2020 LA RIVER MASTER PLAN

FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT APPENDICES

SCH# 2020070128

March 2022

Public Works
LOS ANGELES COUNTY

COUNTY OF LOS ANGELES CALIFORNIA

ICF

Appendix A

Comments Received on the Draft PEIR

Ariana Villanueva

From: Brian Baldauf <brian.baldauf@mrca.ca.gov>
Sent: Friday, February 5, 2021 12:14 PM
To: Genevieve Osmena; PW-LA River CEQA
Cc: Sarah Rascon; Melissa Vega
Subject: 2020 LA River Master Plan Draft PEIR Comment Extension?

CAUTION: External Email. Proceed Responsibly.

Hi Genevieve and Grace.

Thanks for sending us the link to the PEIR. The Santa Monica Mountains Conservancy is planning to prepare comment letters for both the Draft LARMP and the PEIR. We are currently preparing comments for the LARMP to go to the next SMMC Board meeting on 2/22, with our materials due next week.

A1-1 With the timing of the PEIR's release and the comments due 3/18, we would need to also prepare our comments for the February SMMC meeting, which isn't much time! We haven't yet had the chance to dig into the PEIR as we are focused on the Master Plan, but I am writing to ask if the 45-day deadline could be pushed back to 60-days so that staff would have time to review the document and provide comments at the March SMMC meeting planned to occur on 3/22.

A1-2 Any consideration and direction you can provide on this request would be greatly appreciated, as we are coordinating our resources to provide feedback and need to know how to best focus.

Thanks,
Brian

Brian Baldauf
Chief of Watershed Planning

Mountains Recreation & Conservation Authority
570 W. Avenue 26, Suite 100
Los Angeles, CA 90065
Tel: (323) 221-9944 ext. 190

From: County of Los Angeles <lacounty@subscriptions.lacounty.gov>
Sent: Monday, February 1, 2021 8:02 AM
To: Brian Baldauf <brian.baldauf@mrca.ca.gov>
Subject: County of Los Angeles 2020 LA River Master Plan Draft PEIR Available for Review

2020 LA River Master Plan Draft PEIR Available for Review

County of Los Angeles has completed the Draft Program Environmental Impact Report (Draft PEIR) for the proposed 2020 LA River Master Plan.

The Draft PEIR and Notice of Availability is available at pw.lacounty.gov/go/larmpceqa

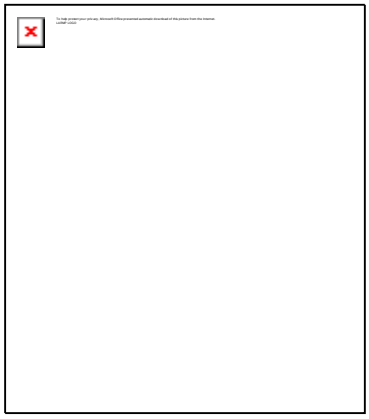
The County is soliciting written comments on the content of the Draft PEIR. In accordance with California Environmental Quality Act (CEQA), comments on the Draft PEIR should be submitted by March 18, 2021, the end of the 45-day comment period, and all written comments will be responded to and included in the Final PEIR. Please send your written comments to the address or email address shown below. For emails, please write "2020 LA River Master Plan Draft PEIR Comments" in the subject line, and include a return address or email address with a contact name with your comments:

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

We will also be hosting an online Public Meeting on March 3, 2021 from 6 p.m. until 8 p.m. The public meeting will include a brief presentation with an overview of the Draft PEIR analysis, followed by submission of verbal comments. Information on how to participate in the public meeting is available at pw.lacounty.gov/go/larmpceqa and registration is available at:

https://www.eventbrite.com/e/la-river-master-plan-draft-program-eir-public-meeting-registration-138697460839

For any questions, don't hesitate to reach out to us at LARiverCEQA@pw.lacounty.gov or at 833-993-1739. Thank you.



This email was sent using GovDelivery Communications Cloud to brian.baldauf@mrca.ca.gov on behalf of: County of Los Angeles · 500 W. Temple St. · Los Angeles 90012

Ariana Villanueva

From: Prescott, Patrick <PPrescott@burbankca.gov>
Sent: Tuesday, February 16, 2021 2:26 PM
To: PW-LA River CEQA
Subject: LA River Master Plan DEIR

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Komjakraphan-Tek,

A2-1 Multiple departments in the City of Burbank are reviewing the DEIR for the L.A. River Master Plan. I am emailing to request two additional weeks to review the DEIR.

Thank you,

Patrick

Patrick Prescott, AICP
Community Development Director
City of Burbank
(818) 238-5176

Working together for a safe, beautiful, and thriving community.

Ariana Villanueva

From: Rynn, Daniel <DRynn@burbankca.gov>
Sent: Thursday, February 18, 2021 5:28 PM
To: Dan Lafferty; Keith Lilley
Cc: PW-LA River CEQA
Subject: LA River Draft Program EIR

CAUTION: External Email. Proceed Responsibly.

Gentlemen,
It has been a long time since we have connected. I hope all is well with you both.

A3-1 I've included you both because I'm not sure who the Storm Water Quality Division is currently under. I've been asked to see if there is a possibility to get an extension of time to review and prepare a response document on the subject EIR. LACDPW has only provided a 45-day public review period to review an almost 2,000 page document. Burbank typically has responses to documents such as this, reviewed and signed by our City Council and Mayor. Our Council dates do not occur every week and our current staffing levels are limited at this time. Is there anyway to have this review period extended to at least 60 days so that agencies such as Burbank have sufficient time to review the extremely large document, prepare a reasonably detailed response letter, and have it presented to our City Council?

The County staff person in Storm Water Quality who is championing this document review is Grace Komjakraphan-Tek.

Please let me know if you or Grace would be amenable to this request and thank you for your time.

Daniel Rynn, PE
Chief Assistant Public Works Director – City Engineer
Burbank, CA
818-238-3940
DRynn@burbankca.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.

