Lavin <bylavin@gmail.com>

Pam Loeb <freeloeb@yahoo.com>

Joe Macias <joe@mipr.net>

CC. Los Angeles City Council Member, Bob Blumenfield
Los Angeles County Supervisor, Sheila Kuehl
California State Assembly Member, Jesse Gabriel
California State Senator, Henry Stern

Ariana Villanueva

From: Sarah Rascon <sarah.rascon@mrca.ca.gov>
Sent: Thursday, August 6, 2020 10:32 AM
To: PW-LA River CEQA
Cc: Genevieve Osmena; Ariana Villanueva
Subject: Extension Request: comment deadline

CAUTION: External Email. Proceed Responsibly.

Hello,

I am respectfully requesting a modest time extension for scoping comments. I believe that many stakeholders would also appreciate considering unprecedented times which have resulted in delays.

Please let me know if this will be effectuated, thank you for the consideration.

Sarah Rascon
Urban River Program Officer
Mountains Recreation and Conservation Authority
Los Angeles River Center and Gardens
570 W. Ave. 26, Los Angeles, California 90065
O: (323) 221-9944, Extension 109
C: (323) 354-2003
[Visit us on Facebook](#)

Ariana Villanueva

From: Michael Affeldt <michael.affeldt@lacity.org>
Sent: Thursday, August 6, 2020 10:28 AM
To: PW-LA River CEQA
Subject: Fwd: Please extend the scoping comment deadline

CAUTION: External Email. Proceed Responsibly.

----- Forwarded message -----

From: Michael Affeldt <michael.affeldt@lacity.org>
Date: Thu, Aug 6, 2020 at 9:59 AM
Subject: Please extend the scoping comment deadline
To: <LARiver@pw.lacounty.gov>

Hello, I am respectfully requesting a modest time extension for scoping comments. I believe that others will also appreciate this as work processes are generally a bit slower these days.

Please let me know if this will be effectuated, and thanks for the consideration!

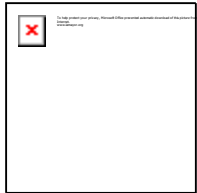
Mike

--



Michael Affeldt
Director, LARiverWorks
Mayor's Office of City Services
213-978-2225
www.lariver.org

--



Michael Affeldt
Director, LARiverWorks
Mayor's Office of City Services
213-978-2225
www.lariver.org

Ariana Villanueva

From: Sharon Brewer <sbrewerz@live.com>
Sent: Thursday, August 6, 2020 9:42 AM
To: PW-LA River CEQA
Subject: Re: Scoping comments for Draft 2020 LA River Master Plan PEIR due today

CAUTION: External Email. Proceed Responsibly.

Good morning,

My son uses the river trails extensively to ride his bike. He uses the San Gabriel trails mainly as he fears for his safety both personal safety and health safety from the amount of human waste while traveling through Los Angeles and the Glendale river trail area. The large encampments are quite visible along the river can be seen from the freeway as we travel from LA into Glendale. The pandemic has also increased the amount of encampments along the river.

We are also seeing more postings that wire is strung across the trails to make the cyclists crash to steal bikes, money and anything else a cyclist carries.

The policing of the encampments and the amount of waste added to the area and wild life is wrecking havoc with the environment along the river.

Thank you for reading my concerns.

Sharon Brewer
Submitted to River trail committee 8/6/2020 before 5 pm.

Get [Outlook for Android](#)

From: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Sent: Thursday, August 6, 2020 8:22:05 AM
Subject: Scoping comments for Draft 2020 LA River Master Plan PEIR due today

Hello,

Thank you for joining us last week for the 2020 LA River Master Plan CEQA Program EIR Scoping Meeting. For those who were unable to make it, the recording from the event is now available online at <http://pw.lacounty.gov/go/larmpceqa>.

Public participation is a key component of the CEQA process, and we appreciate your comments for consideration for the Draft Program EIR. You will receive a Notice of Availability when the Draft Program EIR is available for public review and comment. We will also provide notice about the Draft Program EIR public meeting when those details are available.

You can still submit comments on the scope or issues of concern you would like considered for the Draft Program EIR until August 6, 2020 (the end of the 30-day scoping period). Please send your comments in writing to the physical address or e-mail address shown below, and include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division

900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

Information and updates about the CEQA process for the Draft Program EIR at
<http://pw.lacounty.gov/go/larmpceqa>.

For questions or concerns about the 2020 LA River Master Plan document, please visit
www.larivermasterplan.org or submit your comments to LARiver@pw.lacounty.gov.

Ariana Villanueva

From: Travis Longcore <travislongcore@laudubon.org>
Sent: Wednesday, August 5, 2020 5:46 PM
To: PW-LA River CEQA
Subject: Los Angeles Audubon Society -- Draft Program Environmental Impact Report 2020 LA River Master Plan

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

Los Angeles Audubon Society has been a voice for birds and conservation in Los Angeles for 113 years. Our mission is to promote the study and protection of birds, other wildlife, and their habitats. We have over 3,500 members and supporters, most of whom live in Los Angeles. Our founding principles include a commitment to fostering “a proper conservation of our native birds, other animals, wild flowers, trees, shrubs, soil and water.”

As Los Angeles County Public Works prepares the 2020 LA River Master Plan Environmental Impact Report, we highlight for special attention the following areas within the 51-mile stretch of river under consideration. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the fall migration.

- **Sepulveda Basin and the adjacent Los Angeles River.** These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak.
- **Glendale; Bette Davis Park to Colorado Bridge.** A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway.
- **Frogtown; adjacent Taylor Yard and Rio de Los Angeles State Park.** This area has extensive riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak.
- **South of Downtown; Atlantic Boulevard to Clara Street.** The extensive concrete section here provides important shorebird habitat during fall migration.
- **Long Beach; concrete section from Willow Street to Del Amo Boulevard.** Host to significant shorebird populations (on a global scale) during fall migration.

We ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to Lower Los Angeles River Important Bird Area. We encourage you to take advantage of community-generated datasets of species presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species.

Thank you your attention to these issues and please contact me if you have any questions.

Sincerely,
Travis Longcore

--

Travis Longcore, Ph.D.

President

Los Angeles Audubon Society

www.laaudubon.org

travislongcore@laudubon.org

Ariana Villanueva

From: Karen Barnett <karenbarnett@atwatervillage.org>
Sent: Wednesday, August 5, 2020 3:34 PM
To: PW-LA River CEQA
Cc: Morales, Fernando; Schneider, Erin; Edward Morrissey; Courtney Morris
Subject: Re: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Okay, if you do extend the deadline please let us know as soon as possible. Since there's no word on an extension today... I will plan to submit tomorrow in the late afternoon unless I hear from you.

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

On Wed, Aug 5, 2020 at 10:35 AM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Hi Karen,

Our management is reviewing comments and discussing. We recommend submitting comments by August 6, but we will let you know if they decide to extend the date.

Thank you,

Ariana Villanueva

Environmental Engineering Specialist

Los Angeles County Public Works

(626) 458-7146

From: Karen Barnett <karenbarnett@atwatervillage.org>

Sent: Wednesday, August 5, 2020 9:30 AM

To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>

Cc: Morales, Fernando <FMorales@bos.lacounty.gov>; Schneider, Erin <ESchneider@bos.lacounty.gov>; Edward Morrissey <edward@atwatervillage.org>; Courtney Morris <courtney@atwatervillage.org>

Subject: Re: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Hello Ariana,

Has there been any discussion on extending the comment deadline of August 6, 2020? On Monday evening, the river committee approved a comment letter for the August 13th AVNC board meeting.

If you are NOT extending the deadline, I need to know so that I can get the comments I have from the river and community members into you on August 6 by 5 PM.

Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

On Wed, Jul 29, 2020 at 5:01 PM Karen Barnett <karenbarnett@atwatervillage.org> wrote:

Hello Ariana,

Thanks for speaking with me yesterday. Last night the board approved the letter requesting an extension of the NOP comment period. Courtney and Edward will be emailing it out soon.

See you tonight,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative
River Committee Chair
E-mail: KarenBarnett@atwatervillage.org
Message Phone: 323-230-3406
www.atwatervillage.org

On Mon, Jul 27, 2020 at 11:56 AM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Hi Karen,

Thank you for your inquiry. Below is additional information on the LA River Master Plan Program EIR and CEQA process.

Notice of Preparation and Scoping Meeting on July 29, 2020:

- The main goal for the Notice of Preparation (NOP) and the upcoming meeting is to let the public know that Public Works is initiating the CEQA process.
- The proposed scope of the draft Program EIR is included in the NOP which can be found here: <https://pw.lacounty.gov/swq/peir/doc/NOP-2020.06.26-draft.pdf> and was filed on July 7 (posted with the County Clerk, Office of Planning and Research, sent via certified mail to Steering Committee members, by email to interested parties, and through social media blasts on Twitter and Facebook).
- The meeting on Wednesday will elaborate on the information provided in the NOP and the CEQA approach for the LA River Master Plan. Comments on the scope can continue to be provided until August 6 as the document is being developed. I'd like to reiterate that this meeting is not to present the draft Program EIR, but rather to inform the public and agencies

that we are commencing the CEQA process and presenting a proposed approach for preparing the Program EIR.

Following the Scoping Meeting, the next steps will be the development of Draft Program EIR and issuance of a Notice of Availability (NOA). Once available to the public, there will be a 45-day public review period for the Draft Program EIR. Comments on the draft Program EIR will be taken into consideration and addressed or incorporated into the Final Program EIR.

I'd like to note that the proposed Program EIR will not have any project-specific or site-specific analysis as the Master Plan doesn't provide that level of detail. At this time, this Program EIR would just provide a first-tier analysis for later activities to consider when conducting CEQA analysis for proposed individual projects and would look at the cumulative effects of the Plan as a whole. Future projects along the LA River would still be required to conduct project-specific CEQA evaluation for environmental analysis. Site-specific analysis, such as a flood study for Atwater Village may be included in future CEQA analysis for specific projects as applicable.

I hope this helps! Please feel free to contact me at my number below.

Sincerely,

Ariana Villanueva

Environmental Engineering Specialist

Los Angeles County Public Works

(626) 458-7146

From: Karen Barnett <karenbarnett@atwatervillage.org>

Sent: Friday, July 24, 2020 9:00 AM

To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>

Cc: Morales, Fernando <FMorales@bos.lacounty.gov>; Schneider, Erin <ESchneider@bos.lacounty.gov>

Subject: Re: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Hello Adriana,

I didn't hear back from you on my questions? I'm a bit confused about this process - there appears to be a disconnect. We are being asked to make comments by August 6th, which is the end of a 30 day period - but there is no information available till the meeting on July 29th.

Noticing a 30-day review for comments when there's no information available for the public to review, is not appropriate for public involvement in the CEQA process... *The public is involved in CEQA at many stages. Public involvement starts during the scoping process, which is used to determine what environmental impacts will be studied and what type of environmental document will be needed.* Maybe you are only releasing information to cities, agencies, and non-profits? Either way, you need to extend the comment period, reset it for 30 days (min.) from the date you release materials to the public.

Our monthly AVNC board meeting is after August 6th. So we will have to deal with this in our Special Meeting, August 28th which is dedicated to the HSR DEIR. (Which is before you July 29th NOP/PEIR information meeting)

I believe this process has not been transparent or inclusive for members of the public, especially for riverfront communities such as Atwater Village.

Karen

Atwater Village Neighborhood Council

Central Atwater Representative
River Committee Chair
E-mail: KarenBarnett@atwatervillage.org
Message Phone: 323-230-3406
www.atwatervillage.org

On Mon, Jul 13, 2020 at 9:47 AM Karen Barnett <karenbarnett@atwatervillage.org> wrote:

Thank you for getting back to me.

We as a board or members of the public can ask that certain areas be added in more detail?

For example - the LARRMP has study areas that are more developed than its list of potential projects.

OR

Is it we can ask for more detail on Hazardous Materials or Recreation as a section?

Do you plan to have a section of Atwater Villages 4 miles which will be called out and addressed in more detail? Your flood study in North Atwater Village?

Since this is a "programming EIR" will project automatically get a neg. dec. or will they have to go through the full EIR process?

We have a short timeline for a response since the meeting is so close to the comment period deadline. Any information you can provide sooner is appreciated.

Thanks,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

On Mon, Jul 13, 2020 at 9:25 AM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Hi Karen,

Thank you for reaching out to us. The Draft PEIR for 2020 LA River Master Plan is still in the process of being prepared so the sections are not yet available for review; however, the online scoping meeting held on July 29 will provide an overview of the PEIR/CEQA process and

provides an opportunity for the public to provide input and comment on the scope of the PEIR (the sections you would like to see included in the PEIR). You will have an opportunity to review the sections (i.e. aesthetics, energy, hydrology/water quality, etc.) in the Draft PEIR when it is released for public review with a 45-day period to provide comments. We hope you can join us on July 29 from 6 to 8pm, but if not, all presentation materials will be available on the website afterwards (<https://pw.lacounty.gov/go/larmpceqa>) and we will be accepting written comments on the scope of the PEIR until August 6. Registration for the presentation is not required to attend, but if you sign up, we'll send additional reminder email about the event prior to July 29.

I will also check on issues with the phone number as it should be active.

Let me know if you have any other questions. Thank you!

Sincerely,

Ariana Villanueva

Environmental Engineering Specialist

Los Angeles County Public Works

From: Karen Barnett <karenbarnett@atwatervillage.org>

Sent: Friday, July 10, 2020 3:46 PM

To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>

Cc: Morales, Fernando <FMorales@bos.lacounty.gov>; Schneider, Erin <ESchneider@bos.lacounty.gov>

Subject: Re: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Hello,

This is my third email to this address and I haven't gotten a response?! I would like to know how to prepared for this meeting/NOP/PEIR - where the information is to review?

Your phone number worked once this morning... now my provider says it's no longer in service?

Can you call me at 818 468 1738

Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative
River Committee Chair
E-mail: KarenBarnett@atwatervillage.org
Message Phone: 323-230-3406
www.atwatervillage.org

On Fri, Jul 10, 2020 at 8:13 AM Karen Barnett <karenbarnett@atwatervillage.org> wrote:

Hello Ariana,

Can you point me to the information we need to assess? I don't see any links for sections referenced in the notice. Atwater Village is one of the flood study points mile 28 if I'm recalling correctly. Our community is 4+ miles of the LA River (east and west banks)

Of course, I would like to see it all but specifically these sections in their formats 2020 LA River Master Plan PEIR Scope and Probable Environmental Effects. *I'm assuming flood would be in Hydrology/Water Quality.*

Aesthetics
Air Quality
Energy
Hazards & Hazardous Materials
Hydrology/Water Quality
Land Use/Planning
Noise
Public Services
Recreation
Transportation

Utilities/Service Systems
Cumulative Impacts

Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative
River Committee Chair
E-mail: KarenBarnett@atwatervillage.org
Message Phone: 323-230-3406
www.atwatervillage.org

----- Forwarded message -----

From: **Karen Barnett** <karenbarnett@atwatervillage.org>
Date: Wed, Jul 8, 2020 at 9:52 AM
Subject: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping
To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>

Hello Ariana,

Can you point me to the information we need to assess? I don't see any links for sections referenced in the notice. Atwater Village is one of the flood study points mile 28 if I'm recalling correctly. Our community is 4+ miles of the LA River (east and west banks)

Of course, I would like to see it all but specifically these sections in their formats 2020 LA River Master Plan PEIR Scope and Probable Environmental Effects. *I'm assuming flood would be in Hydrology/Water Quality.*

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Public Services

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Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative
River Committee Chair
E-mail: KarenBarnett@atwatervillage.org
Message Phone: 323-230-3406
www.atwatervillage.org

On Tue, Jul 7, 2020 at 5:20 PM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

The County of Los Angeles, through Los Angeles County Public Works, will prepare a Program Environmental Impact Report (PEIR) pursuant to the California Environmental Quality Act (CEQA) for its proposed 2020 LA River Master Plan. The PEIR will assess the environmental impacts of implementing the 2020 LA River Master Plan. As part of this PEIR process, Public Works is soliciting input from members of the public, organizations, and government agencies on the scope and content of the information to be included and analyzed in the PEIR.

A Notice of Preparation (NOP) has been prepared to notify responsible and trustee agencies, the Office of Planning and Research, the County Clerk, and other interested parties that Public Works is beginning preparation of this PEIR, and starts the 30-day scoping period. The NOP for the 2020 LA River Master Plan PEIR can be viewed at <http://pw.lacounty.gov/go/larmpceqa>.

The community is invited to participate in an online scoping meeting for the PEIR, which is being held virtually due to restrictions under State of California Executive Order N-33-20.

DATE: Wednesday, July 29, 2020

TIME: 6:00 p.m. to 8:00 p.m.

LOCATION: Details about the CEQA online scoping meeting are available at <http://pw.lacounty.gov/go/larmpceqa>

Registration for the event is available at <http://www.eventbrite.com/e/online-scoping-meeting-2020-la-river-master-plan-program-eir-tickets-112158469000>

Scoping comments on the PEIR are due no later than August 6, 2020, which marks the end of the 30-day scoping period. Please send your comments in writing to the physical address or e-mail address shown below. If sending an e-mail, please include "NOP Scoping Comments" in the subject line. Include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva

Los Angeles County Public Works, Stormwater Quality Division

900 South Fremont Avenue, 11th Floor

Alhambra, CA 91803

LARiverCEQA@pw.lacounty.gov

Thank you and we look forward to your participation in the process.

Ariana Villanueva

From: J.P. Rose <JRose@biologicaldiversity.org>
Sent: Wednesday, August 5, 2020 3:30 PM
To: PW-LA River CEQA
Subject: Comments on NOP for 2020 LA River Master Plan
Attachments: Comments on LA River Master Plan NOP 8-5-2020.pdf

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Villanueva,

Please see the attached letter from the Center for Biological Diversity regarding the Notice of Preparation for the 2020 LA River Master Plan Draft Program Environmental Impact Report. We would appreciate if you could confirm receipt of the letter.

Thank you, and I hope you are having a good week!

J.P. Rose
Urban Wildlands Staff Attorney
CENTER *for* BIOLOGICAL DIVERSITY
660 S. Figueroa Street #1000
Los Angeles, CA 90017
Cell: (408) 497-7675
Office: (213) 785-5406
Twitter: @JPRose5
jrose@biologicaldiversity.org



August 6, 2020

Sent via email

Ariana Villanueva
Los Angeles County Public Works
Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, California 91803
LARiverCEQA@pw.lacounty.gov

Re: Notice of Preparation for 2020 LA River Master Plan Draft Program Environmental Impact Report

Dear Ms. Villanueva:

These comments are submitted on behalf of the Center for Biological Diversity (“Center”) on the Notice of Preparation (“NOP”) of a CEQA Programmatic Environmental Impact Report (“EIR”) for the 2020 LA River Master Plan. These comments are submitted to assist the Department of Public Works (“DPW”) in preparation, review and approval of these environmental documents.

As the NOP acknowledges, the Project covers the 51-mile-long, 2-mile-wide corridor of the LA River in Los Angeles County and spans through 18 total jurisdictions. Today, 1 million people live within 1 mile of the river. The Center requests that special consideration be placed on the biological resources, hydrology and water quality, gentrification and homelessness, and equitable access.

I. Background on the Center

The Center is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States, including residents of Los Angeles County. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life.

II. Background on the EIR Process

An EIR is a detailed statement, prepared under the California Environmental Quality Act, Public Resources Code §§ 21000-21178 (“CEQA”), describing and analyzing all significant impacts on the environment of a proposed project and discussing ways of mitigating or avoiding those effects. (Pub. Res. Code §21100; Cal. Code Regs. tit. 14, § 15362.) The purpose of an EIR “is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made.” (*Laurel Heights Improvement Association v. Regents of University of California* (1993) 6 Cal.4th 1112, 1123 [emphasis in original and citations omitted].) An EIR should provide decision making bodies and the public with detailed information about the effect a proposed project is likely to have on the environment, to list ways in which the significant effects of a project might be avoided or minimized, and to indicate alternatives to the project. (Pub. Res. Code § 21061; Cal. Code Regs. tit. 14, § 15002.) California courts have emphasized that an EIR should: disclose all relevant facts; provide a balancing mechanism whereby decision makers and the public can weigh the costs and benefits of a project; provide a means for public participation; provide increased public awareness of environmental issues; provide for agency accountability; and provide substantive environmental protection.

CEQA compels agencies to refrain from approving projects with significant environmental impacts if feasible mitigation measures or alternatives exists that can alleviate or avoid such adverse effects. (*Mountain Lion Foundation v. Fish & Game Com.* (1997) 16 Cal.4th 105, 134.) Pursuant to this substantive mandate, the DPW should consider all feasible mitigation measures and alternatives in its EIR analysis, which should be quantitative, objective, rigorous, and most of all, complete.

III. Notice of Preparation Comments

a. Avoidance and Minimization of Impacts to Wildlife Movement and Habitat Connectivity Must be Prioritized.

The LA River watershed sits within one of the world’s most diverse Mediterranean biodiversity hotspots.¹ Today, the entire 52-mile river is designated as warm freshwater habitat, while the upper portion of the river and mouth are designated as wildlife habitat, used by rare, threatened, or endangered species. (*Id.* at 2.) Filling gaps in scientific research on wildlife along the LA River during the EIR process, as highlighted by Actions 3.2 and 3.6 of the Master Plan, would provide a greater insight into where Kit of Parts and other proposed projects would be best suited to support wildlife.

The Center requests that the Project’s common elements and projects be implemented with the lowest impact on wildlife movement and restore native plants ecosystems wherever possible. The Kit of Parts should also be implemented with an eye towards enhancing and

¹ Jessica M. Henson, et al, *Progress Memorandum to Carolina Hernandez Re: Existing Ecosystem and Habitat Conditions* (Nov. 19, 2018), available at https://d3n8a8pro7vhmx.cloudfront.net/larmp/pages/276/attachments/original/1543873616/181119_LARMP_Task_3.5_Ecosystem_Habitat_Progress_Memorandum_web.pdf?1543873616

interconnecting larger habitat areas in the San Gabriel, Santa Monica, and Santa Susana Mountains at the headwaters near Canoga Park, and between Griffith Park and the Verdugo Mountains at the Glendale Narrows, so that plant and animal species endemic to the River are more likely to survive and thrive. (*Id.* at 4.)

A functional riparian habitat and wetlands can also improve water quality by removing or sequestering many contaminants, therefore improving wildlife habitat quality has implications for the ecological functioning of the River as well as for wildlife uses.²

b. The DEIR Should Adequately Analyze and Mitigate Potential Impacts on Water Quality.

A diverse Mediterranean riparian ecosystem once covered much of the 834 square mile watershed of the LA River and its 9 major tributaries. Today, the LA River is an impaired water body with multiple total maximum daily load requirements (TMDLs) established to regulate the discharge of pollutants. (Progress Memorandum to Carolina Hernandez Re: Water Resources: Flood Risk Management, Water Quality, and Water Supply 2018.)³ The River is subject to five TMDLs for metals, nutrients, trash, bacteria under Section 303(d) of the Clean Water Act that collectively regulate discharges of 13 pollutants. (*Id.* at 19.) Furthermore, 62% of the LA River watershed is developed with mixed land uses where typical pollutants from industrial runoff include copper, zinc, lead, bacteria, suspended solids, PCBs, and DDTs. (*Id.* at 18.) The DEIR should clearly articulate the environmental benefits of increasing enforcement of water permit violations and remediating industrial and commercial contamination as part of the Master Plan.

The DEIR should also assess and mitigate the potential impacts the Master Plan could have on the River's ability to maintain its original "Rec 1" beneficial use designation.⁴ Common elements and Kit of Parts should be implemented in a manner that will someday restore the River to a fishable and swimmable river again. (*Id.*) The DEIR should also assess the prioritization of regional water quality improvement projects in areas of greatest need and should clearly state the increasing environmental benefits that would result from the most restorative actions that remove impervious surfaces and restore wetlands and green spaces.

c. The DEIR Must Assess Water Supply Impacts.

More than 50% of the region's water supply is imported from the Colorado River, Sacramento-San Joaquin River Delta and the Eastern Sierras.⁵ Given the increasing population, regulatory requirements, and demands on imported water, the DEIR should consider the benefits

² Los Angeles River Revitalization Master Plan 2007, available at https://boe.lacity.org/lariverrmp/CommunityOutreach/masterplan_download.htm.

³ Mark Hanna, et al., Progress Memorandum to Carolina Hernandez Re: Water Resources: Flood Risk Management, Water Quality, and Water Supply (Dec. 2018) ("Water Resources Memorandum"), available at https://d3n8a8pro7vhnmx.cloudfront.net/larmp/pages/280/attachments/original/1545082202/LARMP_Task_Memo_3-1_3-2_Progress_Memorandum_web.pdf?1545082202

⁴ Los Angeles River Revitalization Master Plan (2007), available at: <http://boe.lacity.org/lariverrmp/CommunityOutreach/pdf/04Chapter3-IssuesAffectingthePlan42407.pdf>.

⁵ Water Resources Memorandum at p. 22.

from increased groundwater replenishment. The use of stormwater infiltration and low impact development elements in all projects could result in the replenishment of groundwater supplies to meet local objectives of better use of local water resources and reduces reliance on imported water. Efforts to capture flows in the Upper and Lower LA River watershed for groundwater discharge in the San Fernando Basin and Central Basin must be prioritized in the environmental review of the Master Plan.

d. The DEIR Must Adequately Analyze and Mitigate Housing and Displacement Impacts.

Around 38,100 households within 1 mile of the LA River are currently at risk of displacement. (Steering Committee #7 Summary 2019).⁶ An important aspect of the LA River Master Plan would to fund the acquisition of land for affordable housing and to preserve affordable housing. DPW should ensure that affordable housing is not placed next to industries and should avoid placing housing in areas with high flooding potential.

The DEIR should also analyze and mitigated the displacement impacts the Master Plan will likely cause as a result of improving infrastructure at and near the River. Special attention should be given to the communities between Downtown LA and Long Beach where displacement risk is most pervasive and the City of Bell Gardens and other communities that are already in a state of advanced displacement (Steering Committee #7 Summary 2019).⁷ System-level mitigation measures should include a mix of supportive housing, affordable rental, affordable homeownership units, and other anti-displacement measures that would ensure community stability.

e. The DEIR Should Prioritize Equitable Access For All Communities Along the LA River.

The DEIR should place special emphasis on the environmental and societal benefits of increasing the extent of multi-use trails that connect to the River and prioritize access near major destination or areas that need improvements to existing access points. This should include connecting major regional trails, tributary trails and expanding regional loops primarily in the Lower LA River. The communities of highest park need along the LA River include Downtown LA, Bell Gardens, South Gate, Compton, and Long Beach. (Steering Committee Meeting #8 Summary 2019).⁸ Increasing public access to the River should also include common elements, such as street lighting and emergency call boxes, to increase public safety along and within the River.

⁶ Los Angeles River Master Plan Update, Steering Committee Meeting #7 Summary (Sept. 25, 2019), available at <https://pw.lacounty.gov/wmd/watershed/lar/docs/LARMP-SteeringCommittee7SummaryandAppendices.pdf> (p.54)

⁷ *Id.*

⁸ Los Angeles River Master Plan Update, Steering Committee Meeting #8 Summary (Dec. 19, 2019), available at <https://pw.lacounty.gov/wmd/watershed/lar/docs/LARMP-SteeringCommitteeMeeting8-Summary-and-Appendices.pdf>.

f. The DEIR Should Include A “Watershed Restoration” Alternative.

As detailed in the separate letter of August 4, 2020 submitted by Los Angeles Waterkeeper, the Center, Friends of the Los Angeles River, and Heal the Bay, the Center urges the County to include a “Watershed Restoration” alternative in the DEIR. This alternative would better achieve the goals of the Master Plan to “reduce flood risk and improve resiliency,” “support healthy, connected ecosystems” and “promote healthy, safe, clean water”.

IV. Conclusion

The Center appreciates the opportunity to submit comments on the Master Plan. Please do not hesitate to contact us with any questions.



J.P. Rose
Staff Attorney
Center for Biological Diversity
660 S. Figueroa Street, Suite 1000
Los Angeles, California, 90017
jrose@biologicaldiversity.org

Ariana Villanueva

From: Lin, David@Wildlife <David.Lin@Wildlife.ca.gov>
Sent: Wednesday, August 5, 2020 2:30 PM
To: PW-LA River CEQA
Cc: Tang, Victoria@Wildlife; Drewe, Karen@Wildlife; Barrera, Baron@Wildlife; Howell, Susan@Wildlife; Wildlife CEQA; state.clearinghouse@opr.ca.gov
Subject: Comments on 2020 LA River Master Plan NOP
Attachments: CDFW Comments on 2020 LA River Master Plan NOP.pdf

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Villanueva,

The California Department of Fish and Wildlife has completed a review of the Notice of Preparation (NOP) of a Draft Programmatic Environmental Impact Report (DPEIR) submitted by the County of Los Angeles for the following Project: 2020 LA River Master Plan (SCH# 2020070128). Please find CDFW's comment letter attached.

Thank you for the opportunity to provide comments. If you have any questions or concerns regarding CDFW's comments, please feel free to contact David T. Lin, Senior Environmental Scientist (Specialist), at (562) 430-0097 or by email at David.Lin@wildlife.ca.gov at your convenience.

Sincerely,

David T. Lin, Ph.D.
Senior Environmental Scientist (Specialist)
California Department of Fish and Wildlife
South Coast Region 5
4665 Lampson Avenue, Suite C
Los Alamitos, CA 90720
David.Lin@wildlife.ca.gov
Office: (562) 430-0097
Temporary Phone: (424) 226-2189



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

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



August 5, 2020

Ms. Ariana Villanueva
Los Angeles County Public Works
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

Comments on the Notice of Preparation of a Draft Programmatic Environmental Impact Report for 2020 LA River Master Plan, SCH #2020070128, Los Angeles County

Dear Ms. Villanueva:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Notice of Preparation (NOP) of a Draft Programmatic Environmental Impact Report (DPEIR) for the 2020 LA River Master Plan (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

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

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

Ms. Ariana Villanueva
 County of Los Angeles
 August 5, 2020
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Project Description and Summary

Objective: The County of Los Angeles (County), through the Department of Public Works (LACPW), is proposing the Project, which would provide program-level direction for development along the Los Angeles River (LA River) over 25 years. The Project proposes multiple components within 6 categories: (1) trails, access gateways, and shelters; (2) channel modifications; (3) crossings and platforms; (4) diversions; (5) floodplain reclamation; and (6) off channel land assets. Examples include public open spaces, parks, benches, bridges, platforms, trails, shelters, diversion pipes, storage facilities, terraced banks, and affordable housing. Future actions or component projects proposed under the Project would range from “extra-small” (1-acre or less) to “extra-large” (150+ acre/10+ miles). Examples of extra-small projects include pavilions, lighting, environmental graphics, bike racks, and benches. Examples of extra-large projects include regional parks and water recharge areas.

Location: The Project addresses approximately a 2-mile wide corridor along 51 miles of the LA River from the San Fernando Valley to Long Beach on the Pacific Ocean. The Project provides program-level regional planning and does not include any site-specific locations for individual actions or component projects.

Comments and Recommendations

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

Specific Comments

- 1) Lake and Streambed Alteration Agreements: As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow; or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream; or use material from a streambed. For any such activities, the project applicant (or “entity”) must provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration (LSA) Agreement (Agreement) with the applicant is required prior to conducting the proposed activities. CDFW’s issuance of an Agreement for a project that is subject to CEQA will require related environmental compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document prepared by the local jurisdiction (Lead Agency) for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the DPEIR should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the Agreement.
 - a) The Project area supports aquatic, riparian, and wetland habitats; therefore, a preliminary delineation of the lateral extent of the streams should be included in the DPEIR. Activities in the streams subject to 1600 *et seq.* of the Fish and Game code may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers’ Section 404 permit and Regional Water Quality Control Board Section 401 Certification.

Ms. Ariana Villanueva
County of Los Angeles
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- b) In areas of the Project site which may support ephemeral streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of ephemeral channels and help maintain natural sedimentation processes; therefore, CDFW recommends effective setbacks be established to maintain appropriately-sized vegetated buffer areas adjoining ephemeral drainages.
 - c) Project-related changes in drainage patterns, runoff, and sedimentation should be included and evaluated in the DPEIR.
 - d) As part of the LSA Notification process, CDFW requests a hydrological evaluation of the 100-, 50-, 25-, 10-, 5-, and 2-year frequency storm event for existing and proposed conditions. CDFW recommends the DPEIR evaluate the results and address avoidance, minimization, and/or mitigation measures that may be necessary to reduce potential significant impacts.
- 2) Wetlands Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's policies. The Wetlands Resources policy (<https://fgc.ca.gov/About/Policies/Miscellaneous#Wetlands>) of the Fish and Game Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement and expansion of wetland habitat in California. Further, it is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values."
- a) The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, the Project must include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions for the benefit to on-site and off-site wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the DPEIR and these measures should compensate for the loss of function and value.
 - b) The Fish and Game Commission's Water policy guides CDFW on the quantity and quality of the waters of this state that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this state;

Ms. Ariana Villanueva
 County of Los Angeles
 August 5, 2020
 Page 4 of 11

prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & Game Code, § 5650).

- 3) Nesting Birds. Based on a review of satellite imagery, there is scattered vegetation throughout the Project location that may provide potential habitat where Project activities may impact nesting birds. Project activities occurring during the breeding season of nesting birds could result in the incidental loss of fertile eggs, or nestlings, or otherwise lead to nest abandonment in trees directly adjacent to the Project boundary. The Project could also lead to the loss of foraging habitat for sensitive bird species.
 - a) CDFW recommends that measures be taken to avoid Project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).
 - b) Proposed Project activities including (but not limited to) staging and disturbances to native and non-native vegetation, structures, and substrates should occur outside of the avian breeding season which generally runs from February 1 through September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, CDFW recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300-feet of the disturbance area (within 500-feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
- 4) Bat Species. A review of the California Natural Diversity Database (CNDDB) indicates occurrences of several bat species within the Project vicinity. These species include but are not limited to the big free-tailed bat (*Nyctinomops macrotis*), hoary bat (*Lasiurus cinereus*), pallid bat (*Antrozous pallidus*), western yellow bat (*Lasiurus xanthinus*), and western mastiff bat (*Eumops perotis californicus*). The pallid bat and the western mastiff bat are both California Species of Special Concern. Bridges, buildings, trees, and scattered vegetation throughout the Project location may provide potential habitat where Project activities may impact bats. Activities that will result in the removal of trees, buildings or other habitat for bats should consider avoiding adverse impacts to bats.

Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & Game Code § 4150, California Code of Regulations § 251.1). A DPEIR should provide a thorough discussion of potential impacts to bats from construction and operation of the Project to adequately disclose potential impacts and to identify appropriate avoidance and mitigation measures. The CEQA document shall

Ms. Ariana Villanueva
 County of Los Angeles
 August 5, 2020
 Page 5 of 11

describe feasible measures which could minimize significant adverse impacts (CEQA Guidelines §15126.4[a][1]).

- 5) Impacts to sensitive species. The Project location is within the floodplain and active channel of the LA River. CDFW is concerned the Project may affect sensitive species that occur within the LA River and areas adjacent to the Project. Areas of particular concern include reaches of the LA River near the Sepulveda Basin, Griffith Park, and Glendale Narrows where the occurrence of the endangered least Bell's vireo (*Vireo bellii pusillus*), has been documented. Other sensitive or special status species may include (but are not limited to) Crotch bumble bee (*Bombus crotchii*), southwestern willow flycatcher (*Empidonax traillii extimus*), coastal California gnatcatcher (*Polioptila californica californica*), burrowing owl (*Athene cunicularia*), American badger (*Taxidea taxus*), Los Angeles pocket mouse (*Perognathus longimembris brevinasus*), big free-tailed bat (*Nyctinomops macrotis*), hoary bat (*Lasiurus cinereus*), pallid bat (*Antrozous pallidus*), western yellow bat (*Lasiurus xanthinus*), western mastiff bat (*Eumops perotis californicus*), western spadefoot (*Spea hammondi*), western pond turtle (*Emys marmorata*), coast horned lizard (*Phrynosoma blainvillii*), southern California legless lizard (*Anniella stebbinsi*), mesa horkelia (*Horkelia cuneata* var. *puberula*), Parish's brittle scale (*Atriplex parishii*), Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*), and Peruvian dodder (*Cuscuta obtusiflora* var. *glandulosa*). Grading, vegetation removal, and other ground disturbances could crush and bury listed or sensitive plants and animals, resulting in direct mortality. The Project may also affect adjacent habitat by loud noises, lighting, increased human presence and activity, fugitive dust, increased temperatures from asphalt (heat island effect), hydrocarbons from asphalt paving within the LA River floodplain, and spreading invasive weeds, resulting in stress, displacement, and mortality of these species. CDFW recommends to following:
 - a) The Project should use alternatives to hydrocarbon-based asphalt paving. Asphalt pavement continues to leach hydrocarbons and heavy metals, becoming a significant point source of environmental contamination (Sadler, 1999).
 - b) Given this Project is proposed for a sensitive location (within the LA River channel and floodplain), the potential for direct and indirect impacts to sensitive, listed, and fully protected species should be further addressed. The DPEIR should include specific information on species locations, and specifically how the project will be sited to avoid impacts to this species or vegetation communities. If the Project will impact a sensitive species or vegetation community, specific mitigation to offset the loss of habitat (acreage and type) should be included in the DPEIR. Any mitigation proposed should be covered under a conservation easement, include a long-term management plan, and ensure funding to manage the mitigation land in perpetuity.
- 6) Landscaping. The NOP includes parks, open spaces, and trails among the Project objectives. Habitat loss and invasive plants are a leading cause of native biodiversity loss. Invasive plant species spread quickly and can displace native plants, prevent native plant growth, and create monocultures. CDFW recommends using native, locally appropriate plant species for landscaping on the Project site. CDFW recommends invasive/exotic plants, such as pampas grass (*Cortaderia selloana*) and salt cedar (*Tamarisk* spp.), be restricted from use in landscape plans for this Project. A list of invasive/exotic plants that

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should be avoided as well as suggestions for better landscape plants can be found at <https://www.cal-ipc.org/solutions/prevention/landscaping/>

- 7) Tree Removal. Satellite imagery indicates the presence of trees in areas of the Project site that might be developed for parks, trails, channel modifications, or other Project components. Habitat loss is one of the leading causes of native biodiversity loss. To compensate for any loss of trees, CDFW recommends replacing all non-native trees removed as a result of the proposed work activities at least a 1:1 ratio with native trees. CDFW recommends replacing native trees at least a 3:1 ratio with a combination of native trees and/or appropriate understory and lower canopy plantings.

Due to tree removal, Project activities have the potential to result in the spread of tree insect pests and disease into areas not currently exposed to these stressors. This could result in expediting the loss of oaks, alders, sycamore, and other trees in California which support a high biological diversity including special status species. To reduce impacts to less than significant the final environmental document should describe an infectious tree disease management plan and how it will be implemented to avoid significant impacts under CEQA. All trees identified for removal resulting from the Project should be inspected for contagious tree diseases including but not limited to: thousand cankers fungus (*Geosmithia morbida*), see <http://www.thousandcankers.com/>; polyphagous shot hole borer (*Euwallacea* spp.), see <https://anrcatalog.ucanr.edu/pdf/8590.pdf> and <https://www2.ipm.ucanr.edu/agriculture/avocado/polyphagous-shot-hole-borer-and-kuroshio-shot-hole-borer/>; and goldspotted oak borer (*Agrilus auroguttatus*), see <http://ipm.ucanr.edu/PMG/PESTNOTES/pn74163.html>. To avoid the spread of infectious tree diseases, diseased trees should not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed.

- 8) Biological Direct, Indirect, and Cumulative Impacts. The NOP states that the Project location broadly includes “a 51-mile-long, 2-mile-wide corridor (i.e., 1 mile on each side) of the LA River in Los Angeles County”. The LA River is a major riparian corridor in the Los Angeles Basin and serves as an important wildlife movement corridor connecting much of the open spaces through the rapidly urbanizing city. It is essential to understand how these open spaces and the biological diversity within them may be impacted by Project activities. This should aid in identifying specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends providing a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. The following should be addressed in the DPEIR:
 - a) A discussion regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Plan (NCCP, Fish & Game Code, § 2800 *et seq.*). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DPEIR;
 - b) A discussion of potential adverse impacts from lighting, noise, human activity, and exotic species and identification of any mitigation measures;

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- c) A discussion on Project-related changes on drainage patterns and downstream of the Project site; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and, post-Project fate of runoff from the Project site. The discussion should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included;
- d) An analysis of impacts from land use designations and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DPEIR; and,
- e) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

General Comments

- 1) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DPEIR:
 - a) A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas and access routes to the construction and staging areas; and,
 - b) A range of feasible alternatives to Project component location and design features to ensure that alternatives to the proposed Project are fully considered and evaluated. The alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas.
- 2) Biological Baseline Assessment. The Project site consists of land developed with a variety of uses, as well as vacant land, undeveloped land containing native and non-native vegetation. Undisturbed land may be considered sensitive habitat or may provide suitable habitat for special status or regionally and locally unique species. CDFW recommends providing a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project area, with emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project. CDFW also considers impacts to Species of Special Concern a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures. The DPEIR should include the following information:

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- a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The DPEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts. Project implementation may result in impacts to rare or endangered plants or plant communities that have been recorded adjacent to the Project vicinity. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, S3 and S4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting <https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>;
- b) A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <https://wildlife.ca.gov/Conservation/Plants>);
- c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
- d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by the project. CDFW's California Natural Diversity Database (CNDDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. CDFW recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>;
- e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California SSC and California Fully Protected Species (Fish & Game Code §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (see CEQA Guidelines § 15380). Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the USFWS; and,
- f) A recent, wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame, or in phases.

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- 3) California Endangered Species Act. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or CESA-listed rare plant species that results from the Project is prohibited, except as authorized by State law (Fish & Game Code, §§ 2080, 2085; California Code of Regulations, tit. 14, § 786.9). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
- 4) Avoidance, Minimization, and Mitigation for Sensitive Plants. The DPEIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts. CDFW considers these communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in the *Manual of California Vegetation*.
- 5) Compensatory Mitigation. The DPEIR should include mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement, financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code section 65967, the lead agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.
- 6) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, the DPEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water

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pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.

- 7) Translocation/Salvage of Plants and Animal Species. Translocation or transplantation is the process of moving an individual from the Project site and permanently moving it to a new location. CDFW generally does not support the use of, translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.
- 8) Moving out of Harm's Way. The proposed Project is anticipated to result in clearing of natural habitats that support many species of indigenous wildlife. To avoid direct mortality, we recommend that a qualified biological monitor approved by CDFW be on-site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or Project-related construction activities. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. If the Project requires species to be removed, disturbed, or otherwise handled, we recommend that the DPEIR clearly identify that the designated entity should obtain all appropriate state and federal permits.
- 9) Revegetation/Restoration Plan. Plans for restoration and re-vegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.
 - a) CDFW recommends that local on-site propagules from the Project area and nearby vicinity be collected and used for restoration purposes. On-site seed collection should be initiated in the near future to accumulate sufficient propagule material for subsequent use in future years. On-site vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various Project components as appropriate.
 - b) Restoration objectives should include providing special habitat elements where feasible to benefit key wildlife species. These physical and biological features can include (for example) retention of woody material, logs, snags, rocks, and brush piles (see Mayer and Laudenslayer, 1988).

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CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the County of Los Angeles in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact David T. Lin, Senior Environmental Scientist (Specialist), at (562) 430-0097 or by email at David.Lin@wildlife.ca.gov.

Sincerely,

DocuSigned by:

B6E58CFE24724F5...

Erinn Wilson
Environmental Program Manager I

ec: CDFW
Victoria Tang – Los Alamitos
Karen Drewe – Los Alamitos
Baron Barrera – Los Alamitos
David T. Lin – Los Alamitos
Susan Howell – San Diego
CEQA HQ – Sacramento

State Clearinghouse

References

- California Department of Fish and Wildlife (CDFW). March 20, 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <https://www.wildlife.ca.gov/Conservation/Plants>).
- Cowardin, L M., V. Carter, F.C. Golet, and E.T. LaRoe. 1979. *Classification of wetlands and deepwater habitats of the United States*. U.S. Fish and Wildlife Service, FWS/OBS-79/31, Washington, DC.
- Mayer, K.E. and W.F. Laudenslayer, Jr. 1988. Editors: *A Guide to Wildlife Habitats of California*. State of California, Resources Agency, Department of Fish and Game, Sacramento, CA.
- Sadler, R., C. Delamont, P. White, and D. Connell. 1999. Contaminants in soil as a result of leaching from asphalt. *Toxicological & Environmental Chemistry* 68:71-81.
- Sawyer, J.O., T. Keeler-Wolf, and J.M. Evens. 2009. *A Manual of California Vegetation*, Second Edition. California Native Plant Society, Sacramento, CA.

Ariana Villanueva

From: John Buckingham <johnyum@msn.com>
Sent: Wednesday, August 5, 2020 11:59 AM
To: PW-LA River CEQA
Subject: NOP Scoping Comments

CAUTION: External Email. Proceed Responsibly.

Ariana Villanueva,

I want to make another suggestion for the Draft PEIR. With thousands of square feet of surface area on the floor of the LA River from Slauson Ave. to the mouth, solar panels could be installed and connected to the electronic grid. DC to AC power inverters could make the transition seamless.

Thanks again,

John Buckingham
1865 Montair Ave.
Long beach CA 90815
(562) 597-3516

Ariana Villanueva

From: John Buckingham <johnyum@msn.com>
Sent: Wednesday, August 5, 2020 11:18 AM
To: PW-LA River CEQA
Subject: NOP Scoping Comments
Attachments: NOP Scoping Comments.docx

CAUTION: External Email. Proceed Responsibly.

Ariana Villanueva,

I am submitting my opinion for the LA River Draft PEIR as a Word document.