February 25, 2021

Grace Komjakraphan-Tek
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue
Alhambra, CA 91803

RE: 2020 LA River Master Plan – Draft Environmental Impact Report (DEIR)
SCH# 2020070128
GTS# 07-LA-2020-03489
Vic. LA Multiple

Dear Grace Komjakraphan-Tek,

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" (KOP) over the next 25 years:
The six KOP categories are:

- KOP Category 1: Trails and Access Gateways
- KOP Category 2: Channel Modifications
- KOP Category 3: Crossings and Platforms
- KOP Category 4: Diversions
- KOP Category 5: Floodplain Reclamation
- KOP Category 6: Off-Channel Land Assets

After reviewing the DEIR, Caltrans has the following comments:

A4-1 Caltrans concurs with Mitigation Measure TR-1a, which specifies that Vehicle Miles Travelled (VMT) impacts will be evaluated on a per project basis as well as the two-step screening process that will be used. This allows VMT impacts to be analyzed on a project level basis with more detail than can be provided in a Master Plan. Caltrans looks forward to reviewing these projects as part of the CEQA process.

A4-2 Caltrans also concurs with Mitigation Measure TR-1b, which outlines the transportation demand management (TDM) strategies that will be used to offset or prevent the generation of excess VMT.

A4-3 It is especially noteworthy that one of the principal measures given is to price and/or limit car parking, as research indicates that car parking prioritizes driving above all other travel modes and undermines a community's ability to choose public transit and active modes of transportation.

A4-4 Finally, for all locations where active transportation improvements are impacted by Caltrans right of way, our planners and engineers are available to partner on implementing design elements that improve safety and mobility for people walking or riding bikes throughout the Plan area. 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. These elements can help the LA River Master Plan meet its objectives as well as Caltrans' targets of tripling trips made by bicycle, doubling trips made by walking and public transit, and a 15% reduction in statewide VMT. By removing barriers to walking, biking, and taking transit, 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, Greenhouse Gas (GHG) emissions, and encourage alternative modes of travel.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2020-03489.

Sincerely,

Miya Edmonson

MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

STATE OF CALIFORNIA - NATURAL RESOURCES AGENCY GAVIN NEWSOM, *Governor*

CALIFORNIA COASTAL COMMISSION
South Coast Area Office
301 E Ocean Blvd, Suite 300
Long Beach, CA 90802
(562) 590-5071

February 25, 2021

Grace Komjakraphan-Tek
Los Angeles County Public Works
900 South Fremont Avenue, Floor 11
Alhambra, CA 91803

Delivered via electronic mail: GKomjakraphan@dpw.lacounty.gov

Re: 2020 LA River Master Plan
Coastal Commission Staff Comments on Draft PEIR and NOP
State Clearinghouse No. 2020070128

Dear Grace Komjakraphan-Tek:

A5-1 Coastal Commission staff appreciates the opportunity to review and provide comment on the Draft Environmental Impact Report and Notice of Preparation for the 2020 LA River Master Plan (Plan). We also would like to acknowledge the significant collaboration that has taken place to date between interested stakeholders, and federal and state agency representatives, in the development of this significant restoration project. Given the complexity of this riparian and estuarine ecosystem, floodwater infrastructure, public access and recreation amenities, and coastal resources, additional and more thorough project review will be required as a part of necessary future coastal development permits (CDPs) for the proposed project.

A5-2 The following comments address, in a preliminary manner, the issue of the Plan's consistency with the policies of the California Coastal Act of 1976 (specifically Chapters 3 and 8). Based on the project description, portions the LA River in Frame 1 of the Plan are within a range of coastal jurisdictions and are therefore governed by various laws and regulations, including but not limited to, the Local Coastal Program (LCP) for the City of Long Beach, the Port Master Plan (PMP) of Long Beach, and other relevant policies derived from the California Coastal Act of 1976. This letter is an overview of the main issues Commission staff has identified at this time based on the information that has been presented, and it is not an exhaustive analysis. The comments contained herein are preliminary in nature, and those of Coastal Commission staff only, and should not be construed as representing the official opinion of the Coastal Commissioners.

A5-3 The PEIR is conceptual in nature, stating on Pages 1-1 and 2-15 that it "presents a program-level analysis of the 2020 LA River Master Plan and its components that does not include any site-specific or project-specific analysis." While there are over 107 potential projects identified throughout, there is no concrete or detailed description of what each project would entail. The Plan consistently alludes to the 2017 Lower LA River Revitalization Plan and other preceding documents for more specific implementation plans; indeed, the PEIR uses information from these previous reports to make certain determinations and produce relevant maps, such as in Figure 3.10-2. Based on the way the PEIR is structured, the Commission staff's comments will therefore

A5-3 cont. concern two main aspects: 1) as they pertain to the overall framework, and 2) as they pertain to specific potential projects planned for the Coastal Zone.

Regarding the coastal jurisdictions represented, Planning Frame 1, as shown, described, and analyzed in the PEIR, is partially within the Coastal Zone, and includes areas within the City of Long Beach, the Port of Long Beach (incl. Federal territory), and retained Coastal Commission jurisdiction. While the jurisdictional boundaries are generally as depicted in the Coastal Zone of Frame 1, they are more specifically as follows:

> The western flank of the Los Angeles County Flood Control Channel to the south and west of Anaheim St, and all subsequent Port areas to the south and west, shall be subject to the Port Master Plan (PMP) of Long Beach (refer to map on p. I-3 of 1990 PMP).
>
> The eastern flank of the Los Angeles County Flood Control Channel to the south and east of Ocean Blvd, and all subsequent City areas to the south and east, shall be subject to the City of Long Beach's Local Coastal Program (LCP [refer to Attachment A for PD-6 in LCP]). Appealable areas and areas of retained jurisdiction area may include all subareas below Seaside Wy.

A5-4

> Along the Los Angeles River itself, between the two channelization banks, areas immediately south and including Ocean Blvd ROW shall be subject to the PMP, as they are located within Queensway Bay Harbor District 7 (PD-21). The eastern boundary of this jurisdiction crosses the River near mile marker 0 (PEIR Fig. 3.10-2), briefly touches the western bank of the River at the Queensway Bridge, and then turns east to roughly bisect Queensway Bay until the mouth of River. All areas to the north of the aforementioned boundary, and south of Seaside Wy in the City of Long Beach, thereby encompassing more than half of Queensway Bay, shall be subject to retained original Commission permit jurisdiction. Thus, the Coastal Commission is responsible for processing coastal development permits (CDPs) for development projects within this area of the Coastal Zone, as well as for making determinations of the consistency of such projects with the policies of the Coastal Act of 1976.

In addition to the jurisdictional boundaries laid out above, it is important to note that the City of Long Beach has certified LCP language that offers guidance under the 1995 Queensway Bay Development Plan and subsequent LCP amendments, which will play a role in the Commission's review of development within its retained jurisdiction. Also, the 1990 PMP is currently undergoing an update, to be reviewed by the Coastal Commission in 2021, which will prioritize future projects adjacent to the river. Staff appreciates that the PEIR explicitly recognizes the authority of public agencies in the LA River project, including the role of the California Coastal Commission. Should any projects in the Plan be developed, a coastal development permit will be required from each agency with jurisdiction in the coastal zone.

The proposed project involves development in an area of the Commission's retained coastal development permit jurisdiction, and development in areas of a certified Local Coastal Program and Port Master Plan. The Coastal Act was amended by Senate Bill 1843 in 2006 to add Section

30601.3, effective January 1, 2007. Section 30601.3 authorizes the Commission to process a consolidated coastal development permit application when requested by the local government and applicant, and is then approved by the Executive Director, for projects that would otherwise require coastal development permits from both the Commission and from a local government with a certified LCP, or several certified LCP or PMP areas. The policies of the Coastal Act provide the legal standard of review for a consolidated coastal development permit application submitted pursuant to Section 30601.3. The local government's certified LCP or PMP may be used as guidance.

A5-4 cont.

In short, the stated purpose of the master plan is 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 the County while still providing flood risk management" (p. 1-4). The PEIR then lays out nine separate thematic goals in order to achieve this mission. While developing and implementing conceptual objectives and frameworks of the Plan, it is crucial to be aware that many impacts to coastal resources are restricted by Coastal Act policies. For example, except for certain specific instances, fill of a wetland or other coastal waters is prohibited (Section 30233), and the marine resources (Section 30230), water quality (Section 30231), and environmentally sensitive habitat areas (Section 30240) associated with coastal resources are also protected. In addition, public views of scenic coastal resources (Section 30251), public access and recreation (Section 30210), and the public's ability to access the coast and coastal resources for water-oriented recreational activities (Section 30220) are also protected by the Coastal Act. To implement projects within the Coastal Zone, a Coastal Development Permit from the Commission or local government must be found to protect and enhance coastal resources, and consistent with policies of the Coastal Act and of the various LCPs and PMPs.

The following are Commission staff's specific comments on the Plan, broken down by chapter/resource.

Framework/Conceptual:

1.) Executive Summary and Introduction

A5-5

- In the overview of the project, and in later summaries, the focus is on environmental impacts and subsequent mitigation measures proposed. In the context of restoration and development, it is indeed very helpful to evaluate the overall project framework by environmental impact category, and to qualitatively measure the difference between County-led and non-County mitigation. However, given the breadth in geography and jurisdiction of the Plan, it would be additionally informative to have a summary of federal, state, local, and other public agencies involved in the project, to be detailed in Section 1.4. As such, regulatory bodies would be more adept at providing feedback, understanding their jurisdictional authority, and offering technical support to the County in the future development of this project.

A5-6

- Copy Figure 19 of Appendix B (p. 36-37) and attach it to this section, as it helps decipher any redundant terminology within the context of the LA River.
- Add links to the standalone document of each environmental impact category in chapter 3 of the PEIR. In addition, link each mitigation measure listed in Table ES-1 to its relevant section in the PEIR.
- Add links to the section of the PEIR listed in the Front Matter.

2.) Project Description

A5-7
- Page 2-11 generally describes the different tiered pavilions under the Common Elements Typical Project. First, the regular interval with which these pavilions are projected to recur do not match the overall count shown in Table 2-2. Also, the there are limits in all coastal jurisdictions for siting such projects in environmentally sensitive habitat areas (ESHAs) and/or wetlands; it is important these caveats and exceptions are noted in this section.

A5-8
- In Table 2-6, the pavilion components are set to be at elevation above the 1% storm event. The project must consider sea-level rise (SLR). Please follow the Ocean Protection Council's (OPC) State of California Sea-Level Rise Guidance, 2018 Update for sea-level rise predictions, as additional areas within and outside of Frame 1 may be inundated depending on emissions scenarios and other factors. Most importantly, under this schema, the 1% event probability constitutes a high-risk aversion decision, and combined with future sea level rise under the high risk aversion scenario, it would likely coincide with at least 1.5+ ft baseline inundation by 2050, in areas within the flood control channel near the tidal mouth (especially areas of the Port).

A5-9
- Page 2-11 and Figure 2-19 include an equestrian trail under the Multi-Use Trails and Access Gateways Typical Project. Is an equestrian trail planned for the entirety of the LA River? Such a project would require an amendment to the Long Beach LCP or PMP in order to secure a permit, depending on which side of the River it is planned for, since only bicycle and pedestrian routes are currently allowed within either jurisdiction.

A5-10
- For equestrian trails, there are also wildlife considerations, especially near salt marshes, mudflats, and existing marine biological reserves. Horses, if they get graze near ESHAs, may perturb several endangered and noncommon species, particularly birds such as the light-footed Ridgway's rail and California least tern (Levin et al. 2002). Changes in avian biodiversity and shifts in biological resources may further affect fish populations by increasing predation or otherwise disturbing the local estuarine ecosystem.

A5-11
- Please specify in Table 2-5 and in Section 2.5.1.1 that vegetated buffers within the Multi-Use Trails and Access Gateways Typical Project should follow plant species suggested in Section 3.3.1 and Appendix B, *and* that they must be in accordance with the estuarine nature of the LA River below where appropriate. Such plant species should occupy ecological niches that were historically prevalent, assimilating any existing geobiological gradients and ecotones.

A5-12
- If channel modifications, as per KOP 2, are to follow "estuary channel" specifications as exhibited in Figure 2-2, they will likely need a consistency determination and permit approval, given that not all areas of the project proposed within the Coastal Zone are currently configured accordingly.