Thank you,

John Buckingham
Long Beach Ca

NOP Scoping Comments

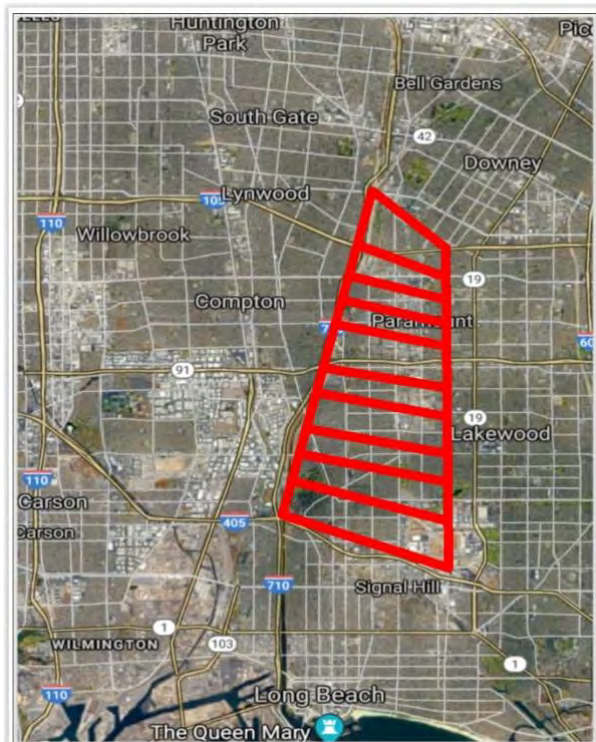
August 5, 2020

Ariana Villanueva,

I would like to offer my opinion on the LA River Draft PEIR. My focus is mainly on the collection of rain water during rainstorms. I believe that an array of tunnels would be a means of collecting the water runoff in the river would be best. The water would be held in the tunnels. The tunnels would act as a cistern as the water is put through water treatment plants for public use and drinking water and stored in above ground storage tanks for distribution.

In the picture left the red lines represent 25-foot diameter tunnels. Starting at the upper left at Imperial Highway and the LA River is where a cut into the river is made and flows south paralleling the river and the I-710 and then east to the Long Beach water treatment plant at Spring St. Another tunnel goes to Downey Ave near the I-105 then south to the Long Beach water treatment plant at Spring St. Other tunnels complete the array. In total, about 26.82 miles of tunnels are shown in the example. If all the tunnels become filled the amount of water collected would be 519,990,907 gallons. Other configurations of tunnels could be done.

This would be my answer to the runoff water in the LA River during a storm. Please forward the any interested parties.



Thank you,

John Buckingham
1865 Montair Ave.
Long Beach CA 90815
(562) 597-3516

Ariana Villanueva

From: Karen Barnett <karenbarnett@atwatervillage.org>
Sent: Wednesday, August 5, 2020 9:30 AM
To: PW-LA River CEQA
Cc: Morales, Fernando; Schneider, Erin; Edward Morrissey; Courtney Morris
Subject: Re: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Hello Ariana,

Has there been any discussion on extending the comment deadline of August 6, 2020? On Monday evening, the river committee approved a comment letter for the August 13th AVNC board meeting.

If you are NOT extending the deadline, I need to know so that I can get the comments I have from the river and community members into you on August 6 by 5 PM.

Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

On Wed, Jul 29, 2020 at 5:01 PM Karen Barnett <karenbarnett@atwatervillage.org> wrote:

Hello Ariana,

Thanks for speaking with me yesterday. Last night the board approved the letter requesting an extension of the NOP comment period. Courtney and Edward will be emailing it out soon.

See you tonight,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

On Mon, Jul 27, 2020 at 11:56 AM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Hi Karen,

Thank you for your inquiry. Below is additional information on the LA River Master Plan Program EIR and CEQA process.

Notice of Preparation and Scoping Meeting on July 29, 2020:

- The main goal for the Notice of Preparation (NOP) and the upcoming meeting is to let the public know that Public Works is initiating the CEQA process.
- The proposed scope of the draft Program EIR is included in the NOP which can be found here: <https://pw.lacounty.gov/swg/peir/doc/NOP-2020.06.26-draft.pdf> and was filed on July 7 (posted with the County Clerk, Office of Planning and Research, sent via certified mail to Steering Committee members, by email to interested parties, and through social media blasts on Twitter and Facebook).
- The meeting on Wednesday will elaborate on the information provided in the NOP and the CEQA approach for the LA River Master Plan. Comments on the scope can continue to be provided until August 6 as the document is being developed. I'd like to reiterate that this meeting is not to present the draft Program EIR, but rather to inform the public and agencies that we are commencing the CEQA process and presenting a proposed approach for preparing the Program EIR.

Following the Scoping Meeting, the next steps will be the development of Draft Program EIR and issuance of a Notice of Availability (NOA). Once available to the public, there will be a 45-day public review period for the Draft Program EIR. Comments on the draft Program EIR will be taken into consideration and addressed or incorporated into the Final Program EIR.

I'd like to note that the proposed Program EIR will not have any project-specific or site-specific analysis as the Master Plan doesn't provide that level of detail. At this time, this Program EIR would just provide a first-tier analysis for later activities to consider when conducting CEQA analysis for proposed individual projects and would look at the cumulative effects of the Plan as a whole. Future projects along the LA River would still be required to conduct project-specific CEQA evaluation for environmental analysis. Site-specific analysis, such as a flood study for Atwater Village may be included in future CEQA analysis for specific projects as applicable.

I hope this helps! Please feel free to contact me at my number below.

Sincerely,

Ariana Villanueva

Environmental Engineering Specialist

Los Angeles County Public Works

(626) 458-7146

From: Karen Barnett <karenbarnett@atwatervillage.org>

Sent: Friday, July 24, 2020 9:00 AM

To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>

Cc: Morales, Fernando <FMorales@bos.lacounty.gov>; Schneider, Erin <ESchneider@bos.lacounty.gov>

Subject: Re: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Hello Adriana,

I didn't hear back from you on my questions? I'm a bit confused about this process - there appears to be a disconnect. We are being asked to make comments by August 6th, which is the end of a 30 day period - but there is no information available till the meeting on July 29th.

Noticing a 30-day review for comments when there's no information available for the public to review, is not appropriate for public involvement in the CEQA process... *The public is involved in CEQA at many stages. Public involvement starts during the scoping process, which is used to determine what environmental impacts will be studied and what type of environmental document will be needed.* Maybe you are only releasing information to cities, agencies, and non-profits? Either way, you need to extend the comment period, reset it for 30 days (min.) from the date you release materials to the public.

Our monthly AVNC board meeting is after August 6th. So we will have to deal with this in our Special Meeting, August 28th which is dedicated to the HSR DEIR. (Which is before you July 29th NOP/PEIR information meeting)

I believe this process has not been transparent or inclusive for members of the public, especially for riverfront communities such as Atwater Village.

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

On Mon, Jul 13, 2020 at 9:47 AM Karen Barnett <karenbarnett@atwatervillage.org> wrote:

Thank you for getting back to me.

We as a board or members of the public can ask that certain areas be added in more detail?

For example - the LARRMP has study areas that are more developed than its list of potential projects.

OR

Is it we can ask for more detail on Hazardous Materials or Recreation as a section?

Do you plan to have a section of Atwater Villages 4 miles which will be called out and addressed in more detail? Your flood study in North Atwater Village?

Since this is a "programming EIR" will project automatically get a neg. dec. or will they have to go through the full EIR process?

We have a short timeline for a response since the meeting is so close to the comment period deadline. Any information you can provide sooner is appreciated.

Thanks,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

On Mon, Jul 13, 2020 at 9:25 AM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Hi Karen,

Thank you for reaching out to us. The Draft PEIR for 2020 LA River Master Plan is still in the process of being prepared so the sections are not yet available for review; however, the online scoping meeting held on July 29 will provide an overview of the PEIR/CEQA process and provides an opportunity for the public to provide input and comment on the scope of the PEIR (the sections you would like to see included in the PEIR). You will have an opportunity to review the sections (i.e. aesthetics, energy, hydrology/water quality, etc.) in the Draft PEIR when it is released for public review with a 45-day period to provide comments. We hope you can join us on July 29 from 6 to 8pm, but if not, all presentation materials will be available on the website afterwards (<https://pw.lacounty.gov/go/larmpceqa>) and we will be accepting written comments on the scope of the PEIR until August 6. Registration for the presentation is not required to attend, but if you sign up, we'll send additional reminder email about the event prior to July 29.

I will also check on issues with the phone number as it should be active.

Let me know if you have any other questions. Thank you!

Sincerely,

Ariana Villanueva

Environmental Engineering Specialist

Los Angeles County Public Works

From: Karen Barnett <karenbarnett@atwatervillage.org>

Sent: Friday, July 10, 2020 3:46 PM

To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>

Cc: Morales, Fernando <FMorales@bos.lacounty.gov>; Schneider, Erin <ESchneider@bos.lacounty.gov>

Subject: Re: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Hello,

This is my third email to this address and I haven't gotten a response?! I would like to know how to prepared for this meeting/NOP/PEIR - where the information is to review?

Your phone number worked once this morning... now my provider says it's no longer in service?

Can you call me at 818 468 1738

Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

On Fri, Jul 10, 2020 at 8:13 AM Karen Barnett <karenbarnett@atwatervillage.org> wrote:

Hello Ariana,

Can you point me to the information we need to assess? I don't see any links for sections referenced in the notice. Atwater Village is one of the flood study points mile 28 if I'm recalling correctly. Our community is 4+ miles of the LA River (east and west banks)

Of course, I would like to see it all but specifically these sections in their formats 2020 LA River Master Plan PEIR Scope and Probable Environmental Effects. *I'm assuming flood would be in Hydrology/Water Quality.*

Aesthetics
Air Quality
Energy
Hazards & Hazardous Materials
Hydrology/Water Quality
Land Use/Planning
Noise
Public Services
Recreation
Transportation
Utilities/Service Systems
Cumulative Impacts

Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative
River Committee Chair
E-mail: KarenBarnett@atwatervillage.org
Message Phone: 323-230-3406
www.atwatervillage.org

----- Forwarded message -----

From: **Karen Barnett** <karenbarnett@atwatervillage.org>

Date: Wed, Jul 8, 2020 at 9:52 AM

Subject: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>

Hello Ariana,

Can you point me to the information we need to assess? I don't see any links for sections referenced in the notice. Atwater Village is one of the flood study points mile 28 if I'm recalling correctly. Our community is 4+ miles of the LA River (east and west banks)

Of course, I would like to see it all but specifically these sections in their formats 2020 LA River Master Plan PEIR Scope and Probable Environmental Effects. *I'm assuming flood would be in Hydrology/Water Quality.*

Aesthetics
Air Quality
Energy
Hazards & Hazardous Materials
Hydrology/Water Quality
Land Use/Planning
Noise
Public Services
Recreation
Transportation
Utilities/Service Systems
Cumulative Impacts

Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative
River Committee Chair
E-mail: KarenBarnett@atwatervillage.org
Message Phone: 323-230-3406
www.atwatervillage.org

On Tue, Jul 7, 2020 at 5:20 PM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

The County of Los Angeles, through Los Angeles County Public Works, will prepare a Program Environmental Impact Report (PEIR) pursuant to the California Environmental Quality Act (CEQA) for its proposed 2020 LA River Master Plan. The PEIR will assess the environmental impacts of implementing the 2020 LA River Master Plan. As part of this PEIR process, Public Works is soliciting input from members of the public, organizations, and government agencies on the scope and content of the information to be included and analyzed in the PEIR.

A Notice of Preparation (NOP) has been prepared to notify responsible and trustee agencies, the Office of Planning and Research, the County Clerk, and other interested parties that Public Works is beginning preparation of this PEIR, and starts the 30-day scoping period. The NOP for the 2020 LA River Master Plan PEIR can be viewed at <http://pw.lacounty.gov/go/larmpceqa>.

The community is invited to participate in an online scoping meeting for the PEIR, which is being held virtually due to restrictions under State of California Executive Order N-33-20.

DATE: Wednesday, July 29, 2020

TIME: 6:00 p.m. to 8:00 p.m.

LOCATION: Details about the CEQA online scoping meeting are available at <http://pw.lacounty.gov/go/larmpceqa>

Registration for the event is available at <http://www.eventbrite.com/e/online-scoping-meeting-2020-la-river-master-plan-program-eir-tickets-112158469000>

Scoping comments on the PEIR are due no later than August 6, 2020, which marks the end of the 30-day scoping period. Please send your comments in writing to the physical address or e-mail address shown below. If sending an e-mail, please include "NOP Scoping Comments" in the subject line. Include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva

Los Angeles County Public Works, Stormwater Quality Division

900 South Fremont Avenue, 11th Floor

Alhambra, CA 91803

LARiverCEQA@pw.lacounty.gov



Thank you and we look forward to your participation in the process.

Ariana Villanueva

From: Melissa von Mayrhauser <melissavm@lawaterkeeper.org>
Sent: Tuesday, August 4, 2020 4:32 PM
To: PW-LA River CEQA
Cc: Genevieve Osmena; Dadashi, Heather; Arthur S. Pugsley; Bruce Reznik; Kim Lewand Martin; J.P. Rose; Liliana Griego; Marissa Christiansen; Katherine Pease
Subject: Comments on the NOP of a DEIR for the LA River Master Plan Update
Attachments: LAW CBD FoLAR HTB LARMPU NOP Comment Letter.pdf

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Villanueva,

On behalf of LA Waterkeeper, The Center for Biological Diversity, Friends of the LA River, and Heal the Bay, please find our attached comment letter regarding the LARMPU PEIR NOP. Please let me know if you have any difficulty opening the document. We will also mail a courtesy copy to you at Public Works.

Thank you,
Melissa

MELISSA VON MAYRHAUSER

Watershed Programs Manager

(310) 394-6162 x101

@LAWaterkeeper





August 4, 2020

Attention: Ariana Villanueva
Los Angeles County Public Works,
Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

Via e-mail to Ariana Villanueva with original to follow via US Mail.

RE: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the LA River Master Plan Update

Dear Ms. Villanueva,

Los Angeles Waterkeeper, the Center for Biological Diversity, Friends of the LA River, and Heal the Bay have reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the LA River Master Plan Update (LARMPU). The County of Los Angeles Department of Public Works (the County) will prepare the EIR pursuant to the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (Guidelines). (See Pub. Res. Code Section 21000 et seq; 14 Cal. Code Regs. Section 15000 et seq). We submit the following comments for consideration as the County prepares the EIR.

Los Angeles Waterkeeper (LAW) is a nonprofit environmental organization with members throughout the LA region. We safeguard LA's inland and coastal waters by enforcing laws and empowering communities throughout Los Angeles County. In the twenty-five years since our founding, LAW has protected LA waterways from thousands of Clean Water Act violations, worked to ensure access to safe drinking water, encouraged stormwater and wastewater recycling, and generated billions of investment dollars for remediation of our region's most threatened waterways. Much of LAW's work centers around rehabilitating the Los Angeles River and its watershed.

The Center for Biological Diversity is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental

“LA River Master Plan Update EIR”

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law. The Center has over 1.7 million members and online activists throughout California and the United States, including residents of Los Angeles County. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life.

Friends of the Los Angeles River (FoLAR) has been at the forefront of ensuring the Los Angeles River is publicly accessible and ecologically sustainable. We inspire River stewardship through community engagement, education, advocacy, and thought leadership. For over 30 years, we have worked to create an enduring vision of the River that acknowledges its legacy as a life-giving waterway and illuminates the critical benefits its restoration can bring to the surrounding communities.

Heal the Bay is a non-profit environmental organization with over 30 years of experience and 15,000 members dedicated to making the coastal waters and watersheds of California safe, healthy, and clean. Heal the Bay has a long history of work on the Los Angeles River; we have advocated for improved habitat, water quality, and recreation by weighing in on numerous policies and permits concerning the Los Angeles River such as TMDLs, the Recreational Use Reassessment (RECUR) study, permits for dredging and clearing vegetation, and other regulatory actions.

LAW, FoLAR, and Heal the Bay have actively participated in the development of the LA River Master Plan as Steering Committee members. We have repeatedly voiced concerns about the LA River Master Plan Update process and drafts throughout the Steering Committee and sub-committee process. We have been concerned about the lack of a clear vision, the lack of equity and ecology prioritization, and the lack of a watershed approach or climate resilience focus. We believe that many of the projects proposed in the draft would not only do harm to communities and ecosystems, but could also foreclose opportunities for preventing future harms. These issues continued to trouble us after reviewing the draft plan presented to the Steering Committee, so we further elaborated upon them in a joint letter submitted on March 12, 2020 with several fellow organizations on the Steering Committee. We still have not received any response to our comments at the date of submitting this letter, so we proceed with this letter with our same concerns in mind. The timing of the release of the NOP makes it difficult for us to submit comments without seeing the public-facing Draft EIR.

After reviewing the Draft EIR NOP, we are concerned about the County’s lack of transparency in its selection of an EIR document type, unclear description of the LARMPU project, and vague discussion of alternatives. CEQA requires transparency and a stable project description written with a level of specificity that allows members of the public to comment on

the project. (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 186). The County’s actions of describing its plan as both a Master EIR and a Program EIR, continually altering the LARMPU project description, and listing of vague alternatives vitiate the environmental review process as a tool for intelligent public participation.

I. The County Must Explain Whether It Intends to Prepare a Master EIR or a Program EIR and Provide Reasoning.

Instead of conflating Master and Program EIRs in labeling the plan’s environmental report a “Draft Master Plan PEIR,” we urge the County to clearly select one option and highlight and consider the relevant issues in the Draft EIR. A clearer selection of an EIR type will not only grant members of the public greater understanding of what they are commenting upon, but will also benefit the County. In the past, courts have substituted their own judgement in the absence of an agency’s EIR designation. A court may independently label an EIR and apply the corresponding CEQA regulations in a manner contrary to an agency’s wishes. Master and Program EIRs are distinct types of EIR documents and should be treated as such.

A Program EIR is one that may be prepared on a series of actions that can be characterized as one large project, and are related either: geographically; as logical parts in the chain of contemplated actions; in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways. (Guidelines Section 15168 subd. (a)). A Program EIR analyzes the environmental consequences of broad policies or programs at the planning stage and requires lead agencies to prepare more detailed analyses in subsequent documents.¹ It can: (1) provide the basis in an initial study for determining whether the later activity may have any significant effects; (2) be incorporated by reference to deal with regional influences, secondary effects, cumulative impacts, broad alternatives, and other factors that apply to the program as a whole; and (3) focus an EIR on a subsequent project to permit discussion solely of new effects which had not been considered before. (Guidelines Section 15168 subd. (d)).

A Program EIR will be most helpful in dealing with subsequent activities if it provides a description of planned activities and deals with the effects of the program as “specifically and comprehensively as possible.” (Guidelines Section 15168 subd. (c)(5)). In instances where the subsequent activities involve site-specific operations, a lead agency should use “a written

¹ See Michael H. Remy et. al., *Guide to CEQA California Environmental Quality Act* 280, 334 (11th ed. 2006).

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checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation” were covered in the Program EIR. (Guidelines Section 15168 subd. (c)(4)). Where such an inquiry concludes that additional CEQA analysis is required, the lead agency should then prepare an initial study to determine whether a negative declaration or EIR should be prepared. (Guidelines Section 15168 subd. (c)(1)).

The Master EIR procedure is another option for conducting environmental review. It is intended to serve as the foundation for analyzing the environmental effects of subsequent projects. A lead agency may prepare a Master EIR for (1) a general plan, general plan update, general plan element, general plan amendment, or specific plan; (2) a project that consists of smaller individual projects which will be carried out in phases; (3) projects that will be carried out or approved pursuant to a development agreement, as well as a number of other classes of projects. It shall, to the greatest extent feasible, evaluate the cumulative impacts, growth inducing impacts, and irreversible significant effects on the environment of subsequent projects. (Guidelines Section 15175).

In practice, a Master EIR is similar to a Program EIR. However, there are at least three differences worth noting. First, the requirements for preparing and applying a Master EIR and its associated focused EIRs are described in detail in both statute and the CEQA Guidelines. Requirements for Program EIRs, on the other hand, are less specifically described in the CEQA Guidelines. Second, once a subsequent project is determined to be within the scope of the Master EIR, a focused EIR must be prepared whenever it can be fairly argued on the basis of substantial evidence in the record that the project may have a significant effect, even if evidence exists to the contrary. Focused EIRs should examine project-specific impacts while referencing the Master EIR’s analysis of cumulative and growth-inducing impacts. Projects that have been described in some detail in the Master EIR may avoid the need for a subsequent focused EIR or negative declaration. Third, to use a Master EIR for a subsequent project, the Master EIR must be re-examined and, if necessary, supplemented at least once every five years. This ensures that the analysis contained in a Master EIR remains topical.²

We encourage the County to consider preparation of a Master EIR because it may facilitate smoother implementation of subsequent projects and greater public participation if prepared in a sufficiently comprehensive manner. The draft LARMPU that Steering Committee members have read already includes a high level of detail about certain projects, including the removal of vegetation from the Glendale Narrows and the construction of a concrete cap over the

² Office of Planning and Research, “Chapter 10 CEQA: Designing Healthy, Equitable, Resilient, and Economically Vibrant Places” in General Plan Guidelines, p. 275.

river in South Gate. The level of detail in the EIR should match the level of detail from the LARMPU, so community members should have an opportunity to comment on the environmental impacts of these projects at this point. Preparation of a Master EIR would also incentivize greater thoroughness and inclusivity in the upcoming EIR. Above all, however, we request a clear selection of an EIR type and an application of the CEQA regulations accordingly.

II. The County Must Devise a Stable Project Description.

Regardless of the County’s designation of the LARMPU EIR, CEQA requires an EIR to contain a stable project description. In fact, “an accurate, stable, and finite project description is the sine qua non of an informative and legally sufficient EIR.” (*County of Inyo* at 186). The CEQA Guidelines flesh out the notion of a “project” by referring to it as “an activity which may cause either a direct...or a reasonably foreseeable indirect physical change in the environment.” (Pub. Res. Code 21065 and *County of Inyo* at 192).

As written, the LARMPU Draft EIR contains an unstable, vague, and inconsistent description of the project as well as a list of ambiguous alternatives. For example, the Draft EIR available to the Steering Committee indicated that there are flooding concerns along the river corridor and discouraged riverfront development while also proposing housing along the river. It then makes it difficult for community members to comment on the County’s stance on housing in the floodplain if this is articulated in a contradictory way. Moreover, the Kit of Parts section of the Master Plan presents the six design components without prioritization or context in terms of their impacts on goals, possibility to do harm, and appropriateness reach by reach.³ It will be very difficult to comment on the environmental impacts of a general idea of floodplain reclamation or in-channel modifications, for instance, without more information. The NOP also states that the scope of the project is along a “51-mile-long, 2-mile-wide corridor,” but the draft LARMPU contains elements that are watershed-wide. All of these contradictions and more will lead to an unstable project description. A project description that gives conflicting signals to the public about the nature and scope of the project is fundamentally misleading and inadequate. (*Washoe Meadows County v. Dep’t of Parks & Recreation* (2017) 17 Cal. App. 5th 277, 287, 225 Cal. Rptr. 3d 238, 245 (*Washoe Meadows*)).

Additionally, some portions of the draft LARMPU are quite detailed, while others are vague, making the document unbalanced as a whole. The draft includes a broad description of possible projects, rather than a preferred or actual project. This type of project description is

³ See section 4 of the “Letter to County LARMPU” for more information about our concerns pertaining to the Kit of Parts portion of the Master Plan.

unstable because it presents the public with a moving target and requires a commenter to offer input on a wide range of alternatives that may not be pertinent to the ultimately approved project. Each option creates a different set of impacts, requiring different mitigation measures. As a result, meaningful public participation is stultified, and the public’s ability to participate in the CEQA process is impaired. (*San Joaquin Raptor Rescue Ctr. v. County of Merced* (2007) 149 Cal. App. 4th 645, 656).

CEQA also requires the EIR to set forth a reasonable range of clear project alternatives to foster informed decision-making and public participation. (see *Laurel Heights Improvement Assoc. v. Regents of the Univ. of Cal.* (1988) 47 Cal.3d 376). The NOP states that the EIR will include a no project alternative, a project alternative, and “one or more feasible ‘build’ alternatives to the proposed 2020 LA River Master Plan.” It is very unclear what this means, but it sounds like community members will be able to comment on either moving forward with the LARMPU as written, not at all, or with an entirely different ‘build’ project.

The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; new and unforeseen insights may emerge during investigation, compelling revision of the original proposal. (*County of Inyo* at 199). An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision that logically takes account of environmental consequences. An assessment of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is “reasonably feasible.” *Washoe Meadows* at 245. Only through an accurate view of the project may decision-makers and affected members of the public balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal, and weigh other possible alternatives. Therefore, we urge the County to devise a stable project description and delineate a set of clear alternatives in the Draft EIR.

III. The County Should Include a “Watershed Restoration” Alternative.

We recommend that the County include a “watershed restoration” alternative, recognizing that the river is a critical freshwater ecosystem that is important to community members. This alternative would expand the scope of the project to include the LA River watershed more formally because in order to achieve the goals of the LARMPU (including “reduce flood risk and improve resiliency,” “support healthy, connected ecosystems” and “promote healthy, safe, clean water”) a system-wide approach is critical. Freshwater ecology

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studies show that making superficial and fragmented changes to streams and stream-adjacent areas does not lead to the restoration of stream ecological function.⁴

The County also needs to use this level of analysis and broader scope in order to understand cumulative impacts. Cumulative impacts refers to two or more individual effects which, when considered together, are considerable and compound other environmental impacts. CEQA requires an EIR to discuss those cumulative impacts to which the project would contribute, and the importance of that contribution in the context of the cumulative impact. (Guidelines Title 14, Section 21083). How will the County understand whether it is meeting the LARMPU goal of “Improving local water supply reliability” without a watershed-wide scope, for instance? The NOP states that the LARMPU recognizes that infrastructure planning is equally important with social and environmental needs. A watershed restoration alternative would make this statement true.

On a final note, the County may also need to conduct a NEPA review given that several of the sections of the river are federally maintained. It is important to note that NEPA guidelines that are in conflict with CEQA do not override an agency’s CEQA obligations as “California courts will not follow NEPA precedent that is contrary to CEQA.” (*Washoe Meadows* at 290). While the presentation of alternative projects can in some cases be an adequate project description for a Draft EIS under NEPA, dramatically different projects in a Draft EIR do not constitute a stable project description under CEQA. Thus, even if the County conducts NEPA review, it will still be required to select a preferred alternative.

Thank you for the opportunity to comment. Please feel free to reach out to us at our e-mail addresses below. We look forward to reading the EIR and public-facing LARMPU draft later this summer.

Sincerely,

Heather Dadashi

Legal Intern

LA Waterkeeper

dadashi2021@lawnet.ucla.edu

Arthur Pugsley

Senior Staff Attorney

LA Waterkeeper

arthur@lawwaterkeeper.org

Melissa von Mayrhauser

Watershed Programs Manager

LA Waterkeeper

melissavm@lawwaterkeeper.org

⁴ Palmer, Margaret A., et al. "River restoration, habitat heterogeneity and biodiversity." 15 Jan. 2010, <https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1365-2427.2009.02372.x>.

“LA River Master Plan Update EIR”

Comments on NOP

August 4, 2020

J.P. Rose

Staff Attorney

Center for Biological Diversity

jrose@biologicaldiversity.org

Marissa Christiansen

President/CEO

Friends of the LA River

Marissa@folar.org

Katherine Pease

Director of Science & Policy

Heal the Bay

kpease@healthebay.org

Cc: Genevieve Osmeña, Los Angeles County Public Works

Ariana Villanueva

From: Higgins, Anthony@DOT <Anthony.Higgins@dot.ca.gov>
Sent: Tuesday, August 4, 2020 3:12 PM
To: PW-LA River CEQA
Cc: state.clearinghouse@opr.ca.gov
Subject: Caltrans District 7 Comment Letter - 2020 LA River Master Plan - NOP - SCH# 2020070128 - GTS# 07-LA-2020-03308
Attachments: 07-LA-2020-03308 2020 LA River Master Plan - NOP - SIGNED.pdf

CAUTION: External Email. Proceed Responsibly.

Greetings,

Please see the attached Caltrans comment letter for the following project:

2020 LA River Master Plan – NOP
SCH# 2020070128
GTS# 07-LA-2020-03308

Best,

Anthony Higgins
Transportation Planner
Caltrans District 7, Division of Planning
100 S. Main Street, MS-16
Los Angeles, CA 90012
(213) 266-3574
anthony.higgins@dot.ca.gov

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0067
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

August 3, 2020

Ariana Villanueva
LA County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

RE: 2020 LA River Master Plan – Notice of
Preparation (NOP)
SCH# 2020070128
GTS# 07-LA-2020-03308
Vic. LA Multiple

Dear Ariana Villanueva,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed 2020 LA River Master Plan builds on the adopted 1996 Master Plan and other regional planning studies prepared since then. It is intended to improve a two-mile wide corridor along 51 miles of the LA River to improve health, equity, access, mobility, and economic opportunity for the diverse communities of Los Angeles County while still providing flood risk management. The 2020 LA River Master Plan proposes six categories of project improvements, or "kit of parts" over the next 25 years:

1) Trails, Access Gateways, and Shelters; 2) Channel Modifications; 3) Crossings and Platforms; 4) Diversions; 5) Floodplain Reclamation; 6) Off Channel Land Assets.

After reviewing the NOP, Caltrans has the following comments:

The size and scope of the proposed Master Plan provides a unique opportunity for the various communities along the LA River to identify their needs and provide feedback for the type of public realm they want when making their daily trips. Caltrans requests that the 2020 LA River Master Plan clearly identify all locations where improvements can be made for people walking, biking, rolling or taking transit along, across, or adjacent to State facilities within the Plan area. Please be specific on the locations within Caltrans right-of-way where improvements are desired and what type of infrastructure is preferred. Some examples include protected Class IV bikeways, wider sidewalks, curb extensions, pedestrian refuge islands, landscaping, street furniture, reduced crossing distances, roadway narrowing, pedestrian and bicycle signage, flashing beacons, and refreshed or new crosswalks. Plans that incorporate significant public engagement, like the one proposed, are used to identify and develop future State transportation projects.

Caltrans' Strategic Management Plan has set targets of tripling trips made by bicycle, doubling trips made by walking and public transit, as well as a 15% reduction in statewide, per capita, vehicle miles traveled (VMT). Similar goals are embedded in California Transportation Plan, the Southern California Association of Governments' (SCAG) Regional Transportation Plan, legislation such as AB 32 and SB 375, as well as Executive Orders S-3-05 and N-19-19. By helping to identify where the barriers to walking, biking, and taking transit exist, this Plan can make transportation mode shift easier for Californians and help the State meet its policy goals to reduce the number of trips made by driving, reduce Greenhouse Gas (GHG) emissions, and encourage alternative modes of travel.

In addition, please consider the following when developing the Draft Program Environmental Impact Report (PEIR):

- Objective 2 and Elements 1 and 3, should consider accessibility for any and all users. At present, LA River Trail access points are primarily limited to major roads, which inhibits the neighborhood accessibility for residents and workers. Streets that run alongside the trail are good candidates for numerous access points at predetermined intervals, allowing users to walk, bicycle, scooter, skateboard or roll to and from their destination without taking a circuitous route to the nearest major roadway.
- The plan should consider lighting and other elements that create an environment where all users can feel safe to use the river path, in any neighborhood and at any time of day/night.
- The LA River Master Plan PEIR should consider and incorporate LA County transportation plans, including Vision Zero, the Bicycle Master Plan, Metro plans, and the 17 adjacent city transportation plans insure all jurisdictions have safe transportation routes to the LA River.
- Partner with adjacent cities and public bodies to adopt complete streets policies to better connect neighborhoods to the river and prioritize access to the river from schools, and other public gathering spaces.
- Implement signage along the river as markers of physical activity (such as ¼ mile or ½ mile markers). Signage should also be informational to highlight the rivers connectivity to nearby destinations, informing the community of its use as a viable route to certain locations.
- Include methods for raising awareness in the adjacent communities of the potential uses of the river for physical activity, arts, and culture. Infrastructure like benches, drinking water stations, bicycle parking, bathroom/reststops, and sufficient pedestrian level lighting should be included to encourage these uses.

- To assist people experiencing homelessness, identify sites within the plan area for development of supportive housing. These sites should be mixed-use to provide housing as well as other goods and services that benefit the community.
- When possible, reduce the Effective Impervious Area in the watershed. Limiting the possibility of constructing surface parking lots would be a highly effective way to reduce the heat-island effect and the amount of non-beneficial impervious area.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2020-03308.

Sincerely,



MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

Ariana Villanueva

From: Leeane Knighton <angusmom@sbcglobal.net>
Sent: Tuesday, August 4, 2020 3:10 PM
To: PW-LA River CEQA
Subject: NOP Scoping Comments

CAUTION: External Email. Proceed Responsibly.

Hello.

As a resident of the 90039 area (Elysian Valley), I know that the river has become more valued in recent years as a source of beauty. However, outside groups have moved into the area with the goal to make a profit from the river, even though the river does not belong to them. I am speaking of the kayak company, for instance. Thanks to COVID, they are no longer profiting from disrupting the ecosystem, which is why the wildlife is doing much better without the tourists in the river.

The river does not belong to anyone. Please get people out of the river. No one should be messing with the river. Property values will decline and people do not have to live close to downtown since telecommuting will be a permanent options. These investors need to just give it up and leave the community alone. There is too much development that will no longer be profitable in the post-COVID era.

Thank you!!!

Ariana Villanueva

From: Tom Williams <ctwilliams2012@yahoo.com>
Sent: Tuesday, August 4, 2020 2:26 PM
To: PW-LA River CEQA
Subject: LA River Master Plan Draft Programmatic Environmental Report - Public Comments #1 Request for Extension

CAUTION: External Email. Proceed Responsibly.

DATE: August 6 2020

TO: Los Angeles County Dept. Public Works
900 South Fremont Avenue, 11th Floor Alhambra, CA 91803
Email: LARiverCEQA@pw.lacounty.gov
Attention: Ariana Villanueva Stormwater Quality Division 900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803 833-993-1739
LARiverCEQA@pw.lacounty.gov

CC:

FROM: Dr. Tom Williams, Snr.Techn.Adviser, Citizens Coalition for A Safe Community
4117 Barrett Rd. LA, Ca 90032-1712 323-528-9682 ctwilliams2012@yahoo.com

SUBJECT: LA River Master Plan – NOP/SCOPING Program Environmental Impact Report (PEIR)
<http://www.larivermasterplan.org/> <https://pw.lacounty.gov/go/larmpceqa>

RE: Public Comments #1 Request for Extension

Due to the general nature of the PEIR and volumes of related reports and appendices and difficulties of communications and coordinations, please extend the public comments deadline to Monday, August 17, 2020 at 5pm.

Ariana Villanueva

From: Victor from ZmURL <victor@zmurl.com>
Sent: Tuesday, August 4, 2020 6:00 AM
To: PW-LA River CEQA
Subject: How did 2020 LA River Master Plan CEQA Scoping Meeting go?

CAUTION: External Email. Proceed Responsibly.

Hi, I wanted to check in and see how your event went.

I started [ZmURL](#) to help people host delightful online events. So maybe we can help you with your next online event :).

Feel free to [book a time on my calendar](#).

Victor

Don't want to get emails like this? [Unsubscribe from our emails](#)

Ariana Villanueva

From: Gupta, Mitali <GuptaM@metro.net>
Sent: Monday, August 3, 2020 5:22 PM
To: PW-LA River CEQA
Subject: RE: NOP Scoping Comments Deadline

CAUTION: External Email. Proceed Responsibly.

Thank you for that clarification Ariana.

Mitali

Mitali Gupta, AICP, ENV SP

LA Metro

213.922.5283

From: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Sent: Monday, August 3, 2020 5:10 PM
To: Gupta, Mitali <GuptaM@metro.net>
Subject: RE: NOP Scoping Comments Deadline

Hi Mitali,

Comments on the scope and content or information you'd like to be considered in the Draft Program EIR for the 2020 LA River Master Plan are due August 6, 2020. Comments or questions on the online scoping meeting itself can be submitted as needed.

Also, we also wanted to reiterate that we are in the initial phases of developing the Draft Program EIR, and will send out Notice of Availability when the Draft Program EIR is available for public review and comment. We will also hold a public meeting and provide notice for that meeting when those details are available.

Please let me know if you have further questions.

Thanks!

Ariana Villanueva
Environmental Engineering Specialist
Los Angeles County Public Works
(626) 458-7146

From: Gupta, Mitali <GuptaM@metro.net>
Sent: Monday, August 3, 2020 12:48 PM
To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Subject: NOP Scoping Comments Deadline

CAUTION: External Email. Proceed Responsibly.

Hi –

I wanted to check if the comments on the online Scoping Meeting is also due on 08/06/20?

Thank you
Mitali

Mitali Gupta, AICP, ENV SP

LA Metro

Manager, Transportation Planning

Mobility Corridors, Countywide Planning and Development

213.922.5283

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Ariana Villanueva

From: Laura Velkei <laura@adccla.org>
Sent: Monday, August 3, 2020 2:54 PM
To: PW-LA River CEQA
Cc: Arts District Community Council LA; LARABA
Subject: NOP Scoping Comments - LA River Master Plan
Attachments: LA River Scoping Comments.pdf

CAUTION: External Email. Proceed Responsibly.

Attached, please find comments from the Boards of ADCCLA and LARABA.

We were very troubled by the scoping meeting of 7/29 including the lack of substantive presentation and the refusal to take comments at the meeting. Our comments are attached here but we do not feel that the handling of the scoping meeting was compliant with the purposes and intent of CEQA as nothing was properly presented to the public for comment. We hope you will consider a more robust process and create special attention to communities directly impacted by these decisions.

Response to our submission should go to the email addresses copied above and re-entered here.

Arts District Community Council LA <info@adccla.org>
LARABA <info@laraba.org>

Thank you.

--

Laura Velkei
Communications Director, Founding Board Member
Arts District Community Council LA
www.adccla.org



Los Angeles River Artists and Business Association
826 E. 3rd Street
Los Angeles, CA 90013
LARABA.ORG



July 29, 2020

Re: LA River Master Plan Update Draft

Dear LA River Master Plan Team,

As a neighborhood that is deeply impacted by decisions about the LA River, our community and Boards have closely followed the expertise of our colleagues at East Yard Communities for Environmental Justice, Friends of the LA River, From Lot to Spot, Heal the Bay, Los Angeles Neighborhood Land Trust, Los Angeles Waterkeeper, The Nature Conservancy, and The Trust for Public Land. We are grateful for the heavy lifting they have done on behalf of protecting communities and our beloved LA River.

While we commend the work done so far, we are here to echo our colleague's talking points and to encourage the working committees to not rush this plan forward. We encourage the team to take the extra 6 months to a year to address the vagaries of the working document.

Our concerns are as follows:

Mission statement is vague and lacking direction

While the language purports to support a healthy river and communities, it is not a true mission statement, and simply collects phrasing that tries to be all things to all people.

A clearer more concise mission statement that can tangibly track metrics is preferable. Statements like, "respect feats of infrastructure" is alarming to our community in the battle for river health and communities.

Our colleagues rightly suggest the following as an alternative statement:

"A healthy LA River flows through a 51-mile connected, public freshwater habitat that is seamlessly woven together with neighboring communities as part of its 824-square-mile watershed. It is an integral part of daily life in LA County—a place to enjoy nature and to get across town, a place to bring all people together in a restored and thriving freshwater and riparian ecosystem, a place that is at the heart of efforts to achieve regional climate and community resiliency, and a place to learn from the past and to shape the future."

We also agree that the Plan should be extended 6 months at a minimum to address the vagaries of the document.

Equity Prioritization

Communities of color are not addressed nor are the potential climate impacts given weight in the Plan.

Luxury housing alone has been prioritized without addressing the ramification and potential displacement of economically disadvantaged communities directly impacted by these decisions.

Provisions need to be put in place that incentivizes equitable development which include real public greenspace and affordable housing

Robust community engagement of these stakeholders must take place. Repeated feedback from colleagues in River communities has been that next to no outreach was performed and they have largely been ignored.

Lack of Watershed Level Approach

Again, the vague and somewhat contradictory use of language leaves much to be desired in an outcome that would enable communities to properly plan for climate impacts, ecological health, and community well-being. As a living asset, the LA River is not something to be “designed” or “controlled”, It is in fact a watershed and ecosystem to be nurtured and repaired.

We support a more robust definition of living that includes frequent updates as would be required for any living asset.

It is also important that the tributaries be included in analyses, GAMs, and graphics/maps and that a commitment is made to updating flood risk and the floodplain noting that restoration is a priority

Platforms and Crossings & Other Channel Modifications

Adding MORE concrete for platform parks that remove sunlight from the river seem to us counterintuitive to the health of both the river and our communities and we vehemently oppose such an application.

Channel modifications and maintenance must come from the POV of restoration and not simple maintenance. Observation of current maintenance practices is a cause of great concern and has shown a lack of respect to the environment and the surrounding communities.

We reiterate our hope that the Committee move towards addressing these large issues in advance of releasing drafts. We do not see the need to rush this process and believe that a more thoughtful and more inclusive process.

Sincerely,



Todd Terazzas
President, ADCCLA
Arts District Community Council



Randall Miller
President, LARABA
Los Angeles, River Artists & Business Association

Ariana Villanueva

From: Gupta, Mitali <GuptaM@metro.net>
Sent: Monday, August 3, 2020 12:48 PM
To: PW-LA River CEQA
Subject: NOP Scoping Comments Deadline

CAUTION: External Email. Proceed Responsibly.

Hi –

I wanted to check if the comments on the online Scoping Meeting is also due on 08/06/20?

Thank you
Mitali

Mitali Gupta, AICP, ENV SP

LA Metro
Manager, Transportation Planning
Mobility Corridors, Countywide Planning and Development
213.922.5283
metro.net | facebook.com/losangelesmetro | @metrolosangeles
Metro's mission is to provide world-class transportation for all.

Ariana Villanueva

From: gail feldman <gailfeldman@live.com>
Sent: Saturday, August 1, 2020 3:06 PM
To: PW-LA River CEQA
Subject: Landscaping plant suggestion

CAUTION: External Email. Proceed Responsibly.

Hi – my name is Gail. I was not able to get involved in last weeks webinar about the LA River Environmental Impact Report. However I was at a meeting for the project about a year ago that was held at Pierce College. At that time, I spoke to a woman about a proposed plant selection to be included in the project's plant palette.

Today, I wish to repeat my suggestion for a drought tolerant natural California native plant that should be included in this project, but is not as popular as many of the other likely candidates. I am referring to *Asclepias fascicularis* or California Narrowleaf Milkweed. This plant used to grow robustly in our Los Angeles area. But has almost disappeared due to land development projects and the use of herbicides. Sometimes as I travel about LA I still see a few plants of it growing along a roadway or a vacant lot. It really stands out at this time of year due to the fact that so very little vegetation can be green and blooming when everything else around it is probably brown and dried out due to lack of attention and lack of irrigation. Please include this plant in your plant palette. It is a summer blooming host plant for many Southern California insects including the Monarch butterfly, other butterflies and moths and bees.

My particular interest in *Asclepias Fascicularis* is because milkweed (there are many varieties but this one is our Los Angeles native one) is the only plant that monarch butterflies lay their eggs on to turn into caterpillars and eventually onto more butterflies. I have included a few photos of the plant. It like full sun to some shade. Is easy to grow, takes little water and does well in our clay soil. Once established, it needs very little care and goes completely dormant in the winter time. But It can get weedy if not cut back once a year. It ca and does reseed, but usually it grows in clusters from it roots that act like rhizomes - much like a potatoe – which is one of the reasons it can grow even our dry Socal summers.



And here is info on one of many California Native growers that you can get it from



CALIFORNIA NATIVE PLANT SOCIETY

Calscape

Restore Nature One Garden at a Time

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Narrow Leaf Milkweed

Asclepias fascicularis

About Narrow Leaf Milkweed (*Asclepias fascicularis*) [45 Nurseries Carry This Plant](#)

- [Add to My Plant List](#)

Narrowleaf milkweed or Mexican whorled milkweed is a flowering perennial sending up many thin, erect stems and bearing distinctive long pointed leaves which are very narrow and often whorled about the stem, giving the plant its common names. It blooms in clusters of lavender or lavender-tinted white flowers which have five reflexed lobes that extend down away from

the blossom. The fruits are smooth milkweed pods which split open to spill seeds along with plentiful silky hairs. This plant is common in the western United States and has the potential to become weedy.

Milkweeds in general are the larval host plants for Monarch butterflies, and this species is probably the single most important host plant for Monarch butterflies in California. Milkweed gardeners should be prepared for the plant to be eaten by Monarch caterpillars, but will be rewarded by the presence of beautiful Monarch Butterflies. The plant is deciduous in winter and will sometimes die back to the ground before reviving in the Spring, and is often covered with aphids, so often best to plant in less prominent spots in a garden.

It's very easy to grow in soils with good drainage, even with no summer water. Plant Description

Plant Type

Perennial herb

Size

1.7 - 3.3 ft tall

1 ft wide

Dormancy

Winter Deciduous

Flower Color

White, Lavender

Flowering Season

Summer, Fall

Wildlife Supported

Butterflies, primarily Monarchs

Sun Full Sun

Moisture Low, Moderate - High

Summer Irrigation

Max 2x / month once established

Nurseries

[Carried by 45](#)

Ease of Care

Moderately Easy

Cold Tolerance

Tolerates cold to 5° F

Soil Drainage

Fast, Medium, Slow

Soil Description

Tolerates a variety of soils including sandy, clay and saline. Tolerates Saline Soil. Soil PH: 6.0 - 8.0

Common uses Butterfly Gardens, Deer Resistant, Bird Gardens

Companion Plants

Works well with a wide variety of other plants, but is best used where its winter leaf loss and summer consumption by caterpillars will not be the center of attention. Also, plant a number of Milkweeds in proximity so that caterpillars will have a sufficient amount to eat. Use with showy, nectar-rich plants that will attract adult Monarchs, such as Indian Mallow ([Abutilon palmeri](#)), [Ceanothus sp.](#), Western Thistle ([Cersium occidentale](#)), [California Aster](#) ([Corethrogyne filaginifolia](#)), [California Fuchsia](#) ([Epilobium canum](#)), [Buckwheat](#) ([Eriogonum sp.](#)), Mint ([Monardella sp.](#)), Monkeyflower ([Mimulus sp.](#)), [Penstemon sp.](#), Sages ([Salvia sp.](#)), [Apricot Mallow](#) ([Sphaeralcea ambigua](#))

Maintenance

It is crucial to not use any pesticide on this plant or in its vicinity because doing so will be fatal to Monarch caterpillars.