A5-13
- A figure after Figure 2-25 showing an overlaid diagram of all KOP proposals would be very useful for understanding the interplay among each kit-of-parts. The Commission assumes that various segments of the River would have multiple KOPs combined.

A5-14
- It is important to note on Page 2-13 that KOP 3 might not be fully implementable if KOP 1 is not first applied, which is contingent on amending the PMP for intended projects within the Coastal Zone. As shown in Figure 3.11-4 and discussed in Table 2-3, bridges, and other modes of connectivity between both sides of the River, may *not* be feasible at times, especially where there are ongoing mining and petrological operations (i.e., oil pumping) right next to the channel. If abutting industrial zones are to be converted to recreational areas, An LCP Amendment or Port Master Plan Amendment will be required.

A5-15
- A study showing the hydrologic/hydraulic outcomes depending on paving materials used in KOP 1, 2, and 3. This is important because additional paved sites of development of the River might augment outflow to the Coastal Zone, and it might affect things such as water quality and salinity, hydrologic cycle, and ecosystem of the estuarine and marine environment downstream.

A5-16
- There is mention on Page 2-14 that, "Any modification to the LA River channel or its water flow requires hydraulic analysis is not increased and to consider the downstream impacts of altering the flow rate on other uses of the water, such as ecosystem function." There is no reference to such an analysis or study, however. Please include one if possible, for the effects of KOP 4-6.

A5-17
3.) <u>Impact Assessment</u>

a.) *Utilities/Service Systems*
- In accordance with the hydraulic analysis of channel modifications, it would be informative to also study altered flow rates due to utility consumption, specifically water, for various project sites.

A5-18
- On Pages 3.18-10 and 3.18-19, it is unclear if Long Beach Water Department (LBWD) would be increasing water recycling and greywater treatment capacity in an effort to create a closed, self-sufficient water utility system. That could be a mitigation measure for environmental impact, despite the PEIR's assessment that wastewater from Common Elements Typical Projects would be of minimal impact.

b.) *Recreation*

A5-19
- Be aware that there are currently restrictions on types of recreation in the LA River subject to both PMP and LCP (generally passive recreation including walking and cycling), which could be amended with the emergence of new potential projects.

A5-20
- Currently, placement of gateways and trails would be limited to eastern bank/levee of LA River, except in PD-7 of the PMP due to relevant stipulation. This roughly limits public access and recreation on the western bank of the river to east of Harbor Scenic Drive. This could be changed with a Port Master Plan Amendment and would require collaboration with the Port to ensure that recreational use of the western bank of the river could be provided safely and without disrupting essential Port operations.

A5-21
- Table 3.15-30 should include elements from the LCP, which is part of the Long Beach General Plan.

A5-22
- There should be a separate section to discuss the Port of Long Beach, since it is within Frame 1, and it contains Harry Bridges Memorial Park and the RMS Queen Mary.

c.) *Transportation*

A5-23
- On Page 3.16-13. The PEIR should mention the importance of integrating transportation infrastructure, consistent with the goals and policies of the LB LCP and PMP, especially the bike path system for PD-6 in Shoreline Downtown.

A5-24
- Any development plans in the Queensway Bay area should increase mobility and public access between the Queensway Bay Harbor District and the City of Long Beach.

A5-25
- Coastal Act Chapter 3 policies require development projects to minimally increase vehicle miles travelled or vehicular traffic, to the extent possible.

d.) *Tribal Cultural Resources*

A5-26
- The Coastal Act has tribal consultation and environmental justice provisions that would perhaps differ than the tribal cultural resources impact analysis performed here. Therefore, in projects located within the Coastal Zone, there should be a tribal consultation and environmental justice study/process that is consistent with Commission policies and regulations. Please reference those policies at the following: www.coastal.ca.gov/env-justice/tribal-consultation/.

A5-27
- Mitigation measures listed on Page 3.17-13 are crucial for compliance with Coastal Act Chapter 3 policies. Archaeological and paleontological study of each project site must be first undertaken before any construction below grade.

A5-28
- There must be some framework included (complementary to the California Native American Graves Protection and Repatriation Act of 2001, as described on Page 3.17-7), in which there is a balanced selection process for archaeological and paleontological artefacts and findings to be exhibited at the art and community centers proposed under Common Elements Typical Project KOP 3.

A5-29
- Sections 4.1.3.2 and 4.1.3.3 in Chapter 4 (Other CEQA Considerations) are more detailed in explaining the impacts of construction and operation of Typical Projects on archaeological resources (and human remains). A figure in Chapter 3 specifying excavation methods is necessary, especially for human remains, for areas inside and outside the littoral zone.

e.) *Population and Housing*

A5-30
- The Commission is aware that in the immediate vicinity of the LA River within the Coastal Zone, there are limited areas zoned for residential housing. Nevertheless, Frame 1 encompasses other parts of the Coastal Zone, especially in the City of Long Beach, that have dense housing. As such, changes in housing density or design that are motivated by the Plan may have significant impact within the Coastal Zone. As such, it is important to refer to Coastal Act Chapter 3 and LCP policies regarding environmental justice (EJ) for further nuance on the subject.

A5-31
- The EIR should include additional discussion and findings surrounding EJ to address potential project impacts to housing, human and environmental health, and the environment.

A5-32
- Additionally, Planning Frame maps with geographical breakdown of current zoning and zoning ordinances would help identify areas where housing is predicted to change dramatically near the LA River. These Frame maps could be overlaid with known environmental risks, such as industrial hazards (especially near the Port), sea-level rise, poor air and water quality, and unstable geology, in order to increase breadth of environmental justice discussion.

f.) *Land Use and Planning*

A5-33
- Figure 3.10-2 would be a useful map for stakeholders within the Coastal Zone, but the boundaries for Plan Project Sites are vague. Commission staff cross-referenced this map with 2017 LLARRP project site descriptions and was able to identify some potential project sites in the coastal zone.

A5-34
- Based on this section, there are several anticipated projects in the PMP that would take precedence over, or conflict with, several Plan Project Sites. Based on the 1990 Long Beach Port Master Plan, there are plans for rail, berth, and pier expansions in the Harbor District. For example, as later discussed in the staff's comments, project sites such as the Shoemaker Bridge Realignment and Harbor District River Edge Greening would be of lesser urgency according to the PMP. Therefore, PMP amendments would be necessary to structurally change the permitting and review priorities for large portions of Frame 1.

A5-35
- Grading and construction phases must also conform to the LCP, PMP, and the Coastal Act. In particular, any operational use or construction activity that disturbs wetlands, creates significant landform alteration near coastal resources, or affects stream flow, requires a coastal development permit.

g.) *Hydrology and Water Quality*

A5-36
- No development should occur in the wetland portion of the estuary, except for maintenance of the wetland function and removal of contaminants.

A5-37
- The PEIR should include sea-level rise and storm flood risk data from the State's OPC Sea-Level Rise Guidance 2018 Update, in addition to FEMA data and scenarios, especially within the Coastal Zone.

A5-38
- A Stormwater Quality Management Plan (SQMP) or Stormwater Pollution Prevention Plan (SWPPP), including proposals for project dewatering within coastal watersheds and for waste discharge, will be required prior to any action on a project by the Commission. It must be compliant with Section 30254.5 of the Coastal Act.

A5-39
- Infrastructure projects that affect and alter the hydrologic balance of the LA River system, such as described for KOP 6 (p. 3.9-47), must also submit to the review and permitting process by the Commission.

A5-40
- Placement of pavilions ("Typical Project" Tier I-III) in interval distance might go against Section 30233d of Coastal Act if water flow within the flood channel is significantly altered, especially in areas where there is currently soft bottom habitat which has less capacity to adapt to stormflow.

h.) *Geology, Soils, and Paleontological Resources*

A5-41
- Geological and biological study of impact of terracing levees and riverbanks, both in soft-bottom and concrete-bottom sections, should be analyzed for the potential to improve water quality and habitat potential, consistent with Section 30253 of the Coastal Act.

A5-42
- Dredging specifications near mouth of river and in Queensway Bay should be provided, and the PEIR should note that on-site or off-site mitigation may be required. The Plan should also identify potential uses for the dredged soils.

A5-43
- Projects with the potential to cause or contribute to erosion, liquefaction, and surface rupture within the Coastal Zone must follow guidance in LCP, PMP, and Coastal Act.

A5-44
- Staff suggests coming up with a Climate Action Plan (CAP) for the Coastal Zone of the project, perhaps incorporating elements of the City of Long Beach Climate Action and Adaptation Plan. Staff asks that this CAP have intersectional analyses, linking GHG emissions to ocean acidification, storm flood risk, poor air quality, ecological degradation, etc. The CAP should also address the adaptive capacity of the river and planned projects to withstand the effects of climate change and reduce risks to surrounding areas.

i.) *Hazards and Hazardous Materials*

A5-45
- The Plan should provide further explanation of mitigation measures against hazards, especially within Harbor Districts 1, 4, and 6. Hazards in Frame 1 are mostly industrial in nature; air quality, water quality, and flood risk assessments are needed for this portion of the River, which is rather unique in this respect (see Section 3.11).

A5-46
- Section 3.11 (specifically Figure 3.11-4) illustrates the high hazard risk for recreational activities in Harbor District 7 on the western side of the LA River. Most of the oil extraction within Frame 1 is along the western bank of the channel, interjected between the I-710 Freeway (offramp) and levee.

A5-47
- The PEIR should identify regulatory mechanisms to induce projects with significant environmental benefit and harm reduction, and incentives to reduce mineral extraction within and adjacent to the Plan area.

A5-48
- The section should include a discussion or study of the impact of plastic debris. Plastic debris has downstream implications, for biological resources, visual resources, recreational opportunities, and economic activity, especially in the estuarine and marine areas of the LA River. Mitigation measures and general analysis should be described, with respect to KOPs, Typical Projects, and construction and operations frameworks.

j.) *Cultural Resources*

A5-49
- The Coastal Act prioritizes public access, recreation, and environmental justice over the preservation, restoration, rehabilitation, and reconstruction of *cultural* or *historic* landmarks. Natural features of the Coastal Zone, of course, should be prioritized.

k.) *Biological Resources*

A5-50
- The PEIR should provide and ecological study of current wildlife ecotones and gradients between Anaheim St and Mouth of LA River. There is a shift from riparian to estuarine. Terrestrial, avian, and marine life should be highlighted in Appendix D. Restoration vs. habitat creation frameworks/metrics should also be included, especially since a replica pre-channelization restoration might not be viable in the face of climate change and sea-level rise.

4.) <u>Other CEQA Considerations</u>

A5-51
- In this section, it might be useful to holistically assess the environmental benefits of this project, as well. CEQA Guidelines ask for very specific considerations, but an additional summary of environmental benefits would be useful in creating a necessary cost-benefit analysis for such an extensive project. It would also be an important prequel to Chapter 5 (Alternatives), too, in that stakeholders could more

A5-51 cont.

easily contemplate the significance and consequence of each proposed project alternative.

A5-52

- One other aspect that should be considered would be construction and operations for KOP 2, channel modifications, within the context of the Coastal Zone. Rather than modifying the concrete banks of the River, the project might require dredging near the mouth of the River at Queensway Bay. This Chapter is a good place to analyze potential environmental impacts of dredging as part of KOP 2.

Specific:

The following comments regard potential project sites laid out in the 2017 Lower LA River Revitalization Plan and Figure 3.10-2 of the Plan. There were no descriptions of any specific land-use or implementation plans, and as such, the comments made forth are only to illustrate the existent confines and limitations for any future Plan project site located within the Coastal Zone.

- *Park on Golden Avenue*
  If a park is to be modified, dedicated, expanded, or otherwise altered in any within the Golden Shore Master Plan area, as delineated in Long Beach's LCP Amendment No. 1-10, then the current plans for this subarea must be amended or appealed, and the project must be reviewed by the Coastal Commission through an amendment to the Long Beach LCP.
- *City of Long Beach Queensway Bay Plan*
  The Queensway Bay is under retained Commission jurisdiction, and as such as under the permit review process pursuant to policies in Chapters 3 and 8 of the California Coastal Act of 1976. Additionally, there is significant guidance in LCP Amendment No. 1-95, and such, this document should be consulted for any future changes to the Queensway Bay area.