Sunset Zones?

3*, 7*, 8*, 9*, 10, 14*, 15*, 16, 17, 18*, 19, 20, 21, 22, 23, 24

Please consider using this plant. The struggling monarch butterfly population needs it.

Thank you, Gail Feldman

Sent from [Mail](#) for Windows 10

Ariana Villanueva

From: Liliana Griego <liliana@folar.org>
Sent: Friday, July 31, 2020 11:06 AM
To: PW-LA River CEQA
Subject: [Caution: Message contains Redirect URL content] RE: Message to 2020 LA River Master Plan CEQA Scoping Meeting attendees D. Cervantes (dcervantes@dhs.lacounty.gov)

CAUTION: External Email. Proceed Responsibly.

Hello,

I was hoping you could help me find the recording of the scoping meeting on your website. Your website states that the recording will be available after the meeting but I'm having a hard time locating it. Given that comments are due by August 6th, I'm hoping to watching the video ASAP in order to have adequate time to submit a comment.

Many thanks,
Liliana



Liliana Griego
Sr. Manager of Policy, Advocacy & Engagement
570 West Avenue 26, Suite 250
Los Angeles, CA 90065
323 - 223 - 0585 liliana@folar.org
www.folar.org



From: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Sent: Tuesday, July 28, 2020 6:16 PM
Subject: Message to 2020 LA River Master Plan CEQA Scoping Meeting attendees D. Cervantes (dcervantes@dhs.lacounty.gov)

We hope you can join us for the scoping meeting tomorrow evening from 6pm to 8pm to learn more about the CEQA process and program-level approach for the 2020 LA River Master Plan Program Environmental Impact Report (PEIR).

For those unable to attend the meeting tomorrow night, the presentation will be recorded and made available after the meeting at <http://pw.lacounty.gov/go/larmpceqa> and comments for consideration in the Draft PEIR can be submitted to the addresses below until August 6, 2020. The Draft PEIR is in the process of being prepared and you will receive another email notification when it is available for public review and comment.

CEQA Scoping Meeting Zoom details follow:

You are invited to a Zoom webinar.

When: July 29, 2020 06:00 PM Pacific Time (US and Canada)
Topic: [2020 LA River Master Plan CEQA Scoping Meeting](#)

Please click the link below to join the webinar:

- <https://us02web.zoom.us/j/88580029733?pwd=TDRtL2JQZUQxUWVxK0cvZkRycU8zQT09>

- Password: July29

Or join by phone:

- 1-669-900-6833
- Webinar ID: 885 8002 9733
- Password: 354142

Please submit your comments about the scope and content that you would like considered for the Draft PEIR no later than August 6, 2020 in writing to the physical address or e-mail address shown below. If sending an e-mail, please include "NOP Scoping Comments" in the subject line and include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov



Ariana Villanueva

From: Seymour Liao <seymour_1@yahoo.com>
Sent: Friday, July 31, 2020 10:19 AM
To: PW-LA River CEQA
Subject: Video of Public CEQA Posted?

CAUTION: External Email. Proceed Responsibly.

Hello,

Could you tell me where the video of Weds' public webinar is posted? I was listen but my internet went out half way through.

Thank you

Ariana Villanueva

From: Anna Blaho <Annab@cerrell.com>
Sent: Thursday, July 30, 2020 11:14 AM
To: PW-LA River CEQA
Subject: Notice of Preparation and Scoping Meeting Questions

CAUTION: External Email. Proceed Responsibly.

Hello,

I missed most of last night's meeting due to loss of internet connection and I am wondering if there were any motions passed or actions taken. Any information you can provide is appreciated.

Thank you very much!

Anna Blaho

Ariana Villanueva

From: Abraham Huie <abrahamhuie@gmail.com>
Sent: Thursday, July 30, 2020 9:22 AM
To: PW-LA River CEQA
Subject: Re: Message to 2020 LA River Master Plan CEQA Scoping Meeting attendees

CAUTION: External Email. Proceed Responsibly.

[unsubscribe](#)

On Tue, Jul 28, 2020 at 6:05 PM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

We hope you can join us for the scoping meeting tomorrow evening from 6pm to 8pm to learn more about the CEQA process and program-level approach for the 2020 LA River Master Plan Program Environmental Impact Report (PEIR).

For those unable to attend the meeting tomorrow night, the presentation will be recorded and made available after the meeting at <http://pw.lacounty.gov/go/larmpceqa> and comments for consideration in the Draft PEIR can be submitted to the addresses below until August 6, 2020. The Draft PEIR is in the process of being prepared and you will receive another email notification when it is available for public review and comment.

CEQA Scoping Meeting Zoom details follow:

You are invited to a Zoom webinar.

When: July 29, 2020 06:00 PM Pacific Time (US and Canada)

Topic: [2020 LA River Master Plan CEQA Scoping Meeting](#)

Please click the link below to join the webinar:

- <https://us02web.zoom.us/j/88580029733?pwd=TDRtL2JQZUQxUWVxK0cvZkRycU8zQT09>
- Password: July29

Or join by phone:

- 1-669-900-6833
- Webinar ID: 885 8002 9733
- Password: 354142

Please submit your comments about the scope and content that you would like considered for the Draft PEIR no later than August 6, 2020 in writing to the physical address or e-mail address shown below. If sending an e-mail, please include "NOP Scoping Comments" in the subject line and include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva

Los Angeles County Public Works, Stormwater Quality Division

900 South Fremont Avenue, 11th Floor

Alhambra, CA 91803

LARiverCEQA@pw.lacounty.gov



--

Abraham Huie

[LinkedIn](#) | [GitHub](#) | [Twitter](#)

abrahamhuie@gmail.com

| (760) 791-6909

UC Berkeley '13, B.A. Political Economy

Ariana Villanueva

From: Karen Barnett <karenbarnett@atwatervillage.org>
Sent: Thursday, July 30, 2020 8:45 AM
To: Gggilbertent@aol.com
Cc: PW-LA River CEQA
Subject: Re: Unable to access meeting this evening...kept asking for a password...I finally reset one but still was locked out!! Sorry,Gene

CAUTION: External Email. Proceed Responsibly.

Hi Gene,

I had the same issue initially - I was using the "phone" password not the zoom. I'm cc'ing the county CEQA folks so that they are aware of the access issue from last night.

Here's the video: https://www.youtube.com/watch?v=zWLqXH_zJ6g&feature=youtu.be

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

On Wed, Jul 29, 2020 at 7:37 PM <gggilbertent@aol.com> wrote:

Ariana Villanueva

From: Victor from ZmURL <victor@zmurl.com>
Sent: Thursday, July 30, 2020 4:37 AM
To: PW-LA River CEQA
Subject: Options for 2020 LA River Master Plan CEQA Scoping Meeting

CAUTION: External Email. Proceed Responsibly.

Hi, 2020 LA River Master Plan CEQA Scoping Meeting looks great.

As a business, we used Eventbrite for in person events, but the online experience felt clunky and slow. So we started ZmURL (Eventbrite for online events) to help people host delightful experiences online.

I'd be happy to help you get set up with [ZmURL](#). Feel free to [book a time on my calendar](#).

Victor



Don't want to get emails like this? [Unsubscribe from our emails](#)

Ariana Villanueva

From: matt millikin <mattmillikin@gmail.com>
Sent: Wednesday, July 29, 2020 7:36 PM
To: PW-LA River CEQA
Subject: LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

Good evening,

Two comments for submission concerning the PEIR scope:

Will/can the PEIR include the important tributaries to/from the main branch of the river?

Will/can the PEIR consider community gardens and farms as planting options in their common element options?

Thank you,

Matt

Ariana Villanueva

From: Karen Barnett <karenbarnett@atwatervillage.org>
Sent: Wednesday, July 29, 2020 5:02 PM
To: PW-LA River CEQA
Cc: Morales, Fernando; Schneider, Erin; Edward Morrissey; Courtney Morris
Subject: Re: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Hello Ariana,

Thanks for speaking with me yesterday. Last night the board approved the letter requesting an extension of the NOP comment period. Courtney and Edward will be emailing it out soon.

See you tonight,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

On Mon, Jul 27, 2020 at 11:56 AM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Hi Karen,

Thank you for your inquiry. Below is additional information on the LA River Master Plan Program EIR and CEQA process.

Notice of Preparation and Scoping Meeting on July 29, 2020:

- The main goal for the Notice of Preparation (NOP) and the upcoming meeting is to let the public know that Public Works is initiating the CEQA process.
- The proposed scope of the draft Program EIR is included in the NOP which can be found here: <https://pw.lacounty.gov/swq/peir/doc/NOP-2020.06.26-draft.pdf> and was filed on July 7 (posted with the County Clerk, Office of Planning and Research, sent via certified mail to Steering Committee members, by email to interested parties, and through social media blasts on Twitter and Facebook).

- The meeting on Wednesday will elaborate on the information provided in the NOP and the CEQA approach for the LA River Master Plan. Comments on the scope can continue to be provided until August 6 as the document is being developed. I'd like to reiterate that this meeting is not to present the draft Program EIR, but rather to inform the public and agencies that we are commencing the CEQA process and presenting a proposed approach for preparing the Program EIR.

Following the Scoping Meeting, the next steps will be the development of Draft Program EIR and issuance of a Notice of Availability (NOA). Once available to the public, there will be a 45-day public review period for the Draft Program EIR. Comments on the draft Program EIR will be taken into consideration and addressed or incorporated into the Final Program EIR.

I'd like to note that the proposed Program EIR will not have any project-specific or site-specific analysis as the Master Plan doesn't provide that level of detail. At this time, this Program EIR would just provide a first-tier analysis for later activities to consider when conducting CEQA analysis for proposed individual projects and would look at the cumulative effects of the Plan as a whole. Future projects along the LA River would still be required to conduct project-specific CEQA evaluation for environmental analysis. Site-specific analysis, such as a flood study for Atwater Village may be included in future CEQA analysis for specific projects as applicable.

I hope this helps! Please feel free to contact me at my number below.

Sincerely,

Ariana Villanueva

Environmental Engineering Specialist

Los Angeles County Public Works

(626) 458-7146

From: Karen Barnett <karenbarnett@atwatervillage.org>

Sent: Friday, July 24, 2020 9:00 AM

To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>

Cc: Morales, Fernando <FMorales@bos.lacounty.gov>; Schneider, Erin <ESchneider@bos.lacounty.gov>

Subject: Re: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Hello Adriana,

I didn't hear back from you on my questions? I'm a bit confused about this process - there appears to be a disconnect. We are being asked to make comments by August 6th, which is the end of a 30 day period - but there is no information available till the meeting on July 29th.

Noticing a 30-day review for comments when there's no information available for the public to review, is not appropriate for public involvement in the CEQA process... *The public is involved in CEQA at many stages. Public involvement starts during the scoping process, which is used to determine what environmental impacts will be studied and what type of environmental document will be needed.* Maybe you are only releasing information to cities, agencies, and non-profits? Either way, you need to extend the comment period, reset it for 30 days (min.) from the date you release materials to the public.

Our monthly AVNC board meeting is after August 6th. So we will have to deal with this in our Special Meeting, August 28th which is dedicated to the HSR DEIR. (Which is before you July 29th NOP/PEIR information meeting)

I believe this process has not been transparent or inclusive for members of the public, especially for riverfront communities such as Atwater Village.

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

On Mon, Jul 13, 2020 at 9:47 AM Karen Barnett <karenbarnett@atwatervillage.org> wrote:

Thank you for getting back to me.

We as a board or members of the public can ask that certain areas be added in more detail?

For example - the LARRMP has study areas that are more developed than its list of potential projects.

OR

Is it we can ask for more detail on Hazardous Materials or Recreation as a section?

Do you plan to have a section of Atwater Villages 4 miles which will be called out and addressed in more detail? Your flood study in North Atwater Village?

Since this is a "programming EIR" will project automatically get a neg. dec. or will they have to go through the full EIR process?

We have a short timeline for a response since the meeting is so close to the comment period deadline. Any information you can provide sooner is appreciated.

Thanks,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

On Mon, Jul 13, 2020 at 9:25 AM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Hi Karen,

Thank you for reaching out to us. The Draft PEIR for 2020 LA River Master Plan is still in the process of being prepared so the sections are not yet available for review; however, the online scoping meeting held on July 29 will provide an overview of the PEIR/CEQA process and provides an opportunity for the public to provide input and comment on the scope of the PEIR (the sections you would like to see included in the PEIR). You will have an opportunity to review the sections (i.e. aesthetics, energy, hydrology/water quality, etc.) in the Draft PEIR when it is released for public review with a 45-day period to provide comments. We hope you can join us on July 29 from 6 to 8pm, but if not, all presentation materials will be available on the website afterwards (<https://pw.lacounty.gov/go/larmpcega>) and we will be accepting written comments on the scope of the PEIR until August 6. Registration for the presentation is not required to attend, but if you sign up, we'll send additional reminder email about the event prior to July 29.

I will also check on issues with the phone number as it should be active.

Let me know if you have any other questions. Thank you!

Sincerely,

Ariana Villanueva

Environmental Engineering Specialist

Los Angeles County Public Works

From: Karen Barnett <karenbarnett@atwatervillage.org>

Sent: Friday, July 10, 2020 3:46 PM

To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>

Cc: Morales, Fernando <FMorales@bos.lacounty.gov>; Schneider, Erin <ESchneider@bos.lacounty.gov>

Subject: Re: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Hello,

This is my third email to this address and I haven't gotten a response?! I would like to know how to prepared for this meeting/NOP/PEIR - where the information is to review?

Your phone number worked once this morning... now my provider says it's no longer in service?

Can you call me at 818 468 1738

Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative
River Committee Chair
E-mail: KarenBarnett@atwatervillage.org
Message Phone: 323-230-3406
www.atwatervillage.org

On Fri, Jul 10, 2020 at 8:13 AM Karen Barnett <karenbarnett@atwatervillage.org> wrote:

Hello Ariana,

Can you point me to the information we need to assess? I don't see any links for sections referenced in the notice. Atwater Village is one of the flood study points mile 28 if I'm recalling correctly. Our community is 4+ miles of the LA River (east and west banks)

Of course, I would like to see it all but specifically these sections in their formats 2020 LA River Master Plan PEIR Scope and Probable Environmental Effects. *I'm assuming flood would be in Hydrology/Water Quality.*

Aesthetics
Air Quality

Energy
Hazards & Hazardous Materials
Hydrology/Water Quality
Land Use/Planning
Noise
Public Services
Recreation
Transportation
Utilities/Service Systems
Cumulative Impacts

Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative
River Committee Chair
E-mail: KarenBarnett@atwatervillage.org
Message Phone: 323-230-3406
www.atwatervillage.org

----- Forwarded message -----

From: **Karen Barnett** <karenbarnett@atwatervillage.org>
Date: Wed, Jul 8, 2020 at 9:52 AM
Subject: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping
To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>

Hello Ariana,

Can you point me to the information we need to assess? I don't see any links for sections referenced in the notice. Atwater Village is one of the flood study points mile 28 if I'm recalling correctly. Our community is 4+ miles of the LA River (east and west banks)

Of course, I would like to see it all but specifically these sections in their formats 2020 LA River Master Plan PEIR Scope and Probable Environmental Effects. *I'm assuming flood would be in Hydrology/Water Quality.*

Aesthetics
Air Quality
Energy
Hazards & Hazardous Materials
Hydrology/Water Quality
Land Use/Planning
Noise
Public Services
Recreation
Transportation
Utilities/Service Systems
Cumulative Impacts

Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative
River Committee Chair
E-mail: KarenBarnett@atwatervillage.org
Message Phone: 323-230-3406
www.atwatervillage.org

On Tue, Jul 7, 2020 at 5:20 PM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

The County of Los Angeles, through Los Angeles County Public Works, will prepare a Program Environmental Impact Report (PEIR) pursuant to the California Environmental Quality Act (CEQA) for its proposed 2020 LA River Master Plan. The PEIR will assess the environmental impacts of implementing the 2020 LA River Master Plan. As part of this PEIR process, Public Works is soliciting input from members of the public, organizations, and government agencies on the scope and content of the information to be included and analyzed in the PEIR.

A Notice of Preparation (NOP) has been prepared to notify responsible and trustee agencies, the Office of Planning and Research, the County Clerk, and other interested parties that Public Works is beginning preparation of this PEIR, and starts the 30-day scoping period. The NOP for the 2020 LA River Master Plan PEIR can be viewed at <http://pw.lacounty.gov/go/larmpceqa>.

The community is invited to participate in an online scoping meeting for the PEIR, which is being held virtually due to restrictions under State of California Executive Order N-33-20.

DATE: Wednesday, July 29, 2020

TIME: 6:00 p.m. to 8:00 p.m.

LOCATION: Details about the CEQA online scoping meeting are available at <http://pw.lacounty.gov/go/larmpceqa>

Registration for the event is available at <http://www.eventbrite.com/e/online-scoping-meeting-2020-la-river-master-plan-program-eir-tickets-112158469000>

Scoping comments on the PEIR are due no later than August 6, 2020, which marks the end of the 30-day scoping period. Please send your comments in writing to the physical address or e-mail address shown below. If sending an e-mail, please include "NOP Scoping Comments" in the subject line. Include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva

Los Angeles County Public Works, Stormwater Quality Division

900 South Fremont Avenue, 11th Floor

Alhambra, CA 91803

LARiverCEQA@pw.lacounty.gov

Thank you and we look forward to your participation in the process.

Ariana Villanueva

From: Carrie Sutkin <carrie.evrnc@gmail.com>
Sent: Wednesday, July 29, 2020 2:43 PM
To: PW-LA River CEQA
Cc: Christine Wartman; Frank Mendoza; Vincent Montalvo
Subject: Re: Message to 2020 LA River Master Plan CEQA Scoping Meeting attendees

CAUTION: External Email. Proceed Responsibly.

ok; sorry we crossed paths on this; hope you can answer any additional questions that one up tonight at the zoom, or following our EVRNC meeting. We do also plan to submit comments for Aug 6.

Thanks,
Carrie Sutkin

On Jul 29, 2020, at 12:08 PM, PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Hi Carrie,

Unfortunately, due to the overlapping meeting times, neither myself nor other Public Works staff familiar with the project can attend the Elysian Valley Riverside Neighborhood Council (EVRNC) meeting tonight as we will need all hands on deck for the CEQA public scoping meeting. We have uploaded the presentation that will be shared tonight, so that you and the EVRNC can view at your convenience, and we can help answer any clarifying questions afterwards.

Presentation: https://www.youtube.com/watch?v=zWLqXH_zJ6g

The table below summarizes our CEQA process for the 2020 LA River Master Plan that you can share with the EVRNC.

Step	Purpose
Notice of Preparation (NOP) July 7, 2020	<ul style="list-style-type: none">• Announce the County is initiating the CEQA process for the LA River Master Plan.• Provide proposed approach to preparing environmental document (proposed Program Environmental Impact Report [EIR]).• Solicit comments from public agencies and interested parties on the scope of the environmental document for a 30-day period, starting on the date the NOP is posted with the County Clerk and Office of Planning and Research.
Scoping Meeting July 29, 2020	<ul style="list-style-type: none">• Present proposed approach to preparing environmental document.• Clarify any questions on the proposed CEQA approach.• Solicit input in writing about particular areas of concern based on the information provided in the NOP from agencies and interested parties
Notice of Availability (NOA)	<ul style="list-style-type: none">• Announce that the draft Program EIR is available for review.

Draft Program EIR available for comment period.	<ul style="list-style-type: none"> • Provide 45-day comment period for the public and public agencies to provide input on draft Program EIR. The comment period begins when the NOA is filed with the County Clerk and Office of Planning and Research.
Public Meeting on Draft Program EIR	<ul style="list-style-type: none"> • Public meeting held during the draft Program EIR comment period to present and clarify questions on the draft Program EIR.
County drafts Final Program EIR.	<ul style="list-style-type: none"> • Address and incorporate comments into the Final EIR.

The County is in the initial stage for the CEQA process for the LA River Master Plan. The meeting today is not to present the draft Program EIR, but rather to inform the public and agencies that we are commencing the CEQA process and presenting a proposed approach for preparing the Program EIR. If the EVRNC has issues of particular concern for your area, please send those in writing to lariverCEQA@pw.lacounty.gov for us to consider as we prepare the Program EIR. We will send you and others notification when the draft Program EIR is available for review and comment.

Please note that the proposed Program EIR will not have any project-specific or site-specific analysis as the Master Plan doesn't provide that level of detail. Due to this lack of specificity, the Program EIR will be a first-tier base reference of facts and analysis on a program-level for later activities to consider. Future projects along the LA River that tier from the LA River Master Plan would still be required to conduct project-specific and site-specific evaluation in light of the scope and content of the PEIR to determine if further CEQA is needed, and the decision to proceed with future projects would be up to the project proponent and community needs, available funding, and other local policy decisions.

We will continue to be available to respond to your questions throughout the CEQA process.

Thank you.

Ariana Villanueva
Environmental Engineering Specialist

Los Angeles County Public Works
(626) 458-7146

From: Carrie Sutkin <carrieasutkin@gmail.com>
Sent: Tuesday, July 28, 2020 9:15 PM
To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Subject: Re: Message to 2020 LA River Master Plan CEQA Scoping Meeting attendees

CAUTION: External Email. Proceed Responsibly.

Arianna - hope you can join us at evrnc
Zoom special meeting Wed night 7/29 at 6:30. Let me know if you need an agenda - it's posted at myevrnc.com.

Thanks
Carrie Sutkin
Sent from my iPhone

On Jul 28, 2020, at 6:18 PM, PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

We hope you can join us for the scoping meeting tomorrow evening from 6pm to 8pm to learn more about the CEQA process and program-level approach for the 2020 LA River Master Plan Program Environmental Impact Report (PEIR).

For those unable to attend the meeting tomorrow night, the presentation will be recorded and made available after the meeting at <http://pw.lacounty.gov/go/larmpceqa> and comments for consideration in the Draft PEIR can be submitted to the addresses below until August 6, 2020. The Draft PEIR is in the process of being prepared and you will receive another email notification when it is available for public review and comment.

CEQA Scoping Meeting Zoom details follow:

You are invited to a Zoom webinar.

When: July 29, 2020 06:00 PM Pacific Time (US and Canada)
Topic: [2020 LA River Master Plan CEQA Scoping Meeting](#)

Please click the link below to join the webinar:

- <https://us02web.zoom.us/j/88580029733?pwd=TDRtL2JQZUQxUWVxK0cvZkRycU8zQT09>
- Password: July29

Or join by phone:

- 1-669-900-6833
- Webinar ID: 885 8002 9733

- Password: 354142

Please submit your comments about the scope and content that you would like considered for the Draft PEIR no later than August 6, 2020 in writing to the physical address or e-mail address shown below. If sending an e-mail, please include "NOP Scoping Comments" in the subject line and include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

<image001.png>

Ariana Villanueva

From: Steffie Hands <handsonrealestate@gmail.com>
Sent: Wednesday, July 29, 2020 2:08 PM
To: PW-LA River CEQA
Subject: NOP Scoping Comments

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

My family and friends use the riverbed path often for bike riding, walking and running in Long Beach.

Here are the considerations we'd like to see in the PEIR:

1. Safety issues with homeless encampments and unsavory individuals. These have been increasing every year, and there have been some horrible incidents on the path including homicides.
2. Safety issues with the use of pesticides and weed abatement. I am not sure what is currently used, but we are concerned about the environmental impact of pesticides on the ecology, the surrounding neighborhoods, and the river water that eventually drains to the ocean.
3. Plans that address the natural ecology of the riverbed to ensure that birds, animals, plants, etc can live and thrive along the riverbed.

Overall, We would like to see more of the river bed areas safer and more useable for individuals and families, while keeping it as "natural" as possible.

Best regards,
Steffie Hands



Steffie Hands, Realtor

Re/Max Real Estate Specialists
562-508-9869 | HandsOnRealEstate@gmail.com

Address: 6695 E. PCH #150, Long Beach, CA 90803

Website: www.CalBungalow.com

License: DRE#01502653

Read My Zillow Reviews:

<http://www.zillow.com/profile/handsonrealestate>



Ariana Villanueva

From: Carrie Sutkin <carrieasutkin@gmail.com>
Sent: Tuesday, July 28, 2020 9:15 PM
To: PW-LA River CEQA
Subject: Re: Message to 2020 LA River Master Plan CEQA Scoping Meeting attendees

CAUTION: External Email. Proceed Responsibly.

Arianna - hope you can join us at evrnc
Zoom special meeting Wed night 7/29 at 6:30. Let me know if you need an agenda - it's posted at myevrnc.com.
Thanks
Carrie Sutkin
Sent from my iPhone

On Jul 28, 2020, at 6:18 PM, PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

We hope you can join us for the scoping meeting tomorrow evening from 6pm to 8pm to learn more about the CEQA process and program-level approach for the 2020 LA River Master Plan Program Environmental Impact Report (PEIR).

For those unable to attend the meeting tomorrow night, the presentation will be recorded and made available after the meeting
at <http://pw.lacounty.gov/go/larmpceqa> and comments for consideration in the Draft PEIR can be submitted to the addresses below until August 6, 2020. The Draft PEIR is in the process of being prepared and you will receive another email notification when it is available for public review and comment.

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You are invited to a Zoom webinar.

When: July 29, 2020 06:00 PM Pacific Time (US and Canada)

Topic: [2020 LA River Master Plan CEQA Scoping Meeting](#)

Please click the link below to join the webinar:

- <https://us02web.zoom.us/j/88580029733?pwd=TDRTtL2JQZUQxUWVxK0cvZkRyZWVxQT09>
- Password: July29

Or join by phone:

- 1-669-900-6833
- Webinar ID: 885 8002 9733
- Password: 354142

Please submit your comments about the scope and content that you would like considered for the Draft PEIR no later than August 6, 2020 in writing to the physical

address or e-mail address shown below. If sending an e-mail, please include "NOP Scoping Comments" in the subject line and include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

<image001.png>

Ariana Villanueva

From: Carrie Sutkin <carrieasutkin@gmail.com>
Sent: Tuesday, July 28, 2020 6:40 PM
To: PW-LA River CEQA
Subject: Re: Message to 2020 LA River Master Plan CEQA Scoping Meeting attendees

CAUTION: External Email. Proceed Responsibly.

As you know your scoping meeting conflicts with evrNC ELU committee. If you have someone who can join our zoom call that would be great - thanks - did you get our agenda?

Sent from my iPhone

On Jul 28, 2020, at 6:18 PM, PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

We hope you can join us for the scoping meeting tomorrow evening from 6pm to 8pm to learn more about the CEQA process and program-level approach for the 2020 LA River Master Plan Program Environmental Impact Report (PEIR).

For those unable to attend the meeting tomorrow night, the presentation will be recorded and made available after the meeting at <http://pw.lacounty.gov/go/larmpceqa> and comments for consideration in the Draft PEIR can be submitted to the addresses below until August 6, 2020. The Draft PEIR is in the process of being prepared and you will receive another email notification when it is available for public review and comment.

CEQA Scoping Meeting Zoom details follow:

You are invited to a Zoom webinar.

When: July 29, 2020 06:00 PM Pacific Time (US and Canada)

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- Password: July29

Or join by phone:

- 1-669-900-6833
- Webinar ID: 885 8002 9733
- Password: 354142

Please submit your comments about the scope and content that you would like considered for the Draft PEIR no later than August 6, 2020 in writing to the physical address or e-mail address shown below. If sending an e-mail, please include "NOP

Scoping Comments” in the subject line and include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

<image001.png>

Ariana Villanueva

From: Sean Gabe <gabe3126@gmail.com>
Sent: Monday, July 27, 2020 5:47 PM
To: PW-LA River CEQA
Subject: Urban Farms & the LA River

CAUTION: External Email. Proceed Responsibly.

Hello,

Thank you for allowing comments on the LA River Master Plan. I am part of a non-profit that distributes large amounts of food in Los Angeles. We have a demo hydroponic farm project with plans to increase our size and operations to much larger scales. Access to river adjacent locations will provide numerous benefits to our project without diverting water from the river.

We realize the LA River Master Plan is already far along. Our urban farm operations only have minor impacts on spaces where we operate while providing great ecological and community benefits.

Please consider community farm access and the ecological benefit in locations along the LA river as you evaluate the environmental impact of the LA River Master Plan.

I would like to discuss the use of space adjacent to the LA River for community farms. Please let me know an appropriate group or individual to whom I may connect.

Much Appreciated,

Sean
310-310-4776

Ariana Villanueva

From: Brittney Johnson <brittney.johnson@lacity.org>
Sent: Monday, July 27, 2020 5:20 PM
To: PW-LA River CEQA
Subject: Away Re: Reminder: CEQA Scoping Meeting for 2020 LA River Master Plan in 2 Days

CAUTION: External Email. Proceed Responsibly.

Thank you for contacting me.

If you can not reach me and need immediate attention please email my Supervisor James.Westbrooks@lacity.org
Thank you.

--

Brittney Johnson

Field Deputy

www.the-new-ninth.com

4301 S. Central Ave. 90011

Phone: (323) 846-2651

Direct Line: (323)846-2660

Fax: (323)846-2656

Ariana Villanueva

From: Barry Johnson <bjohnson4166@sbcglobal.net>
Sent: Monday, July 27, 2020 5:12 PM
To: PW-LA River CEQA
Subject: Re: Reminder: CEQA Scoping Meeting for 2020 LA River Master Plan in 2 Days

CAUTION: External Email. Proceed Responsibly.

Connie,

Did you get this ? I will be unable to attend because I'm getting up at 2AM the next morning.

Barry

On Monday, July 27, 2020, 04:58:38 PM PDT, PW-LA River CEQA <lariverceqa@pw.lacounty.gov> wrote:

The County of Los Angeles, through Los Angeles County Public Works, is starting the California Environmental Quality Act (CEQA) process for the 2020 LA River Master Plan and is soliciting public and agency input on scope, methods, content, and alternatives which will be considered for the proposed Program Environmental Impact Report (PEIR). Please participate in the virtual meeting this Wednesday, July 29, 2020 to learn more about the CEQA process for the Draft PEIR, and [click here for more details on the Notice of Preparation](#).

Meeting Details

Date: Wednesday, July 29, 2020

Time: 6:00 pm to 8:00 pm

Location: The hyperlink to the online meeting will be sent via email and made available at <http://pw.lacounty.gov/go/larmpceqa> before the meeting.

[Please click here to register for the meeting](#). Registration is not required for attendance, but participants who register will receive an email reminder and instructions for the meeting.

If you cannot attend the meeting, the presentation will be available at <http://pw.lacounty.gov/go/larmpceqa> and questions can be sent to LARiverCEQA@pw.lacounty.gov.

Comments on what you'd like to see in the PEIR should be submitted no later than August 6, 2020 in writing to the physical address or e-mail address shown below. If sending an e-mail, please include "NOP Scoping Comments" in the subject line and include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva

Los Angeles County Public Works, Stormwater Quality Division

900 South Fremont Avenue, 11th Floor

Alhambra, CA 91803

LARiverCEQA@pw.lacounty.gov

Thank you for your interest and we look forward to your input on the scope and content for consideration in the PEIR. The Draft PEIR will be released for public review when it is ready and you will receive another email notification at that time.

Ariana Villanueva

From: Julie Beals <jbeals.lacgc@gmail.com>
Sent: Monday, July 27, 2020 4:54 PM
To: PW-LA River CEQA
Subject: Working Tuesday through Friday Re: Reminder: CEQA scoping meeting for 2020 LA River Master Plan in 2 days

CAUTION: External Email. Proceed Responsibly.

Thank you for your email. Please note that I work Tuesdays through Fridays. Please contact Diana Campos at dcampos.lacgc.com if you have an urgent question on a Monday.

Thank you,

Julie

--

Julie Beals

Executive Director, Los Angeles Community Garden Council
323-942-WORM (9679)
lagardencouncil.org

Ariana Villanueva

From: Albert Lew <albert.lew@lacity.org>
Sent: Monday, July 27, 2020 11:03 AM
To: PW-LA River CEQA
Cc: Stephanie Lopez; Christopher DeMonbrun
Subject: CEQA: 2020 LA River Master Plan - NOP & Scoping Meeting of dPEIR
Attachments: 07162020_2020 LA River Master Plan - NOP and Scoping Meeting for dPEIR.pdf

CAUTION: External Email. Proceed Responsibly.

Ms. Villanueva,

Please find attached the official response. A hard copy will be sent to your office when normal operations resume.

Regards,

Albert C. Lew, P.E.

Wastewater Engineering Services Division (WESD)

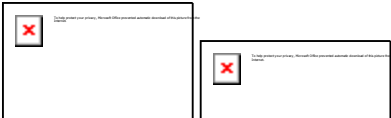
Bureau of Sanitation

Department of Public Works

City of Los Angeles

Phone: 323.342.6207

Fax: 323.342.6210



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HYPERION EXECUTIVE PLANT MANAGER

WASTEWATER ENGINEERING SERVICES DIVISION
2714 MEDIA CENTER DRIVE
LOS ANGELES, CA 90065
FAX: (323) 342-6210
WWW.LACITYSAN.ORG

July 16, 2020

Ms. Ariana Villanueva
Los Angeles County Public Works
Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

Dear Ms. Villanueva,

**2020 LA RIVER MASTER PLAN - NOTICE OF PREPARATION AND SCOPING
MEETING FOR A DRAFT PROGRAM ENVIRONMENTAL IMPACT
REPORT**

This is in response to your July 7, 2020 Notice of Preparation and Scoping Meeting for a Draft Program Environmental Impact Report for the proposed project located along a 51-mile-long, 2-mile-wide and spans through 17 cities. The river encompasses an 834-square-mile watershed and flows from its headwaters at river mile 51 in Canoga Park within the City of Los Angeles to river mile zero at Long Beach. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. At this stage, your project description lacks sufficient detail for us to conduct a thorough capacity analysis as descriptions for individual proposed developments are needed to assess sewage generation. Please notify our office in the instance additional information for environmental review is available for this project.

zero waste • zero wasted water

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

File Location: CEQA Review\FINAL CEQA Response LTRs\FINAL DRAFT\832 and 837 Project - Request for WWSI.2020 LA River Master Plan - NOP and Scoping Meeting for dPEIR.doc

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at chris.demonbrun@lacity.org

Sincerely,



Ali Poosti, Division Manager
Wastewater Engineering Services Division
LA Sanitation and Environment

AP/CD: sa

c: Shahram Kharaghani, LASAN
Michael Scaduto, LASAN
Wing Tam, LASAN
Christopher DeMonbrun, LASAN

Ariana Villanueva

From: Karen Barnett <karenbarnett@atwatervillage.org>
Sent: Friday, July 24, 2020 9:00 AM
To: PW-LA River CEQA
Cc: Morales, Fernando; Schneider, Erin
Subject: Re: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Hello Adriana,

I didn't hear back from you on my questions? I'm a bit confused about this process - there appears to be a disconnect. We are being asked to make comments by August 6th, which is the end of a 30 day period - but there is no information available till the meeting on July 29th.

Noticing a 30-day review for comments when there's no information available for the public to review, is not appropriate for public involvement in the CEQA process... *The public is involved in CEQA at many stages. Public involvement starts during the scoping process, which is used to determine what environmental impacts will be studied and what type of environmental document will be needed.* Maybe you are only releasing information to cities, agencies, and non-profits? Either way, you need to extend the comment period, reset it for 30 days (min.) from the date you release materials to the public.

Our monthly AVNC board meeting is after August 6th. So we will have to deal with this in our Special Meeting, August 28th which is dedicated to the HSR DEIR. (Which is before you July 29th NOP/PEIR information meeting)

I believe this process has not been transparent or inclusive for members of the public, especially for riverfront communities such as Atwater Village.

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

On Mon, Jul 13, 2020 at 9:47 AM Karen Barnett <karenbarnett@atwatervillage.org> wrote:

Thank you for getting back to me.

We as a board or members of the public can ask that certain areas be added in more detail?

For example - the LARRMP has study areas that are more developed than its list of potential projects.

OR

Is it we can ask for more detail on Hazardous Materials or Recreation as a section?

Do you plan to have a section of Atwater Villages 4 miles which will be called out and addressed in more detail? Your flood study in North Atwater Village?

Since this is a "programming EIR" will project automatically get a neg. dec. or will they have to go through the full EIR process?

We have a short timeline for a response since the meeting is so close to the comment period deadline. Any information you can provide sooner is appreciated.

Thanks,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

On Mon, Jul 13, 2020 at 9:25 AM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Hi Karen,

Thank you for reaching out to us. The Draft PEIR for 2020 LA River Master Plan is still in the process of being prepared so the sections are not yet available for review; however, the online scoping meeting held on July 29 will provide an overview of the PEIR/CEQA process and provides an opportunity for the public to provide input and comment on the scope of the PEIR (the sections you would like to see included in the PEIR). You will have an opportunity to review the sections (i.e. aesthetics, energy, hydrology/water quality, etc.) in the Draft PEIR when it is released for public review with a 45-day period to provide comments. We hope you can join us on July 29 from 6 to 8pm, but if not, all presentation materials will be available on the website afterwards (<https://pw.lacounty.gov/go/larmpceqa>) and we will be accepting written comments on the scope of the PEIR until August 6. Registration for the presentation is not required to attend, but if you sign up, we'll send additional reminder email about the event prior to July 29.

I will also check on issues with the phone number as it should be active.

Let me know if you have any other questions. Thank you!

Sincerely,

Ariana Villanueva

Environmental Engineering Specialist

Los Angeles County Public Works

From: Karen Barnett <karenbarnett@atwatervillage.org>
Sent: Friday, July 10, 2020 3:46 PM
To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Cc: Morales, Fernando <FMorales@bos.lacounty.gov>; Schneider, Erin <ESchneider@bos.lacounty.gov>
Subject: Re: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Hello,

This is my third email to this address and I haven't gotten a response?! I would like to know how to prepared for this meeting/NOP/PEIR - where the information is to review?

Your phone number worked once this morning... now my provider says it's no longer in service?

Can you call me at 818 468 1738

Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative
River Committee Chair
E-mail: KarenBarnett@atwatervillage.org
Message Phone: 323-230-3406
www.atwatervillage.org

On Fri, Jul 10, 2020 at 8:13 AM Karen Barnett <karenbarnett@atwatervillage.org> wrote:

Hello Ariana,

Can you point me to the information we need to assess? I don't see any links for sections referenced in the notice. Atwater Village is one of the flood study points mile 28 if I'm recalling correctly. Our community is 4+ miles of the LA River (east and west banks)

Of course, I would like to see it all but specifically these sections in their formats 2020 LA River Master Plan PEIR Scope and Probable Environmental Effects. *I'm assuming flood would be in Hydrology/Water Quality.*

Aesthetics
Air Quality
Energy
Hazards & Hazardous Materials
Hydrology/Water Quality
Land Use/Planning
Noise
Public Services
Recreation
Transportation
Utilities/Service Systems
Cumulative Impacts

Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative
River Committee Chair
E-mail: KarenBarnett@atwatervillage.org
Message Phone: 323-230-3406
www.atwatervillage.org

----- Forwarded message -----

From: **Karen Barnett** <karenbarnett@atwatervillage.org>
Date: Wed, Jul 8, 2020 at 9:52 AM

Subject: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping
To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>

Hello Ariana,

Can you point me to the information we need to assess? I don't see any links for sections referenced in the notice. Atwater Village is one of the flood study points mile 28 if I'm recalling correctly. Our community is 4+ miles of the LA River (east and west banks)

Of course, I would like to see it all but specifically these sections in their formats 2020 LA River Master Plan PEIR Scope and Probable Environmental Effects. *I'm assuming flood would be in Hydrology/Water Quality.*

Aesthetics
Air Quality
Energy
Hazards & Hazardous Materials
Hydrology/Water Quality
Land Use/Planning
Noise
Public Services
Recreation
Transportation
Utilities/Service Systems
Cumulative Impacts

Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative
River Committee Chair
E-mail: KarenBarnett@atwatervillage.org
Message Phone: 323-230-3406
www.atwatervillage.org

On Tue, Jul 7, 2020 at 5:20 PM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

The County of Los Angeles, through Los Angeles County Public Works, will prepare a Program Environmental Impact Report (PEIR) pursuant to the California Environmental Quality Act (CEQA) for its proposed 2020 LA River Master Plan. The PEIR will assess the environmental impacts of implementing the 2020 LA River Master Plan. As part of this PEIR process, Public Works is soliciting input from members of the public, organizations, and government agencies on the scope and content of the information to be included and analyzed in the PEIR.

A Notice of Preparation (NOP) has been prepared to notify responsible and trustee agencies, the Office of Planning and Research, the County Clerk, and other interested parties that Public Works is beginning preparation of this PEIR, and starts the 30-day scoping period. The NOP for the 2020 LA River Master Plan PEIR can be viewed at <http://pw.lacounty.gov/go/larmpceqa>.

The community is invited to participate in an online scoping meeting for the PEIR, which is being held virtually due to restrictions under State of California Executive Order N-33-20.

DATE: Wednesday, July 29, 2020

TIME: 6:00 p.m. to 8:00 p.m.

LOCATION: Details about the CEQA online scoping meeting are available at <http://pw.lacounty.gov/go/larmpceqa>

Registration for the event is available at <http://www.eventbrite.com/e/online-scoping-meeting-2020-la-river-master-plan-program-eir-tickets-112158469000>

Scoping comments on the PEIR are due no later than August 6, 2020, which marks the end of the 30-day scoping period. Please send your comments in writing to the physical address or e-mail address shown below. If sending an e-mail, please include "NOP Scoping Comments" in the subject line. Include a return address or e-mail address and a contact name in your agency with your comments:


Ariana Villanueva

Los Angeles County Public Works, Stormwater Quality Division

900 South Fremont Avenue, 11th Floor

Alhambra, CA 91803

LARiverCEQA@pw.lacounty.gov



Thank you and we look forward to your participation in the process.

Ariana Villanueva

From: Carrie Sutkin <carrie.evrnc@gmail.com>
Sent: Thursday, July 23, 2020 5:39 PM
To: PW-LA River CEQA; Rehman, Waqas
Subject: Re: Reminder: Upcoming CEQA Scoping Meeting for 2020 LA River Master Plan PEIR

CAUTION: External Email. Proceed Responsibly.

What? you are asking us to review a document that isn't ready?

There is no phone number on any of your material. People are very confused. Are you (here, no name on your email) available to go out to NCs and explain this process? i didn't do a very good job at it last night, but i could not even reach you in person.

So our NC is having an emergency meeting next wed. you're invited. We will be adopting a letter of concern and a request you give us more time to understand the PEIR and how to comment on it. I'm getting requests from Woodland Hills, and Arts district to advise them.

That's not my job!

This is too complicated. what is the webinar on? people ideas about what is supposed to be in the PEIR?

Please explain, Arianna. it would be nice if you had your phone number on your email response too.

Are you taking calls?

Carrie

On Jul 23, 2020, at 1:50 PM, PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Hello Carrie,

The Draft PEIR for the 2020 LA River Master Plan is still in the process of being prepared so the sections and document are not yet available for review. When the Draft PEIR is ready for public review and comment, we will post a Notice of Availability, have newspaper notices, and will send out another email blast so you're aware that the document is ready for your review. The document will be available at <http://pw.lacounty.gov/go/larmpceqa>. We are also currently in the process of adding a link from the LA River Master Plan homepage (www.larivermasterplan.org) to the CEQA page where the Draft PEIR will be available.

We are currently in the 30-day scoping period and have posted a Notice of Preparation (NOP) which is a brief notice under CEQA sent to notify agencies and the public that we plan to prepare an Environmental Impact Report and starts the 30-day scoping period. A copy of the NOP is available at <https://pw.lacounty.gov/swq/peir/doc/NOP-2020.06.26-draft.pdf>. The purpose of the scoping period and the upcoming virtual public scoping meeting on Wednesday, July 29 is for the County to listen to public input on alternatives and environmental impacts that should be analyzed in the scope of the PEIR, and comments will be taken into consideration in the development of the Draft PEIR.

Thank you for your interest in the 2020 LA River Master Plan PEIR. We hope that you can attend the virtual public scoping meeting. The presentation will also be available on the website afterward the meeting for those who cannot attend.

Sincerely,

Ariana Villanueva
Environmental Engineering Specialist
Los Angeles County Public Works

From: Carrie Sutkin <carrie.evrnc@gmail.com>

Sent: Thursday, July 23, 2020 8:36 AM

To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>

Subject: Re: Reminder: Upcoming CEQA Scoping Meeting for 2020 LA River Master Plan PEIR

CAUTION: External Email. Proceed Responsibly.

thanks. but where is the PEIR? i can't find it?

On Jul 22, 2020, at 6:42 PM, PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Thank you again for your interest in the 2020 LA River Master Plan process.

As a reminder, County of Los Angeles, through Los Angeles County Public Works, will prepare a Program Environmental Impact Report (PEIR) pursuant to the California Environmental Quality Act (CEQA) for its proposed 2020 LA River Master Plan. The public scoping meeting for the PEIR will be held virtually due to restrictions under State of California Executive Order N-33-20.

DATE: Wednesday, July 29, 2020

TIME: 6:00 p.m. to 8:00 p.m.

LOCATION: Details about the CEQA online scoping meeting are available at <http://pw.lacounty.gov/go/larmpceqa>

Public Works is soliciting input from members of the public, organizations, and government agencies on the scope and content of the information to be included and analyzed in the PEIR.

Registration is not required for attendance, but registered attendees will receive an email reminder and instructions for the meeting. Registration is available at <http://www.eventbrite.com/e/online-scoping-meeting-2020-la-river-master-plan-program-eir-tickets-112158469000>

Scoping comments on the PEIR are due no later than August 6, 2020, which marks the end of the 30-day scoping period. Please send your comments in writing to the physical address or e-mail address shown below. If sending an e-mail, please include "NOP

Scoping Comments” in the subject line and include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

Thank you for your interest in the project and we look forward to your input on the scope and content of the PEIR.

For more information about the CEQA process for the 2020 LA River Master Plan, please visit <http://pw.lacounty.gov/go/larmpceqa>.

Ariana Villanueva

From: Mary Ellen Fisenne <mame8993@hotmail.com>
Sent: Thursday, July 23, 2020 1:45 PM
To: PW-LA River CEQA
Subject: Re: NOP Scoping Comments, LA Public Works

CAUTION: External Email. Proceed Responsibly.

Ariana, Thank you for your reply and the consideration of these issues. Mary Ellen

From: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Date: Thursday, July 23, 2020 at 1:20 PM
To: Mary Ellen Fisenne <mame8993@hotmail.com>
Subject: RE: NOP Scoping Comments, LA Public Works

Hello Ms. Mary Ellen Waller,

Thank you for reaching out to us and providing your comment about the Notice of Preparation (NOP) of the 2020 LA River Master Plan Program Environmental Impact Report (PEIR). The Draft PEIR for the 2020 LA River Master Plan is still in the process of being prepared so the sections are not yet available for review. The purpose of the 30-day NOP scoping period and upcoming virtual public scoping meeting on July 29 is for the County to obtain agency and public input on what they would like to see analyzed in the scope of the PEIR, and comments are taken into consideration in the development of the Draft PEIR. When the Draft PEIR is ready for public review and comment, we will post a Notice of Availability, have newspaper notices, and will send out another email blast so you're aware that the document is ready for your review.

Your input is valuable to understanding the environmental concerns of Bell Creek as a tributary of the LA River. These comments will be considered in our environmental impact analyses through the PEIR. Additionally, Bell Creek is identified in County's Upper LA River Enhanced Watershed Management Plan which includes watershed control measures to address applicable stormwater quality regulations. The 2020 LA River Master Plan is being developed through extensive community input and robust data analysis. In addition to taking your comment into consideration for the PEIR, we have provided your comments, including your emails and letter, to the 2020 LA River Master Plan team for their consideration in the development of the 2020 LA River Master Plan.

Sincerely,

Ariana Villanueva
Environmental Engineering Specialist
Los Angeles County Public Works

From: Mary Ellen Fisenne <mame8993@hotmail.com>
Sent: Wednesday, July 8, 2020 3:07 PM
To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Subject: NOP Scoping Comments, LA Public Works

CAUTION: External Email. Proceed Responsibly.

Ariana,

I am commenting on the recent Legal Notice 2020 LA River Master Plan. I was unable to access the 2020 LA River Master Plan PEIR at the address provided in the Notice, (the notice may be improperly noticed, kindly forward the link). My comments are as follows:

If the contamination at the headwaters of the Los Angeles River is not addressed, the proposed 2020 LA River Master Plan is fatally flawed and potentially lethal to the community. The feeder stream to the LA River is Bell Creek which has long been known to carry water from the Santa Susana Field Laboratory (SSFL), where rocket engine testing nuclear research, and a partial nuclear meltdown took place.

It is socially irresponsible to go forward with a plan unless the issue of hazardous waste from the SSFL including radioactive waste has been addressed. Toxic waste has been dumped into the creek for decades including chromium, dioxin, lead, mercury, liquid -propellant for rocket engines and other pollutants. I am a former resident of Bell Canyon, a community in Ventura County, though which Bell Creek flows. I have been a longtime advocate for addressing the clean-up of the SSFL. I have copied a link to previous correspondence that I received from the EPA decades ago related to this creek that flows into the Los Angeles River.

I cannot imagine going forward with this plan for recreation and inviting the public to use the LA River without cleaning up the headwaters that have been streaming though the SSFL, a property that still, after more than 60 years, has not been cleaned up. What is the plan for addressing the wastewater and storm runoff into the LA River from Bell Creek? What studies on this issue have been done? My concern is that this issue has not been addressed, the County is touting recreation along the river to improve health. How about starting with a plan to keep people from, unbeknownst to them, recreating in highly toxic chemical additives and widespread radioactive contamination? I would appreciate a reply so that I know my correspondence has been received. Thank you for your time and attention, Cordially, Mary Ellen Waller

See information below as to Bell Creek:

The initial headwater feeder-streams begin in the Simi Hills in Ventura County from 90% of the Rocketdyne Santa Susana Field Laboratory(SSFL) property as its watershed, leaving the site with toxic substances and radionuclide contamination via culvert outfalls, aquifer seeps and springs, and surface runoff.^{[3][4]} It then flows as a creek southeast through Bell Canyon (the community and geographic feature), Bell Canyon Park, and El Escorpión Park in a natural stream bed. It then is altered to flow in a concrete channel. Moore Creek joins in from the west, and then it flows east, channelized through West Hills, where it is joined by the South Fork and South Branches of the same name and by Dayton Creek. Then on through Canoga Park to join Arroyo Calabajas (Calabajas Creek) and becoming the Los Angeles River.

[https://en.wikipedia.org/wiki/Bell_Creek_\(Southern_California\)](https://en.wikipedia.org/wiki/Bell_Creek_(Southern_California))

https://www.etec.energy.gov/Environmental_and_Health/Documents/BellCanyonFiles/EPA_PartialSplitSampResults.pdf



Mary Ellen Waller *
Attorney at Law

July 14, 2020

Ariana Villanueva
Los Angeles County Public Works
Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

Re: NOP Scoping Comments, LA Public Works

Dear Ms. Villanueva:

I have not received a reply to my previous e-mail of July 8, 2020 as I had requested. Enclosed please find copies of my correspondence. I would appreciate a response.

Cordially,

(Dictated, but not read to expedite)

MARY ELLEN WALLER

MEW: cs

encl.

* California and New York State Bar Admissions

23501 Park Sorrento, #103, Calabasas, California 91302
Telephone 818 / 224-7900; Facsimile 818 / 224-2497
www.FeinbergWaller.com

Subject:

FW: NOP Scoping Comments, LA Public Works

From: Mary Ellen Fisenne <mame8993@hotmail.com>

Date: Wednesday, July 8, 2020 at 3:06 PM

To: "LARiverCEQA@pw.lacounty.gov" <LARiverCEQA@pw.lacounty.gov>

Subject: NOP Scoping Comments, LA Public Works

Ariana,

I am commenting on the recent Legal Notice 2020 LA River Master Plan. I was unable to access the 2020 LA River Master Plan PEIR at the address provided in the Notice, (the notice may be improperly noticed, kindly forward the link). My comments are as follows:

If the contamination at the headwaters of the Los Angeles River is not addressed, the proposed 2020 LA River Master Plan is fatally flawed and potentially lethal to the community. The feeder stream to the LA River is Bell Creek which has long been known to carry water from the Santa Susana Field Laboratory (SSFL), where rocket engine testing nuclear research, and a partial nuclear meltdown took place.

It is socially irresponsible to go forward with a plan unless the issue of hazardous waste from the SSFL including radioactive waste has been addressed. Toxic waste has been dumped into the creek for decades including chromium, dioxin, lead, mercury, liquid -propellant for rocket engines and other pollutants. I am a former resident of Bell Canyon, a community in Ventura County, though which Bell Creek flows. I have been a longtime advocate for addressing the clean-up of the SSFL. I have copied a link to previous correspondence that I received from the EPA decades ago related to this creek that flows into the Los Angeles River.

I cannot imagine going forward with this plan for recreation and inviting the public to use the LA River without cleaning up the headwaters that have been streaming though the SSFL, a property that still, after more than 60 years, has not been cleaned up. What is the plan for addressing the wastewater and storm runoff into the LA River from Bell Creek? What studies on this issue have been done? My concern is that this issue has not been addressed, the County is touting recreation along the river to improve health. How about starting with a plan to keep people from, unbeknownst to them, recreating in highly toxic chemical additives and widespread radioactive contamination? I would appreciate a reply so that I know my correspondence has been received. Thank you for your time and attention, Cordially, Mary Ellen Waller

See information below as to Bell Creek:

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[https://en.wikipedia.org/wiki/Bell_Creek_\(Southern_California\)](https://en.wikipedia.org/wiki/Bell_Creek_(Southern_California))

https://www.etec.energy.gov/Environmental_and_Health/Documents/BellCanyonFiles/EPA_PartialSplitSampResults.pdf

Bell Creek (Southern California)

Bell Creek (also known as **Escorpión Creek**) is a 10-mile-long (16 km)^[2] tributary of the Los Angeles River, in the Simi Hills of Ventura County and the San Fernando Valley of Los Angeles County and City, in Southern California.

Contents

- Route
- Crossings

Bell Creek

South Branch Bell Creek

South Fork Bell Creek
- See also
- References
- External links

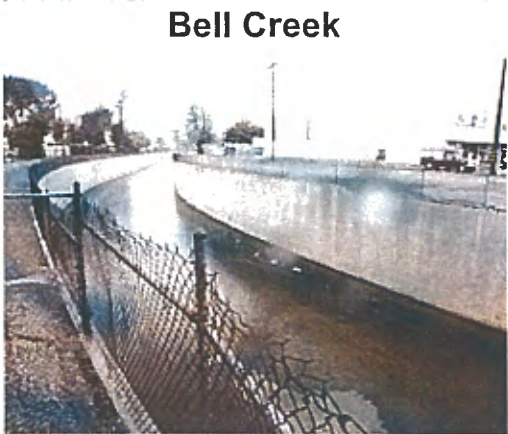
Route



The Arroyo Calabasas (left) and Bell Creek (right) join to form the Los Angeles River

The initial headwater feeder-streams begin in the Simi Hills in Ventura County from 90% of the Rocketdyne Santa Susana Field Laboratory (SSFL) property as its watershed, leaving the site with toxic substances and radionuclide contamination via culvert outfalls, aquifer seeps and springs, and surface runoff.^{[3][4]} It then flows as a creek southeast through Bell Canyon (the community and geographic feature), Bell Canyon Park, and El Escorpión Park in a natural stream bed. It then is altered to flow in a concrete channel. Moore Creek joins in from the west, and then it flows east, channelized through West Hills, where it is joined by the South Fork and South Branches of the same name and by Dayton Creek. Then on through Canoga Park to join Arroyo Calabasas (Calabasas Creek) and becoming the Los Angeles River.

Bell Creek begins as a free-flowing stream until passing Escorpión Peak (Castle Peak) in Bell Canyon Park. At Bell Canyon Road and Elmsbury Lane it becomes encased in a concrete flood control channel. It then passes under Valley Circle Boulevard, flowing just south of Highlander Road through former Rancho El Escorpión-current West Hills, and further eastward parallel to (and south of) Sherman Way



Looking west from Topanga Canyon Blvd.

	Location
Country	United States
Physical characteristics	
Source	
 • location	Simi Hills, California
Mouth	
 • location	Los Angeles River, California
 • coordinates	34°11′43″N 118°36′07″W^[1]
Basin size	Simi Hills, western San Fernando Valley

in Canoga Park. There, it joins Arroyo Calabasas, directly east of Canoga Park High School beside Vanowen Avenue. The confluence marks the *"headwaters"* of the Los Angeles River, 34.1952°N 118.601838°W.

Crossings

From mouth to source (year built in parentheses):^[5]

Bell Creek

- Vassar Avenue/Canoga Park High School [Pedestrian Bridge]
- California State Route 27 - North Topanga Canyon Boulevard (1949)
- Glade Avenue [Pedestrian Bridge]
- Shoup Avenue (1962)
- Dayton Creek enters from north
- Fallbrook Avenue (1963)
- South Branch enters
- Royer Avenue [Pedestrian Bridge]
- South Fork enters
- Platt Avenue (1961)
- Moore Creek enters from west
- Valley Circle Boulevard (1963)
- Highlander Road (19__)
- Bell Canyon Road (1969)
- Buckskin Court (1969)

South Branch Bell Creek

- Vanowen Street (1949)

South Fork Bell Creek

- Vanowen Street (1958)
- Haynes Street [Pedestrian Bridge, Closed]
- Victory Boulevard (1959)
- Platt Avenue (1959)
- Peterson Avenue (1961)

See also

- Source (river or stream) - a.k.a. watershed and headwaters
- Confluence - a.k.a. *"headwaters"*
- Drainage basin - a.k.a. *"watershed"*
- Urban runoff

References

1. U.S. Geological Survey Geographic Names Information System: Bell Creek (https://geonames.usgs.gov/apex/f?p=gnispq:3::NO::P3_FID:239173)
2. U.S. Geological Survey. National Hydrography Dataset high-resolution flowline data. The National Map (<https://viewer.nationalmap.gov/viewer/>) Archived (<https://www.webcitation.org/66gupqQDM?url=http://viewer.nationalmap.gov/viewer/>) 2012-04-05 at WebCite, accessed March 16, 2011

3. <http://www.enviroreporter.com/images/ESADA/2003-SSFL-surface%20water-map.jpg> SSFL Watersheds Map (access date: 4/11/2010)
4. <http://www.enviroreporter.com/2010/02/goo-ology/> EnviroReporter.com. "Goo-ology." access date:5/5/2010
5. "National Bridge Inventory Database" (<http://www.nationalbridges.com/>). Retrieved 2009-10-30.

External links

- Bell Canyon photo gallery (<https://web.archive.org/web/20090708105516/http://www.bellcanyon.com/photogallery.aspx>): 'Nature' sections.
-

Retrieved from "[https://en.wikipedia.org/w/index.php?title=Bell_Creek_\(Southern_California\)&oldid=828337727](https://en.wikipedia.org/w/index.php?title=Bell_Creek_(Southern_California)&oldid=828337727)"

This page was last edited on 1 March 2018, at 23:55 (UTC).

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Rec'd 2/27/99



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 9

75 Hawthorne Street
San Francisco, CA 94105-3901

February 17, 1999

Mary Ellen Waller
185 Bell Canyon Boulevard
Bell Canyon, CA 91307

S. Hoffmann

Re: Partial Results from Bell Canyon Split Sampling

Dear Ms. Waller:

In response to your January 13, 1998 letter, I am providing EPA's partial split sampling results from the Rocketdyne Bell Canyon Sampling. While EPA's laboratory, the National Air and Radiation Environmental Laboratory, has not yet completed all of their analyses, they do expect to finish in another five weeks. I will provide you with a complete set of results when it is available.

Because you also expressed concerns about EPA's level of involvement in the investigation, I am also providing a copy of a letter I sent to Rocketdyne on June 10, 1998. EPA and other the regulatory agencies involved in this sampling had relatively little time to review the workplan, consequently, no agency approved it. However, EPA, the California Department of Toxic Substances Control (DTSC) or the California Department of Health Services (Radiologic Health Branch and Environmental Health Branch) were present during four of the five days that sampling occurred.

In your letter, you also asked whether "the sediment samples of the creek bed were taken at deep enough levels to be of any true merit." EPA's answer is yes. However, you should be aware that EPA considers the type of sampling conducted by Rocketdyne to be a screening level investigation, even though the samples were analysed for an extensive number of contaminants. EPA and other agencies typically use this level of investigation to determine if immediate remediation is necessary, if further investigation is necessary or if no further action is required. While the currently available data in no way suggests that immediate remediation is necessary, EPA will withhold its judgment on the need for further investigation until we have completed our review of all split sampling results and Rocketdyne's Bell Canyon Area Soil Sampling Report, dated October 1998 (a copy of the report is available at the SSFL's three information repositories: the Simi Valley Library, the Urban Archives Center of the Oviatt Library at California State University Northridge and the Platt Branch Library).

02-23-99A10:40 RCVD

001485 RC

If I can be of further assistance to you, please feel free to call me at (415) 744-2070.

Sincerely,



Tom Kelly
Project Manager, Boeing Rocketdyne
Santa Susana Field Laboratory

cc: Dianne Feinstein, Senator (w/o enclosure)
Elton Gallegly, U.S. Representative (w/o enclosure)
Penny Nakashima, DTSC
Clem Welsh, DHS
Steve Hsu, DHS
Wayne Chiou, LARWQCB
Jeffrey Kaminiski Bell Canyon Association
Frank Shillo, Ventura County Supervisor
Jerome Raskin, SSFL Workgroup
Sheldon Plotkin, SSFL Workgroup
Dan Hirsch, SSFL Workgroup
Joe Lyou, SSFL Workgroup
Barbara Johnson, SSFL Workgroup
Steve Lafflam, Boeing, Rocketdyne

Ariana Villanueva

From: Carrie Sutkin <carrie.evrnc@gmail.com>
Sent: Thursday, July 23, 2020 8:36 AM
To: PW-LA River CEQA
Subject: Re: Reminder: Upcoming CEQA Scoping Meeting for 2020 LA River Master Plan PEIR

CAUTION: External Email. Proceed Responsibly.

thanks. but where is the PEIR? i can't find it?

On Jul 22, 2020, at 6:42 PM, PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Thank you again for your interest in the 2020 LA River Master Plan process.

As a reminder, County of Los Angeles, through Los Angeles County Public Works, will prepare a Program Environmental Impact Report (PEIR) pursuant to the California Environmental Quality Act (CEQA) for its proposed 2020 LA River Master Plan. The public scoping meeting for the PEIR will be held virtually due to restrictions under State of California Executive Order N-33-20.

DATE: Wednesday, July 29, 2020

TIME: 6:00 p.m. to 8:00 p.m.

LOCATION: Details about the CEQA online scoping meeting are available
at <http://pw.lacounty.gov/go/larmpceqa>

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Registration is not required for attendance, but registered attendees will receive an email reminder and instructions for the meeting. Registration is available at <http://www.eventbrite.com/e/online-scoping-meeting-2020-la-river-master-plan-program-eir-tickets-112158469000>

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Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

Thank you for your interest in the project and we look forward to your input on the scope and content of the PEIR.

For more information about the CEQA process for the 2020 LA River Master Plan, please visit <http://pw.lacounty.gov/go/larmpceqa>.

Ariana Villanueva

From: Romana Barajas <barajas1gcpnc@gmail.com>
Sent: Wednesday, July 22, 2020 8:09 PM
To: PW-LA River CEQA
Subject: Re: Reminder: Upcoming CEQA scoping meeting for 2020 LA River Master Plan PEIR

CAUTION: External Email. Proceed Responsibly.

I will be attending the meeting.

On Wed, Jul 22, 2020 at 8:43 AM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Thank you again for your interest in the 2020 LA River Master Plan process.

- As a reminder, County of Los Angeles, through Los Angeles County Public Works, will prepare a Program Environmental Impact Report (PEIR) pursuant to the California Environmental Quality Act (CEQA) for its proposed 2020 LA River Master Plan. The public scoping meeting for the PEIR will be held virtually due to restrictions under State of California Executive Order N-33-20.

- **DATE:** Wednesday, July 29, 2020

TIME: 6:00 p.m. to 8:00 p.m.

LOCATION: Details about the CEQA online scoping meeting are available at
<http://pw.lacounty.gov/go/larmpceqa>

- Public Works is soliciting input from members of the public, organizations, and government agencies on the scope and content of the information to be included and analyzed in the PEIR.

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- Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

Thank you for your interest in the project and we look forward to your input on the scope and content of the PEIR.

- For more information about the CEQA process for the 2020 LA River Master Plan, please visit <http://pw.lacounty.gov/go/larmpceqa>.

Romana Barajas

barajas1gcpnc@gmail.com

Ariana Villanueva

From: Carrie Sutkin <carrie.evrnc@gmail.com>
Sent: Wednesday, July 22, 2020 5:44 PM
To: PW-LA River CEQA
Subject: where is the program EIR?

CAUTION: External Email. Proceed Responsibly.

what document are people supposed to look at?

Ariana Villanueva

From: Carrie Sutkin <carrie.evrnc@gmail.com>
Sent: Wednesday, July 22, 2020 5:25 PM
To: PW-LA River CEQA
Subject: LA River Master Plan page needs to be updated

CAUTION: External Email. Proceed Responsibly.

How come there is no information about the PEIR on the LA River master plan page?
where are we supposed to go to review the document? why isn't there a path on the homepage?

oh, now I see, you have a new page.... [http](#); that's very misleading..... why isn't there a link?

Ariana Villanueva

From: Padric Gleason Gonzales <padric.gleason@gmail.com>
Sent: Wednesday, July 22, 2020 2:42 PM
To: PW-LA River CEQA
Subject: NOP Scoping Comments

CAUTION: External Email. Proceed Responsibly.

Hello,

My name is Padric Gleason Gonzales. I'm a resident of downtown Long Beach, here at the mouth of the L.A. River. I'm writing in support of the 2020 LA River Master Plan PEIR, particularly its goals of providing parks and open space, supporting connected ecosystems, and promoting clean water.

I want to specifically contribute four (4) considerations :

1. **Water capture should be encouraged.** California suffers from drought and Los Angeles County relies on a complex system of imported water. Runoff also pollutes the L.A. River with surface/ground-level contaminants. And most rainfall is completely wasted! In 2017, the L.A. County Department of Public Works estimated that in one 2-week period, 25 billion gallons of stormwater drained into the ocean from the L.A. River watershed. Much of this was direct runoff from roads, parking lots, and freeways. *The Master Plan should encourage widespread adoption of rainwater capture and runoff diversion, for example through the creation of and funding for spreading grounds, infiltration swales, and parkway medians.*
2. **Physical obstacles in the Lower L.A. River prevent natural tidal effects and migration of river life.** Specifically, there is a small dam just south of the Anaheim Street crossing and the concrete channel begins just south of the Willow Street crossing, both in Long Beach. *Barriers should be removed with the goal of restoring the natural tide, creating space for native flora and fauna, and encouraging migration of marine life into the river.*
3. **Long Beach receives runoff from 51 miles of river.** Unfortunately, the Army Corps of Engineers built a sea wall in Long Beach Harbor that creates a barrier to the outflow of the L.A. River into the ocean. On the one hand, it's good that this barrier prevents some L.A. River garbage and debris from entering the ocean. On the other hand, it's awful that Long Beach suffers from terrible pollution due to garbage and debris from our upstream neighbors. *I encourage the plan to consider the L.A. River's impacts on downstream neighborhoods and equitably share responsibility and funding/resources for cleanups downstream, like on Alamitos Beach.*
4. **Don't forget Compton Creek.** As one of the L.A. River's major tributaries, and in particular one that is heavily polluted but also has major restoration potential, *projects in Compton Creek should be eligible for funding and guidance within the scope of the L.A. River Master Plan.*

Thank you for considering my contributions. I look forward to helping to push this project forward.

Regards,

Padric Gleason Gonzales

padric.gleason@gmail.com

110 W 6TH ST, APT 323

LONG BEACH, CA 90802

Ariana Villanueva

From: Lisa Pease <lisa.pease@ey.com>
Sent: Wednesday, July 22, 2020 9:10 AM
To: PW-LA River CEQA
Subject: RE: Reminder: Upcoming CEQA scoping meeting for 2020 LA River Master Plan PEIR

CAUTION: External Email. Proceed Responsibly.

I sure hope the path will be at least six feet wide in all places!

Regards,

Lisa Pease

Lisa Pease | CSA | Strategy and Transactions
Ernst & Young LLP
Office: +1 213 240 7019 | lisa.pease@ey.com

Thank you for considering the environmental impact of printing this email.

From: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Sent: Wednesday, July 22, 2020 8:38 AM
Subject: Reminder: Upcoming CEQA scoping meeting for 2020 LA River Master Plan PEIR

Thank you again for your interest in the 2020 LA River Master Plan process.

As a reminder, County of Los Angeles, through Los Angeles County Public Works, will prepare a Program Environmental Impact Report (PEIR) pursuant to the California Environmental Quality Act (CEQA) for its proposed 2020 LA River Master Plan. The public scoping meeting for the PEIR will be held virtually due to restrictions under State of California Executive Order N-33-20.

DATE: Wednesday, July 29, 2020

TIME: 6:00 p.m. to 8:00 p.m.

LOCATION: Details about the CEQA online scoping meeting are available at
<http://pw.lacounty.gov/go/larmpceqa>

Public Works is soliciting input from members of the public, organizations, and government agencies on the scope and content of the information to be included and analyzed in the PEIR.

Registration is not required for attendance, but registered attendees will receive an email reminder and instructions for the meeting. Registration is available at <http://www.eventbrite.com/e/online-scoping-meeting-2020-la-river-master-plan-program-eir-tickets-112158469000>

Scoping comments on the PEIR are due no later than August 6, 2020, which marks the end of the 30-day scoping period. Please send your comments in writing to the physical address or e-mail address shown below. If sending an e-mail, please include "NOP Scoping Comments" in the subject line and include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

Thank you for your interest in the project and we look forward to your input on the scope and content of the PEIR.

For more information about the CEQA process for the 2020 LA River Master Plan, please visit <http://pw.lacounty.gov/go/larmpceqa>.

Any tax advice in this e-mail should be considered in the context of the tax services we are providing to you. Preliminary tax advice should not be relied upon and may be insufficient for penalty protection.

The information contained in this message may be privileged and confidential and protected from disclosure. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to the message and deleting it from your computer.

Notice required by law: This e-mail may constitute an advertisement or solicitation under U.S. law, if its primary purpose is to advertise or promote a commercial product or service. You may choose not to receive advertising and promotional messages from Ernst & Young LLP (except for EY Client Portal and the ey.com website, which track e-mail preferences through a separate process) at this e-mail address by forwarding this message to no-more-mail@ey.com. If you do so, the sender of this message will be notified promptly. Our principal postal address is 5 Times Square, New York, NY 10036. Thank you. Ernst & Young LLP

Ariana Villanueva

From: Miriam Rodriguez <miriam.rodriguez@lacity.org>
Sent: Wednesday, July 22, 2020 9:09 AM
To: PW-LA River CEQA
Subject: Re: Reminder: Upcoming CEQA Scoping Meeting for 2020 LA River Master Plan PEIR

CAUTION: External Email. Proceed Responsibly.

Hello,

thank you for your email. I am out of the Office and will return on Monday, July 27. If you need immediate attention, please call our Office at (323) 526-9332.

Best,

--

Miriam Rodriguez
Area Director
Office of Councilmember José Huizar
City of Los Angeles | Council District 14

Boyle Heights Office
2130 E. First Street, Suite 241
Los Angeles, CA 90033
(323) 526-9332 office | (323) 526-9366 fax

Ariana Villanueva

From: Deborah Bloome <dbloome@accelateresiliencela.org>
Sent: Tuesday, July 21, 2020 10:39 AM
To: PW-LA River CEQA
Subject: Where is a copy of the Plan to review?

CAUTION: External Email. Proceed Responsibly.

Hi...I am interested in the PIER scoping for the Plan, but I don't actually see a link to the Plan in the information sent. Perhaps I just missed it. Could you please share it with me?

Thank you!

--

Deborah Bloome
Senior Director of Policy
Accelerate Resilience L.A. (ARLA)
310-400-6715

Accelerate Resilience L.A.™ is a sponsored project of Rockefeller Philanthropy Advisors

Ariana Villanueva

From: Karen Barnett <karenbarnett@atwatervillage.org>
Sent: Monday, July 13, 2020 9:47 AM
To: PW-LA River CEQA
Cc: Morales, Fernando; Schneider, Erin
Subject: Re: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Thank you for getting back to me.

We as a board or members of the public can ask that certain areas be added in more detail?

For example - the LARRMP has study areas that are more developed than its list of potential projects.

OR

Is it we can ask for more detail on Hazardous Materials or Recreation as a section?

Do you plan to have a section of Atwater Villages 4 miles which will be called out and addressed in more detail? Your flood study in North Atwater Village?

Since this is a "programming EIR" will project automatically get a neg. dec. or will they have to go through the full EIR process?

We have a short timeline for a response since the meeting is so close to the comment period deadline. Any information you can provide sooner is appreciated.

Thanks,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

On Mon, Jul 13, 2020 at 9:25 AM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Hi Karen,

Thank you for reaching out to us. The Draft PEIR for 2020 LA River Master Plan is still in the process of being prepared so the sections are not yet available for review; however, the online scoping meeting held on July 29 will provide an overview of the PEIR/CEQA process and provides an opportunity for the public to provide input and comment on the scope of the PEIR (the sections you would like to see included in the PEIR). You will have an opportunity to review the sections (i.e. aesthetics, energy, hydrology/water quality, etc.) in the Draft PEIR when it is released for public review with a 45-day period to provide comments. We hope you can join us on July 29 from 6 to 8pm, but if not, all presentation materials will be available on the website afterwards

(<https://pw.lacounty.gov/go/larmpceqa>) and we will be accepting written comments on the scope of the PEIR until August 6. Registration for the presentation is not required to attend, but if you sign up, we'll send additional reminder email about the event prior to July 29.

I will also check on issues with the phone number as it should be active.

Let me know if you have any other questions. Thank you!

Sincerely,

Ariana Villanueva

Environmental Engineering Specialist

Los Angeles County Public Works

From: Karen Barnett <karenbarnett@atwatervillage.org>

Sent: Friday, July 10, 2020 3:46 PM

To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>

Cc: Morales, Fernando <FMorales@bos.lacounty.gov>; Schneider, Erin <ESchneider@bos.lacounty.gov>

Subject: Re: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Hello,

This is my third email to this address and I haven't gotten a response?! I would like to know how to prepared for this meeting/NOP/PEIR - where the information is to review?

Your phone number worked once this morning... now my provider says it's no longer in service?

Can you call me at 818 468 1738

Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative
River Committee Chair
E-mail: KarenBarnett@atwatervillage.org
Message Phone: 323-230-3406
www.atwatervillage.org

On Fri, Jul 10, 2020 at 8:13 AM Karen Barnett <karenbarnett@atwatervillage.org> wrote:

Hello Ariana,

Can you point me to the information we need to assess? I don't see any links for sections referenced in the notice. Atwater Village is one of the flood study points mile 28 if I'm recalling correctly. Our community is 4+ miles of the LA River (east and west banks)

Of course, I would like to see it all but specifically these sections in their formats 2020 LA River Master Plan PEIR Scope and Probable Environmental Effects. *I'm assuming flood would be in Hydrology/Water Quality.*

Aesthetics
Air Quality
Energy
Hazards & Hazardous Materials
Hydrology/Water Quality
Land Use/Planning
Noise
Public Services
Recreation
Transportation
Utilities/Service Systems
Cumulative Impacts

Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative
River Committee Chair
E-mail: KarenBarnett@atwatervillage.org
Message Phone: 323-230-3406
www.atwatervillage.org

----- Forwarded message -----

From: **Karen Barnett** <karenbarnett@atwatervillage.org>
Date: Wed, Jul 8, 2020 at 9:52 AM
Subject: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping
To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>

Hello Ariana,

Can you point me to the information we need to assess? I don't see any links for sections referenced in the notice. Atwater Village is one of the flood study points mile 28 if I'm recalling correctly. Our community is 4+ miles of the LA River (east and west banks)

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Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

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Message Phone: 323-230-3406

www.atwatervillage.org

On Tue, Jul 7, 2020 at 5:20 PM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

The County of Los Angeles, through Los Angeles County Public Works, will prepare a Program Environmental Impact Report (PEIR) pursuant to the California Environmental Quality Act (CEQA) for its proposed 2020 LA River Master Plan. The PEIR will assess the environmental impacts of implementing the 2020 LA River Master Plan. As part of this PEIR process, Public Works is soliciting input from members of the public, organizations, and government agencies on the scope and content of the information to be included and analyzed in the PEIR.

A Notice of Preparation (NOP) has been prepared to notify responsible and trustee agencies, the Office of Planning and Research, the County Clerk, and other interested parties that Public Works is beginning preparation of this PEIR, and starts the 30-day scoping period. The NOP for the 2020 LA River Master Plan PEIR can be viewed at <http://pw.lacounty.gov/go/larmpceqa>.

The community is invited to participate in an online scoping meeting for the PEIR, which is being held virtually due to restrictions under State of California Executive Order N-33-20.

DATE: Wednesday, July 29, 2020

TIME: 6:00 p.m. to 8:00 p.m.

LOCATION: Details about the CEQA online scoping meeting are available at <http://pw.lacounty.gov/go/larmpceqa>

Registration for the event is available at <http://www.eventbrite.com/e/online-scoping-meeting-2020-la-river-master-plan-program-eir-tickets-112158469000>

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Ariana Villanueva

Los Angeles County Public Works, Stormwater Quality Division

900 South Fremont Avenue, 11th Floor

Alhambra, CA 91803

LARiverCEQA@pw.lacounty.gov

Thank you and we look forward to your participation in the process.

Ariana Villanueva

From: Karen Barnett <karenbarnett@atwatervillage.org>
Sent: Friday, July 10, 2020 3:46 PM
To: PW-LA River CEQA
Cc: Morales, Fernando; Schneider, Erin
Subject: Re: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

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Thank you,

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Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

----- Forwarded message -----

From: **Karen Barnett** <karenbarnett@atwatervillage.org>

Date: Wed, Jul 8, 2020 at 9:52 AM

Subject: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>

Hello Ariana,

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Noise

Public Services

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Utilities/Service Systems

Cumulative Impacts

Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

On Tue, Jul 7, 2020 at 5:20 PM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

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2020 LA River Master Plan. As part of this PEIR process, Public Works is soliciting input from members of the public, organizations, and government agencies on the scope and content of the information to be included and analyzed in the PEIR.

A Notice of Preparation (NOP) has been prepared to notify responsible and trustee agencies, the Office of Planning and Research, the County Clerk, and other interested parties that Public Works is beginning preparation of this PEIR, and starts the 30-day scoping period. The NOP for the 2020 LA River Master Plan PEIR can be viewed at <http://pw.lacounty.gov/go/larmpceqa>.

The community is invited to participate in an online scoping meeting for the PEIR, which is being held virtually due to restrictions under State of California Executive Order N-33-20.

DATE: Wednesday, July 29, 2020

TIME: 6:00 p.m. to 8:00 p.m.

LOCATION: Details about the CEQA online scoping meeting are available at <http://pw.lacounty.gov/go/larmpceqa>

Registration for the event is available at <http://www.eventbrite.com/e/online-scoping-meeting-2020-la-river-master-plan-program-eir-tickets-112158469000>

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Ariana Villanueva

Los Angeles County Public Works, Stormwater Quality Division

900 South Fremont Avenue, 11th Floor

Alhambra, CA 91803

LARiverCEQA@pw.lacounty.gov

Thank you and we look forward to your participation in the process.

Ariana Villanueva

From: Karen Barnett <karenbarnett@atwatervillage.org>
Sent: Friday, July 10, 2020 8:14 AM
To: PW-LA River CEQA
Subject: Fwd: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Hello Ariana,

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Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

----- Forwarded message -----

From: Karen Barnett <karenbarnett@atwatervillage.org>

Date: Wed, Jul 8, 2020 at 9:52 AM

Subject: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>

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Thank you,

Karen

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Ariana Villanueva

Los Angeles County Public Works, Stormwater Quality Division

900 South Fremont Avenue, 11th Floor

Alhambra, CA 91803

LARiverCEQA@pw.lacounty.gov

Thank you and we look forward to your participation in the process.

Ariana Villanueva

From: Mary Ellen Fisenne <mame8993@hotmail.com>
Sent: Wednesday, July 8, 2020 3:07 PM
To: PW-LA River CEQA
Subject: NOP Scoping Comments, LA Public Works

CAUTION: External Email. Proceed Responsibly.

Ariana,

I am commenting on the recent Legal Notice 2020 LA River Master Plan. I was unable to access the 2020 LA River Master Plan PEIR at the address provided in the Notice, (the notice may be improperly noticed, kindly forward the link). My comments are as follows:

If the contamination at the headwaters of the Los Angeles River is not addressed, the proposed 2020 LA River Master Plan is fatally flawed and potentially lethal to the community. The feeder stream to the LA River is Bell Creek which has long been known to carry water from the Santa Susana Field Laboratory (SSFL), where rocket engine testing nuclear research, and a partial nuclear meltdown took place.

It is socially irresponsible to go forward with a plan unless the issue of hazardous waste from the SSFL including radioactive waste has been addressed. Toxic waste has been dumped into the creek for decades including chromium, dioxin, lead, mercury, liquid -propellant for rocket engines and other pollutants. I am a former resident of Bell Canyon, a community in Ventura County, though which Bell Creek flows. I have been a longtime advocate for addressing the clean-up of the SSFL. I have copied a link to previous correspondence that I received from the EPA decades ago related to this creek that flows into the Los Angeles River.

I cannot imagine going forward with this plan for recreation and inviting the public to use the LA River without cleaning up the headwaters that have been streaming though the SSFL, a property that still, after more than 60 years, has not been cleaned up. What is the plan for addressing the wastewater and storm runoff into the LA River from Bell Creek? What studies on this issue have been done? My concern is that this issue has not been addressed, the County is touting recreation along the river to improve health. How about starting with a plan to keep people from, unbeknownst to them, recreating in highly toxic chemical additives and widespread radioactive contamination? I would appreciate a reply so that I know my correspondence has been received. Thank you for your time and attention, Cordially, Mary Ellen Waller

See information below as to Bell Creek:

The initial [headwater](#) feeder-streams begin in the [Simi Hills](#) in [Ventura County](#) from 90% of the [Rocketdyne Santa Susana Field Laboratory](#) (SSFL) property as its [watershed](#), leaving the site with [toxic substances](#) and [radionuclide](#) contamination via culvert outfalls, [aquifer seeps](#) and [springs](#), and [surface runoff](#).^{[3][4]} It then flows as a [creek](#) southeast through [Bell Canyon](#) (the community and geographic feature), [Bell Canyon Park](#), and [El Escorpión Park](#) in a natural [stream bed](#). It then is altered to flow in a [concrete channel](#). Moore Creek joins in from the west, and then it flows east, channelized through [West Hills](#), where it is joined by the South Fork and South Branches of the same name and by Dayton Creek. Then on through [Canoga Park](#) to join [Arroyo Calabasas](#) (Calabasas Creek) and becoming the [Los Angeles River](#).

[https://en.wikipedia.org/wiki/Bell_Creek_\(Southern_California\)](https://en.wikipedia.org/wiki/Bell_Creek_(Southern_California))

https://www.etec.energy.gov/Environmental_and_Health/Documents/BellCanyonFiles/EPA_PartialSplitSampResults.pdf

Ariana Villanueva

From: Carrie Sutkin <carrieasutkin@gmail.com>
Sent: Wednesday, July 8, 2020 2:07 PM
To: PW-LA River CEQA
Subject: Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

thank you.

On Jul 8, 2020, at 10:47 AM, PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

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DATE: Wednesday, July 29, 2020

TIME: 6:00 p.m. to 8:00 p.m.

LOCATION: Details about the CEQA online scoping meeting are available at <http://pw.lacounty.gov/go/larmpceqa>

Registration for the event is available at <http://www.eventbrite.com/e/online-scoping-meeting-2020-la-river-master-plan-program-eir-tickets-112158469000>

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Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

LARiverCEQA@pw.lacounty.gov

Thank you and we look forward to your participation in the process.

Ariana Villanueva

From: Kathleen ODaniels <kcodaniels@gmail.com>
Sent: Wednesday, July 8, 2020 1:39 PM
To: PW-LA River CEQA
Subject: migratory birds

CAUTION: External Email. Proceed Responsibly.

Hi, Do you have a list of the migratory birds that use the LA River and their nesting places.

Thanks you,

Kathleen ODaniels

Ariana Villanueva

From: Karen Barnett <karenbarnett@atwatervillage.org>
Sent: Wednesday, July 8, 2020 9:52 AM
To: PW-LA River CEQA
Subject: Atwater Village questions Re: CEQA PEIR for LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Hello Ariana,

Can you point me to the information we need to assess? I don't see any links for sections referenced in the notice. Atwater Village is one of the flood study points mile 28 if I'm recalling correctly. Our community is 4+ miles of the LA River (east and west banks)

Of course, I would like to see it all but specifically these sections in their formats 2020 LA River Master Plan PEIR Scope and Probable Environmental Effects. *I'm assuming flood would be in Hydrology/Water Quality.*

Aesthetics
Air Quality
Energy
Hazards & Hazardous Materials
Hydrology/Water Quality
Land Use/Planning
Noise
Public Services
Recreation
Transportation
Utilities/Service Systems
Cumulative Impacts

Thank you,

Karen

Atwater Village Neighborhood Council

Central Atwater Representative

River Committee Chair

E-mail: KarenBarnett@atwatervillage.org

Message Phone: 323-230-3406

www.atwatervillage.org

On Tue, Jul 7, 2020 at 5:20 PM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

The County of Los Angeles, through Los Angeles County Public Works, will prepare a Program Environmental Impact Report (PEIR) pursuant to the California Environmental Quality Act (CEQA) for its proposed 2020 LA River Master Plan. The PEIR will assess the environmental impacts of implementing the 2020 LA River Master Plan. As part of this PEIR process, Public Works is soliciting input from members of the public, organizations, and government agencies on the scope and content of the information to be included and analyzed in the PEIR.

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Ariana Villanueva

Los Angeles County Public Works, Stormwater Quality Division

900 South Fremont Avenue, 11th Floor

Alhambra, CA 91803

LARiverCEQA@pw.lacounty.gov

Thank you and we look forward to your participation in the process.

Ariana Villanueva

From: Chris Wall <chris@hollyworldflowers.com>
Sent: Tuesday, July 7, 2020 9:22 PM
To: Anastasia Mann; PW-LA River CEQA; mark.pampanin@lacity.org
Subject: Re: CEQA PEIR for 2020 LA River Master Plan PEIR - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

This is a program of wide public interest, affecting many neighborhoods, many cities along the length of the river where projects are proposed, and all the areas downstream to its junction with the Pacific at Long Beach Harbor.

To say there is a two hour online meeting in three weeks, with decisions made in four, in an email that does not meet any government standard of wide circulation, is a de facto admission decisions have been made, land allotted, plans drawn, agencies awarded, developers secured financing - all that already done - and then twenty or thirty people will be given two minutes each to object to this pork barrel desecration of a natural resource that should be employed, not squandered, and certainly not hidden under warehouses and cheaply constructed housing designed to make all parties enabling it a piece of the prize, one way or another.

I am calling for a Covid era moratorium of a minimum 120 days on any further development on the LA River, and the immediate notification of anyone living or working within five miles of the river by US Mail - not once - but three times - the first time with text, within three weeks from today, July 8, 2020, the second time, another three weeks later, in an accurately illustrated color flyer similar to those employed by real estate agents, and the third, yet another three weeks later, a letter, requesting the addressee - and anyone else who wishes to comment - anonymously or not, on what they think of the plans, by mail, email, text, or - novel idea - by phone - advising what they would do with the river - because they are the people, we are the people, and it is 2020, and we demand to be heard.

The entire LA River development scene needs to be reviewed by the new Inspector General for Land Use and Development - a position very recently approved to be created by the Los Angeles City Council. Rushing ahead with this ill considered development without the new Inspector General's approval will be seen as a conspirational effort to avoid much needed oversight. Rethinking your schedule in tune with the times will be recognized for thoughtfulness, not rethinking, not rescheduling will be viewed with lasting disdain, for improper decisions, and for the creation of ill will brought about by ignoring the people once again. That time has passed.

I await your timely well considered response.

Chris Wall
Hollywood Hills

On Tue, Jul 7, 2020 at 6:01 PM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

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Ariana Villanueva

Los Angeles County Public Works, Stormwater Quality Division

[900 South Fremont Avenue, 11th Floor](#)

[Alhambra, CA 91803](#)

LARiverCEQA@pw.lacounty.gov

Thank you and we look forward to your participation in the process.

Ariana Villanueva

From: Sally Kuchar <sallykuchar@gmail.com>
Sent: Tuesday, July 7, 2020 6:41 PM
To: PW-LA River CEQA
Subject: Re: CEQA PEIR for 2020 LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Hi. Can you remove me from this list? Thanks!

Sent from my iPhone

On Jul 7, 2020, at 6:07 PM, PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

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Alhambra, CA 91803

LARiverCEQA@pw.lacounty.gov

Thank you and we look forward to your participation in the process.

Ariana Villanueva

From: Ricardo Morelli <doctormorelli@yahoo.com>
Sent: Tuesday, July 7, 2020 6:16 PM
To: PW-LA River CEQA
Subject: Re: CEQA PEIR for 2020 LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Greetings Ms. Villanueva,

Is the 2020 LA River Master Plan contemplating the large and growing number of homeless occupying the river "islands" and shores?

I see these neighbors on my walks and on my way to work and it's obvious many of them have mental issues and drug addiction. Is providing services to them part of the plan?

Sincerely,

Ricardo Morelli

On Tuesday, July 7, 2020, 6:06:22 PM PDT, PW-LA River CEQA <lariverceqa@pw.lacounty.gov> wrote:

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900 South Fremont Avenue, 11th Floor

Alhambra, CA 91803

LARiverCEQA@pw.lacounty.gov

Thank you and we look forward to your participation in the process.

Ariana Villanueva

From: zichrey@frontier.com
Sent: Tuesday, July 7, 2020 6:07 PM
To: PW-LA River CEQA
Subject: NOPScoping Comments

CAUTION: External Email. Proceed Responsibly.

My wife and I have walked different sections of the river trail. We feel this trail is a valuable resource for all residents of L.A. County. We particularly like the section through Frogtown in Silver Lake/Atwater Village. Sections of the trail in Long Beach, where we live, do not appear to be as wide and are less conducive to walking while others are biking.



3371 Glendale Blvd.
P.O. Box: 105, Los Angeles, CA 90039
Email: Board@AtwaterVillage.org
Message Phone: 323 230-3406
www.AtwaterVillage.org



AVNC Officers Co-Chairs: Courtney Morris, Edward Morrissey • Treasurer: Josh Hertz • Secretary: Karen Knapp

August 13, 2020

RE: AVNC comments, scoping Draft 2020 LA River Master Plan CEQA Programmatic Environmental Impact Report (PEIR)

Dear Councilmember O'Farrell, Council Member Ryu and Mayor Garcetti,

The AVNC is submitting the following comments for the scoping of the Los Angeles County's Draft 2020 LA River Master Plan CEQA Programmatic Environmental Impact Report (PEIR). As a riverfront community with a 4 mile border along the LA River we have seen the changes since the passing and implementation of the Los Angeles River Revitalization Master Plan (LARRMP). With the benefits and improvements everyone has enjoyed there have been impacts to the community. We see this as an opportunity to share our ground level experience with you and the county to make the LA River a better place for all.

We appreciate all your work to improve the LA River and the support you have provided for our community lead initiatives and projects.

Sincerely,

Courtney Morris
Co-Chair

Edward Morrissey
Co-Chair

CC: LA County CEQA team @ LARiverCEQA@pw.lacounty.gov
Honorable Supervisor Sheila Keuhl Third Supervisorial District County of Los Angeles
Honorable Supervisor Hilda Solis First Supervisorial District County of Los Angeles
Honorable Congressman Adam Schiff 28th Congressional District United States House of Representatives
Honorable State Senator Anthony Portantino
Honorable State Assemblymember Laura Freidman

NOP Descriptions with comments in blue:

Project Location and Background

The proposed Project is located along a 51-mile-long, 2-mile-wide corridor (i.e., 1 mile on each side) of the LA River - 834-square-mile watershed and flows from its headwaters at river mile 51 in Canoga Park within the City of Los Angeles to river mile zero at Long Beach, where the river meets the Pacific Ocean (Figure 1). The LA River was channelized between the late 19th and mid-

20th centuries to protect lives and property from flooding as the LA region rapidly grew and transformed to a largely urbanized area

1996 LA River Master Plan

The 1996 Master Plan was a first step in developing an inclusive vision of shared open spaces and parks, stewardship of water resources, and safety from hazardous floods.