A5-53

- *Golden Shore Biological Reserve*
  This marine reserve is part of the Tideland Trust Land originally dedicated by the Long Beach LCP in 1980. Since then, LCP Amendment No. 1-95 has added specifications to this parcel, and any changes proposed here must be approved by the Commission, since the area is located within the Commission's retained jurisdiction.
- *Shoemaker Bridge/Chavez Park Realignment*
  The western terminus of the Shoemaker Bridge falls within Port of Long Beach jurisdiction, and as such as is governed by the PMP. Awaiting an update, the latest PMP from 1990 prioritizes an industrial rail alignment project known as Pico Corridor Interchange over other projects. A PMP Amendment may be required if the project conflicts with planned Port uses.
- *6th & 7th St Pedestrian Improvements*
  This project will require review by the Port of Long Beach for consistency with the PMP and Port objectives.
- *Harbor District River Edge Greening*
  A greening of the River edge may be compatible with the 1990 PMP Goal 4 of District 7 (p. VI-26). However, in other Harbor Districts, such as 1, 4, and 6, such a project might not be currently permissible unless the PMP is amended or updated. The Commission

supports the goal to increase environmental benefits within this jurisdiction, so long as they are compatible with the Port's operations and the Coastal Act's Chapters 3 and 8 policies.

- *Waterfront Bike Path*
  The Waterfront Bike Path is a recent improvement which the Plan suggests would be later expanded into a multi-use trail under KOP 1. to the facility should be integrated it into the existing cycling network laid out in the LCP for Planning District 6 (Downtown Shoreline). On the Port side, Harbor District 7 supports increased public access and recreational opportunities, including cycling, whereas other riverfront Harbor Districts do not. In such Harbor Districts (1, 4, and 6), other anticipated projects may be of higher priority, though it is subject to change as the PMP is updated and amended. In any case, existing paths and cycling facilities should in integrated with planned projects in a network approach.
- *Ocean Boulevard Greening*
  There are already park dedication provisions for the southern ROW on Ocean Blvd, such as Victory Park and Santa Cruz Park. There are also certain landscaping stipulations (usually described as "lush vegetation") for these areas. Much of this language, at least for PD-6, can be found in LCP Amendment No. 1-10.

A5-53 cont.

- *Terminal Island Freeway Tree Buffer*
  Unlike at the River edge, where vegetation efforts are encouraged south of Ocean Blvd under the Goal 4 of the 1990 PMP for District 7 (p. VI-26), a freeway tree buffer may be incompatible within an intensively industrial zone of the Port. The buffer should be designed and sited in order to be compatible with Port berths and piers, which might also change usage or location in the future. Therefore, a tree buffer might not be an appropriate or reasonable addition to this specific site.
- *Los Angeles River Greenway*
  It is assumed that the County will seamlessly connect areas abutting the banks of the LA River both inside and outside the Coastal Zone. LCP, PMP, and Coastal Act policies dictate the viability of an LA River Greenway, yet it is highly encouraged that this project is realized concurrently alongside parallel additions such as the Ocean Blvd Greening, Harbor District River Edge Greening, and Waterfront Bike Path.

- *Screened Public Parcels*
  The 2017 Lower LA River Revitalization Plan states that, "Low impact development to treat the onsite 85th percentile runoff volume was proposed on all screened, publicly owned parcels throughout the Watershed Management Program area." Due to the industrial and environmental benefit of treating and recycling storm runoff, the Plan should continue this goal of utilizing excess parcels adjacent to the river for stormwater management.
- *Add: Estuarine Dredging*
  The Long Beach LCP offers guidance to continuously dredge Queensway Bay and the mouth of the Los Angeles River after heavy winter rains, in order assure the continuation of boating operations of Catalina Landing and the Downtown Marina, as well as those of the Port from RMS Queen Mary towards Pier J. The Coastal Act includes dredging policies applicable to the mouth of the LA River and Queensway Bay that are not covered by the LCP guidance, and/or those that are within the Commission's original retained permit jurisdiction. If the dredging is done in a manner similar to the consistency determination CD-005-97, then the County would be fulfilling a crucial public works assignment in the

A5-54

A5-54 cont.

most ideal manner. Otherwise, the County would have to submit the project for review and permitting with the Commission.

A5-55

Please note that the comments provided herein are preliminary in nature. More specific comments may be appropriate as the project develops and site-specific plans are assigned. Coastal Commission staff requests notification of any future activity associated with this project or related projects. Additionally, the comments contained herein are those of Coastal Commission staff only and should not be construed as representing the opinion of the Coastal Commission itself. Thank you again for the opportunity to comment on the Draft PEIR. We look forward to future collaboration on preservation of coastal resources within the South Coast region. If you have any questions or concerns, please do not hesitate to contact us at the Coastal Commission's Long Beach office.

Sincerely,

Shahar Amitay
Environmental Services Intern

cc: Christopher Koontz, City of Long Beach
Maryanne Cronin, City of Long Beach
Heather Tomley, Port of Long Beach
Tony Chan, Port of Long Beach
Dani Ziff, California Coastal Commission
Zach Rehm, California Coastal Commission
Amber Dobson, California Coastal Commission
Steve Hudson, California Coastal Commission

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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

Comment Letter A6

April 28, 2021

Ms. Grace Komjakraphan-Tek
Los Angeles County Public Works
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
GKomjakraphan@dpw.lacounty.gov

Subject: 2020 LA River Master Plan, Draft Program Environmental Impact Report, SCH #2020070128, Los Angeles County Public Works, Los Angeles County

Dear Ms. Komjakraphan-Tek:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Program Environmental Impact Report (PEIR) from the Los Angeles County Public Works (LACPW; Lead Agency) 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 & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

A6-1

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

Background: In the 1930s, the U.S. Army Corps of Engineers and Los Angeles County Flood Control District channelized the Los Angeles River (LA River) and replaced the shifting floodplain to protect lives and property from flooding. As a result, the LA River evolved from an uncontrolled and meandering river to a major flood management system. The historic floodplain of the LA River is almost entirely developed. Most of the LA River within the channel (bank to bank) is concrete lined along its sides and bottom. However, the LA River is "soft-bottom" (earthen channel) at the Estuary, Sepulveda Basin, and Glendale Narrows. Other areas of the LA River have concrete walls forming a rectangular channel, often called a box channel, or a trapezoidal channel formed by levees.