COMMENT:

Flood safety was not addressed in 1996 for Atwater Village. Based on 1992 LACDA flood risk was assessed in Glendale Narrows, *no action was taken based on Cost/Benefit analysis. As quoted from County Representative at 2016 Glendale Narrows Potential Special Flood Hazard Area (SFHA)*

2020 LA River Master Plan Objectives

The proposed 2020 LA River Master Plan builds on the adopted 1996 Master Plan and other regional planning studies prepared since then. It is intended to improve 51 miles of connected open space along the LA River to improve health, equity, access, mobility, and economic opportunity for the diverse communities of Los Angeles County while still providing flood risk management.

The 2020 LA River Master Plan has the following nine objectives:

1. Reduce flood risk and improve resiliency.
2. Provide equitable, inclusive, and safe parks, open space, and trails.
3. Support healthy connected ecosystems.
4. Enhance opportunities for equitable access to the river corridor.
5. Embrace and enhance opportunities for arts and culture.
6. Address potential adverse impacts on housing affordability and people experiencing homelessness.
7. Foster opportunities for continued community engagement, development, and education.
8. Improve local water supply reliability.
9. Promote healthy, safe, clean water.

Future projects/actions proposed under the 2020 LA River Master Plan would range from extra-small (XS) (1-acre or less) to extra-large (XL) (150+ acre/10+ miles) and would include implementation of these design components individually or in combination as multi-benefit projects in the future. The proposed 2020 LA River Master Plan also includes Design Guidelines for all projects/actions to be implemented to present a unified identity while promoting best practices and resiliency for the LA River corridor.

COMMENT:

LA River - County elements and design cohesiveness: Los Angeles River Revitalization Master Plan (LARRMP) has implemented elements, which may not be “unified” with future Los Angeles County Los Angeles River Master Plan (2020) elements. The “kit of parts” should be flexible in developed LA River Areas.

Community identity: The “kit of parts” elements seek to present a “unified identity” along the river which could be at the expense of “community identity” for residents of Atwater Village which is fully in the 1 mile radius of the river border. Atwater Village currently has a specific

look with the iron gates and benches. Furthermore Atwater Village community elements include tile work to evoke its history with the local, historic Franciscan Tile Factory.

Program-Level Analysis, Tiering, and Later Activities

At the time of preparation of the PEIR, design information for the proposed 2020 LA River Master Plan is at a conceptual level; therefore, the environmental impacts analysis will be presented at a program level and will not include site-specific locations of any of the "Kit of Parts."

In addition, at this stage, informed assumptions regarding construction and operations scenarios can be reasonably made for only select design components. **Accordingly, the environmental impacts analysis for these design components will be presented in detail as analysis of "typical projects"** in the PEIR while the remaining design components will be analyzed qualitatively at a high-level in the 2020 LA River Master Plan PEIR.

COMMENT:

Your typical project for trail as presented at the virtual meeting is not typical – your analysis for a trail should include an additional “typical” situation, which is more realistic for implementation. (Example: in Atwater Village, which is an equestrian district, we do not have 40’ of access for shared use path as presented)

More typical path: 12’ of area with pedestrians and bikes (equestrians in Atwater Village)

1. Most river paths trails do not have 40 feet to accommodate 3 separate users.
2. Levee path and trails have 12-16’ of useable area
3. Equestrian users are not “typical” in most areas.
4. **include option** of physical separation of users along east and west banks (similar to beach paths)

The PEIR will serve as the first-tier analysis for later, more detailed project-specific and site-specific environmental reviews. When later activities are proposed after the PEIR is certified and the 2020 LA River Master Plan is approved, a determination will be made at that time by the agency: a) whether the activity is covered "within the scope" of the PEIR; and b) if new or worsened significant effects not previously examined in the PEIR could occur. Factors that an agency may consider in making the determination of being within the scope of the PEIR could include the geographic area analyzed in the PEIR, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, and covered infrastructure described in the PEIR

If an agency determines that a later activity is covered in the scope of the PEIR and new or substantially more severe significant impacts would not occur, no further environmental documentation would be required. If new or more severe impacts beyond those disclosed in the PEIR could occur, the agency would prepare the appropriate level of subsequent CEQA documentation needed (e.g., mitigated negative declaration, or a site-specific supplemental or subsequent EIR) and the subsequent CEQA review would focus solely on new or substantially more severe significant effects

that were not considered in the original PEIR

COMMENT:

Projects in the LARRMP have used that Master Plan's PEIR for Negative Declarations. We want to ensure that the community's concerns are heard by our commenting on the County's NOP PEIR and in future projects, which will specifically and/or cumulatively impact Atwater Village.

Create a kit of rules and regulations to match physical kit of parts and projects

We recommend that the PEIR study include a top level discussion of "introduction of open space, open space improvements and access improvements" from a programming perspective. How will new and/or revisited open spaces impact existing residential, equestrian communities, businesses, and etc.

community impacts: a program EIR should address and provide a common set of rules and regulation along the river: hours of operation, common rules for signage, set of signage examples (mixed-use: ped/bike + ped/bike/equestrian), potential "walk only" zones and potential "residential zones". Include new and/or additional use impacts such as trash, safety, parking and maintenance operations.

Create a general understanding of responsibility for increased access and open space in residential, equestrian and other communities along the LA River.

Aesthetics

COMMENT:

The "kit of parts" elements seek to present a "unified identity" along the river which could be at the expense of "community identity" for residents of Atwater Village which is fully in the 1 mile radius of the river border.

Atwater Village currently has a specific look with the iron gates and benches along the LA River. Furthermore Atwater Village community elements at entry and elements on streets include tile work elements that evoke our local history with the historic Franciscan Tile factory.

Air Quality

COMMENT:

Atwater Village: Census tracts comprising much of Atwater rank in the 95-100% percentile of the CalEnviroScreen, meaning that they are in the top 5% of environmentally burdened census tracts in the State of California.

The current LA River bike path is adjacent to I5, separated by a chain link fence. Most if not all, future trails, access points and projects will be within 500' of the highways surrounding Atwater Village (I5, 134 and 2 fwys) and other similarly situated communities.

We request that you study and mitigate the Air Quality in Atwater Village; diesel particulates impact on bike path and other trail users. This needs to be studied in depth for the safety of current and future LA River amenity users. We have a sample mitigation measure: mulch wall <https://drive.google.com/drive/u/0/folders/1NmNjaXA1u3FIUAHZducTbpR1MU5NYeE>

High Speed Rail Construction: Include cumulative impacts on air quality due to the HSR construction projects. High Speed Rail Corridor to be completed within the same period as County's LA River Master Plan timeline. Atwater Village's east border, the HSR corridor is within 1 mile of the LA River.

Energy:

COMMENT:

Alternative energy sources should be integrated into projects for multibenefits i.e. parking shade solar panels, picnic tables shade structure with solar panels. PEIR should explore all energy sources hydro, solar and wind, to achieve carbon neutral, zero emission goals.

Hazards & Hazardous Materials

COMMENT:

The whole of Taylor Yard is a brownfield site, this should be included, and construction and haul routes could negatively impact Atwater Village residents.

Hydrology/Water Quality

COMMENT:

LA River water quality in Atwater Village (Glendale Narrows):

North Atwater Village to Fletcher Drive has not been studied in depth over a significant period of time. Historically, there have been high E. coli levels, which were said to be due to the Verdugo Wash and Equestrian Community.

We recommend that the PEIR include an in depth study of water quality in the Glendale Narrows. Studying the water quality is important to analyze before any project recommendations that include water sports or water activities for public safety, in Atwater Village (Glendale Narrows)

Request based current situation at RattleSnake Park (South of Fletcher Dr) and Heal the Bay LA River Report card "Water Quality in the Upper L.A. River Watershed decreased slightly from

*2018 to 2019 with a two percentage point decrease in Green grades issued. This watershed also had three sites on the Honor Roll and three sites on the Freshwater Fails list.” **Freshwater Fails #3 Rattlesnake Park L.A. River Watershed: Recreation Zones.***

We feel this situation requires that the County study Atwater Village (and Glendale Narrows) as it is upstream from Rattlesnake park and could have water related activities in it’s Master Plan.

Water quality standards or waste discharge requirements: in order to protect water quality for human and wildlife use, we request that you study redirecting all LA River sewer and storm drains to water treatment facilities before discharging into the LA River. [Hudson River, The Clean Rivers Project in DC, and others, which address the current and future impacts of the **Clean Water Act (CWA)**]

PEIR should Integrate water testing and provide a continuous water quality reporting and monitoring plan.

Request based on aforementioned water quality fail and documented case of Avian Botulism in 2019. This case of Avian Botulism killed most of the bird and duck populations in Atwater Village. As of today, they have begun to return but in less numbers. This outbreak doesn’t have a documented start but there were several storm drain and sewer cleanings prior to and during summer/fall 2019.

Ground Water: EPA currently studying Atwater Village ground water and vapor contamination in SFV area 4(?) to Pollock Area. This should be included in your PEIR as it will impact any projects in the region.

Flood Risk/Mitigation: We recommend that you use your LA County Master plan findings from “mile 28” for all LA River projects in Atwater Village – not current FEMA maps.

Flood mitigation for the Atwater Village area was not addressed in the 1996 County Master Plan. While flood risk was acknowledged in 1992 LACDA Study, no action has been taken to correct or mitigate flood safety issues. *(The county is responsible for all flood matters in Los Angeles County, deferring the issue to USACE is not a corrective measure.)*

Population/Housing

The PEIR will address the proposed Project's potential for inducing population growth and displacing people and housing within the County and 17 incorporated jurisdictions. Analysis of population and housing along the 51-mile-long river will assess the differences between forecasts based on existing general plans of the County and 17 cities and regional growth projections. Specifically, the PEIR will assess whether the Project would induce substantial unplanned population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). Additionally, the PEIR will analyze whether the Project would displace substantial numbers of existing people or housing necessitating the construction of replacement housing elsewhere. These impacts, and their level of significance, will be assessed in

detail in the PEIR.

COMMENT:

Address connectivity of both banks for the LA River. Atwater Village has been seeking to connect the East Bank of the LA River for a safe multi use corridor and community “riverwalk” alternative to the West Bank “bike path”.

Flood Housing/Rental: Building and development along the LA River you must acknowledge areas of flood and “potential flood” hazard, note the requirements of Assembly Bill 646 flood hazard disclosures

Public Services

The PEIR will determine, at a program-level, if the improved access and anticipated increase in visitors in the Project area would result in impacts on Public Services — including fire protection, police protection, schools, parks, and other public facilities — by considering response times and increased demands, as applicable. The PEIR will assess available information on the current demand for public services against any new demand that is created by Project improvements. In addition, emergency access impacts during construction and operations would be analyzed. These impacts, and their level of significance, will be assessed in detail in the PEIR.

COMMENT:

We would like to have you include the HSR projects impacts on access and isolation when assessing public safety. One of our HSR mitigation requests is to place a fire/swift rescue substation in North Atwater Village (upon HSR land not used for project(s)). Atwater Village currently has limited access now and less in the future, increased access and open spaces along the river will bring more people, businesses, and visitors which will increase the need for emergency response services to be localized.

Recreation

The PEIR will address the proposed Project's potential impact on notable recreation areas; regional, neighborhood, and local parks; trails; and other local recreational facilities and uses — such as water recreation and equestrian uses — within and near the study area across the 18 jurisdictions. Specifically, the PEIR will analyze the Project's potential to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Additionally, the PEIR will analyze whether the Project includes recreational facilities or would require the construction or expansion of recreation facilities which might have an adverse physical effect on the environment. These impacts, and their level of significance, will be assessed in detail in the PEIR.

COMMENT:

When analyzing the recreational uses at current and future parks and access points we believe that you should analyze the impacts of traffic, parking and quality of life issues for local riverfront communities. Many communities along the LA River are adjacent to other

infrastructure, such as rail or highways, which limits accessibility to the LA River resources.

Atwater Village is an isolated community with 4 miles of river frontage but only 3 major streets crossing the community to Glendale/Los Angeles and no contiguous street at its length. In the future all access to Atwater Village will be via, bridge, overpass and underpass. Currently there are limited public transportation options to reach the LA River in Atwater Village.

Traffic: burden of bringing city wide and regional access to the LA River should not burden the local streets or residential communities without mitigation

Parking: burden of parking should not fall upon residential streets at LA River access points. City wide and regional projects should include parking.

Increased LA River use in residential communities: we recommend the use of Residential Quiet Zones, (as seen at beach communities and Greek Theatre-Los Feliz Hills residential area)

Areas of high mixed use: These areas need to be considered walk only and slow zones designated by signage

Require street bike path connectivity to LA River Bike Paths: to reduce congestion and parking issues, study alternative access, bike paths, to LA River recreation opportunities and access points.

Study the use and purchase of HSR excess property for LA river opportunity sites, example solar operated Bike Share Station.

Transportation

A transportation impact analysis will be prepared for the PEIR to describe the existing local and regional transportation network and to evaluate the proposed Project's construction- and operations-related traffic impacts, where feasible, for vehicular, transit, bike, and pedestrian circulation. The PEIR will analyze whether the Project will conflict with a program, plan, ordinance, or policy addressing the circulation system. The transportation analysis for the PEIR will be conducted using a uniform approach based on the draft County transportation assessment guidelines, including application of the project screening criteria and the Vehicle Miles Traveled (VMT) thresholds. Senate Bill (SB) 743, which replaces vehicle level of service (LOS) as the CEQA metric of significance with VMT, goes into full effect on July 1, 2020. The County has developed a draft update to the Transportation Section of the County CEQA Thresholds Guide that includes a comprehensive methodological approach to the assessment of transportation impacts, including VMT-based thresholds of significance and a process to screen out projects which will not require VMT analysis (due to their size, location, or other factors). These draft guidelines and thresholds are expected to be adopted by the LA County Board of Supervisors in June 2020, ahead of both the SB 743 implementation deadline and the anticipated publication of the draft PEIR in late summer 2020. The draft County VMT threshold is 16.8 percent below existing VMT per capita, which is more conservative than the threshold recommended by the California Office of Planning and Research or

that adopted by the City of Los Angeles, both of which are set at 15 percent below existing. Considering the approach of the PEIR, including the absence of any specific sites or projects under the proposed 2020 LA River Master Plan to be analyzed in the PEIR, the County has determined that its uniform set of VMT guidelines will best serve the transportation analysis for the PEIR considering the 17 cities in the study area are in various stages of transitioning from LOS to VMT. Accordingly, the PEIR transportation analysis approach will use the County transportation assessment guidelines, including the project screening criteria and the VMT thresholds. These impacts, and their level of significance, will be assessed in detail in the PEIR.

COMMENT:

City of Los Angeles Mobility Plan should be addressed, LA River connectivity to alternative transportation routes, bike trails, bus and rail to LA River. There should be a seamless integration of all plans for transportation.

Bus stops must be provided for projects and access areas that have more than 20 parking spaces

Street bike paths should connect to the LA River Bike Path. Safe access for river users which lowers VMT.

Cumulative Impacts

COMMENT:

Include **all HSR related projects** along with other projects in Atwater Village

HSR Rail Corridor Projects impacting Atwater Village:

Verdugo Wash Overcrossing J-Hook (NEW/Metro project)

Doran Street: At-Grade Closed (NEW/Metro project)

Salem/Sperry St: Overcrossing (NEW/Metro project)

Brazil Street/Broadway: At-Grade Closed (NEW/Metro project)

Riverwalk Path Bridge: LA River/Verdugo Wash Bridge (NEW/Metro project)

Doran Street: San Fernando Rd. pedestrian Overpass (NEW/Metro project)

Colorado Street: Undercrossing (modified)

Goodwin Avenue: Undercrossing (new)

Chevy Chase Drive: At-Grade Closed

Chevy Chase Drive: Pedestrian Bridge (new)

Los Feliz Boulevard: Undercrossing (modified)

Storage Etc: Demolition rerouting of rail line (new)

Glendale Boulevard: Undercrossing (modified)

Include the proposed HSR projects:

Doran St:

Stand alone Communication tower (SEE VOL 4 DWG NO. CO-O4003)

Signal house (SEE VOL 4 DWG NO. TC-O4104)

West San Fernando Rd (mid): Stand alone Communication tower (SEE VOL 4 DWG NO. CO-F4002)

Verdant/New Life Vision Church: Switching Station (SEE VOLUME 4 DWG NO. TP-04101)

South of Glendale Blvd/Hehr International Inc.: Signal house (SEE VOL. 4, DWG. NO. TC-04106s)

South of Glendale Blvd/Hehr International Inc.: Communication tower (SEE VOL. 4, DWG. NO. CO-F4004)

South of Glendale Blvd/West Casitas LLC: Interlocking site (SEE VOL. 4, DWG. NO. TC-04002)

South of Glendale Blvd/West Casitas LLC: Interlocking site (SEE VOL. 4, DWG. NO. TC-04003)

The required HSR electrical needs will permanently change the Atwater Village view:

Cantilever Structures: 84 to 105 along the Atwater Village border

Overhead contact system (OCS): A simple two-wire system consisting of a messenger wire and a contact wire that are supported by cantilever structures and attached to poles installed alongside the rail tracks.

Additional known construction projects:

Glendale-Los Angeles Water Treatment Plant Campus Update

Glendale-Hyperion Bridge Seismic Retrofit Project

Potential Project:

2800 Casitas Avenue Project (AKA True North Landing)

This list is not comprehensive, there are and will be other “land use” projects, in the 25 year period.

Growth-Inducing Impacts

The PEIR will discuss the ways in which the proposed Project could foster growth in the surrounding environment; growth-related secondary impacts also will be discussed.

Mandatory Finding of Significance

The PEIR will analyze whether the Project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. The PEIR will discuss if the Project has impacts that are individually limited, but considered cumulatively significant. Additionally, the PEIR will analyze whether the Project has environmental effects which cause substantial adverse effects on human beings, either directly or indirectly.

COMMENT:

The PEIR should have an Environmental Justice Effects section:

This is warranted under the County's LA River Master Plans 9 stated goals. Analyze the distribution of benefit/burden of County's LA River Master Plan on riverfront communities.

Equity investment and inclusion along the LA River:

PEIR should look at broadening access to the LA River's publicly funded projects to open opportunities and access to a wider and more diverse selection of companies, non-profits and vendors.



August 6, 2020

Sent via email

Ariana Villanueva
Los Angeles County Public Works
Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, California 91803
LARiverCEQA@pw.lacounty.gov

Re: Notice of Preparation for 2020 LA River Master Plan Draft Program Environmental Impact Report

Dear Ms. Villanueva:

These comments are submitted on behalf of the Center for Biological Diversity (“Center”) on the Notice of Preparation (“NOP”) of a CEQA Programmatic Environmental Impact Report (“EIR”) for the 2020 LA River Master Plan. These comments are submitted to assist the Department of Public Works (“DPW”) in preparation, review and approval of these environmental documents.

As the NOP acknowledges, the Project covers the 51-mile-long, 2-mile-wide corridor of the LA River in Los Angeles County and spans through 18 total jurisdictions. Today, 1 million people live within 1 mile of the river. The Center requests that special consideration be placed on the biological resources, hydrology and water quality, gentrification and homelessness, and equitable access.

I. Background on the Center

The Center is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States, including residents of Los Angeles County. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life.

II. Background on the EIR Process

An EIR is a detailed statement, prepared under the California Environmental Quality Act, Public Resources Code §§ 21000-21178 (“CEQA”), describing and analyzing all significant impacts on the environment of a proposed project and discussing ways of mitigating or avoiding those effects. (Pub. Res. Code §21100; Cal. Code Regs. tit. 14, § 15362.) The purpose of an EIR “is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made.” (*Laurel Heights Improvement Association v. Regents of University of California* (1993) 6 Cal.4th 1112, 1123 [emphasis in original and citations omitted].) An EIR should provide decision making bodies and the public with detailed information about the effect a proposed project is likely to have on the environment, to list ways in which the significant effects of a project might be avoided or minimized, and to indicate alternatives to the project. (Pub. Res. Code § 21061; Cal. Code Regs. tit. 14, § 15002.) California courts have emphasized that an EIR should: disclose all relevant facts; provide a balancing mechanism whereby decision makers and the public can weigh the costs and benefits of a project; provide a means for public participation; provide increased public awareness of environmental issues; provide for agency accountability; and provide substantive environmental protection.

CEQA compels agencies to refrain from approving projects with significant environmental impacts if feasible mitigation measures or alternatives exists that can alleviate or avoid such adverse effects. (*Mountain Lion Foundation v. Fish & Game Com.* (1997) 16 Cal.4th 105, 134.) Pursuant to this substantive mandate, the DPW should consider all feasible mitigation measures and alternatives in its EIR analysis, which should be quantitative, objective, rigorous, and most of all, complete.

III. Notice of Preparation Comments

a. Avoidance and Minimization of Impacts to Wildlife Movement and Habitat Connectivity Must be Prioritized.

The LA River watershed sits within one of the world’s most diverse Mediterranean biodiversity hotspots.¹ Today, the entire 52-mile river is designated as warm freshwater habitat, while the upper portion of the river and mouth are designated as wildlife habitat, used by rare, threatened, or endangered species. (*Id.* at 2.) Filling gaps in scientific research on wildlife along the LA River during the EIR process, as highlighted by Actions 3.2 and 3.6 of the Master Plan, would provide a greater insight into where Kit of Parts and other proposed projects would be best suited to support wildlife.

The Center requests that the Project’s common elements and projects be implemented with the lowest impact on wildlife movement and restore native plants ecosystems wherever possible. The Kit of Parts should also be implemented with an eye towards enhancing and

¹ Jessica M. Henson, et al, *Progress Memorandum to Carolina Hernandez Re: Existing Ecosystem and Habitat Conditions* (Nov. 19, 2018), available at https://d3n8a8pro7vhmx.cloudfront.net/larmp/pages/276/attachments/original/1543873616/181119_LARMP_Task_3.5_Ecosystem_Habitat_Progress_Memorandum_web.pdf?1543873616

interconnecting larger habitat areas in the San Gabriel, Santa Monica, and Santa Susana Mountains at the headwaters near Canoga Park, and between Griffith Park and the Verdugo Mountains at the Glendale Narrows, so that plant and animal species endemic to the River are more likely to survive and thrive. (*Id.* at 4.)

A functional riparian habitat and wetlands can also improve water quality by removing or sequestering many contaminants, therefore improving wildlife habitat quality has implications for the ecological functioning of the River as well as for wildlife uses.²

b. The DEIR Should Adequately Analyze and Mitigate Potential Impacts on Water Quality.

A diverse Mediterranean riparian ecosystem once covered much of the 834 square mile watershed of the LA River and its 9 major tributaries. Today, the LA River is an impaired water body with multiple total maximum daily load requirements (TMDLs) established to regulate the discharge of pollutants. (Progress Memorandum to Carolina Hernandez Re: Water Resources: Flood Risk Management, Water Quality, and Water Supply 2018.)³ The River is subject to five TMDLs for metals, nutrients, trash, bacteria under Section 303(d) of the Clean Water Act that collectively regulate discharges of 13 pollutants. (*Id.* at 19.) Furthermore, 62% of the LA River watershed is developed with mixed land uses where typical pollutants from industrial runoff include copper, zinc, lead, bacteria, suspended solids, PCBs, and DDTs. (*Id.* at 18.) The DEIR should clearly articulate the environmental benefits of increasing enforcement of water permit violations and remediating industrial and commercial contamination as part of the Master Plan.

The DEIR should also assess and mitigate the potential impacts the Master Plan could have on the River's ability to maintain its original "Rec 1" beneficial use designation.⁴ Common elements and Kit of Parts should be implemented in a manner that will someday restore the River to a fishable and swimmable river again. (*Id.*) The DEIR should also assess the prioritization of regional water quality improvement projects in areas of greatest need and should clearly state the increasing environmental benefits that would result from the most restorative actions that remove impervious surfaces and restore wetlands and green spaces.

c. The DEIR Must Assess Water Supply Impacts.

More than 50% of the region's water supply is imported from the Colorado River, Sacramento-San Joaquin River Delta and the Eastern Sierras.⁵ Given the increasing population, regulatory requirements, and demands on imported water, the DEIR should consider the benefits

² Los Angeles River Revitalization Master Plan 2007, available at https://boe.lacity.org/lariverrmp/CommunityOutreach/masterplan_download.htm.

³ Mark Hanna, et al., Progress Memorandum to Carolina Hernandez Re: Water Resources: Flood Risk Management, Water Quality, and Water Supply (Dec. 2018) ("Water Resources Memorandum"), available at https://d3n8a8pro7vhnmx.cloudfront.net/larmp/pages/280/attachments/original/1545082202/LARMP_Task_Memo_3-1_3-2_Progress_Memorandum_web.pdf?1545082202

⁴ Los Angeles River Revitalization Master Plan (2007), available at: <http://boe.lacity.org/lariverrmp/CommunityOutreach/pdf/04Chapter3-IssuesAffectingthePlan42407.pdf>.

⁵ Water Resources Memorandum at p. 22.

from increased groundwater replenishment. The use of stormwater infiltration and low impact development elements in all projects could result in the replenishment of groundwater supplies to meet local objectives of better use of local water resources and reduces reliance on imported water. Efforts to capture flows in the Upper and Lower LA River watershed for groundwater discharge in the San Fernando Basin and Central Basin must be prioritized in the environmental review of the Master Plan.

d. The DEIR Must Adequately Analyze and Mitigate Housing and Displacement Impacts.

Around 38,100 households within 1 mile of the LA River are currently at risk of displacement. (Steering Committee #7 Summary 2019).⁶ An important aspect of the LA River Master Plan would to fund the acquisition of land for affordable housing and to preserve affordable housing. DPW should ensure that affordable housing is not placed next to industries and should avoid placing housing in areas with high flooding potential.

The DEIR should also analyze and mitigated the displacement impacts the Master Plan will likely cause as a result of improving infrastructure at and near the River. Special attention should be given to the communities between Downtown LA and Long Beach where displacement risk is most pervasive and the City of Bell Gardens and other communities that are already in a state of advanced displacement (Steering Committee #7 Summary 2019).⁷ System-level mitigation measures should include a mix of supportive housing, affordable rental, affordable homeownership units, and other anti-displacement measures that would ensure community stability.

e. The DEIR Should Prioritize Equitable Access For All Communities Along the LA River.

The DEIR should place special emphasis on the environmental and societal benefits of increasing the extent of multi-use trails that connect to the River and prioritize access near major destination or areas that need improvements to existing access points. This should include connecting major regional trails, tributary trails and expanding regional loops primarily in the Lower LA River. The communities of highest park need along the LA River include Downtown LA, Bell Gardens, South Gate, Compton, and Long Beach. (Steering Committee Meeting #8 Summary 2019).⁸ Increasing public access to the River should also include common elements, such as street lighting and emergency call boxes, to increase public safety along and within the River.

⁶ Los Angeles River Master Plan Update, Steering Committee Meeting #7 Summary (Sept. 25, 2019), available at <https://pw.lacounty.gov/wmd/watershed/lar/docs/LARMP-SteeringCommittee7SummaryandAppendices.pdf> (p.54)

⁷ *Id.*

⁸ Los Angeles River Master Plan Update, Steering Committee Meeting #8 Summary (Dec. 19, 2019), available at <https://pw.lacounty.gov/wmd/watershed/lar/docs/LARMP-SteeringCommitteeMeeting8-Summary-and-Appendices.pdf>.

f. The DEIR Should Include A “Watershed Restoration” Alternative.

As detailed in the separate letter of August 4, 2020 submitted by Los Angeles Waterkeeper, the Center, Friends of the Los Angeles River, and Heal the Bay, the Center urges the County to include a “Watershed Restoration” alternative in the DEIR. This alternative would better achieve the goals of the Master Plan to “reduce flood risk and improve resiliency,” “support healthy, connected ecosystems” and “promote healthy, safe, clean water”.

IV. Conclusion

The Center appreciates the opportunity to submit comments on the Master Plan. Please do not hesitate to contact us with any questions.



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Heal the Bay

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August 10, 2020

Ariana Villanueva
Los Angeles County Public Works
Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

Submitted via email to: LARiverCEQA@pw.lacounty.gov

RE: Comments on the Notice of Preparation (NOP) for the Draft Program Environmental Impact Report (PEIR) for the LA River Master Plan

Dear Ariana Villanueva:

Heal the Bay is a non-profit environmental organization with over 30 years of experience and 15,000 members dedicated to making the coastal waters and watersheds of California safe, healthy, and clean. Heal the Bay has a long history of work on the Los Angeles River; we have advocated for improved habitat, water quality, and recreation by weighing in on numerous policies and permits concerning the Los Angeles River such as TMDLs, the Recreational Use Reassessment (RECUR) study, permits for dredging and clearing vegetation, and other regulatory actions.

Heal the Bay has actively participated in the development of the LA River Master Plan as a Steering Committee member. Throughout that two-year process we have provided feedback and expressed concerns over the process and the content of the Plan.

After reviewing the NOP for the Draft PEIR and attending the public CEQA scoping meeting, we are concerned about two specific issues, namely the lack of commitment to public participation and the limitation of the assessment of impacts to only two very specific typical projects.

1. **Public Participation Must Be Prioritized.** We are concerned that the timing of the request for public comments on the NOP and the PEIR does not allow for adequate public participation. Given that the LA River Master Plan has not yet been released, the public cannot adequately comment on the NOP. It will be even harder for the public to comment on the Draft PEIR when it is out in summer 2020, again, given that the Draft LA River Master Plan may still not be out then. During the scoping meeting, it was



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estimated that the Draft Master Plan will be released in the late summer or early fall. It is unfair to expect people to provide meaningful comments on the PEIR in the absence of the draft Plan itself. Further, due to COVID-19 and the need to conduct outreach and public participation virtually, additional thought, care, and time must be devoted to ensure adequate public participation. Public participation must be made as easy as possible. The CEQA scoping meeting did not make public participation easy. For instance, the comments provided during that meeting were not even considered as official comments or on the record; people were taking the time to attend the meeting, type out their comments and questions, and yet those written questions and comments were routinely dismissed by stating that the comments needed to be emailed in order to be considered. The description of the scoping meeting was not what actually happened at the meeting: "After the presentation, a Q&A session will be held followed by submission of oral comments by previously registered commenters. Written comment forms will be supplied for those who wish to submit comments in writing at the scoping meeting."¹ Comments were not received orally, nor through a registration process and written comment forms were not supplied for those wishing to submit comments at the scoping meeting.

We ask for a commitment to true public participation by delaying the release of the Draft PEIR until *after* the release of the Draft LA River Master Plan. We also ask for additional time for public review of the Draft PEIR, additional public meetings in multiple languages once the PEIR is released, that comments be received in meetings as well as in written formats, and that additional creative ways of engaging the public be explored (e.g. a virtual post-it-note board, virtual open house.)

2. The PEIR needs to evaluate impacts of all six elements in the kit of parts.

The NOP states that the PEIR will evaluate two typical projects, which are the common elements and a multi-use trails and access gateways project. We are concerned with this limited evaluation primarily because these two types of projects are likely to be less impactful than other types of projects that will not be evaluated in the same depth. Heal the Bay, in addition to other groups, has routinely expressed concern over the platform parks element and the potential for this design to have significant negative environmental impacts. Focusing the PEIR on two projects that are considerably less impactful than other proposed project types is disingenuous and not representative of the actual Master Plan. We understand that specific projects will not be examined in the

¹ <https://pw.lacounty.gov/swq/peir/doc/NOP-2020.06.26-draft.pdf>



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PEIR but a range of potential impacts should be examined for each of the six project types in the kit of parts.

We ask for a detailed evaluation of impacts for *all* six elements of the kit of the parts in the PEIR, not merely a high level analysis.

Thank you for your consideration of these comments. Please feel free to contact us at kpease@healthebay.org or 213-631-8495 with any questions.

Sincerely,

Katherine M. Pease, PhD
Director of Science & Policy

Travis Longcore, Ph.D.

President

Los Angeles Audubon Society

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August 6, 2020

Sent Electronically

Ms. Ariana Villanueva
Los Angeles County Public, Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
Email: lariverceqa@pw.lacounty.gov

RE: 2020 Los Angeles River Master Plan Notice of Preparation (NOP)

Dear Ms. Villanueva:

On behalf of the Los Angeles Conservancy, I am writing to comment on the 2020 Los Angeles River Master Plan Notice of Preparation (NOP). The Los Angeles River is one of the County's most important natural and historic resources with a complex and layered history.

As a Program EIR (PEIR) the 2020 Los Angeles River Master Plan will be the guiding document for an estimated 107 projects over a period of 25 years. As stated in the NOP, the Master Plan study area spans fifty-one miles of river from Canoga Park to Long Beach and extends one mile from either side of the river's banks. The study area encompasses seventeen cities and unincorporated L.A. County communities.

In 1996, the Los Angeles River Master Plan expanded its vision from the originally single-purpose flood control into a multi-benefit amenity that reflects aesthetic, environmental, economic, and recreational values of residents. The 2020 Master Plan further expands on the 1996 vision through its nine objects and "kit of parts."

- I. The Los Angeles River Viaducts are significant historic resources and should be preserved

The Los Angeles River is home to a unique collection of the City's most iconic civic monuments. Constructed between 1909-1939 by the City of Los Angeles, the Los Angeles River Viaducts tell the story of the city's growth from a second-tier city into a burgeoning economic center.



The viaducts primary function was to serve as a permanent safe means of transportation for motorists and street cars to cross the river. Beyond their primary function, these bridges acted as a beacon of the City's City Beautiful urban design. To all those who arrived from the east by train, the viaducts conveyed a progress not only relating to economics but to progressive thinking and sophistication. The bridges were a way to let tourists, businessmen, and new residents know that Los Angeles was equal to San Francisco and the metropolitan cities on the east coast.

Because of their significance, several of the bridges have been designated City of Los Angeles Historic-Cultural Monuments (HCM). As a component of the PEIR, we urge the County to fully collaborate with the City of Los Angeles Bureau of Engineering to assess each bridge in relation to any proposed projects and overarching goals for access and modes of travel either at grade or below the spans along the river. An overall historic preservation plan should be incorporated for these resources and others as part of the PEIR, to better understand the needs of this important collection and ensure their longevity and viability.

II. Many historic resources lie outside the banks of the Los Angeles River and within the Study Area and therefore should be surveyed

As stated in the PEIR, the study area extends one mile in either direction from the river's banks along its fifty-one-mile course. Stretching from Canoga Park to Long Beach, there are countless historic resources within the project study area. Development along the river is integral to the story of Los Angeles and its history. The communities that have formed along the river's banks are as diverse as the County itself with unique stories and experiences.

To fully understand the Study Area's historic and cultural resources, the Conservancy urges the County to conduct a historic resources survey (incorporating existing inventories, such as SurveyLA) that fully aligns with the area affected and included within the PEIR.

Historic resources are not only architectural, but are often related to art, culture, and important events. The 2020 Los Angeles River Master Plan NOP lists nine objectives, the Conservancy believes historic preservation directly relates to the following three objectives:

- Objective #2 - Provide equitable, inclusive, and safe parks, open space, and trails;
- Objective #5 – Embrace and enhance opportunities for arts and culture; and
- Objective #7 – Foster opportunities for continued community engagement, development and education.

Incorporating historic preservation into the Master Plan has many community benefits. Preservation empowers communities through saving historic places that tell community history. Connection to the historic built environment provides an important tangible link to history that cannot be achieved through history books alone. Historic preservation is an equitable solution to history telling and through community engagement.

The PEIR should also acknowledge existing historic resources and sites of important events, including those that have already experienced the loss of built-environment features. One



example is the site of the Sleepy Lagoon along the L.A. River near Commerce, and the murder that took place there. This event and a series that followed sparked concern about the treatment of Mexican-American youth. It is also considered a key event in the lead up to Los Angeles' [Zoot Suit Riots](#) of 1943.

While we often celebrate the good, it's important to recognize our more difficult histories too. While this story and others is a difficult history ripe with racism and injustices, we can learn from it and grow in a positive way. Fully acknowledging these physical places as part of the PEIR is important.

III. The Conservancy requests a meeting with the County's 2020 Los Angeles River Master Plan representatives.

The Conservancy requests a meeting with the County's 2020 Los Angeles River Master Plan team. After reviewing the Master Plan's Steering Committee, there does not appear to be a high level of historic preservation expertise represented. We hope a meeting with County representatives will facilitate a meaningful dialogue and help to create a more well-rounded 2020 Master Plan.

IV. Conclusion

The Conservancy looks forward to the 2020 Los Angeles River Master Plan update. We see the river as an important resource for all Angelenos and a place for equitable engagement. Throughout its fifty-one miles, the Master Plan Study Area encompasses countless historic resources. Therefore, the Conservancy urges the County to conduct a historic resources survey throughout the entirety of the Study Area. Within the river's banks, the collection Los Angeles River Viaducts tells an important history unto itself. To ensure the longevity of these bridges, the County should complete a comprehensive historic preservation plan as part of and to be included within the larger master plan. Lastly, the Conservancy requests a meeting with Master Plan representatives to better understand and ensure historic preservation is fully incorporated within the 2020 Master Plan.



About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,

Adrian Scott Fine

Adrian Scott Fine
Director of Advocacy





Los Angeles River Artists and Business Association
826 E. 3rd Street
Los Angeles, CA 90013
LARABA.ORG



July 29, 2020

Re: LA River Master Plan Update Draft

Dear LA River Master Plan Team,

As a neighborhood that is deeply impacted by decisions about the LA River, our community and Boards have closely followed the expertise of our colleagues at East Yard Communities for Environmental Justice, Friends of the LA River, From Lot to Spot, Heal the Bay, Los Angeles Neighborhood Land Trust, Los Angeles Waterkeeper, The Nature Conservancy, and The Trust for Public Land. We are grateful for the heavy lifting they have done on behalf of protecting communities and our beloved LA River.

While we commend the work done so far, we are here to echo our colleague's talking points and to encourage the working committees to not rush this plan forward. We encourage the team to take the extra 6 months to a year to address the vagaries of the working document.

Our concerns are as follows:

Mission statement is vague and lacking direction

While the language purports to support a healthy river and communities, it is not a true mission statement, and simply collects phrasing that tries to be all things to all people.

A clearer more concise mission statement that can tangibly tracks metrics is preferable. Statements like, "respect feats of infrastructure" is alarming to our community in the battle for river health and communities.

Our colleagues rightly suggest the following as an alternative statement:

"A healthy LA River flows through a 51-mile connected, public freshwater habitat that is seamlessly woven together with neighboring communities as part of its 824-square-mile watershed. It is an integral part of daily life in LA County—a place to enjoy nature and to get across town, a place to bring all people together in a restored and thriving freshwater and riparian ecosystem, a place that is at the heart of efforts to achieve regional climate and community resiliency, and a place to learn from the past and to shape the future."

We also agree that the Plan should be extended 6 months at a minimum to address the vagaries of the document.

Equity Prioritization

Communities of color are not addressed nor are the potential climate impacts given weight in the Plan.

Luxury housing alone has been prioritized without addressing the ramification and potential displacement of economically disadvantage communities directly impacted by these decisions.

Provisions need to be put in place that incentivizes equitable development which include real public greenspace and affordable housing

Robust community engagement of these stakeholders must take place. Repeated feedback from colleagues in River communities has been that next to no outreach was performed and they have largely been ignored.

Lack of Watershed Level Approach

Again, the vague and somewhat contradictory use of language leaves much to be desired in an outcome that would enable communities to properly plan for climate impacts, ecological health, and community well-being. As a living asset, the LA River is not something to be “designed” or “controlled”, It is in fact a watershed and ecosystem to be nurtured and repaired.

We support a more robust definition of living that includes frequent updates as would be required for any living asset.

It is also important that the tributaries be included in analyses, GAMs, and graphics/maps and that a commitment is made to updating flood risk and the floodplain noting that restoration is a priority

Platforms and Crossings & Other Channel Modifications

Adding MORE concrete for platform parks that remove sunlight from the river seem to us counterintuitive to the health of both the river and our communities and we vehemently oppose such an application.

Channel modifications and maintenance must come from the POV of restoration and not simple maintenance. Observation of current maintenance practices is a cause of great concern and has shown a lack of respect to the environment and the surrounding communities.

We reiterate our hope that the Committee move towards addressing these large issues in advance of releasing drafts. We do not see the need to rush this process and believe that a more thoughtful and more inclusive process.

Sincerely,



Todd Terazzas
President, ADCCLA
Arts District Community Council



Randall Miller
President, LARABA
Los Angeles, River Artists & Business Association



August 4, 2020

Attention: Ariana Villanueva
Los Angeles County Public Works,
Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

Via e-mail to Ariana Villanueva with original to follow via US Mail.

RE: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the LA River Master Plan Update

Dear Ms. Villanueva,

Los Angeles Waterkeeper, the Center for Biological Diversity, Friends of the LA River, and Heal the Bay have reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the LA River Master Plan Update (LARMPU). The County of Los Angeles Department of Public Works (the County) will prepare the EIR pursuant to the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (Guidelines). (See Pub. Res. Code Section 21000 et seq; 14 Cal. Code Regs. Section 15000 et seq). We submit the following comments for consideration as the County prepares the EIR.

Los Angeles Waterkeeper (LAW) is a nonprofit environmental organization with members throughout the LA region. We safeguard LA's inland and coastal waters by enforcing laws and empowering communities throughout Los Angeles County. In the twenty-five years since our founding, LAW has protected LA waterways from thousands of Clean Water Act violations, worked to ensure access to safe drinking water, encouraged stormwater and wastewater recycling, and generated billions of investment dollars for remediation of our region's most threatened waterways. Much of LAW's work centers around rehabilitating the Los Angeles River and its watershed.

The Center for Biological Diversity is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental

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law. The Center has over 1.7 million members and online activists throughout California and the United States, including residents of Los Angeles County. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life.

Friends of the Los Angeles River (FoLAR) has been at the forefront of ensuring the Los Angeles River is publicly accessible and ecologically sustainable. We inspire River stewardship through community engagement, education, advocacy, and thought leadership. For over 30 years, we have worked to create an enduring vision of the River that acknowledges its legacy as a life-giving waterway and illuminates the critical benefits its restoration can bring to the surrounding communities.

Heal the Bay is a non-profit environmental organization with over 30 years of experience and 15,000 members dedicated to making the coastal waters and watersheds of California safe, healthy, and clean. Heal the Bay has a long history of work on the Los Angeles River; we have advocated for improved habitat, water quality, and recreation by weighing in on numerous policies and permits concerning the Los Angeles River such as TMDLs, the Recreational Use Reassessment (RECUR) study, permits for dredging and clearing vegetation, and other regulatory actions.

LAW, FoLAR, and Heal the Bay have actively participated in the development of the LA River Master Plan as Steering Committee members. We have repeatedly voiced concerns about the LA River Master Plan Update process and drafts throughout the Steering Committee and sub-committee process. We have been concerned about the lack of a clear vision, the lack of equity and ecology prioritization, and the lack of a watershed approach or climate resilience focus. We believe that many of the projects proposed in the draft would not only do harm to communities and ecosystems, but could also foreclose opportunities for preventing future harms. These issues continued to trouble us after reviewing the draft plan presented to the Steering Committee, so we further elaborated upon them in a joint letter submitted on March 12, 2020 with several fellow organizations on the Steering Committee. We still have not received any response to our comments at the date of submitting this letter, so we proceed with this letter with our same concerns in mind. The timing of the release of the NOP makes it difficult for us to submit comments without seeing the public-facing Draft EIR.

After reviewing the Draft EIR NOP, we are concerned about the County’s lack of transparency in its selection of an EIR document type, unclear description of the LARMPU project, and vague discussion of alternatives. CEQA requires transparency and a stable project description written with a level of specificity that allows members of the public to comment on

the project. (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 186). The County’s actions of describing its plan as both a Master EIR and a Program EIR, continually altering the LARMPU project description, and listing of vague alternatives vitiate the environmental review process as a tool for intelligent public participation.

I. The County Must Explain Whether It Intends to Prepare a Master EIR or a Program EIR and Provide Reasoning.

Instead of conflating Master and Program EIRs in labeling the plan’s environmental report a “Draft Master Plan PEIR,” we urge the County to clearly select one option and highlight and consider the relevant issues in the Draft EIR. A clearer selection of an EIR type will not only grant members of the public greater understanding of what they are commenting upon, but will also benefit the County. In the past, courts have substituted their own judgement in the absence of an agency’s EIR designation. A court may independently label an EIR and apply the corresponding CEQA regulations in a manner contrary to an agency’s wishes. Master and Program EIRs are distinct types of EIR documents and should be treated as such.

A Program EIR is one that may be prepared on a series of actions that can be characterized as one large project, and are related either: geographically; as logical parts in the chain of contemplated actions; in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways. (Guidelines Section 15168 subd. (a)). A Program EIR analyzes the environmental consequences of broad policies or programs at the planning stage and requires lead agencies to prepare more detailed analyses in subsequent documents.¹ It can: (1) provide the basis in an initial study for determining whether the later activity may have any significant effects; (2) be incorporated by reference to deal with regional influences, secondary effects, cumulative impacts, broad alternatives, and other factors that apply to the program as a whole; and (3) focus an EIR on a subsequent project to permit discussion solely of new effects which had not been considered before. (Guidelines Section 15168 subd. (d)).

A Program EIR will be most helpful in dealing with subsequent activities if it provides a description of planned activities and deals with the effects of the program as “specifically and comprehensively as possible.” (Guidelines Section 15168 subd. (c)(5)). In instances where the subsequent activities involve site-specific operations, a lead agency should use “a written

¹ See Michael H. Remy et. al., *Guide to CEQA California Environmental Quality Act* 280, 334 (11th ed. 2006).

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checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation” were covered in the Program EIR. (Guidelines Section 15168 subd. (c)(4)). Where such an inquiry concludes that additional CEQA analysis is required, the lead agency should then prepare an initial study to determine whether a negative declaration or EIR should be prepared. (Guidelines Section 15168 subd. (c)(1)).