Objective: The proposed Project is along a 51-mile-long, approximately 2-mile-wide corridor (1 mile on each side) of the LA River. The LA River right-of-way is confined to its channel, top of levee, and immediately adjacent "landside" areas. The Project's nine objectives are to:

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; and,
9) Promote healthy, safe, clean water.

A6-2

To meet Project objectives, the Project includes up to 107 potential projects ranging in size from extra-small (less than 1 acre) to extra-large (150+ acres/10+ miles) that would be implemented over the next 25 years. The Project is intended to be a visionary and practical document for 18 local jurisdictions within the Project area. The Project allows for a consistent approach to achieve the nine objectives through implementation of six improvement categories, or kit of parts (KOP) categories. The six KOP categories include:

1) KOP Category 1: Trails and Access Gateways. The following design components could be constructed: pedestrian/bike/equestrian trails; equestrian facilities; light towers; water towers; lookouts; boardwalks; channel access points; vehicular access for maintenance and operations; underpasses and overpasses; vegetated buffer; and habitat corridor.
2) KOP Category 2: Channel Modifications. The following design components could be constructed: terraced bank; check dams and deployable barriers; levees; armored channels/vertical walls; daylighted storm drains; removed/added concrete; sediment removal; bridge pier modifications; channel texturing/grooving/smoothing; reshape low flow; and installation of access ramps.
3) KOP Category 3: Crossings and Platforms. The following design components could be constructed: bridges (pedestrian, bike, equestrian, habitat/wildlife, and multi-use); cantilevers; and platforms.
4) KOP Category 4: Diversions. The following design components could be constructed: pumps, diversion pipe/tunnel/channel, overflow weirs, underground gallery, side channel, storm drain interceptors, and wetlands.

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5) KOP Category 5: Floodplain Reclamation. Floodplain reclamation in the LA River include wetlands, naturalized banks, braided channels, fields, storage, and side channels.
6) KOP Category 6: Off-Channel Land Assets. Off-channel land assets include affordable housing; cultural centers; urban agriculture/composting; water storage; water treatment facilities; dry wells; spreading grounds; purple pipe connections; storm drain daylighting; injection wells; solar panels; fields; and parks. These design elements would occur outside of the LA River right-of-way.

Each of these six KOP categories includes a recommended collection of design components and can be implemented individually or in any combination as subsequent projects, as driven by the local jurisdiction's needs, funding, and policy decisions.

After the Project is approved, individual subsequent projects would be designed and implemented over time by any one of the 18 jurisdictions or others. Individual subsequent projects would tier from the PEIR.

A6-2 cont.

Location: The LA River encompasses an 834 square-mile watershed. The LA River flows from its headwaters in the Santa Susana Mountains eastward to the northern area of Griffith Park. Then, the LA River turns southward through the Glendale Narrows before it flows across the coastal plain and into San Pedro Bay near Long Beach where the LA River drains into the Pacific Ocean. The Project spans through 18 jurisdictions (17 cities and unincorporated Los Angeles County areas). Nine distinct geographical sections, or planning frames, related to jurisdictional, hydraulic, and ecological zones have been identified along the LA River and are included in the Project.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist LACPW in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring, and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

Specific Comments

Comment #1: Impacts of Recreation on Wildlife

Issue: The Project may impact biological resources because of increased visitor uses and recreation.

A6-3

Specific impacts: The Project may cause local extirpation of wildlife from otherwise suitable habitat. Direct impacts on wildlife may include energetic costs to the animal, nest abandonment, reduced reproductive success, and reduced fitness.

Why impacts would occur: The Project proposes to create recreational opportunities along the LA River where opportunities do not currently exist. These opportunities include pedestrian/bike/equestrian trails, equestrian facilities, lookouts, boardwalks, channel access points, platform parks, and pavilions. Increased visitor uses and recreation along the LA River

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has potential to impact wildlife and habitat through a variety of ways, including:

- Increased numbers of people and dogs;
- Increased area of influence;
- Increased noise levels;
- Increased trash or pet waste;
- Introduction of unnatural food sources via trash and trash receptacles;
- Loss of habitat due to erosion from non-official footpaths; and,
- Loss of habitat due to introduction or spread of invasive plant species.

Evidence impacts would be significant: Recreation and increased human activities can have the following effects on wildlife:

- Non-consumptive recreation can lead to detrimental changes in animal behavior, reproduction, growth, and immune system function (Lucas 2020).
- Human presence can instill strong fear in wild animals, which may adjust their activity to avoid contact with humans. Such risk avoidance can have important nonlethal effects on animal physiology and fitness. This shift may have negative and far-reaching ecological consequences (Gaynor et al. 2018; Mitrovich et al. 2020).
- Human activities that result in escape or avoidance behaviors may increase the probability of a bird being detected by a predator, increase intraspecific aggression in colonial species, expose bird chicks and eggs to adverse environmental conditions that can cause embryo death, and divert energy from feeding or reproduction to defensive behaviors (Hillman et al. 2015).
- Blue tit (*Cyanistes caeruleus*) nestlings near recreation facilities develop slower and fledge with low body mass and poor body condition (Remacha et al. 2016).
- Belding's savannah sparrow (*Passerculus sandwichensis beldingi*) is sensitive to pedestrian and vehicle traffic. An approaching distance of 3 meters and 2.8 meters during the pre-nesting and nesting season, respectively, alert Belding's savannah sparrows to take flight (Fernandez-Juricic et al. 2009).
- Being approached by a person may trigger a change in the behavior or physiological processes in a bird (e.g., flight responses or increased heart rate). Although these responses tend to be short in duration, they can have longer term effects as is the case of breeding birds being flushed from nests leaving eggs or chicks vulnerable to predation (Steven et al. 2011).
- Relatively 'low' impact activities such as walking or hiking can still have negative effects on birds (Steven et al. 2011).
- Increased noise may alter or mask the auditory signals required for information exchange in birds (Hillman et al. 2015).
- Some species of birds are sensitive to off-trail activities, particularly dog walking (greater area of influence) (Miller et al. 2001).
- Patterns of wildlife habitat use can be disrupted by disturbances occurring outside of regular human activity, such as large recreation events, off-trial visitor behavior, or the proliferation of new social trails, even in areas that traditionally see high levels of visitor use (Mitrovich et al. 2020).