The Master EIR procedure is another option for conducting environmental review. It is intended to serve as the foundation for analyzing the environmental effects of subsequent projects. A lead agency may prepare a Master EIR for (1) a general plan, general plan update, general plan element, general plan amendment, or specific plan; (2) a project that consists of smaller individual projects which will be carried out in phases; (3) projects that will be carried out or approved pursuant to a development agreement, as well as a number of other classes of projects. It shall, to the greatest extent feasible, evaluate the cumulative impacts, growth inducing impacts, and irreversible significant effects on the environment of subsequent projects. (Guidelines Section 15175).

In practice, a Master EIR is similar to a Program EIR. However, there are at least three differences worth noting. First, the requirements for preparing and applying a Master EIR and its associated focused EIRs are described in detail in both statute and the CEQA Guidelines. Requirements for Program EIRs, on the other hand, are less specifically described in the CEQA Guidelines. Second, once a subsequent project is determined to be within the scope of the Master EIR, a focused EIR must be prepared whenever it can be fairly argued on the basis of substantial evidence in the record that the project may have a significant effect, even if evidence exists to the contrary. Focused EIRs should examine project-specific impacts while referencing the Master EIR’s analysis of cumulative and growth-inducing impacts. Projects that have been described in some detail in the Master EIR may avoid the need for a subsequent focused EIR or negative declaration. Third, to use a Master EIR for a subsequent project, the Master EIR must be re-examined and, if necessary, supplemented at least once every five years. This ensures that the analysis contained in a Master EIR remains topical.²

We encourage the County to consider preparation of a Master EIR because it may facilitate smoother implementation of subsequent projects and greater public participation if prepared in a sufficiently comprehensive manner. The draft LARMPU that Steering Committee members have read already includes a high level of detail about certain projects, including the removal of vegetation from the Glendale Narrows and the construction of a concrete cap over the

² Office of Planning and Research, “Chapter 10 CEQA: Designing Healthy, Equitable, Resilient, and Economically Vibrant Places” in General Plan Guidelines, p. 275.

river in South Gate. The level of detail in the EIR should match the level of detail from the LARMPU, so community members should have an opportunity to comment on the environmental impacts of these projects at this point. Preparation of a Master EIR would also incentivize greater thoroughness and inclusivity in the upcoming EIR. Above all, however, we request a clear selection of an EIR type and an application of the CEQA regulations accordingly.

II. The County Must Devise a Stable Project Description.

Regardless of the County’s designation of the LARMPU EIR, CEQA requires an EIR to contain a stable project description. In fact, “an accurate, stable, and finite project description is the sine qua non of an informative and legally sufficient EIR.” (*County of Inyo* at 186). The CEQA Guidelines flesh out the notion of a “project” by referring to it as “an activity which may cause either a direct...or a reasonably foreseeable indirect physical change in the environment.” (Pub. Res. Code 21065 and *County of Inyo* at 192).

As written, the LARMPU Draft EIR contains an unstable, vague, and inconsistent description of the project as well as a list of ambiguous alternatives. For example, the Draft EIR available to the Steering Committee indicated that there are flooding concerns along the river corridor and discouraged riverfront development while also proposing housing along the river. It then makes it difficult for community members to comment on the County’s stance on housing in the floodplain if this is articulated in a contradictory way. Moreover, the Kit of Parts section of the Master Plan presents the six design components without prioritization or context in terms of their impacts on goals, possibility to do harm, and appropriateness reach by reach.³ It will be very difficult to comment on the environmental impacts of a general idea of floodplain reclamation or in-channel modifications, for instance, without more information. The NOP also states that the scope of the project is along a “51-mile-long, 2-mile-wide corridor,” but the draft LARMPU contains elements that are watershed-wide. All of these contradictions and more will lead to an unstable project description. A project description that gives conflicting signals to the public about the nature and scope of the project is fundamentally misleading and inadequate. (*Washoe Meadows County v. Dep’t of Parks & Recreation* (2017) 17 Cal. App. 5th 277, 287, 225 Cal. Rptr. 3d 238, 245 (*Washoe Meadows*)).

Additionally, some portions of the draft LARMPU are quite detailed, while others are vague, making the document unbalanced as a whole. The draft includes a broad description of possible projects, rather than a preferred or actual project. This type of project description is

³ See section 4 of the “Letter to County LARMPU” for more information about our concerns pertaining to the Kit of Parts portion of the Master Plan.

unstable because it presents the public with a moving target and requires a commenter to offer input on a wide range of alternatives that may not be pertinent to the ultimately approved project. Each option creates a different set of impacts, requiring different mitigation measures. As a result, meaningful public participation is stultified, and the public’s ability to participate in the CEQA process is impaired. (*San Joaquin Raptor Rescue Ctr. v. County of Merced* (2007) 149 Cal. App. 4th 645, 656).

CEQA also requires the EIR to set forth a reasonable range of clear project alternatives to foster informed decision-making and public participation. (see *Laurel Heights Improvement Assoc. v. Regents of the Univ. of Cal.* (1988) 47 Cal.3d 376). The NOP states that the EIR will include a no project alternative, a project alternative, and “one or more feasible ‘build’ alternatives to the proposed 2020 LA River Master Plan.” It is very unclear what this means, but it sounds like community members will be able to comment on either moving forward with the LARMPU as written, not at all, or with an entirely different ‘build’ project.

The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; new and unforeseen insights may emerge during investigation, compelling revision of the original proposal. (*County of Inyo* at 199). An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision that logically takes account of environmental consequences. An assessment of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is “reasonably feasible.” *Washoe Meadows* at 245. Only through an accurate view of the project may decision-makers and affected members of the public balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal, and weigh other possible alternatives. Therefore, we urge the County to devise a stable project description and delineate a set of clear alternatives in the Draft EIR.

III. The County Should Include a “Watershed Restoration” Alternative.

We recommend that the County include a “watershed restoration” alternative, recognizing that the river is a critical freshwater ecosystem that is important to community members. This alternative would expand the scope of the project to include the LA River watershed more formally because in order to achieve the goals of the LARMPU (including “reduce flood risk and improve resiliency,” “support healthy, connected ecosystems” and “promote healthy, safe, clean water”) a system-wide approach is critical. Freshwater ecology

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studies show that making superficial and fragmented changes to streams and stream-adjacent areas does not lead to the restoration of stream ecological function.⁴

The County also needs to use this level of analysis and broader scope in order to understand cumulative impacts. Cumulative impacts refers to two or more individual effects which, when considered together, are considerable and compound other environmental impacts. CEQA requires an EIR to discuss those cumulative impacts to which the project would contribute, and the importance of that contribution in the context of the cumulative impact. (Guidelines Title 14, Section 21083). How will the County understand whether it is meeting the LARMPU goal of “Improving local water supply reliability” without a watershed-wide scope, for instance? The NOP states that the LARMPU recognizes that infrastructure planning is equally important with social and environmental needs. A watershed restoration alternative would make this statement true.

On a final note, the County may also need to conduct a NEPA review given that several of the sections of the river are federally maintained. It is important to note that NEPA guidelines that are in conflict with CEQA do not override an agency’s CEQA obligations as “California courts will not follow NEPA precedent that is contrary to CEQA.” (*Washoe Meadows* at 290). While the presentation of alternative projects can in some cases be an adequate project description for a Draft EIS under NEPA, dramatically different projects in a Draft EIR do not constitute a stable project description under CEQA. Thus, even if the County conducts NEPA review, it will still be required to select a preferred alternative.

Thank you for the opportunity to comment. Please feel free to reach out to us at our e-mail addresses below. We look forward to reading the EIR and public-facing LARMPU draft later this summer.

Sincerely,

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⁴ Palmer, Margaret A., et al. "River restoration, habitat heterogeneity and biodiversity." 15 Jan. 2010, <https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1365-2427.2009.02372.x>.

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August 5, 2020

Ms. Ariana Villanueva
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<< Transmitted via electronic mail: LARiverCEQA@pw.lacounty.gov >>

RE: 2020 LA River Master Plan Draft Program Environmental Impact Report

Dear Ms. Villanueva:

The Mountains Recreation and Conservation Authority (MRCA) respectfully submits the following comments to the County of Los Angeles, Department of Public Works (Public Works) on the Notice of Preparation (NOP) for the proposed 2020 LA River Master Plan (Project) Program Environmental Impact Report (PEIR) which seeks to evaluate any potential impacts on the environment pursuant to the California Environmental Quality Act (CEQA). The proposed Project is located along the Los Angeles River (LA River) a 51-mile-long, 2-mile-wide corridor (1-mile on each side) of the LA River in Los Angeles County and spans 17 cities and unincorporated Los Angeles County (18 total jurisdictions). Although the LA River was channelized between the late 19th and mid-20th centuries to protect lives and property from flooding as the LA region rapidly grew and transformed to a largely urbanized area, habitat and wildlife have flourished throughout and along the river. Currently, an estimated 1 million people live within 1 mile of the river.

The MRCA is a public agency which was established in 1985 pursuant to the Joint Powers Act and is a partnership between the Santa Monica Mountains Conservancy (SMMC), the Conejo Recreation and Park District, and the Rancho Simi Recreation and Park District. The MRCA manages more than 75,000 acres of parkland and is dedicated to the preservation and management of local open space and parkland, wildlife habitat, watershed lands, and trails as well as ensuring public access to public parkland. As advocates for the Los Angeles River, we have actively acquired and developed open spaces adjacent to the River. We have and continue to develop and provide planning of River and tributary path greenways and existing parks and planned future parks. Additionally, the MRCA also operates and manages the only two River Recreation Zones, which were areas designated for in channel use, upon the river being deemed a traditional navigable waterway by the U.S. Environmental Protection Agency in 2010, which created protections throughout the river's watershed. The MRCA has been an active participant throughout the Project planning process serving on the LA River Master Plan steering committee.

We have compiled below a list of items which we would like to share with you and hope will be thoroughly addressed before the draft PEIR is approved.

Geography

Currently, this analysis is limited to the 51 miles of the LA River, beginning in Canoga Park within the City of Los Angeles, extending to Long Beach where the river meets the Pacific Ocean. Furthermore, the proposed project area extends up to 1-mile wide on each side of the river corridor, for a total of 2 miles, one on each side of the river, being defined as the study area. As subject experts know, the river does not begin at the headwaters in Canoga Park, but rather at the tributaries which originate in the mountain ranges in the Los Angeles Basin. The watershed is vast and although we realize it would be challenging to include all tributaries in the Los Angeles River watershed, there are significant tributaries which account for majority of the water in the river which should be considered for incorporation. The Upper Los Angeles River and Tributaries (ULART) Revitalization Plan analyzes and plans for major tributaries within the watershed; given that opportunities identified in the ULART plan are congruent with Public Work's mission, it would be highly beneficial to expand the County's reach to include tributaries within ULART under the PEIR, which would truly produce a cumulative analysis and regional impact, which the County has stated as being a goal of the Project.

Other planning efforts underway also include the CA High Speed Rail (HSR) project. The proposed alignment from Burbank to Los Angeles is currently in its planning process and poses significant and long-term impacts to the river and adjacent lands, including the threat to impede public access. Another project along the river with substantial beneficial impacts is the Los Angeles River Path project by Metro, which closes a significant 8-mile gap on the river path between the cities of Los Angeles and Vernon. The PEIR should have the foresight to include HSR cumulative impacts and address adverse impacts, as well as LA River Path alternatives included in the project analysis.

Aesthetics

Not only has public perception changed toward the LA River because of its navigable designation, but also because of its visual characteristics. When water, vegetation, habitat and wildlife are found in the river, like many river's outside of Los Angeles, it is then that people realize the value of a natural resource that once existed, a natural and wild river. The PEIR is expected to describe the existing visual character of the proposed Project study area and surrounding areas, and will identify key visual resources and scenic views. There are few naturalized areas in the LA River which remain and should be preserved, including the Sepulveda Basin, Griffith Park, and the Glendale Narrows. The probable impacts of the Project should not include substantial adverse effects on key visual resources and scenic vistas. Although one of the primary functions of the Flood Control District is to maintain flood capacity, it is our hope and expectation that many of the existing characteristics will not be compromised for flood control purposes, but rather will be preserved and enhanced to further create a thriving, riparian ecosystem. The mission

of the Flood Control District has since been expanded to include maximum environmental and ecological benefits, as well as recreation - all of which contribute to river aesthetics.

Biological Resources

The LA River contains an abundance of biological resources, existing both in the river channel and adjacent to the river within the 2-mile-wide study area of the river corridor. The rich riparian habitat that thrives off the existing water sustains vegetation, plants and wildlife along with their habitat. The river and its adjoining areas is home to aquatic and non-aquatic invertebrates, endangered species, such as the Least Bell's Vireo, the red-legged frog, and more than 20 species of birds. Additionally, the river is a significant stop along the Pacific flyway being essential for migratory birds. In order to best evaluate the impacts of the project, all of the following should be taken into consideration and assessed in the PEIR, along with appropriate consultation with the Department of Fish and Wildlife. Additionally, should the PEIR be sufficient to allow for channel modifications, such as those proposed in the City of Los Angeles Fish Passage Study led by Stillwater Sciences and funded by Wildlife Conservation Board, endemic and native endangered fish could be reintroduced.

Hydrology/Water Quality

An opportunity presented by the PEIR includes the ability to analyze the differences between the existing conditions and the future conditions with respect to Hydrology and Water Quality in the river. Analysis should thoroughly analyze pollutant sources and concentration of pollutants- how such pollution concentration levels would impact habitat, wildlife and human uses, thus affecting compliance with the Federal Clean Water Act and safe water quality uses. Also, changes in the impervious surfaces, application of stormwater infrastructure, and discharges, affecting sensitive habitats such as the estuary. Given the potential for reduced discharges, water quality standards could be affected, specifically as it pertains to water quality standards of surface/groundwater that could be degraded. Also, currently underway is a study by the State Water Resources Control Board analyzing river flows; the PEIR should include analysis for how the LA River Flows Study will be incorporated.

Land Use/Planning/Air Quality

There are a variety of land uses that occur adjacent to the LA River in the County and within each of the cities that which the study area analyzes. The PEIR should evaluate the compatibility of the proposed Project with neighboring areas within all of the jurisdictions, analyze and mitigate change to or displacement of existing uses. The proposed Project is located in such a publicly important area that public access should be a priority when planning for uses, while creating a cadence of accessways, access points and amenities. These opportunities offer current and future restored habitat on urban public lands which are scarce.

Given the scale of projects in the Kit of Parts, many of which are listed in the Project, those that specifically are related to housing should only consider transit-oriented

developments (TODs) that are adjacent to public transportation, in order to reduce vehicle miles traveled (VMT) and to mitigate the potential to drastically increase traffic congestion in already dense neighborhoods where air quality by the single largest polluter, being vehicles, would be exacerbated further contributing to Greenhouse Gas (GHG) emissions.

Public Services

It is anticipated that use of the river will increase and the PEIR should determine, at a program-level the impacts and need for Public Services — including fire protection, public safety which should be provided by the appropriate law enforcement, such as a Ranger, homelessness assistance and encampment cleanups, as well as other public facilities. The PEIR should assess available information on the current demand for public services against any new demand that is created by Project improvements. The PEIR should review the 2019 Los Angeles River Ranger Program Establishment Plan in order to ascertain the issues and recommendations provided through community consensus.

Recreation

Stakeholders and leaders have worked years to allow for recreation, both in channel and along the river. Today, passive recreation is one of the most popular uses of the river which include walking, running, biking, fishing and kayaking. The river offers opportunities for mental and physical health for the 18 jurisdictions throughout the study area, serving not only the estimated 1 million people who live within 1 mile of the river, but also those who travel from far distances to experience an urban river. The PEIR should address the proposed Project's potential impact on notable recreation areas and the river recreation zones; impacts to regional, neighborhood, and local parks and those in planning; trails; and other local recreational facilities and uses. The PEIR should analyze the Project's likelihood to increase the use of existing neighborhood and regional parks or other recreational facilities and the substantial physical deterioration that could be accelerated. Additionally, the PEIR should consider any adverse physical effects on the environment. Recreation access should only be enhanced for public use while fostering natural, recreation areas, and protecting existing investments that have been made in the river.

Population/Housing

While the state is in a housing crisis, the proposed Project's potential for inducing population growth and displacing people within the County remains a threat to both government and existing communities. As a member of the Los Angeles Regional Open Space and Housing (LAROSAH) Collaborative, the MRCA does not believe that affordable housing and open space protection need to be mutually exclusive; however, when planning for housing, we must propose solutions for the appropriate type of housing- affordable and low income, while maintaining protections for open space. The MRCA supports investments in communities which also protect the social fabric of respective neighborhoods. Other considerations should include the land use analysis, additional infrastructure and construction that would be required, as well as potential adverse effects to the environment and wildlife while undergoing improvements for

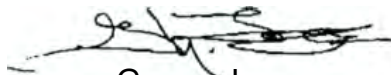
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population growth. Los Angeles is already a highly urbanized County, lacking open space, parks, sufficient habitat for wildlife, and permeable surfaces which should be championed throughout the PEIR for a cumulative analysis and regional environmental impact.

Thank you for your consideration of our comments. Please address any future documents, notices, and questions to myself at the above letterhead address, by phone at (323) 221-9944 x 109, and email at sarah.rascon@mrca.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "George Lange", with a horizontal line drawn through it.

George Lange
Chairperson

August 13, 2020

The LA River Master Plan meetings have provided the community the opportunity to voice their concerns over the overall program and its proposed projects. Despite the river being almost entirely concretized, meeting attendees selected the ecology and the environment of the river as top concerns, regardless of where the ULART or Master Plan meetings were held.

Hundreds of people and dozens of local organizations have been working to better understand the biodiversity of the river. New projects along the river should take note of what lives in the area and incorporate the natural ecosystem into these plans. The community has made it clear that top priorities include the natural environment. Program efforts should make sure that biodiversity monitoring for the local flora, fauna, and the microbial community is conducted and reviewed regularly. These results can help determine the efficacy and longevity of local projects to best serve their respective communities. In addition, program transparency of monitoring plans will not only encourage the community to remain engaged but allow local organizations to collaborate with the City and ensure time and funds are used efficiently.

For example, the public interest in the ecology of the LA River helped shape the formation of Protecting Our River (ProtectingOurRiver.org), a community science project from the University of California that aims to study the biodiversity of the LA River using environmental DNA (the DNA organisms shed into the environment). This project is a collaboration between UCLA, UC Santa Cruz, conservation groups, government agencies, local high schools, and the public. Environmental DNA results are later posted online for free to allow the community, policymakers, and researchers to access the data and see the list of organisms identified on the river. Community members are encouraged to join the Protecting our River team for (virtual) field gatherings along different sites of the entire river to give their perspectives on what researchers are observing. While the PouR team collects environmental DNA samples from the river, community scientists can share their own experiences to help better understand the biological community. This interactive project allows researchers to provide valuable data to collaborators while accepting input from the community to help structure future research. In return, these data can be used to help structure programs that'll best fit the local communities.

Our urban river has the unique opportunity to unite millions of LA County residents. Updates to the Master Plan should transparently reflect the community's interests; dozens of local organizations have spent years of work doing just this. Before any of the proposed projects begin, the program needs to have a thorough understanding of potential ecosystem impacts as a whole and keep the community engaged through it all. An emphasis on biodiversity monitoring is critical in maintaining the river's health and the LA River Master Plan as a whole. An unhealthy ecosystem can lead to failed projects, but taking the initiative now can lead to years of an active and engaged LA County riverine community.



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August 6, 2020

Sent via Email to: LARiverCEQA@pw.lacounty.gov

Attn: Ariana Villanueva
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Re: Scoping Comments for the Draft Program Environmental Impact Report, 2020 LA River Master Plan

Dear Planners:

These scoping comments for the Draft Program Environmental Impact Report, 2020 LA River Master Plan ("DEIR") are submitted by the L.A. River Walkers and Watchers and by the individuals listed below.

The L.A. River Walkers and Watchers ("LARWW") is a group of residents and neighbors who volunteer to help preserve the Bike Path along the Los Angeles River in the west San Fernando Valley, including the park-underserved communities of Reseda and Canoga Park. LARWW works to ensure that local government agencies, state conservancies, and joint power authorities with Los Angeles River jurisdiction provide public safety, maintenance and resource-management services, enforce regulations, address health concerns, and care for the overall wellbeing of resources along the Los Angeles River Bike Path. Since 2017, LARWW has held a monthly walk along the river. Community residents and volunteers engage in trash and graffiti removal, monitor problem areas, and identify and report concerns. LARWW volunteers on these monthly walks have devoted thousands of man hours to cleaning up the LA River Bike Path and making this key resource safer and more user-friendly for all. More information can be found on our facebook page <<https://www.facebook.com/LARiverWW>> and website <<http://www.larww.org>>.

The Los Angeles River is a unique geographical feature that winds its way through Los Angeles County, with the vast majority of the river flowing through the City of Los Angeles. The draft working plan ("GAMWP")¹, the only document that the directly impacted public can access at this time, refers to the river as an "open space spine" ... "unique within the county" ... "providing park space to underserved adjacent communities with little room to site new parks, while serving as a destination for the entire county and beyond, offering a variety of experiences from one mile to the next." GAMWP at 10.

¹ 2020 Proposed WORKING DRAFT VERSION 6: Los Angeles River Master Plan Update August 2019, last visited August 1, 2020 at: https://d3n8a8pro7vnm.cloudfront.net/larmp/pages/315/attachments/original/1569626307/Proposed_GAM_WORKING_DRAFT_VERSION_6-10_Changes_since_July.pdf?1569626307

The draft working plan also states, “Members of the community identified walking and bicycling as the top two activities they participate in along the river—with participation in these two activities together greater than the participation all other activities combined. Yet, 61% said they do not use the river due to safety concerns.” GAMWP at 10.

Similar sentiments are echoed by our neighbors who come on LARWW monthly walks. Many ONLY walk on the Bike Path at our monthly walks because going alone is too scary an excursion. As residents who are directly impacted by recently installed (within the last 5 years) facilities along the river, we can assure the planners that the agencies have a long way to go to make this either a desired destination for visitors or a safe place for local residents.

Lighting that was installed along the LA River Bike Path was designed for appearance not for utility. The lamps were vandalized within weeks of the path being opened. Five years later, long stretches of these street lamps are still prone to failure. Fences are often inadequate, and frequently cut or pushed down. Illegal encampments abound. Illegal camp fires have burned adjacent private properties. On several of our monthly walks, walkers have had to step over the bodies of individuals strung out on drugs. We have removed hundreds of used needles and syringes on our monthly cleanups, as well as human excrement. Members of our community have been assaulted by illegal campers and gang members that use the Bike Path to distribute illegal drugs.

Over the last three years, we have worked closely with the Office of Los Angeles City Council Member Bob Blumenfield to address these challenges. As a result, the City will soon implement a pilot project to use Mountains Recreation and Conservation Authority (“MRCA”) Park Rangers along the river between its source in Canoga Park and Lindley Avenue in Reseda. We strongly feel that MRCA Park Rangers ought to patrol all 51 miles of the river since the current public safety situation is untenable.

THE DEIR MUST REVIEW IMPACTS TO PUBLIC SAFETY

The California Environmental Quality Act (“CEQA”) is meant to give the community a voice in land use decisions. Under CEQA, an EIR must analyze the project’s potential impacts on land use and public safety. We urge you to make public safety a key issue in the CEQA analysis.

All alternatives and proposed actions should be analyzed for their impacts on public safety. Many of the existing facilities along the river offer significant, basic challenges for fire and emergency services personnel that need to be addressed. All too frequently we have seen projects proposed, implemented and then left unmaintained and unpatrolled. Until members of LARWW took the initiative and numbered the street lamps along the Bike Path there was no mechanism to even report the location of issues. We feel that it is critical that the County learn from its own and its sister agencies’ experiences as it addresses ongoing challenges along the river so as not to repeat the same costly mistakes.

For any project approved under the PEIR, there should be a requirement for annual public reporting regarding implementation of any required mitigation measures. The public should have a simple mechanism to report mitigation measure failures. Both could be

facilitated by a dedicated phone app or website that tracks projects along the river and allows the public to report any issues that arise from a given project's implementation.

OBJECTIVES

LARWW generally supports the Objectives listed in the Notice of Preparation ("NOP") although we have serious reservations that any will be achieved over the life of the plan were the County to ignore the experiences and challenges facing residents living along the LA River and the LA River Bike Path.

However, we strongly suggest you modify Objective 6 "Address potential adverse impacts on housing affordability and people experiencing homelessness." to: Objective 6. "Address potential adverse impacts on existing residential housing, housing affordability, and people experiencing homelessness." Otherwise, in failing to mention impacts to existing residents, the Plan is essentially leaving out or ignoring a significant portion of the community.

ALTERNATIVES

The DEIR should assess the viability of the components of each alternative it reviews over the proposed 25 year plan period. For each alternative, the DEIR should explain how projects will or will not be maintained over the life of the plan. For each alternative, the DEIR should assess if any basic challenges for fire and emergency services personnel need to be addressed.

Because jurisdiction is so fragmented along the river with multiple agencies, the DEIR should assess how each alternative resolves or does not resolve jurisdictional issues.

Review of the "no action" alternative should include a critical review of current management. How effective is the existing plan? Has it achieved any of its desired objectives? If not, what can be done to assure that the new plan will?

PREFERRED ALTERNATIVE

Our experience working to preserve the LA River Bike Path has frequently been frustrating because jurisdiction along the river is so heavily fragmented. The multi-jurisdictional oversight of the LA River and the Bike Path means that local communities don't just have to deal with Los Angeles County and Los Angeles City, but with multiple departments within the County and the City. There are also other state and federal entities that are involved. This fragmented jurisdiction creates a management nightmare, wastes public funds, and exasperates local communities. Accordingly, we would like to see the preferred alternative include turning over Los Angeles River management to a single, park-oriented, agency such as the MRCA. We see this as the only viable alternative that will allow the plan to meet the listed 2020 LA River Master Plan Objectives.

“KIT OF PARTS”

According to the Notice of Preparation (“NOP”), “Under each of these "Kit of Parts" categories, multiple components — including benches, bridges, platforms, trails, shelters, diversion pipes, storage facilities, terraced banks, and affordable housing — are being proposed to serve as a menu of options to provide multiple benefits at any given potential location along the LA River.” These terms “benches, bridges, platforms, trails, shelters, diversion pipes, storage facilities, terraced banks, and affordable housing” must be clearly defined in the Plan. The full suite of environmental impacts, including impacts to public safety, should be analyzed for each option in the DEIR.

The DEIR should review the monitoring that will be required to ensure the ongoing review of the utility and effectiveness of the proposed “Kit of Parts” options.

The Plan should incorporate adaptive management principles so that design deficiencies can be rectified and mitigated once identified. The LARWW can vouch for the failure of similar attempts to installed “unified features” by the City of Los Angeles along the existing LA River Bike Path where ornamental street lamps were installed that were vandalized within weeks of installation. Years later, adequate lighting along the Bike Path still remains a significant concern. Yet the City used the same inadequate design when it developed the Confluence Park at the junction of Aliso Creek and the Los Angeles River. The lamps are off far more often than they are on. Rigid approaches are an unnecessary waste of public funds and a risk to public safety.

To better assure public safety, access points to river should be at existing main streets only. This restriction would help protect private property along the river and would provide street parking for visitors.

The Plan should require that each “Kit of Parts” option installed along the river must be georeferenced and made available on all agency maps so that the locations are clear to all especially fire and emergency services. The City of Los Angeles has an excellent phone/internet app (“MyLA311”) but unfortunately it requires a street address on input. As we can attest, this does not work in park settings or along the river where there are no street numbers. The DEIR must address this concern so that the locations of “Kit of Parts” options are known to fire and emergency services and to the local communities along the river to assure public safety.

Several of us attended the July 29, 2020 scoping meeting. In the presentation, one of the graphics showed that the proposed shared walking/running paths are to be a single 6 feet wide path, whereas the proposed bike lanes are to be split (for obvious safety reasons). However, a single 6 feet wide walking path is inadequate for runners and families to share during times of heavy use. Runners have to veer into the bike lanes to get around parents with strollers and small children. Families are not to be blamed for wanting to walk together and this is a behavior the agencies should be encouraging anyway. The need for wider walkways has become increasingly clear during the current pandemic when social distancing is critical. The adequacy of the 6 feet wide walking/running paths is a safety concern that should be examined and addressed in the DEIR.

The “Kit of Parts” does not list bioswales. If these are being covered, the DEIR must include a full and complete analysis of impacts to river flow and any increased risks for local flooding.

WATER QUALITY

The DEIR is reviewing a master plan for the Los Angeles River with an estimated 25 year lifespan. Water quality is a key issue. On our monthly walks, the LARWW frequently see both humans and pets (especially dogs) wading, paddling, and bathing in the river. And of course the wildlife along the river is dependent on that water too.

The people living in illegal encampments in the river channel often dump trash and human waste directly into the river. LARWW members frequently encounter humans using river culverts as living spaces, setting up encampments and lighting open camp fires. We have had agency staff tell us that they will not enter some of the culverts because of unspecified risks of “toxicity”. We have been unsuccessful in locating water quality data for our local reaches of the river. We expect the Master Plan to help make basic information such as water quality more readily available to the public.

We ask that each alternative include water quality monitoring along the river. Implementation of “Kit of Parts” options should include a water quality monitoring requirement as mitigation. The results should be posted on the Los Angeles River Plan website so that they are easily accessible to members of local communities. This would disclose the actual impact of “Kit of Parts” options, further public transparency and support for the plan, and help assuage public safety concerns.

The L.A. River Walkers and Watchers and the individuals listed below thank you for providing this opportunity to submit comments. Please include the individuals listed below in future emails for the Los Angeles River Master Plan EIR process.

Yours sincerely,

L.A. River Walkers and Watchers <lariverww@gmail.com>

Evelyn Aleman <evelyn@mipr.net>

Bob Akre <agentschoice@aol.com>

Alyssa Boyle <gumbyzmom@hotmail.com>

Michael J. Connor <connor.michaelj@gmail.com>

Dorian Gunning <dorian.gunning@gmail.com>

Sandra Knapton <sandraknapton@yahoo.com>

Bonnie Lavin <bylavin@gmail.com>

Pam Loeb <freeloeb@yahoo.com>

Joe Macias <joe@mipr.net>

CC. Los Angeles City Council Member, Bob Blumenfield
Los Angeles County Supervisor, Sheila Kuehl
California State Assembly Member, Jesse Gabriel
California State Senator, Henry Stern

Ariana Villanueva

From: Alyssa Boyle <gumbyzmom@hotmail.com>
Sent: Tuesday, August 11, 2020 6:08 PM
To: PW-LA River CEQA
Subject: LA River Toxicology Report

CAUTION: External Email. Proceed Responsibly.

Hello,

I am a resident of Encino and am very concerned about river bike and walking paths opening up in neighborhoods that border the river. The current bike path along the river at Canoga Park/Winnetka has encampments of homeless people living in the culverts that have grown from 15 to 50+ during quarantine. The LAPD now considers that area too toxic to patrol. How will those areas be evaluated for the EIR? How will we keep the river safe once it's all opened up in the future? As it is, people and animals are seen in the water on a daily basis. It is very concerning as it is dangerous as well as illegal.

--

Sincerely,
Alyssa Boyle

--

Sincerely,
Alyssa Boyle

Ariana Villanueva

From: Andy Lipkis <alipkis@accelerateresiliencela.org>
Sent: Thursday, August 13, 2020 10:06 PM
To: PW-LA River CEQA
Cc: Deborah Bloome; Zenya Prowell; Jennifer Bravo
Subject: Issues I'd like to address: Urban Watershed Management for Climate and Social Resilience

CAUTION: External Email. Proceed Responsibly.

Dear LA County Public Works River team:

I made many attempts to log onto the LA River Master Plan CEQA briefing, but was unsuccessful. Therefore I'm glad that you have invited written followup input. I understand from your request that you are seeking the topic/subject of our desired input, as opposed to a full briefing, at this time.

I wish to address two combined subjects that the LA River Master Plan **APPEARS** not to have **fully** addressed: that is *managing the entire urban watershed of the LA River as both a watershed, and as source and resource for climate, social, and economic safety, sustainability and resilience*.

The promotional materials and videos for the LA River Master Plan mention conserving water resources and rainwater to augment local supplies. They mention using "low-impact development" to help clean and conserve some of the water, but they do not mention goals and objectives that include "maximize" and "optimize" the water and watershed resources and their potential to create much greater equity of health, safety, and economic opportunities.

With a County that is plagued with substantial inequitable vulnerabilities to climate and other threats to health, safety and security, including extreme heat, air and water pollution, flooding, water shortages and fire, **it is imperative that this plan include "enhancing equitable climate resilience" as one of its primary goals.**

The water, soil, plants, land, residents, businesses and government agencies that comprise the LA River Watershed represent a tremendous resource and opportunity for health and a better future that should be acknowledged, quantified and addressed by the Master Plan.

Please let me know how I can elaborate on these concerns so they can be addressed in the Master Plan and its Programmatic Environmental Impact Report.

Thank you for your consideration.

Sincerely,

-Andy

--

Andy Lipkis
Project Executive
Accelerate Resilience L.A. (ARLA)
Founder, TreePeople
ALipkis@AccelerateResilienceLA.org
Telephone: +1-310-400-6008

Executive Assistant: Zenya Prowell
ZProwell@AccelerateResilienceLA.org
Telephone: +1-310-400-6083

Ariana Villanueva

From: annalee chandler <intrepid1@dslextre.me.com>
Sent: Thursday, August 6, 2020 4:12 PM
To: PW-LA River CEQA
Cc: david ryu; Erin Baranko; ted@davidryu.com
Subject: input / questions

CAUTION: External Email. Proceed Responsibly.

You folks have done an **INCREDIBLY** awesome job of making the LA River more and more beautiful! Truly. The water is flowing more freely, the birds abound. I am interested in the longer term improvements, as I ride a bike every other day along the river. I know that in the future will be re-connected to the now end of the bikeway by the freeway overpass. And when that connection is made, when will that end connect to the eventual like to be able to ride to Long Beach.

And the homeless issue along the bike way. Seems every other day their trash is removed, etc, but they return again and again to trash what you have improved. Last week they set fire to a heap of trash and the fire department had to come to put it out, snarling untold amount of the 5 fwy.

Please, please let's not make your efforts be in vain! They spoil it at an unbelievable pace!

William Lovelace
7311 Pacific View Drive
Los Angeles, CA 90068
(310) 387-5012 cell

Ariana Villanueva

From: Bedros . <bedrosb@msn.com>
Sent: Wednesday, August 12, 2020 7:49 PM
To: PW-LA River CEQA
Subject: mosquitoes

CAUTION: External Email. Proceed Responsibly.

How do you plan to deal with the drought issue?

How do you deal with the mosquitoes issue?

Thank you,
Bedros

Los Angeles County
Department of Public Works
900 Fremont Avenue
Alhambra, CA
Email: lariverceqa@pw.lacounty.gov

To whom it may concern:

RE: Comments on scoping Program EIR for the 2020 LA County River Master Plan

Thank you for inviting our community to submit comments. Several of us, active in the Elysian Valley area have attended the master plan meetings, up and down the river but we have not seen the Program DEIR which makes it impossible to respond to this notice, in detail. This is not a technical response, and I hope it's not used as such. Rather, this is a broad list of issues, I have raised at each meeting I attend, and have written about in the surveys and letters to you over the years.

Community Input/Outreach: This is a very important project for our community and yet the complexity of the task, a 52 mile master plan, affecting dozens of jurisdictions, that our city council or city department have not presented to us, in a detailed fashion to explain what the City of Los Angeles plans to do in light of this County Master Plan for the Los Angeles River/Flood Control District's properties in the Right of Way and adjacent to it. Where is the PEIR? What will it really say? And Why aren't you sharing that with us? It's odd and it feels rushed. Please send us the completed Program EIR. Have it translated into Spanish and other languages and really provide workshops on sections and facilitate comments on each section. I heard your webinar was not an effective outreach method for listening to public input, as it was noticed.

In the absence of a document to comment on (Where is the PEIR?) I'm providing this list of impacts that should be analyzed; this is my initial check list.

- i. Analyze impact on City of Los Angeles (and the other 22 cities along the 51 miles)
 1. land use
 2. lack of affordable housing,
 3. lack of off-site improvements in the older industrial areas,
 4. lack of funding and maintenance plans for ongoing operations of naturalized right of way for recreation uses
 5. lack of an anti- gentrification policy.

ii. The PEIR should analyze impact of The County Master Plan on county owned properties.

iii. PEIR should Analyze and mitigate Green infrastructure investments on low income housing and working-class households;

iv. It should analyze and mitigate impact of increased use of River, on narrows streets, and zero street or off-street parking to accommodate visitors on weekends, or evenings.

v. It should provide some guidance to Cities and residents for mitigating Flood concerns with Flood Plain Mapping: City and US Army Corps of Engineers need guidance on flood maps. How should ZIMAS be updated and how should Building and Safety and Planning integrate enforcement.

vi. It should show Environmental impact of Flood maintenance roads being converted to bike-pedestrian shared path.

viii. Should provide guidance to local municipalities and the US Army maintenance requirements for new improvements on the main stem and public access requirements (open street ends, ensure street lighting, etc..).

ix. Green Streets standards should be required of all residential and commercial streets that run into a body of water to ensure it is clean before going into the channel.

x. Street Ends: each street ends needs signage, ada access, and safety markings and maintenance. At the end of each street, there should be public access for multiple benefits of storm water capture, and recreation, and public safety as many people need the shared path to get around.

xi. River/Flood Control System -storm water monitoring should be increased. We have residents who would like to participate in citizen water quality monitoring programs to better understand this issue.

xii. Maintenance, habitat restoration and Arundo removal needs to be funded for the main stem of the LA River/Flood Control Channel. If it is not funded, what will the impact be?

xiii. Maintenance of trails. LA River Greenway is a linear park intended for passive recreational uses, like walking, hiking, and cycling. What will the impact of the updated county master plan be on the demand for: patrols, garbage collection services, permit use of the river ROW.

xiv. Public Education: Flood Control District- Water Safety. Distribute “No way-out videos for our local schools (as we do not have a public library in our community).

Please return to the local neighborhood Councils and the Alliance of River Communities once you begin the CEQA process for the PEIR and EIR in earnest.

Respectfully,

Carrie Sutkin, DPPD
2438 Gatewood Street
Los Angeles, CA 90031
(323) 868-5383

Cc: LA County Supervisor Hilda Solis, First District

Ariana Villanueva

From: Carrie Sutkin <carrie.evrnc@gmail.com>
Sent: Wednesday, July 29, 2020 2:43 PM
To: PW-LA River CEQA
Cc: Christine Wartman; Frank Mendoza; Vincent Montalvo
Subject: Re: Message to 2020 LA River Master Plan CEQA Scoping Meeting attendees

CAUTION: External Email. Proceed Responsibly.

ok; sorry we crossed paths on this; hope you can answer any additional questions that one up tonight at the zoom, or following our EVRNC meeting. We do also plan to submit comments for Aug 6.

Thanks,
Carrie Sutkin

On Jul 29, 2020, at 12:08 PM, PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Hi Carrie,

Unfortunately, due to the overlapping meeting times, neither myself nor other Public Works staff familiar with the project can attend the Elysian Valley Riverside Neighborhood Council (EVRNC) meeting tonight as we will need all hands on deck for the CEQA public scoping meeting. We have uploaded the presentation that will be shared tonight, so that you and the EVRNC can view at your convenience, and we can help answer any clarifying questions afterwards.

Presentation: https://www.youtube.com/watch?v=zWLqXH_zJ6g

The table below summarizes our CEQA process for the 2020 LA River Master Plan that you can share with the EVRNC.

Step	Purpose
Notice of Preparation (NOP) July 7, 2020	<ul style="list-style-type: none">• Announce the County is initiating the CEQA process for the LA River Master Plan.• Provide proposed approach to preparing environmental document (proposed Program Environmental Impact Report [EIR]).• Solicit comments from public agencies and interested parties on the scope of the environmental document for a 30-day period, starting on the date the NOP is posted with the County Clerk and Office of Planning and Research.
Scoping Meeting July 29, 2020	<ul style="list-style-type: none">• Present proposed approach to preparing environmental document.• Clarify any questions on the proposed CEQA approach.• Solicit input in writing about particular areas of concern based on the information provided in the NOP from agencies and interested parties
Notice of Availability (NOA)	<ul style="list-style-type: none">• Announce that the draft Program EIR is available for review.

Draft Program EIR available for comment period.	<ul style="list-style-type: none"> • Provide 45-day comment period for the public and public agencies to provide input on draft Program EIR. The comment period begins when the NOA is filed with the County Clerk and Office of Planning and Research.
Public Meeting on Draft Program EIR	<ul style="list-style-type: none"> • Public meeting held during the draft Program EIR comment period to present and clarify questions on the draft Program EIR.
County drafts Final Program EIR.	<ul style="list-style-type: none"> • Address and incorporate comments into the Final EIR.

The County is in the initial stage for the CEQA process for the LA River Master Plan. The meeting today is not to present the draft Program EIR, but rather to inform the public and agencies that we are commencing the CEQA process and presenting a proposed approach for preparing the Program EIR. If the EVRNC has issues of particular concern for your area, please send those in writing to lariverCEQA@pw.lacounty.gov for us to consider as we prepare the Program EIR. We will send you and others notification when the draft Program EIR is available for review and comment.

Please note that the proposed Program EIR will not have any project-specific or site-specific analysis as the Master Plan doesn't provide that level of detail. Due to this lack of specificity, the Program EIR will be a first-tier base reference of facts and analysis on a program-level for later activities to consider. Future projects along the LA River that tier from the LA River Master Plan would still be required to conduct project-specific and site-specific evaluation in light of the scope and content of the PEIR to determine if further CEQA is needed, and the decision to proceed with future projects would be up to the project proponent and community needs, available funding, and other local policy decisions.

We will continue to be available to respond to your questions throughout the CEQA process.

Thank you.

Ariana Villanueva
Environmental Engineering Specialist

Ariana Villanueva

From: Chris Wall <chris@hollyworldflowers.com>
Sent: Tuesday, July 7, 2020 9:22 PM
To: Anastasia Mann; PW-LA River CEQA; mark.pampanin@lacity.org
Subject: Re: CEQA PEIR for 2020 LA River Master Plan PEIR - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

This is a program of wide public interest, affecting many neighborhoods, many cities along the length of the river where projects are proposed, and all the areas downstream to its junction with the Pacific at Long Beach Harbor.

To say there is a two hour online meeting in three weeks, with decisions made in four, in an email that does not meet any government standard of wide circulation, is a de facto admission decisions have been made, land allotted, plans drawn, agencies awarded, developers secured financing - all that already done - and then twenty or thirty people will be given two minutes each to object to this pork barrel desecration of a natural resource that should be employed, not squandered, and certainly not hidden under warehouses and cheaply constructed housing designed to make all parties enabling it a piece of the prize, one way or another.

I am calling for a Covid era moratorium of a minimum 120 days on any further development on the LA River, and the immediate notification of anyone living or working within five miles of the river by US Mail - not once - but three times - the first time with text, within three weeks from today, July 8, 2020, the second time, another three weeks later, in an accurately illustrated color flyer similar to those employed by real estate agents, and the third, yet another three weeks later, a letter, requesting the addressee - and anyone else who wishes to comment - anonymously or not, on what they think of the plans, by mail, email, text, or - novel idea - by phone - advising what they would do with the river - because they are the people, we are the people, and it is 2020, and we demand to be heard.

The entire LA River development scene needs to be reviewed by the new Inspector General for Land Use and Development - a position very recently approved to be created by the Los Angeles City Council. Rushing ahead with this ill considered development without the new Inspector General's approval will be seen as a conspirational effort to avoid much needed oversight. Rethinking your schedule in tune with the times will be recognized for thoughtfulness, not rethinking, not rescheduling will be viewed with lasting disdain, for improper decisions, and for the creation of ill will brought about by ignoring the people once again. That time has passed.

I await your timely well considered response.

Chris Wall
Hollywood Hills

On Tue, Jul 7, 2020 at 6:01 PM PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

The County of Los Angeles, through Los Angeles County Public Works, will prepare a Program Environmental Impact Report (PEIR) pursuant to the California Environmental Quality Act (CEQA) for its proposed 2020 LA River Master Plan. The PEIR will assess the environmental impacts of implementing the 2020 LA River Master Plan. As part of this PEIR process, Public Works is soliciting input from members of the public, organizations, and government agencies on the scope and content of the information to be included and analyzed in the PEIR.

A Notice of Preparation (NOP) has been prepared to notify responsible and trustee agencies, the Office of Planning and Research, the County Clerk, and other interested parties that Public Works is beginning preparation of this PEIR, and starts the 30-day scoping period. The NOP for the 2020 LA River Master Plan PEIR can be viewed at <http://pw.lacounty.gov/go/larmpceqa>.

The community is invited to participate in an online scoping meeting for the PEIR, which is being held virtually due to restrictions under State of California Executive Order N-33-20.

DATE: Wednesday, July 29, 2020

TIME: 6:00 p.m. to 8:00 p.m.

LOCATION: Details about the CEQA online scoping meeting are available at <http://pw.lacounty.gov/go/larmpceqa>

Registration for the event is available at <http://www.eventbrite.com/e/online-scoping-meeting-2020-la-river-master-plan-program-eir-tickets-112158469000>

Scoping comments on the PEIR are due no later than August 6, 2020, which marks the end of the 30-day scoping period. Please send your comments in writing to the physical address or e-mail address shown below. If sending an e-mail, please include "NOP Scoping Comments" in the subject line. Include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva

Los Angeles County Public Works, Stormwater Quality Division

[900 South Fremont Avenue, 11th Floor](#)

[Alhambra, CA 91803](#)

LARiverCEQA@pw.lacounty.gov

Thank you and we look forward to your participation in the process.



Mary Ellen Waller *
Attorney at Law

July 14, 2020

Ariana Villanueva
Los Angeles County Public Works
Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

Re: NOP Scoping Comments, LA Public Works

Dear Ms. Villanueva:

I have not received a reply to my previous e-mail of July 8, 2020 as I had requested. Enclosed please find copies of my correspondence. I would appreciate a response.

Cordially,

(Dictated, but not read to expedite)

MARY ELLEN WALLER

MEW: cs

encl.

* California and New York State Bar Admissions

23501 Park Sorrento, #103, Calabasas, California 91302
Telephone 818 / 224-7900; Facsimile 818 / 224-2497
www.FeinbergWaller.com

Subject:

FW: NOP Scoping Comments, LA Public Works

From: Mary Ellen Fisenne <mame8993@hotmail.com>

Date: Wednesday, July 8, 2020 at 3:06 PM

To: "LARiverCEQA@pw.lacounty.gov" <LARiverCEQA@pw.lacounty.gov>

Subject: NOP Scoping Comments, LA Public Works

Ariana,

I am commenting on the recent Legal Notice 2020 LA River Master Plan. I was unable to access the 2020 LA River Master Plan PEIR at the address provided in the Notice, (the notice may be improperly noticed, kindly forward the link). My comments are as follows:

If the contamination at the headwaters of the Los Angeles River is not addressed, the proposed 2020 LA River Master Plan is fatally flawed and potentially lethal to the community. The feeder stream to the LA River is Bell Creek which has long been known to carry water from the Santa Susana Field Laboratory (SSFL), where rocket engine testing nuclear research, and a partial nuclear meltdown took place.

It is socially irresponsible to go forward with a plan unless the issue of hazardous waste from the SSFL including radioactive waste has been addressed. Toxic waste has been dumped into the creek for decades including chromium, dioxin, lead, mercury, liquid -propellant for rocket engines and other pollutants. I am a former resident of Bell Canyon, a community in Ventura County, though which Bell Creek flows. I have been a longtime advocate for addressing the clean-up of the SSFL. I have copied a link to previous correspondence that I received from the EPA decades ago related to this creek that flows into the Los Angeles River.

I cannot imagine going forward with this plan for recreation and inviting the public to use the LA River without cleaning up the headwaters that have been streaming though the SSFL, a property that still, after more than 60 years, has not been cleaned up. What is the plan for addressing the wastewater and storm runoff into the LA River from Bell Creek? What studies on this issue have been done? My concern is that this issue has not been addressed, the County is touting recreation along the river to improve health. How about starting with a plan to keep people from, unbeknownst to them, recreating in highly toxic chemical additives and widespread radioactive contamination? I would appreciate a reply so that I know my correspondence has been received. Thank you for your time and attention, Cordially, Mary Ellen Waller

See information below as to Bell Creek:

The initial headwater feeder-streams begin in the Simi Hills in Ventura County from 90% of the Rocketdyne Santa Susana Field Laboratory(SSFL) property as its watershed, leaving the site with toxic substances and radionuclide contamination via culvert outfalls, aquifer seeps and springs, and surface runoff.^{[3][4]} It then flows as a creek southeast through Bell Canyon (the community and geographic feature), Bell Canyon Park, and El Escorpión Park in a natural stream bed. It then is altered to flow in a concrete channel. Moore Creek joins in from the west, and then it flows east, channelized through West Hills, where it is joined by the South Fork and South Branches of the same name and by Dayton Creek. Then on through Canoga Park to join Arroyo Calabasas (Calabasas Creek) and becoming the Los Angeles River.

[https://en.wikipedia.org/wiki/Bell_Creek_\(Southern_California\)](https://en.wikipedia.org/wiki/Bell_Creek_(Southern_California))

https://www.etec.energy.gov/Environmental_and_Health/Documents/BellCanyonFiles/EPA_PartialSplitSampResults.pdf

Bell Creek (Southern California)

Bell Creek (also known as **Escorpión Creek**) is a 10-mile-long (16 km)^[2] tributary of the Los Angeles River, in the Simi Hills of Ventura County and the San Fernando Valley of Los Angeles County and City, in Southern California.

Contents

- Route
- Crossings

Bell Creek

South Branch Bell Creek

South Fork Bell Creek
- See also
- References
- External links

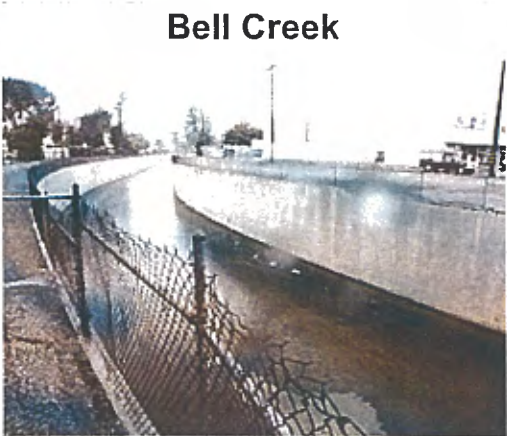
Route



The Arroyo Calabasas (left) and Bell Creek (right) join to form the Los Angeles River

The initial headwater feeder-streams begin in the Simi Hills in Ventura County from 90% of the Rocketdyne Santa Susana Field Laboratory (SSFL) property as its watershed, leaving the site with toxic substances and radionuclide contamination via culvert outfalls, aquifer seeps and springs, and surface runoff.^{[3][4]} It then flows as a creek southeast through Bell Canyon (the community and geographic feature), Bell Canyon Park, and El Escorpión Park in a natural stream bed. It then is altered to flow in a concrete channel. Moore Creek joins in from the west, and then it flows east, channelized through West Hills, where it is joined by the South Fork and South Branches of the same name and by Dayton Creek. Then on through Canoga Park to join Arroyo Calabasas (Calabasas Creek) and becoming the Los Angeles River.

Bell Creek begins as a free-flowing stream until passing Escorpión Peak (Castle Peak) in Bell Canyon Park. At Bell Canyon Road and Elmsbury Lane it becomes encased in a concrete flood control channel. It then passes under Valley Circle Boulevard, flowing just south of Highlander Road through former Rancho El Escorpión-current West Hills, and further eastward parallel to (and south of) Sherman Way



Looking west from Topanga Canyon Blvd.

	Location
Country	United States
Physical characteristics	
Source	
 • location	Simi Hills, California
Mouth	
 • location	Los Angeles River, California
 • coordinates	34°11′43″N 118°36′07″W﻿ / ﻿ ^[1]
Basin size	Simi Hills, western San Fernando Valley

in Canoga Park. There, it joins Arroyo Calabasas, directly east of Canoga Park High School beside Vanowen Avenue. The confluence marks the "*headwaters*" of the Los Angeles River, 34.1952°N 118.601838°W.

Crossings

From mouth to source (year built in parentheses):^[5]

Bell Creek

- Vassar Avenue/Canoga Park High School [Pedestrian Bridge]
- California State Route 27 - North Topanga Canyon Boulevard (1949)
- Glade Avenue [Pedestrian Bridge]
- Shoup Avenue (1962)
- Dayton Creek enters from north
- Fallbrook Avenue (1963)
- South Branch enters
- Royer Avenue [Pedestrian Bridge]
- South Fork enters
- Platt Avenue (1961)
- Moore Creek enters from west
- Valley Circle Boulevard (1963)
- Highlander Road (19__)
- Bell Canyon Road (1969)
- Buckskin Court (1969)

South Branch Bell Creek

- Vanowen Street (1949)

South Fork Bell Creek

- Vanowen Street (1958)
- Haynes Street [Pedestrian Bridge, Closed]
- Victory Boulevard (1959)
- Platt Avenue (1959)
- Peterson Avenue (1961)

See also

- Source (river or stream) - a.k.a. watershed and headwaters
- Confluence - a.k.a. "*headwaters*"
- Drainage basin - a.k.a. "*watershed*"
- Urban runoff

References

1. U.S. Geological Survey Geographic Names Information System: Bell Creek (https://geonames.usgs.gov/apex/f?p=gnispq:3:::NO::P3_FID:239173)
2. U.S. Geological Survey. National Hydrography Dataset high-resolution flowline data. The National Map (<https://viewer.nationalmap.gov/viewer/>) Archived (<https://www.webcitation.org/66gupqQDM?url=http://viewer.nationalmap.gov/viewer/>) 2012-04-05 at WebCite, accessed March 16, 2011

3. <http://www.enviroreporter.com/images/ESADA/2003-SSFL-surface%20water-map.jpg> SSFL Watersheds Map (access date: 4/11/2010)
4. <http://www.enviroreporter.com/2010/02/goo-ology/> EnviroReporter.com. "Goo-ology." access date:5/5/2010
5. "National Bridge Inventory Database" (<http://www.nationalbridges.com/>). Retrieved 2009-10-30.

External links

- Bell Canyon photo gallery (<https://web.archive.org/web/20090708105516/http://www.bellcanyon.com/photogallery.aspx>): 'Nature' sections.
-

Retrieved from "[https://en.wikipedia.org/w/index.php?title=Bell_Creek_\(Southern_California\)&oldid=828337727](https://en.wikipedia.org/w/index.php?title=Bell_Creek_(Southern_California)&oldid=828337727)"

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Rec'd 2/27/99



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 9

75 Hawthorne Street
San Francisco, CA 94105-3901

February 17, 1999

Mary Ellen Waller
185 Bell Canyon Boulevard
Bell Canyon, CA 91307

S. Hoffmann

Re: Partial Results from Bell Canyon Split Sampling

Dear Ms. Waller:

In response to your January 13, 1998 letter, I am providing EPA's partial split sampling results from the Rocketdyne Bell Canyon Sampling. While EPA's laboratory, the National Air and Radiation Environmental Laboratory, has not yet completed all of their analyses, they do expect to finish in another five weeks. I will provide you with a complete set of results when it is available.

Because you also expressed concerns about EPA's level of involvement in the investigation, I am also providing a copy of a letter I sent to Rocketdyne on June 10, 1998. EPA and other the regulatory agencies involved in this sampling had relatively little time to review the workplan, consequently, no agency approved it. However, EPA, the California Department of Toxic Substances Control (DTSC) or the California Department of Health Services (Radiologic Health Branch and Environmental Health Branch) were present during four of the five days that sampling occurred.

In your letter, you also asked whether "the sediment samples of the creek bed were taken at deep enough levels to be of any true merit." EPA's answer is yes. However, you should be aware that EPA considers the type of sampling conducted by Rocketdyne to be a screening level investigation, even though the samples were analysed for an extensive number of contaminants. EPA and other agencies typically use this level of investigation to determine if immediate remediation is necessary, if further investigation is necessary or if no further action is required. While the currently available data in no way suggests that immediate remediation is necessary, EPA will withhold its judgment on the need for further investigation until we have completed our review of all split sampling results and Rocketdyne's Bell Canyon Area Soil Sampling Report, dated October 1998 (a copy of the report is available at the SSFL's three information repositories: the Simi Valley Library, the Urban Archives Center of the Oviatt Library at California State University Northridge and the Platt Branch Library).

02-23-99A10:40 RCVD

001485 RC

If I can be of further assistance to you, please feel free to call me at (415) 744-2070.

Sincerely,



Tom Kelly
Project Manager, Boeing Rocketdyne
Santa Susana Field Laboratory

cc: Dianne Feinstein, Senator (w/o enclosure)
Elton Gallegly, U.S. Representative (w/o enclosure)
Penny Nakashima, DTSC
Clem Welsh, DHS
Steve Hsu, DHS
Wayne Chiou, LARWQCB
Jeffrey Kaminiski Bell Canyon Association
Frank Shillo, Ventura County Supervisor
Jerome Raskin, SSFL Workgroup
Sheldon Plotkin, SSFL Workgroup
Dan Hirsch, SSFL Workgroup
Joe Lyau, SSFL Workgroup
Barbara Johnson, SSFL Workgroup
Steve Lafflam, Boeing, Rocketdyne

From: Janet Surmi
818.232.6626
jsurmi@hotmail.com

To: Ariana Villanueva
(626) 458-7146
LARiverCEQA@pw.lacounty.gov

Aug. 6, 2020

I have viewed the Scoping meeting from July 29, 2020 and would like to submit my comments as follows.

I am a native of Los Angeles and have lived in the San Fernando Valley for over 37 years, and as a homeowner in West Toluca Lake for the past 22 years. As Treasurer of our HOA for 10 years, I oversaw our Association during an adjacent, 55-unit housing construction project in 2014. As our property is part of the LA RIO, I was interested in how the large construction project would impact our area which is adjacent to the LA River along Riverside Drive and had been in contact with the LA River Project Team.

As an interested member of the community during your LA River Master Plan Scoping process, I would like to suggest consideration of a pedestrian bridge walkway to connect the River at Moorpark Street and is adjacent, on the east-side, to the 101 Freeway overpass and freeway on-ramp.

This area of the River has long been neglected and it would offer an important cross-over to connect the River as well as a safe pass-way for pedestrians in an ever increasing dense area of people on foot and who walk their dogs and bike in the area.

Additionally, another pedestrian walkway to connect the River would be along Riverside Drive across Tujunga Avenue where it meets the southern tip of North Hollywood Park that runs along Tujunga Avenue. This would provide access to the park and to the Amelia Earhart Regional Library. (This library is also on the National Register of Historic Sites of Los Angeles.) This would also be a perfect location for a cross-over that would provide safe public access to the park as a destination and offer a connection along the River from Moorpark Street and up along Riverside Drive and through to the park.

Not only would these cross-overs provide a way to connect the River and provide safe pedestrian access from and across heavily trafficked areas, they would also serve as a way to compliment the River and act as gateways to and for the community.

For suggestion, please see examples below (on page 2) of a pedestrian bridge in Seattle, WA and further details found on the website:

<https://www.seattlebikeblog.com/2013/12/02/microsoft-offers-to-fund-walkbike-bridge-over-520-near-overlake-transit-center/>



Ariana Villanueva

From: Jeff Kaemmerling <jeffkaemm@gmail.com>
Sent: Monday, August 10, 2020 6:31 AM
To: PW-LA River CEQA
Subject: Ceqa scoping meeting inclusions

CAUTION: External Email. Proceed Responsibly.

Hi there,

I would like the scope to include a safe connection of all the bike paths along the LA River, because right now it's difficult to enjoy or reap benefits.

Thanks!

jeffkaemm@gmail.com

Ariana Villanueva

From: John Buckingham <johnyum@msn.com>
Sent: Wednesday, August 5, 2020 11:59 AM
To: PW-LA River CEQA
Subject: NOP Scoping Comments

CAUTION: External Email. Proceed Responsibly.

Ariana Villanueva,

I want to make another suggestion for the Draft PEIR. With thousands of square feet of surface area on the floor of the LA River from Slauson Ave. to the mouth, solar panels could be installed and connected to the electronic grid. DC to AC power inverters could make the transition seamless.

Thanks again,

John Buckingham
1865 Montair Ave.
Long beach CA 90815
(562) 597-3516

Ariana Villanueva

From: John Buckingham <johnyum@msn.com>
Sent: Wednesday, August 5, 2020 11:18 AM
To: PW-LA River CEQA
Subject: NOP Scoping Comments
Attachments: NOP Scoping Comments.docx

CAUTION: External Email. Proceed Responsibly.

Ariana Villanueva,

I am submitting my opinion for the LA River Draft PEIR as a Word document.

Thank you,

John Buckingham
Long Beach Ca

NOP Scoping Comments

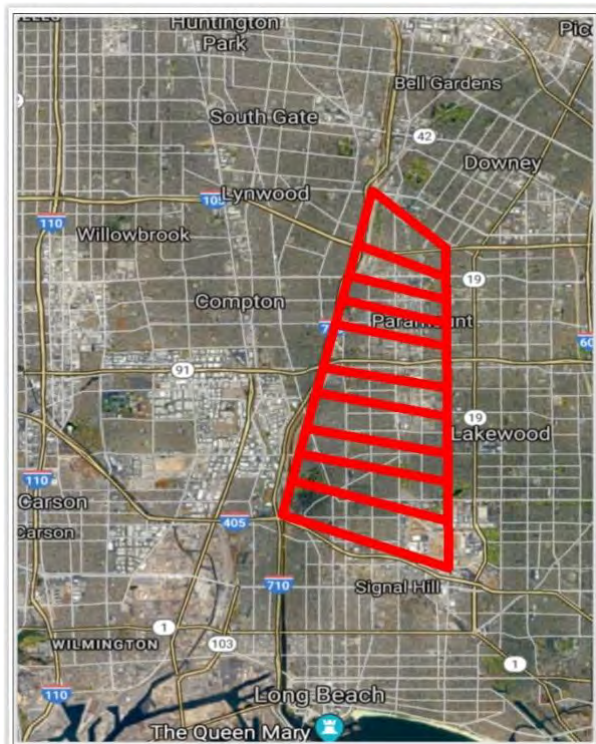
August 5, 2020

Ariana Villanueva,

I would like to offer my opinion on the LA River Draft PEIR. My focus is mainly on the collection of rain water during rainstorms. I believe that an array of tunnels would be a means of collecting the water runoff in the river would be best. The water would be held in the tunnels. The tunnels would act as a cistern as the water is put through water treatment plants for public use and drinking water and stored in above ground storage tanks for distribution.

In the picture left the red lines represent 25-foot diameter tunnels. Starting at the upper left at Imperial Highway and the LA River is where a cut into the river is made and flows south paralleling the river and the I-710 and then east to the Long Beach water treatment plant at Spring St. Another tunnel goes to Downey Ave near the I-105 then south to the Long Beach water treatment plant at Spring St. Other tunnels complete the array. In total, about 26.82 miles of tunnels are shown in the example. If all the tunnels become filled the amount of water collected would be 519,990,907 gallons. Other configurations of tunnels could be done.

This would be my answer to the runoff water in the LA River during a storm. Please forward the any interested parties.



Thank you,

John Buckingham
1865 Montair Ave.
Long Beach CA 90815
(562) 597-3516

Ariana Villanueva

From: Karl Guder <kgguder@gmail.com>
Sent: Thursday, August 6, 2020 6:10 PM
To: PW-LA River CEQA
Subject: LA River PEIR

CAUTION: External Email. Proceed Responsibly.

You must integrate the Arroyo Seco bikeway with this project and extend to the Rose Bowl.
This will actually add a viable non-car commuter option.

Thank you for your attention to this matter.



"Failing to prepare, is preparing to fail" — John Wooden

Ariana Villanueva

From: Leeane Knighton <angusmom@sbcglobal.net>
Sent: Tuesday, August 4, 2020 3:10 PM
To: PW-LA River CEQA
Subject: NOP Scoping Comments

CAUTION: External Email. Proceed Responsibly.

Hello.

As a resident of the 90039 area (Elysian Valley), I know that the river has become more valued in recent years as a source of beauty. However, outside groups have moved into the area with the goal to make a profit from the river, even though the river does not belong to them. I am speaking of the kayak company, for instance. Thanks to COVID, they are no longer profiting from disrupting the ecosystem, which is why the wildlife is doing much better without the tourists in the river.

The river does not belong to anyone. Please get people out of the river. No one should be messing with the river. Property values will decline and people do not have to live close to downtown since telecommuting will be a permanent options. These investors need to just give it up and leave the community alone. There is too much development that will no longer be profitable in the post-COVID era.

Thank you!!!

Ariana Villanueva

From: Lisa Pease <lisa.pease@ey.com>
Sent: Wednesday, July 22, 2020 9:10 AM
To: PW-LA River CEQA
Subject: RE: Reminder: Upcoming CEQA scoping meeting for 2020 LA River Master Plan PEIR

CAUTION: External Email. Proceed Responsibly.

I sure hope the path will be at least six feet wide in all places!

Regards,

Lisa Pease

Lisa Pease | CSA | Strategy and Transactions
Ernst & Young LLP
Office: +1 213 240 7019 | lisa.pease@ey.com

Thank you for considering the environmental impact of printing this email.

From: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Sent: Wednesday, July 22, 2020 8:38 AM
Subject: Reminder: Upcoming CEQA scoping meeting for 2020 LA River Master Plan PEIR

Thank you again for your interest in the 2020 LA River Master Plan process.

As a reminder, County of Los Angeles, through Los Angeles County Public Works, will prepare a Program Environmental Impact Report (PEIR) pursuant to the California Environmental Quality Act (CEQA) for its proposed 2020 LA River Master Plan. The public scoping meeting for the PEIR will be held virtually due to restrictions under State of California Executive Order N-33-20.

DATE: Wednesday, July 29, 2020

TIME: 6:00 p.m. to 8:00 p.m.

LOCATION: Details about the CEQA online scoping meeting are available at
<http://pw.lacounty.gov/go/larmpceqa>

Public Works is soliciting input from members of the public, organizations, and government agencies on the scope and content of the information to be included and analyzed in the PEIR.

Registration is not required for attendance, but registered attendees will receive an email reminder and instructions for the meeting. Registration is available at <http://www.eventbrite.com/e/online-scoping-meeting-2020-la-river-master-plan-program-eir-tickets-112158469000>

Scoping comments on the PEIR are due no later than August 6, 2020, which marks the end of the 30-day scoping period. Please send your comments in writing to the physical address or e-mail address shown below. If sending an e-mail, please include "NOP Scoping Comments" in the subject line and include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

Thank you for your interest in the project and we look forward to your input on the scope and content of the PEIR.

For more information about the CEQA process for the 2020 LA River Master Plan, please visit <http://pw.lacounty.gov/go/larmpceqa>.

Any tax advice in this e-mail should be considered in the context of the tax services we are providing to you. Preliminary tax advice should not be relied upon and may be insufficient for penalty protection.

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Ariana Villanueva

From: Mary Ellen Fisenne <mame8993@hotmail.com>
Sent: Thursday, July 23, 2020 1:45 PM
To: PW-LA River CEQA
Subject: Re: NOP Scoping Comments, LA Public Works

CAUTION: External Email. Proceed Responsibly.

Ariana, Thank you for your reply and the consideration of these issues. Mary Ellen

From: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Date: Thursday, July 23, 2020 at 1:20 PM
To: Mary Ellen Fisenne <mame8993@hotmail.com>
Subject: RE: NOP Scoping Comments, LA Public Works

Hello Ms. Mary Ellen Waller,

Thank you for reaching out to us and providing your comment about the Notice of Preparation (NOP) of the 2020 LA River Master Plan Program Environmental Impact Report (PEIR). The Draft PEIR for the 2020 LA River Master Plan is still in the process of being prepared so the sections are not yet available for review. The purpose of the 30-day NOP scoping period and upcoming virtual public scoping meeting on July 29 is for the County to obtain agency and public input on what they would like to see analyzed in the scope of the PEIR, and comments are taken into consideration in the development of the Draft PEIR. When the Draft PEIR is ready for public review and comment, we will post a Notice of Availability, have newspaper notices, and will send out another email blast so you're aware that the document is ready for your review.

Your input is valuable to understanding the environmental concerns of Bell Creek as a tributary of the LA River. These comments will be considered in our environmental impact analyses through the PEIR. Additionally, Bell Creek is identified in County's Upper LA River Enhanced Watershed Management Plan which includes watershed control measures to address applicable stormwater quality regulations. The 2020 LA River Master Plan is being developed through extensive community input and robust data analysis. In addition to taking your comment into consideration for the PEIR, we have provided your comments, including your emails and letter, to the 2020 LA River Master Plan team for their consideration in the development of the 2020 LA River Master Plan.

Sincerely,

Ariana Villanueva
Environmental Engineering Specialist
Los Angeles County Public Works

From: Mary Ellen Fisenne <mame8993@hotmail.com>
Sent: Wednesday, July 8, 2020 3:07 PM
To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Subject: NOP Scoping Comments, LA Public Works

CAUTION: External Email. Proceed Responsibly.

Ariana,

I am commenting on the recent Legal Notice 2020 LA River Master Plan. I was unable to access the 2020 LA River Master Plan PEIR at the address provided in the Notice, (the notice may be improperly noticed, kindly forward the link). My comments are as follows:

If the contamination at the headwaters of the Los Angeles River is not addressed, the proposed 2020 LA River Master Plan is fatally flawed and potentially lethal to the community. The feeder stream to the LA River is Bell Creek which has long been known to carry water from the Santa Susana Field Laboratory (SSFL), where rocket engine testing nuclear research, and a partial nuclear meltdown took place.

It is socially irresponsible to go forward with a plan unless the issue of hazardous waste from the SSFL including radioactive waste has been addressed. Toxic waste has been dumped into the creek for decades including chromium, dioxin, lead, mercury, liquid -propellant for rocket engines and other pollutants. I am a former resident of Bell Canyon, a community in Ventura County, though which Bell Creek flows. I have been a longtime advocate for addressing the clean-up of the SSFL. I have copied a link to previous correspondence that I received from the EPA decades ago related to this creek that flows into the Los Angeles River.

I cannot imagine going forward with this plan for recreation and inviting the public to use the LA River without cleaning up the headwaters that have been streaming though the SSFL, a property that still, after more than 60 years, has not been cleaned up. What is the plan for addressing the wastewater and storm runoff into the LA River from Bell Creek? What studies on this issue have been done? My concern is that this issue has not been addressed, the County is touting recreation along the river to improve health. How about starting with a plan to keep people from, unbeknownst to them, recreating in highly toxic chemical additives and widespread radioactive contamination? I would appreciate a reply so that I know my correspondence has been received. Thank you for your time and attention, Cordially, Mary Ellen Waller

See information below as to Bell Creek:

The initial headwater feeder-streams begin in the Simi Hills in Ventura County from 90% of the Rocketdyne Santa Susana Field Laboratory(SSFL) property as its watershed, leaving the site with toxic substances and radionuclide contamination via culvert outfalls, aquifer seeps and springs, and surface runoff.^{[3][4]} It then flows as a creek southeast through Bell Canyon (the community and geographic feature), Bell Canyon Park, and El Escorpión Park in a natural stream bed. It then is altered to flow in a concrete channel. Moore Creek joins in from the west, and then it flows east, channelized through West Hills, where it is joined by the South Fork and South Branches of the same name and by Dayton Creek. Then on through Canoga Park to join Arroyo Calabajas (Calabajas Creek) and becoming the Los Angeles River.

[https://en.wikipedia.org/wiki/Bell_Creek_\(Southern_California\)](https://en.wikipedia.org/wiki/Bell_Creek_(Southern_California))

https://www.etec.energy.gov/Environmental_and_Health/Documents/BellCanyonFiles/EPA_PartialSplitSampResults.pdf

Ariana Villanueva

From: Matt Horns <getplanted.native@gmail.com>
Sent: Friday, August 7, 2020 6:17 PM
To: PW-LA River CEQA
Subject: NOP Scoping Comments

CAUTION: External Email. Proceed Responsibly.

PUBLIC COMMENT

2020 LA RIVER MASTER PLAN

REGARDING THE DOWNTOWN LOS ANGELES AREA

CONCERN:

Constructing high-rise buildings along the river near Downtown Los Angeles would impact environmental conditions, quality of life, and public safety in adjoining areas.

Streamside neighborhoods in the Downtown Los Angeles area already have some of the highest population densities in Southern California. Adding high-density housing units would displace current residents. It would also place additional stress on infrastructure that is already overwhelmed and in need of serious maintenance.

Numerous commercial properties lie vacant. Additional commercial space is not needed in the river corridor.

One aspect of the 2020 MP is establishing riparian ecosystems on the river bed and banks. Large structures adjacent to the river would create extensive shade that could limit the growth of riparian vegetation.

SUGGESTED MITIGATION:

Refine zoning and building codes to limit new construction in the river corridor.

Disallow new construction of buildings with more than two above-ground floors within 200 feet from the top of the river bank.

For single-family residences, limit the lot size and square-footage of new construction in an effort to prevent the river corridor from transforming to an exclusive luxury community.

From

Matthew Horns

310-562-9465

getplanted.native@gmail.com

127 S. Park View St. #207, Los Angeles CA 90057

Ariana Villanueva

From: matt millikin <mattmillikin@gmail.com>
Sent: Wednesday, July 29, 2020 7:36 PM
To: PW-LA River CEQA
Subject: LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

Good evening,

Two comments for submission concerning the PEIR scope:

Will/can the PEIR include the important tributaries to/from the main branch of the river?

Will/can the PEIR consider community gardens and farms as planting options in their common element options?

Thank you,

Matt

Ariana Villanueva

From: Padric Gleason Gonzales <padric.gleason@gmail.com>
Sent: Wednesday, July 22, 2020 2:42 PM
To: PW-LA River CEQA
Subject: NOP Scoping Comments

CAUTION: External Email. Proceed Responsibly.

Hello,

My name is Padric Gleason Gonzales. I'm a resident of downtown Long Beach, here at the mouth of the L.A. River. I'm writing in support of the 2020 LA River Master Plan PEIR, particularly its goals of providing parks and open space, supporting connected ecosystems, and promoting clean water.

I want to specifically contribute four (4) considerations :

1. **Water capture should be encouraged.** California suffers from drought and Los Angeles County relies on a complex system of imported water. Runoff also pollutes the L.A. River with surface/ground-level contaminants. And most rainfall is completely wasted! In 2017, the L.A. County Department of Public Works estimated that in one 2-week period, 25 billion gallons of stormwater drained into the ocean from the L.A. River watershed. Much of this was direct runoff from roads, parking lots, and freeways. *The Master Plan should encourage widespread adoption of rainwater capture and runoff diversion, for example through the creation of and funding for spreading grounds, infiltration swales, and parkway medians.*
2. **Physical obstacles in the Lower L.A. River prevent natural tidal effects and migration of river life.** Specifically, there is a small dam just south of the Anaheim Street crossing and the concrete channel begins just south of the Willow Street crossing, both in Long Beach. *Barriers should be removed with the goal of restoring the natural tide, creating space for native flora and fauna, and encouraging migration of marine life into the river.*
3. **Long Beach receives runoff from 51 miles of river.** Unfortunately, the Army Corps of Engineers built a sea wall in Long Beach Harbor that creates a barrier to the outflow of the L.A. River into the ocean. On the one hand, it's good that this barrier prevents some L.A. River garbage and debris from entering the ocean. On the other hand, it's awful that Long Beach suffers from terrible pollution due to garbage and debris from our upstream neighbors. *I encourage the plan to consider the L.A. River's impacts on downstream neighborhoods and equitably share responsibility and funding/resources for cleanups downstream, like on Alamitos Beach.*
4. **Don't forget Compton Creek.** As one of the L.A. River's major tributaries, and in particular one that is heavily polluted but also has major restoration potential, *projects in Compton Creek should be eligible for funding and guidance within the scope of the L.A. River Master Plan.*

Thank you for considering my contributions. I look forward to helping to push this project forward.

Regards,

Padric Gleason Gonzales

padric.gleason@gmail.com

110 W 6TH ST, APT 323

LONG BEACH, CA 90802

Ariana Villanueva

From: Renee Lawler <Renee_Matt@live.com>
Sent: Thursday, August 6, 2020 1:57 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan CEQA Program EIR comments
Attachments: 1977EIREquestrianZoneMapSanFranciscoAve.pdf; sample docs for OOI and 2020 DEIR arguments July 29 2020.pdf

CAUTION: External Email. Proceed Responsibly.

August 6, 2020

To: Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

Re: Scoping comments for Draft 2020 LA River Master Plan

The language of the law, AB530, is primary in understanding the scope and objective for those working on this DEIR and in order to be aligned with the State Law and the reason and purpose of this entire Lower Los Angeles River Revitalization process. The revision of the LA River Master Plan for the South LA River, sovereign land, is stated in AB530 – that due to the linear nature of the river, no one entity could consider all the complex issues when planning along the river corridor, therefore, a regional approach to project review and planning was necessary. The chosen “Program” EIR may at this point in the process, may not achieve those stated objectives and the purpose of the law that initiated the entire effort.

Past performance by key participants in the LA River Revitalization Master Planning effort, members of the Task Force, (entities and municipalities, such as the City of Long Beach and LA County Flood Control District), have exhibited resistance to cooperate when tasked with addressing flood control mitigation both site specific and broader reaching areas. The necessity for cooperation between various entities, public or private, for the LA River corridor which includes the lands on either side is the essence of the law, AB530. During the CEQA DEIR review, the concept of collaboration and accountability for planning and project review within the corridor to be inclusive of more entities on a larger scale, not just in the hands of the local entities – to be in keeping with the primary objective and legislative intent.

There are additional guiding documents such as the 1999 Maintenance and Use Agreement between the LA Co Flood Control District and the Army Corps of Engineers that must be considered in this DEIR process to understand where the responsibilities lie with regard to the primary objective of flood control. Flood impacts to the river lands and their established and adjoining communities, animals and historic equestrian trail network are also a regional concern. The 1999 agreement, for instance, outlines responsibility of the “District” and local entities with respect to flood control infrastructure, reporting, response, project review and impact assessment for projects of all sizes within the region. When a project is proposed in the corridor (including one mile on either side or more if/as needed, site specific or broad-scale), LACFCD should be involved in review of the storm drain infra-structure. Regardless of what City or the immediate jurisdiction any storm drain is in, those structures are all ancillary to the flood control channel should be reviewed on a project by project basis for their effectiveness to control flooding within the vicinity, their effectivity to support the purpose of the flood control system on the whole and to address any gaps or deficiencies existing or that would add to cumulative negative impacts should there be a project or no action taken. This is an obligation of LACFCD and terms for their existence when established as a necessary entity in the region for flood control management on a cooperation basis with the Federal entity the Army Corps.

By using the Program EIR and placing responsibility on a local level review the goal and objective of AB530 may not be actualized. Based on past history, local level project review in the LA River corridor is insufficient, thus the legislation, so to propose through a Program DEIR the continuation of local level site specific CEQA review will likely result in more un-mitigated cumulative negative impacts for the historic equestrian trails, lands and established communities with concerns, features, issues that are layered, regional in nature and require a more complex review than the local entities have traditionally conducted.

The DEIR is using the assumption that the local entity would use a “kit of tools” or review in 5 mile segments. The problem with that is that the river has features that should not be broken into segments – such as the historic equestrian trail. Much of the trail demise and un-mitigated cumulative impacts to the equestrian lifeline, is due to local level planning and no real review/accountability on a larger linear scale for the horse trail. The horse trail, and the flood control channel and the storm drains which are supporting ancillary systems, and the open space in channels, outer channel and adjoining vacant or open lands that support this wildlife, trail and recreation and historic community corridor needs to be considered in this DEIR.

The horse trail along the LA River and vicinity was dedicated in 1944, for the purpose of preserving a culturally significant example of CA history. The bridle/riding/hiking trail (different from the bike path which was the utility road on top of the berm converted to a bike path in the 1970s). The horse trail is still used today for recreation was a connector feeder trail that ultimately merged with the Anza Trail at the Rio Hondo and was used by the Spanish and Ranchos. The trail has been compromised, obstructed, built upon, encroached upon by trash, motorcycles and homeless. The trail is a linear feature, just as the river is and it is a prime example, along with control of flooding why in order to address all the complex issues when planning a project large or small, broad or site specific along the LA River corridor a regional “committee” approach is needed instead of business as usual leaving it to the local level to “do the right thing” through Program EIR – so maybe there is some other approach needed. The essence of AB530 – the legislation that prompted the 41 member steering committee, the Lower Los Angeles River Revitalization Plan and the reason this DEIR is being conducted, conveys that because history has proven many local entities don’t have or use the tools to adequately address these many concerns and the result is impacts accumulate and go un-mitigated. The State legislation, that passed unanimously under Speaker, Anthony Rendon acknowledged the fact that a regional approach for the river corridor(s) that includes the river lands and 1 mile on either side, was needed, and that no one single entity could possibly anticipate or take all the proper steps to adequately review CEQA impacts for the linear LA River lands that include the linear/parallel historic equestrian trail and the associated open spaces. The idea that a single entity, such as the City of Long Beach could properly mitigate or proceed with “no project” for the South LA River lands and 1 mile on either side on a project basis is opposite to the law that prompted this process and needs to be addressed in this DEIR from that perspective and if another type of CEQA review is required to achieve the objectives of AB530 primarily and secondarily the Revitalization Steering Committees’ primary objectives, which I will address individually.

2020 LA River Master Plan Objectives:

Flood control risks – The storm drain infrastructure is currently incapable of handling the rain run off for current density in the City of Long Beach vicinity. The City communicated that fact to the County and denied taking corrective action despite known flooding conditions. “Pipes are too small” was stated from City to County, both well aware of the known deficiencies and yet the City of Long Beach opted not to cooperate with LA Co Flood Control District in correcting, documenting, reporting or cooperating in mitigating, despite both parties having combined responsibility via storm water NPDES permit requirements, 1999 Maintenance and use Agreement with the Army Corps of Engineers, 1996 & 2006 & 2020 LA River Master Plans etc. Due to the fact that they have not upgraded the most of the storm drain infrastructure, despite knowledge and notice to do so, in more than just a “site specific location” any additional density along the flood control river corridor, in the City of Long Beach for instance, or more site specific such as the proposed OOI Integral development at what has been proposed regional parkland and historic equestrian zone for decades of master plans, will stress an already under-sized flood control storm drain system for the storm pump station SD6. This proposed development will cause reoccurrence of the known flooding, likely with increased intensity and adding more properties for the negative impacts that the City and Flood Control district recently mediated over. The rain run-off from Wardlow/OOI parcels, Wrigley Heights and the Los Cerritos neighborhood flows southward and through Wrigley North (south of Wardlow). While one of the intended destinations for run off is to Storm Drain

Station #6 at Willow & 26th, the problem is that most rain run-off never makes it to the drain pipes, which the City recognizes. But because they know their piping and system is sub-standard and in many locations undersized, they are ok with the excess (due to more and more density and impermeable surfaces compounds) being diverted to the river lands instead of to the pipes. That excess routes to flood properties that are river adjacent where there is no infra-structure to handle that cumulatively increased excess density run-off and subsequently is never reported accurately as to the capacity for the pump and pipe systems. This is an example of a complex issue that AB530 referred to, one that has much larger impact but left in the hands of the local entity and the District is not being adequately reviewed for conduct, procedure and mitigation.

Safe equitable, inclusive parks, open space, and trails – The 2020 LA River master plan and prior have outlined the OOI property as necessary open space to enhance the park poor needs of the south LA River and the citizens who reside in the west side of Long Beach. Also this property combined with the vacant golf driving range to the north and the Wrigley Greenbelt south of Wardlow represent the largest swath of land along the river adjacent to the historic horse bridle-equestrian/hiking trail. That horse trail (not the utility road turned bike path in 1970 on top of the berm that crosses and merges the older historic trail), is the one of the oldest recognized features in the vicinity that represents 2 historic periods in CA history and the life line for culturally significant minority group and several river-adjacent residential, commercial and open space equestrian zones. The integrity of the trail from an historic mobility necessary function as well as more recent history to include recreational use will be negatively impacted if the land ear-marked for the past 30 years for parkland/equestrian zone at Wardlow and the LA River is developed and not retained open space. The trails and open spaces are the life-line for the horse culture in the LA River vicinity and we must rely on un-obstructed trail passage, safe mobility as any other user group (biking or walking). In addition it is open space adjacent to the trail and to the few remaining equestrian housing horse-overlay zones that need large 8,000 s.f., minimum lot sizes with set-backs, and trail access easements for the health, safety and protection for the historic lifestyle, animals and integrity of the trail from negative impacts brought by non-compatible uses such as high density development. The City of Long Beach conducted an in-depth EIR review in 1977 for the protection of these river-adjacent zones and that EIR should be considered in this DEIR process.

Support healthy connected ecosystems. – The OOI parcels are not site specific due to their connection to the linear historic horse trail and open space still present to the north and south and adjacent direct proximity to the trail and river lands and flood control channel. It is part of the large linear environmental corridor that many species depend upon and so this land within the one mile zone, ear-marked to be preserved open space for the last 3 decades of master plans is subject to development without considering for past or present master plan and this DEIR. The river environmental corridor, as a resource, has been vastly and negatively altered since it was deeded to the State of CA. The south LA River, sovereign land - owned by the people of the State of CA, as acknowledged by AB530 and the courts, continues to experience negative impact every time development occurs on or adjacent to the river lands. The corridor ecosystem is not defined by the man-made parcel lines. The river corridor and trails were once all open space; however with the present day man-made flood control channel and short term memory of what should be, is being eaten up by development right up to the flood control berm edge. That type of encroachment on the corridor is just as negative an impact as building right up to the edge of any wetlands or coastal protected zone.

Enhance opportunities for equitable access to river corridor. – The corridor includes wild species and domestic horses and historic and established communities that are being squeezed out of the corridor due to being overrun by density development and encroachments, biking, trash, motorcycles, homeless and flooding. It is not equitable that the biking community and housing density should overtake the needs of the historic occupants, horses and wildlife that require open space and low density.

Embrace and enhance opportunities for arts and culture. – The cultural significance of the horse and rancho lifestyle is being extinguished by this proposed OOI development on 20 acres river and trail adjacent. The OOI area was zoned Horse overlay zone in 1977 requiring large 8000 s.f. minimum lots, set-backs for the health and safety of the horses and residents, and with detailed CEQA review for the purpose of preserving and protecting the horse culture and adjacent trail network of significance. Furthermore, the City of LB indicated in their new Land use Element of the General Plan “LUE” that the “Wrigley Heights equestrian zone” would remain and Councilman Uranga and Linda Tatum re-iterated so during the LUE debates; yet the City continues to omit and ignore the horse overlay zoning low density requirements to protect that culture. They

would rather not acknowledge the Horse Overlay in their “other zones” and intentionally assigned the “founding and contemporary” place type to this horse-overlay zone so they could set the stage for this higher density project in what should be a lower density Horse overlay zone or entirely open space with a compatible parkland multi-use (walk/bike/horseback ride) user group format. This is another example of a local entity not considering the master plan prior or present or the complex negative impacts this type of development (large enough to consider it outside the limits of DEIR self-imposed “site specific” exception) as it poses cumulative negative impacts for a large area that includes but is not limited to flooding, wildlife, historic equestrian, traffic, noise, air, dust pollution and more.

Address potential adverse impacts on housing affordability and people experiencing homelessness. – How is this type of development going to address adverse impacts on housing when developing the OOI will further the extermination of a protected minority community that was supposed to be protected in this horse overlay zone?

Foster opportunities for continued community engagement, development and education. – The community has engaged over this property for decades. Even when included in 3 master plans spanning decades including a lengthy environmental review in 1977 that pre-dates CEQA resulting in the protective 20 page horse overlay zoning the City of Long Beach actively ignores those historic efforts. Furthermore, Al Austin and the City of Long Beach were participants of the 2020 LA River Master planning process and agreed to the concept of retaining the 58 acres that include the OOI parcels for open space but instead they continue to make spot zoning and LUE changes and to suit their development desires and have exhibited no intention of listening to the needs and wishes of the people and environmental concerns of which they are all well aware, driven instead by development dollars.

Improve local water supply reliability – The deficient storm drain pipes that allow the excess to flow and not make it to the pump stations continue to pose many risks and non-compliance concerns.

Promote healthy, safe clean water – same as above.

Documents to be considered in the DEIR process that relate to the LA River should include, but not limited to:

- 1972 Clean Water
- 1977 Horse Overlay zoning and EIR requirements
- 1996 LA River Master Plan
- 1999 Operation, Maintenance, Repair, Replacement & Rehabilitation agreement between LA County Drainage Area “District” and the Army Corps of Engineers
- Integrated Regional Water Management Plan – Greater Los Angeles Region
- Municipal NPDES Storm Water Permit Requirements of the City of Long Beach
- City of Long Beach Land Use Element (LUE) of the General Plan

Thank you for your consideration.

Respectfully,

Renee Lawler
renee_matt@live.com

F I N A L

environmental impact report

DEPARTMENT OF CITY PLANNING LONG BEACH, CALIFORNIA

DATE . JULY 28, 1977 (CERTIFIED BY CITY
TO . CITY PLANNING COMMISSION PLANNING COMMISSION)
FROM . CITY PLANNING DEPARTMENT

SUBJECT . PROPOSED HORSE OVERLAY ZONE
(E-7-77)

ADDRESS . CITY-WIDE

APPLICANT . CITY OF LONG BEACH

ZONE . R-1, R-2, C-3, M-1, M-2A

- (6) On industrial premises located southerly of Willow Street, northerly of Pacific Coast Highway, and westerly of the Terminal Island Freeway (M-2A zone).

Project Goals and Objectives

1. Protect the existing horse-keeping areas.
- 2. Protect land uses proximate to equestrian activities from potentially detrimental impacts.
3. Protect land uses in the vicinity of horse-keeping activities from future intrusions.

Principal Elements of the Project

The elements of the project consist of the conditions and requirements which would be imposed by the Municipal Zoning Ordinance for a Horse-Overlay Zone, the objectives which would be accomplished by application of the regulations, and the plans and petitions which delineate the properties to be zoned.

Approximately 50 - 60 acres of private land within the City of Long Beach are utilized for equestrian purposes, usually in conjunction with a single-family residence. Certain rights-of-way are also utilized for horse related activities.

The proposed ordinance would delete existing Section 9120.17 of the Zoning Regulations pertaining to fallout shelters in all use districts and replace it with a new set of regulations establishing the Horse District (H) land-use category. The proposed regulations are based on the concept of establishing horse overlay districts on the existing Zone Districts Map of the City. An overlay zone is a mapped zone that imposes a set of requirements in addition to those of the underlying zoning district. In an area where an overlay zone is established, property is placed simultaneously in two zones, and the land may be developed only under the conditions and requirements of both zones.

Overlay zones are described in the zoning text, mapped, and adopted by the governing body in a manner similar to conventional zoning. Provisions are administered through the usual zoning process. The provisions of this ordinance are summarized in Table 1.

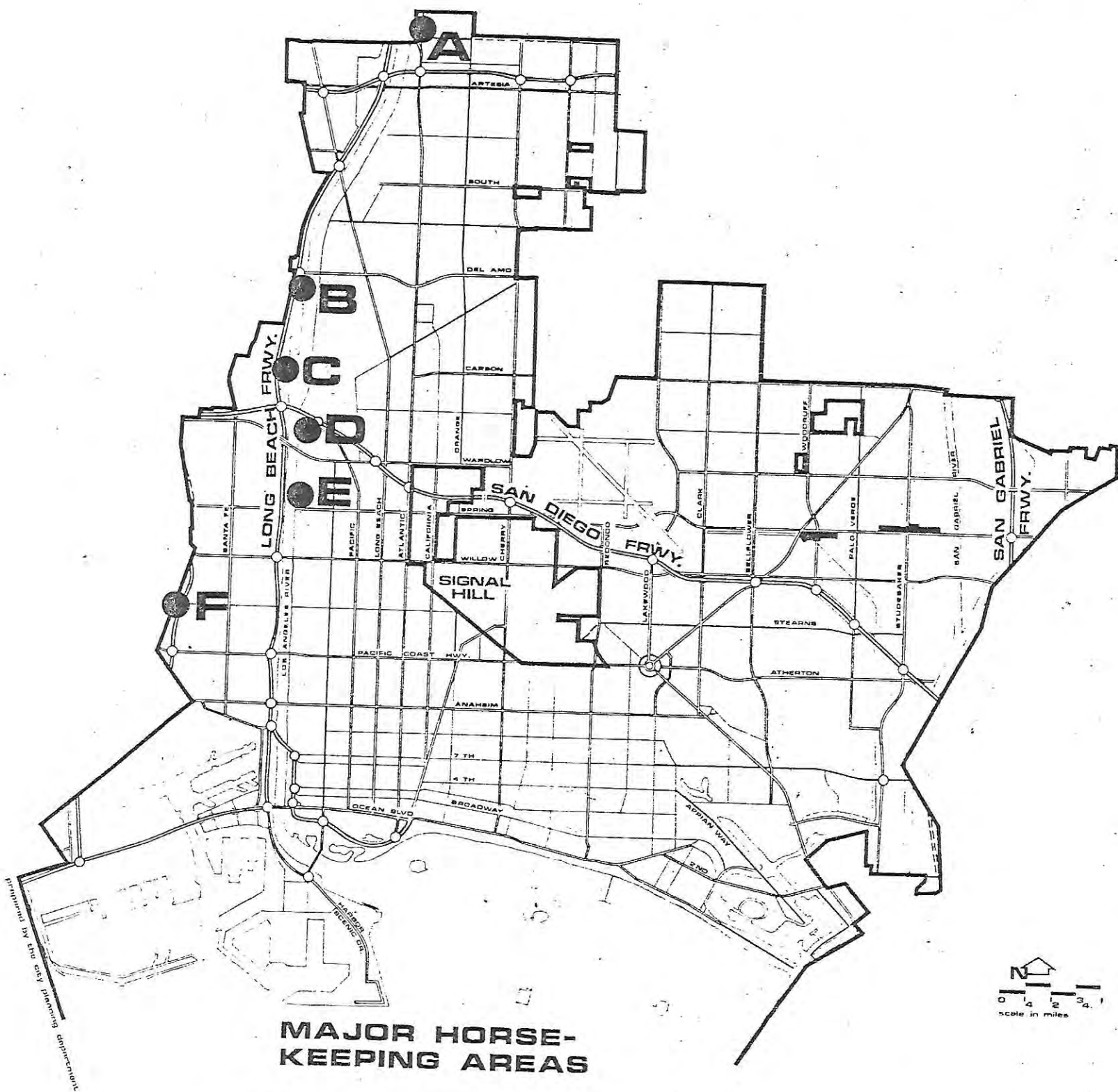


FIGURE 2

to the disadvantage of proximate land uses which are not protected by specific horse keeping regulations, as indicated by the complaint data in Table 3.

Persons living adjacent to equestrian facilities are generally not subject to any known health hazards. Although horses may be carriers of diseases carried primarily by insects, they are generally less susceptible than species more common to an urbanized setting. Further, local climate does not permit the harboring of encephalitis. Horses are less likely carriers of ringworm disease than are cats and dogs. Most of the population is adequately inoculated against contraction of tetanus. Manure stockpiling is controlled and enforced by the Health Department; this effectively controls related nuisances. In the opinion of Robert Hale, Director of Environmental Health, Long Beach Health Department, horse keeping is generally conducted in sanitary conditions, with no known detriment to public health.

Anticipated Impacts

→ The proposed ordinance would confer legal status to equestrian land uses and thus protect opportunities for equestrian-related recreation and lifestyles. The standards of the ordinance would, however, limit quartering of horses on specific areas of private parcels.

LAND USE

Environmental Setting

Current equestrian areas are indicated on Figures 3 through 8. An environmental inventory and assessment of the land use dynamics are presented in Table 6.

Anticipated Impacts

Implementation of the proposed ordinance would protect the legal status of existing equestrian areas and encourage eventual upgrading of related structures. Adjacent land uses would be protected by the standards of development and by the prohibition of equestrian activities in areas other than those designated in the overlay zone. Control over the number of horses and quarters for their keep would provide increased compatibility between equestrian and non-equestrian uses.

LVE

October 2019

10. Improve quality of life, health and overall livability through the implementation of the West Long Beach Livability Implementation Plan.
11. Respect and maintain the equestrian uses within Wrigley Heights and promote shared use and maintenance of the area trail system.



5

Implementation



OPERATION, MAINTENANCE, REPAIR, REPLACEMENT, AND REHABILITATION MANUAL

**LOS ANGELES COUNTY DRAINAGE AREA
CALIFORNIA**

DECEMBER 1999

**LOS ANGELES DISTRICT, CORPS OF ENGINEERS
LOS ANGELES, CALIFORNIA**

RECREATION

16. Various local recreation and planning agencies whose jurisdictions include parts of the flood control system may become increasingly interested in the recreational possibilities of the flood control rights-of-way. Since these lands are likely to remain in their present condition for some time, investment in the development of recreation facilities on them for public use seems justified; the Government's attitude encourages such use. Any proposed recreational facilities that involve discharges of dredged or fill material (including excavation) into waters of the United States, or involves work or structures in or affecting navigable waters of the United States, shall be authorized by the Regulatory Branch in a Corps permit.

17. Recreational features have been or can be developed within the basins of flood control dams and along the berm roadways of the channels in the form of bicycle, hiking, and equestrian trails. This development generally involves special berm and invert access ramps, under crossings and protective fencing, and occasionally more extensive recreational features.

18. Such uses generally do not interfere with flood control activities; some concern must be given, however, for the maintenance of proper access control to prevent unauthorized access to areas beyond the recreation limits, particularly during the storm season. Recreation proposals are evaluated through the usual review procedures, coordinated with the Recreation Resource Specialists of the District.

DEVELOPMENT FOR INCREASED LAND UTILIZATION

19. There has been an increased interest in private development within flood control rights-of-way to increase the utilization of lands adjacent to these rights-of-way. This increased utilization may involve the construction of a building or bridge which spans the channel, although proposals to use the berm roadway space for parking or loading are more common. The most significant proposals for development, however, involve covering the channel itself in order to connect both sides of the channel right-of-way. This type of development creates the question of maintenance for the channel cover. Since the cover is built by and for private interests, a public agency such as the United States Government or the Local Sponsor cannot be expected to maintain the cover, yet it is difficult to assign the responsibility for maintenance to a private interest. Current policy states that each proposal for development of this type will be reviewed on an individual basis.

20. In any event, a proposed development must be compatible with existing land use zoning. Since the United States does not establish zoning regulations, the responsibility for insuring compatibility of existing zoning with a proposed land use lies with the applicant, and any conflicts must be resolved before approval is granted by the United States. Any proposed private developments that involve discharges of dredged or fill material (including excavation) into waters of the United States, or involves work or structures in or affecting navigable waters of the United States, shall be authorized by the Regulatory Branch in a Corps permit.

MISCELLANEOUS

21. Proposals are frequently made for temporary use of flood control facilities or rights-of-way for a variety of purposes other than those previously discussed. Such proposals are highly diverse, ranging

LOS ANGELES RIVER



MASTER PLAN
JUNE 1996

Los Angeles County Departments of
Public Works
Harry W. Stone, Director

Parks and Recreation
Rodney E. Cooper, Director

Regional Planning
James Hartl, Director

National Parks Service
Rivers, Trails and Conservation
Assistance Program

and the
Los Angeles River Advisory Committee

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL# of pages **3**

To

Renee Lawler

Dept/Agency

From

Pea Henderson

Phone #

Fax #

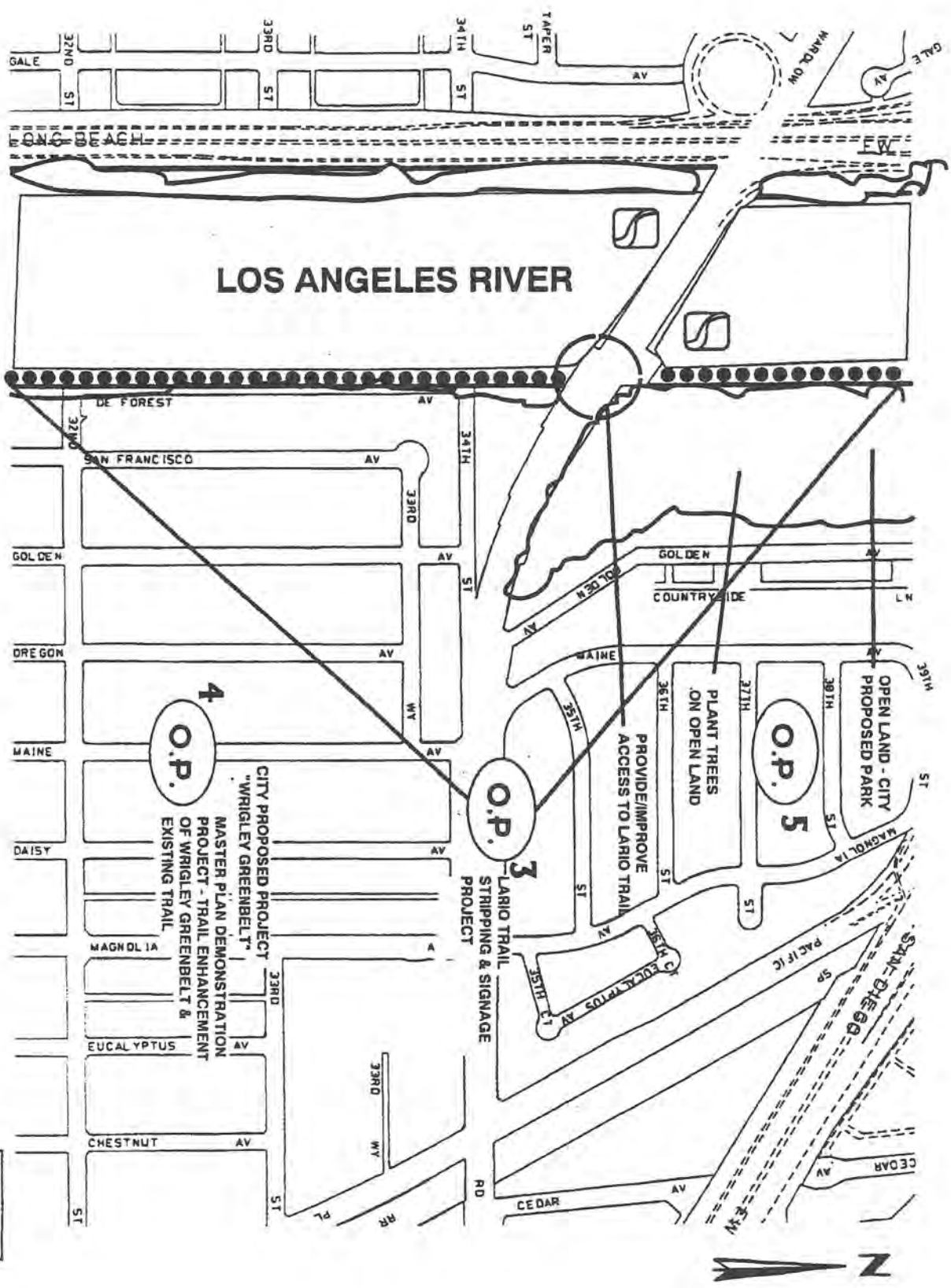
Fax #

NSN 7540-01-217-7388

5099-101

GENERAL SERVICES ADMINISTRATION

SCALE
1 inch equals
500 feet



F I N A L

environmental impact report

DEPARTMENT OF CITY PLANNING
LONG BEACH, CALIFORNIA

DATE

JULY 28, 1977

(CERTIFIED BY CITY
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TO

CITY PLANNING COMMISSION

FROM

CITY PLANNING DEPARTMENT

SUBJECT

PROPOSED HORSE OVERLAY ZONE
(E-7-77)

SCOPE

CITY-WIDE

APPROVED BY

CITY OF LONG BEACH

DATE

R-1, R-2, C-3, M-1, M-2A

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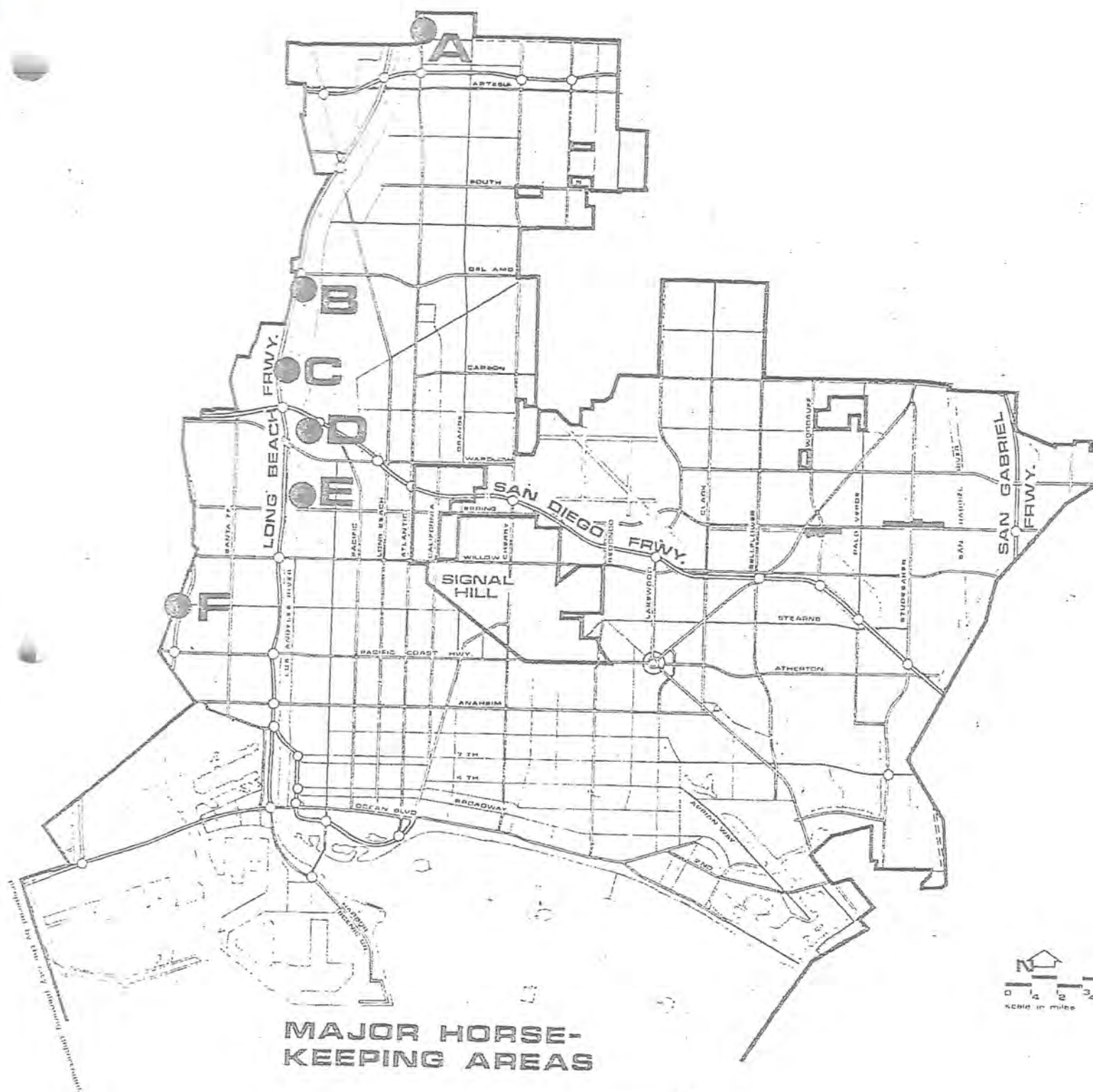


FIGURE 2



CITY OF LONG BEACH

DEPARTMENT OF PUBLIC WORKS

333 WEST OCEAN BOULEVARD • LONG BEACH, CA 90802 • (562) 570-6383 • FAX (562) 570-6012

May 23, 2017

Mr. Ryan Butler

Civil Engineer

Los Angeles County Public Works

900 South Fremont Avenue

Alhambra, CA 91803

Re: Connection to Storm Water Inlet – Public Equestrian Rest Area

Dear Mr. Butler,

Please be advised that your request to connect to the City of Long Beach storm drain has been denied.

We received your request to connect the proposed 18" ADS HP storm drain pipe into the city's storm water system at the intersection of Spring St. and San Francisco St.

During the recent rains, the City of Long Beach experienced flooding issues in multiple locations due to drainage deficiencies. The main problem is that our storm drain pipes are undersized. After reviewing your project, we found that the 60" main storm drain pipe in which you proposed to connect is undersized, therefore no connection is allowed as this time. (Please see attached exhibit).

However, if we upgrade the pipes later, you may re-submit your application for consideration in the future.

If you have further questions, please contact Christian Perez directly at (562) 570-6679 or by email at Christian.perez@longbeach.gov.

Regards,

Alvin Papa
Assistant City Engineer
City of Long Beach

FCD_001273

From: Terri Grant
Sent time: 11/03/2015 01:39:52 PM
To: Mark Lombos; Cung Nguyen; Paul Shadmani
Subject: RE: Thank you

That flooding issue is a good point. If we can address the drainage behind their homes in our project, we should include that in the presentation too

From: Sziebl, Connie [mailto:CSziebl@labcos.org]
Sent: Tuesday, November 03, 2015 12:38 PM
To: Moore, Julie; Terri Grant
Cc: Mark Lombos; Cung Nguyen; Paul Shadmani
Subject: Thank you

Hello all...

Thank you for arranging the conference call. I believe we were able to get much accomplished as we move forward with this issue. I appreciate your flexibility regarding the concerns we have about the schedule. I think once we begin the process, we will be able to tell if we can move at a little faster pace or not.

I am getting ready to forward the two flyers regarding the meeting on the 18th. That is all I will be e mailing. Once you finish with the revised schedule, I will forward that document.

To DPW. I will send to Ara Malovan and Derek Wieske. When Derek contacted me after I wrote to Sean, Derek asked that I copy Dennis Jue the project manager in all my correspondence to them on this issue. I figure he might be a consultant since his e mail address is not @longbeach.gov. Derek also copied Sean Crumby and George Kerr. Who is George Kerr, do any of you know? I take it you will send them the flyers?

To Parks Rec and Marine, I will e mail Stephen Scott, the Acting Director and Valerie Davis his assistant. She knows everything. Should I copy Meredith Reynolds or will you copy her?

I will also be in touch with the City Manager's' office.

So as soon as you tell me to whom I send the flyers – I do not want to step on your toes – I will send out my e mail. Thanks.


Connie

P.S. Do any of you remember if the City of Long Beach did any work on San Francisco Street to alleviate the flooding that takes place in the encroached area plus their garages during the rainy season? I understand it has been knee deep. If anything, the flooding that might take place during this rainy season will play a major role in the design.

From: Daniel B. Sharp
Sent time: 04/09/2016 04:23:10 PM
To: Amir Ibrahim
Cc: Terri Grant; Paul Shadmani
Subject: Public Equestrian Rest Area - Request for assistance with drainage design

Hi Amir,

I'm not sure if you have heard of the Public Equestrian Rest Area project....it's about a 1-acre project in Long Beach that has been encroached upon for years by the adjacent residents. The plan is to remove the encroachments, add some equestrian amenities, and open the site to the public. This project has come about because the City of Long Beach is completing the Wrigley Greenbelt Project both north and south of this project location.

 There have been local drainage issues at the location historically, and AED thought they could handle it with some simple re-grading. However, as they have gotten deeper into the design, we realize that the adjacent properties drain to the site so their proposed solution isn't workable.

We would like to have DES take a look and see if there are some reasonable solutions that don't involve pumps or a major new drain.

If that sounds reasonable, let us know who we should be working with on your staff and we will set a meeting to go over the specifics.

Let me know if you would rather have more info before we set up a larger meeting. Thanks. Dan.

Daniel B. Sharp, P.E.

Watershed Management Division
County of Los Angeles Department of Public Works
(818) 458-7353 ext. 400
(626) 759-0559 mobile
dsharp@dpw.lacounty.gov

future. How can development services adequately monitor or the public be aware of something that is not properly listed or mapped for reference?

This overt omission opens the door for further cumulative negative impacts to properties such as mine, in a recognized equestrian/minority community and this LUE and your response does not satisfy the legal protections as intended by Horse Overlay decision of 1977.

Respectfully, I urge the City of Long Beach to immediately make the necessary changes and include the horse overlay zones in all documents with transparency.

Sincerely,
Renee Lawler

From: Christopher Koontz [mailto:Christopher.Koontz@longbeach.gov]
Sent: Thursday, December 5, 2019 4:17 PM
To: renee_matt@live.com; Hoorae1@aol.com
Cc: Celina Luna <Celina.Luna@longbeach.gov>
Subject: Horse Overlay

Ms. Lawler and Ms. Gabelich,

I wanted to follow-up on your communications to Councilmember Uranga regarding the horsekeeping zoning within the City. As we have discussed on a few occasions over the last several years, the General Plan does not map individual overlays or zoning characteristics, however those zoning details are an important implementation tool for our many neighborhoods in the City.

During the General Plan (LUE) process, in response to your comments, we added a specific policy related to horsekeeping. The following is listed on [page 148 of the LUE](#).

11. Respect and maintain the equestrian uses within Wrigley Heights and promote shared use and maintenance of the area trail system.

As to the actual zoning, which is the regulatory teeth that allows equestrian efforts. There is no intention from the Department of Development Services to modify those existing regulations. I am not aware of any interest from City Council to modify those regulations. A map of those existing horse-overlay properties is attached for your reference. The General Plan recognizes the policy-direction to maintain the existing equestrian uses and shared use of the trail system.

Thank you again for contacting the City of Long Beach. I hope this email provides greater clarity and assurance regarding your concerns.

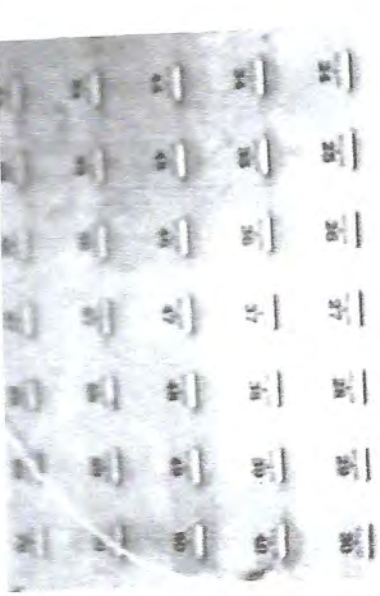
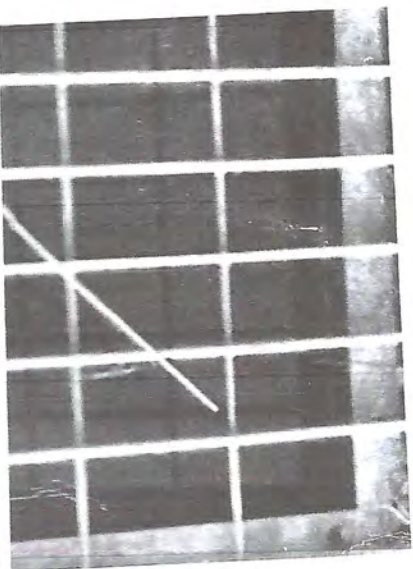
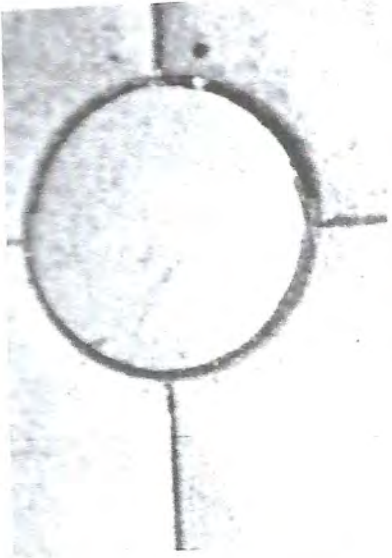
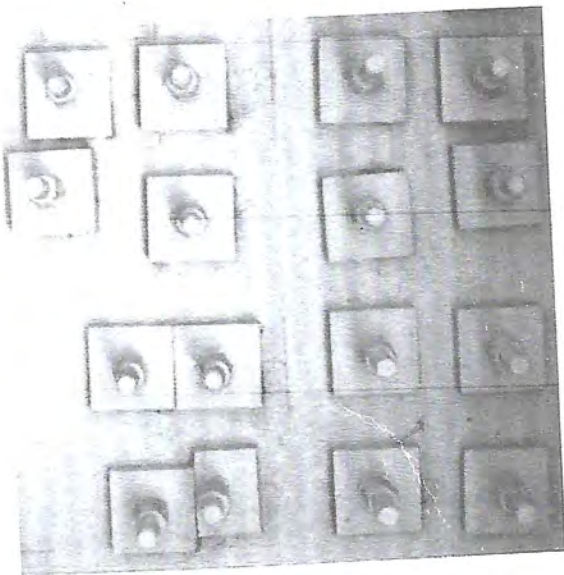
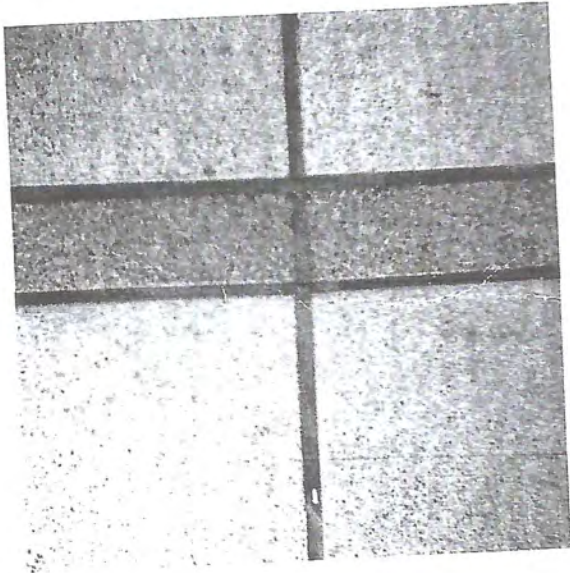
Christopher Ira Koontz, AICP
Planning Bureau Manager

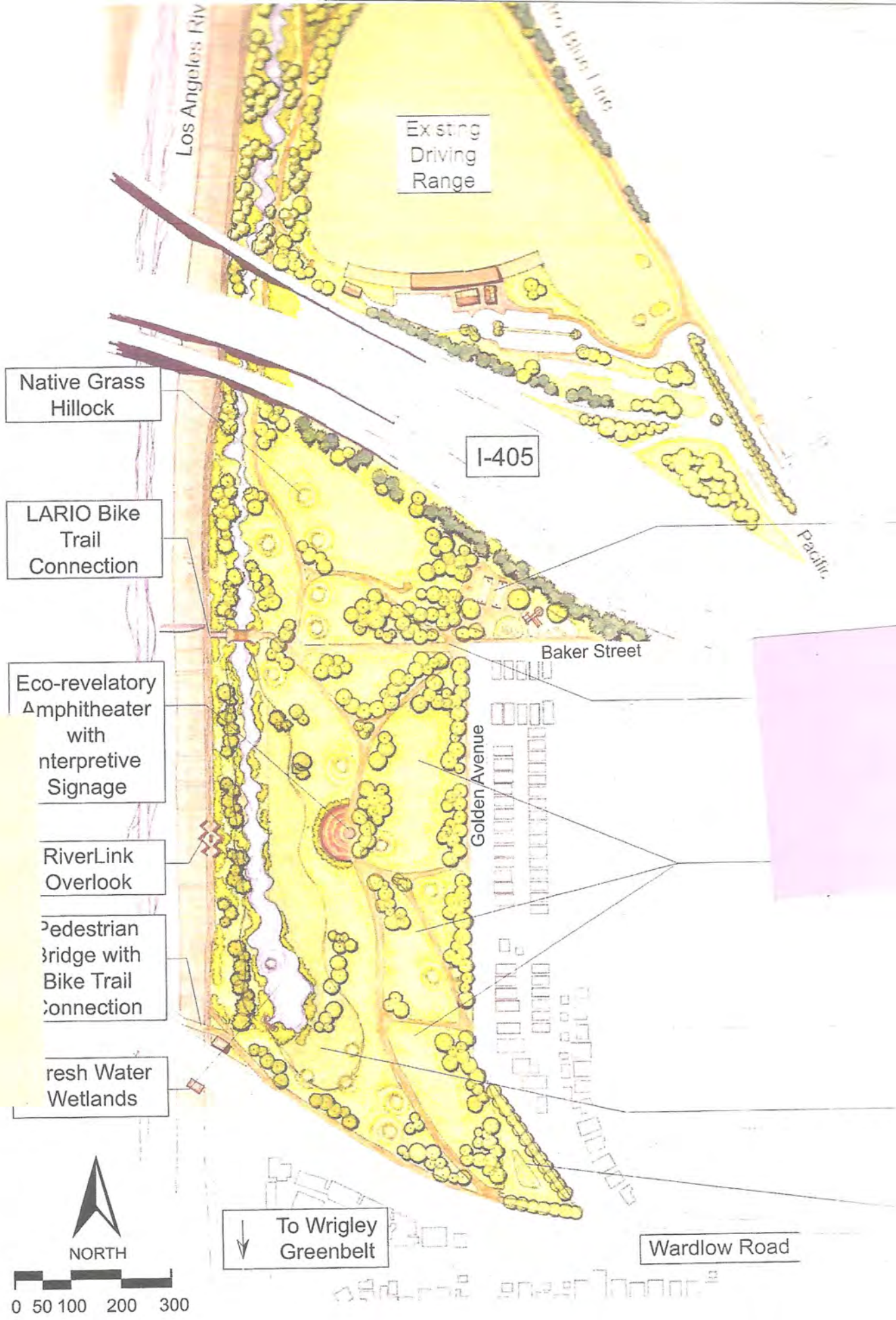
Long Beach Development Services
411 W. Ocean Blvd., 3rd Fl. | Long Beach, CA 90802
Office: 562-570-6288



LONG BEACH RIVERLINK

CONNECTING CITY TO RIVER





OPEN SPACE AND RECREATION ELEMENT

Recreation Vehicle Campground has a small pool. There are four swimming pools at Long Beach Unified School District (LBUSD) high schools that are open

to the public in the summer through City/LBUSD joint use agreements. Also, the City Colleges and California State University at Long Beach add an additional four pools to the public pool inventory.

5. Golf Courses

There are five City-owned golf courses in Long Beach at Heartwell, El Dorado, Recreation and Skylinks. All together they have four driving ranges, three 18-hole courses, one 9-hole course and one 18-hole par three lighted course, encompassing 568 municipal golf acres. The City contracts with private concessionaires who operate the courses. There are also two private golf courses and one private driving range in the City. The courses are an 18-hole course at Virginia Country Club and a 9-hole course at Bixby Ranch. A new, publicly accessible driving range is located at the intersection of the I-405 San Diego Freeway and the Los Angeles River.

6. Equestrian, Bicycle, Walking and Skating Trails

There remains a segment of equestrian trail on the floodplain adjacent to the Los Angeles River, but only a handful of properties along the river allow horses to be kept. These trails lie on County of Los Angeles flood control property, which is being studied for various open space enhancements under the Los Angeles River Master Plan.

According to the 2001 Long Beach Bicycle Master Plan, the City has an estimated 64 miles of bikeways, 35 of which are completely separated from roadway traffic. The shoreline, river and park trails accommodate pedestrians, skate boarders and skating as well. Although this chapter contains a policy and program recommending the development of an open space linkage and trails plan, the bicycle map and policies pertaining to walking and cycling in the community are largely contained in the Transportation (Circulation) Element.

7. Long Beach Museum of Art

Recently renovated and expanded, the Long Beach Museum of Art is located in Bluff Park at 2300 E. Ocean Boulevard. The Museum is very reasonably priced and is open to the public five days a week. It features applied and decorative arts including paintings, sculpture, video and children's art. Summer concerts are performed in the courtyard area overlooking the Pacific Ocean.

8. Beaches

Located between the Los Angeles and San Gabriel rivers, Long Beach has approximately 247 acres of beaches and 11 miles of shoreline. Although the beach property is owned by the State, the City retains responsibility for

collaborative efforts to increase opportunities to fund those projects, has greatly enhanced the willingness of these entities to seek mutually beneficial solutions to problems that historically were a source of conflict.

Subregional Characteristics

Given the size and complexity of the GLAC Region and the number of stakeholders and agencies that could participate in Plan development and other planning activities, to manage stakeholder input and acknowledge geographic variation, five subregional planning areas were established, as discussed in Chapter 1.

Lower San Gabriel and Los Angeles Rivers Subregion

The Lower SG & LA is comprised of 37 cities, 27 in the Gateway IRWM Region and 10 in the Santa Ana Watershed Project Authority IRWM Region (which includes the Orange County portion of the Coyote Creek watershed). Dozens of water agencies/companies and other entities which have an interest in a variety of water management issues serve the Lower SG & LA's three million residents. The Lower SG & LA faces significant ground and surface water quality challenges, as well as flood

control issues, due to its location in the lower reaches of two major watersheds and intense urban development changes.

It has the greatest water recharge capacity in the GLAC Region due to the recharge basins in the vicinity of the Whittier Narrows. Further, it has the most densely developed commercial and industrial land uses coupled with the least amount of open space on a per acre basis in the GLAC Region; notably several cities in the Lower SG & LA are over 100 years old. Further, the Lower SG & LA is in the lower reaches of a vast metropolitan area and, therefore has significant water quality issues along with tremendous opportunities for conjunctive use, recycled and reclaimed water use, desalination and wetlands restoration in the estuaries of the San Gabriel River and Los Angeles River. The cities in the Lower SG & LA face many competing financial needs, including complying with stormwater regulations, replacing aging infrastructure, providing affordable housing and increasing public safety. A considerable number of the cities have experienced and will continue to experience severe funding shortages for infrastructure repair, maintenance and installation along with high household poverty rates.



The Los Angeles River is fed by the largest drainage area in the Region.

Ariana Villanueva

From: Ricardo Morelli <doctormorelli@yahoo.com>
Sent: Tuesday, July 7, 2020 6:16 PM
To: PW-LA River CEQA
Subject: Re: CEQA PEIR for 2020 LA River Master Plan - NOP and Scoping

CAUTION: External Email. Proceed Responsibly.

Greetings Ms. Villanueva,

Is the 2020 LA River Master Plan contemplating the large and growing number of homeless occupying the river "islands" and shores?

I see these neighbors on my walks and on my way to work and it's obvious many of them have mental issues and drug addiction. Is providing services to them part of the plan?

Sincerely,

Ricardo Morelli

On Tuesday, July 7, 2020, 6:06:22 PM PDT, PW-LA River CEQA <lariverceqa@pw.lacounty.gov> wrote:

The County of Los Angeles, through Los Angeles County Public Works, will prepare a Program Environmental Impact Report (PEIR) pursuant to the California Environmental Quality Act (CEQA) for its proposed 2020 LA River Master Plan. The PEIR will assess the environmental impacts of implementing the 2020 LA River Master Plan. As part of this PEIR process, Public Works is soliciting input from members of the public, organizations, and government agencies on the scope and content of the information to be included and analyzed in the PEIR.

A Notice of Preparation (NOP) has been prepared to notify responsible and trustee agencies, the Office of Planning and Research, the County Clerk, and other interested parties that Public Works is beginning preparation of this PEIR, and starts the 30-day scoping period. The NOP for the 2020 LA River Master Plan PEIR can be viewed at <http://pw.lacounty.gov/go/larmpceqa>.

The community is invited to participate in an online scoping meeting for the PEIR, which is being held virtually due to restrictions under State of California Executive Order N-33-20.

DATE: Wednesday, July 29, 2020

TIME: 6:00 p.m. to 8:00 p.m.

LOCATION: Details about the CEQA online scoping meeting are available at <http://pw.lacounty.gov/go/larmpceqa>

Registration for the event is available at <http://www.eventbrite.com/e/online-scoping-meeting-2020-la-river-master-plan-program-eir-tickets-112158469000>

Scoping comments on the PEIR are due no later than August 6, 2020, which marks the end of the 30-day scoping period. Please send your comments in writing to the physical address or e-mail address shown below. If sending an e-mail, please include "NOP Scoping Comments" in the subject line. Include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva

Los Angeles County Public Works, Stormwater Quality Division

900 South Fremont Avenue, 11th Floor

Alhambra, CA 91803

LARiverCEQA@pw.lacounty.gov

Thank you and we look forward to your participation in the process.

Ariana Villanueva

From: Rosalind Helfand <rozhelfand@gmail.com>
Sent: Wednesday, August 12, 2020 9:45 PM
To: PW-LA River CEQA
Subject: NOP Scoping Comments

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Villanueva,

Please accept my NOP scoping comments. Thank you for your time!

Rosalind Helfand
Independent Environmental and Social Policy Advisory
rozhelfand@gmail.com
310-869-5749

NOP Scoping Comments:

*** Climate change should be included at multiple points in the PEIR, not just under "Greenhouse Gas Emissions" and not just as an emissions discussion**

Impacts, including cumulative impacts, shouldn't be assessed without considering the current and projected impacts of climate change on the following:

- Wildlife, including species of special concern, that currently relies on the stability of LA River water and habitat to endure climate change impacts.
- Wildlife, including species of special concern, that will come to rely on the LA River during and following the project completion due to range and habitat changes tied to climate change (includes species that are projected to become vulnerable, not just those that are currently considered vulnerable).
- The impact of the LA River project overall on urban forest as critical for cooling both people and wildlife and providing habitat for climate impacted wildlife.
- Impacts on hydrology and water quality due to possible cumulative effects of the project in relation to climate change impacts.
- Current and projected climate change impacts on the effectiveness of the LA River plans for flood mitigation (seeing that floods may be enhanced by climate change).
- Accounting for the climate change plans of cities (not just the county) through which the river runs.
- Potential climate impacts of project construction phases.

*** Human traffic impact on wildlife**

- Regarding public services and recreation, how will increases in human traffic in some areas where wildlife reside, as well as new human traffic post-project completion, impact wildlife that depend on the river for habitat, food, and water?

*** Total urban forest impact** (adding to the discussion of trees in Land Use/Planning)

- Align with overall urban forest planning such as with the City of Los Angeles, and consider: Impact to overall canopy; impact to healthy mature tree numbers overall; impact to tree types that wildlife and birds often rely upon overall; impact on the capacity for the urban forest to mitigate stormwater runoff; impact on the urban forest capacity to mitigate heat island effects and climate change impacts; impact on urban forest capacity to mitigate air pollution and sequester carbon (loss of mature trees again a concern).

*** Light pollution impact on wildlife**

- Will the project during construction and after completion increase light pollution in sensitive areas for wildlife?

*** Changes to hydrology and water quality impacts on wildlife**

- How important is overall stability for many species currently relying on especially habitat rich areas? (relates to climate change questions)
- Look at the cumulative impact of wetland loss/lack in relation to wetland need for species in the region.

*** Sourcing and end life of construction materials and waste**

- How will the ecosystem and climate impacts of construction materials sources and waste be accounted for?
- Is there an end life plan for reuse/recycling of waste and materials?

*** For "Growth-Inducing Impacts"**

- How will "growth" be defined? Differentiate between desirable and undesirable types of growth.

*** Transportation**

- How will the project minimize future transportation emissions that contribute to poor air and climate change by aligning with climate change mitigation planning?

Ariana Villanueva

From: Sharon Brewer <sbrewerz@live.com>
Sent: Thursday, August 13, 2020 9:36 PM
To: PW-LA River CEQA
Subject: LA River trail

CAUTION: External Email. Proceed Responsibly.

August 13, 2020

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

Dear Ariana,

By way of introduction, my name is Sharon Brewer. I am a concerned citizen in the Long Beach area. My son and his friends use the LA River Trails quite extensively to get across town and train for the next bike race whenever that is given the bleak sports forecast. They use the trails to avoid being hit by cars.

The trail usually chosen is the Long Beach to San Gabriel route because it is cleaner. He rides the Long Beach loop and found that the homeless are taking up more than half of the trail with their cabana like structures to keep them out of the sun.

The problems of the LA River Trail are many and stretch over 51 miles. .

1. Homeless living in the area. If displaced from the river they will find another area. The example is best understood when cleaning the area near the DTLA police station area when one area is cleared for cleaning the homeless are displaced for a day but return quickly.
2. Medical waste along the river is a huge problem. Needles and drug paraphernalia are strewn in the river and areas surrounding the area. If parks are to be built this area must be clean and remain clean for the children.
3. Human waste is also a problem for the river and the areas surrounding the river.
4. Garbage not included in the last two categories. Shopping carts, bicycles and just lots of every day garbage.
5. Water stations are currently being used for showers. Water stations have cloudy and murky water.
6. Flooding issue every time it rains under the tunnel at the 605 near Alhambra.

The environment and River have taken a beating along the river. The trails are largely unpoliced and are always a worry as the homeless put up wires to catch the cyclist or jogger and steal from their catch.

Kayakers use the river but the thought of overturning in the LA river is just gross. Fish from the LA River is should not be used for human consumption due to the human waste and garbage.

To improve the experience of the LA River it would take a huge effort but the people displaced will still not be able to afford housing. Mental institutions have closed and the need to rehabilitate or just deal with the mental issues of the homeless is no longer available.

Ariana Villanueva

From: Sharon Brewer <sbrewerz@live.com>
Sent: Thursday, August 6, 2020 9:42 AM
To: PW-LA River CEQA
Subject: Re: Scoping comments for Draft 2020 LA River Master Plan PEIR due today

CAUTION: External Email. Proceed Responsibly.

Good morning,

My son uses the river trails extensively to ride his bike. He uses the San Gabriel trails mainly as he fears for his safety both personal safety and health safety from the amount of human waste while traveling through Los Angeles and the Glendale river trail area. The large encampments are quite visible along the river can be seen from the freeway as we travel from LA into Glendale. The pandemic has also increased the amount of encampments along the river.

We are also seeing more postings that wire is strung across the trails to make the cyclists crash to steal bikes, money and anything else a cyclist carries.

The policing of the encampments and the amount of waste added to the area and wild life is wrecking havoc with the environment along the river.

Thank you for reading my concerns.

Sharon Brewer
Submitted to River trail committee 8/6/2020 before 5 pm.

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From: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Sent: Thursday, August 6, 2020 8:22:05 AM
Subject: Scoping comments for Draft 2020 LA River Master Plan PEIR due today

Hello,

Thank you for joining us last week for the 2020 LA River Master Plan CEQA Program EIR Scoping Meeting. For those who were unable to make it, the recording from the event is now available online at <http://pw.lacounty.gov/go/larmpceqa>.

Public participation is a key component of the CEQA process, and we appreciate your comments for consideration for the Draft Program EIR. You will receive a Notice of Availability when the Draft Program EIR is available for public review and comment. We will also provide notice about the Draft Program EIR public meeting when those details are available.

You can still submit comments on the scope or issues of concern you would like considered for the Draft Program EIR until August 6, 2020 (the end of the 30-day scoping period). Please send your comments in writing to the physical address or e-mail address shown below, and include a return address or e-mail address and a contact name in your agency with your comments:

Ariana Villanueva
Los Angeles County Public Works, Stormwater Quality Division

900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

Information and updates about the CEQA process for the Draft Program EIR at
<http://pw.lacounty.gov/go/larmpceqa>.

For questions or concerns about the 2020 LA River Master Plan document, please visit
www.larivermasterplan.org or submit your comments to LARiver@pw.lacounty.gov.

Ariana Villanueva

From: Steffie Hands <handsonrealestate@gmail.com>
Sent: Wednesday, July 29, 2020 2:08 PM
To: PW-LA River CEQA
Subject: NOP Scoping Comments

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

My family and friends use the riverbed path often for bike riding, walking and running in Long Beach.

Here are the considerations we'd like to see in the PEIR:

1. Safety issues with homeless encampments and unsavory individuals. These have been increasing every year, and there have been some horrible incidents on the path including homicides.
2. Safety issues with the use of pesticides and weed abatement. I am not sure what is currently used, but we are concerned about the environmental impact of pesticides on the ecology, the surrounding neighborhoods, and the river water that eventually drains to the ocean.
3. Plans that address the natural ecology of the riverbed to ensure that birds, animals, plants, etc can live and thrive along the riverbed.

Overall, We would like to see more of the river bed areas safer and more useable for individuals and families, while keeping it as "natural" as possible.

Best regards,
Steffie Hands



Steffie Hands, Realtor

Re/Max Real Estate Specialists
562-508-9869 | HandsOnRealEstate@gmail.com

Address: 6695 E. PCH #150, Long Beach, CA 90803

Website: www.CalBungalow.com

License: DRE#01502653

Read My Zillow Reviews:

<http://www.zillow.com/profile/handsonrealestate>



Ariana Villanueva

From: Wolfgang Brardt <wolfgangbrardt@gmail.com>
Sent: Thursday, August 6, 2020 5:35 PM
To: PW-LA River CEQA
Subject: Comments about LA River project

CAUTION: External Email. Proceed Responsibly.

Hello, My name is Wolfgang Brardt, I'm a Owner of a skateboard Magazine called 86'D Magazine. I have a great idea on how we could use tons of the space of the old river.

Essentially placing a skate obstacle along the river to form sort of a trail for Skateboarders, BMX'ers and all persons on any type of wheels to use. Skateboarding in LA as I'm sure you know is a worldwide destination and hot spot. It's a fact that now more children pick up Skateboards than baseball. In 20 years it's predictable that America's pastime will be Skateboarding. LA's River project could turn LA into that much more of a travel destination for people from all over the world.

I have tons of Design ideas that would be so simple and cheap to create and build. The best part is the LA River is already perfect for all activities with wheels. adding a fe supplemental obstacles would just breathe so much creative life into what is currently a kind of dark place.

Thank you so much for reading, looking forward to hearing back!

Sincerely, Wolfgang

--

Wolfgang Brardt

[@wolfgangbrardt](#)

[\(562\)513-9951](#)

wolfgangbrardt@gmail.com

Ariana Villanueva

From: zichrey@frontier.com
Sent: Tuesday, July 7, 2020 6:07 PM
To: PW-LA River CEQA
Subject: NOPScoping Comments

CAUTION: External Email. Proceed Responsibly.

My wife and I have walked different sections of the river trail. We feel this trail is a valuable resource for all residents of L.A. County. We particularly like the section through Frogtown in Silver Lake/Atwater Village. Sections of the trail in Long Beach, where we live, do not appear to be as wide and are less conducive to walking while others are biking.