A6-3 cont.

The Project has proposed to Mitigation Measure BIO-9: *Prepare and Implement Construction Best Management Practices and Operations Recreation* Plan, to mitigate for potential impacts of

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recreation on biological resources. Mitigation Measure BIO-9 proposes seasonal closures during sensitive periods and seasonal restrictions on certain recreational uses. Seasonal closures would only mitigate for potential impacts on wildlife during certain times of the year (e.g., bird nesting season). However, wildlife could use or occupy habitat year-round. Wildlife could become displaced or extirpated from otherwise functional habitat where recreational activities are created or increased. Seasonal closures alone may be insufficient to mitigate for the Project's potential to displace or extirpate wildlife. Accordingly, inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species by CDFW and/or U.S. Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #1: CDFW recommends LACPW include measures under Mitigation Measure BIO-1 or BIO-9 (or where appropriate) whereby individual subsequent projects analyze impacts of recreational activities on biological resources. At a minimum, an analysis should include:

A6-3 cont.

1) potential direct and indirect impacts on wildlife as a function of each type of recreational activity proposed and associated increases in human activity, noise, and lighting; and,
2) potential for wildlife to be entangled in furnishings (e.g., perimeter fencing or netting around basketball courts) associated with each recreational activity.

Mitigation Measure #2: CDFW recommends LACPW provide a mitigation measure whereby recreational activities proposed by individual subsequent projects avoid known breeding and nursery sites for sensitive and special status species (e.g., least Bell's vireo). At a minimum, a project should restrict or modify trails, trail dimensions, number of trails, spatial arrangement of trails, access points, and all recreation-related structures to avoid sensitive areas.

Mitigation Measure #3: CDFW recommends LACPW provide a mitigation measure whereby recreational activities proposed by individual subsequent projects incorporate appropriate setbacks or restrictions if avoidance is not feasible. An appropriate setback should consider the species (e.g., alert and flight initiation distances) and type and intensity of recreational use proposed (e.g., trail, pavilion, lookout). A project should restrict activities that are likely to have greater impacts such as dog walking and horseback riding near sensitive and special status species habitat. A project should restrict the size of gathering areas such as pavilions to limit the number of users to a smaller group.

Comment #2: California Fully Protected Bird Species

Issue: The Project may impact California Fully Protected bird species.

A6-4

Specific impacts: According to Table 3.3-3 in Chapter 3.3, *Biological Resources,* the following California Fully Protected bird species have a potential to occur along the LA River: American peregrine falcon (*Falco peregrinus*); bald eagle (*Haliaeetus leucocephalus)*; California brown pelican (*Pelecanus occidentalis californicus*); and California least tern (*Sterna albifrons browni*). Project construction and activities, directly or through habitat modification, may result in injury or mortality, reduced reproductive capacity, population declines, or local extirpation of these

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California Fully Protected bird species. Temporal or permanent loss of foraging, breeding, nesting, or nursery habitat may occur.

Why impacts would occur: Impacts to these species may occur as a result of ground-disturbing (e.g., staging, mobilization, demolition, and grading) activities, vegetation removal, increased human activity, noise disturbances, light, and dust. The Project proposes mitigation for nesting birds and raptors by implementing a buffer of up to 500 feet for a raptor nest and an appropriate distance for a non-raptor nest as determined by a biologist. Buffers for birds and raptors may not be large enough to avoid impacts on nests of California Fully Protected birds. Moreover, the Project's proposed buffers only mitigates for impacts on nests, eggs, and nestlings during the bird/raptor breeding season. California Fully Protected species may not be taken at any time. Accordingly, an adequate mitigation plan would need to also avoid impacts on a California Fully Protected species during all life stages.

A6-4 cont.

Evidence impact would be significant: The Project may result in adverse effects, either directly or through habitat modifications, on a California Fully Protected species. Take of any species designated as California Fully Protected under the Fish and Game Code is prohibited. CDFW cannot authorize the take of any California Fully Protected species as defined by State law. California Fully Protected species may not be taken or possessed at any time. No licenses or permits may be issued for take, except for collecting those species for necessary scientific research and relocation of the bird species for protection of livestock (Fish & G. Code, § 3511).

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #1: CDFW recommends LACPW provide a mitigation measure whereby individual subsequent projects avoid impacts on California Fully Protected birds by implementing a minimum 0.5-mile no-disturbance buffer around each nest of a California Fully Protected bird. Additionally, a qualified biologist should develop a robust avoidance, buffer, and demarcation plan specifically for California Fully Protected birds depending on project-level specifics [e.g., project area, species, life stage(s), scope of work].

Mitigation Measure #2: CDFW recommends Mitigation Measure BIO-3c, *Active Eagle Nest Avoidance Measures*, be modified to state that a lead agency will also notify and consult with CDFW (in addition to USFWS) if a bald eagle nest is detected within a project area.

Comment #3: Lake and Streambed Alteration Agreement

Issue: The Project may impact streams.

Specific impacts: The Project may result in temporary or permanent modifications to a stream.

A6-5

Why impacts would occur: The Project may modify the LA River by modifying the channel (KOP Category 2), creating platform parks on a land bridge across the channel, and installing diversion structures (KOP Category 4). Diversion structures may obstruct water flow and change the bed and channel of a stream (confinement). Water diversion may adversely affect the existing stream pattern, potentially resulting in substantial erosion or siltation within the project area and downstream.

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Evidence impacts would be significant: Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- Divert or obstruct the natural flow of any river, stream, or lake;
- Change the bed, channel, or bank of any river, stream, or lake;
- Use material from any river, stream, or lake; or,
- Deposit or dispose of material into any river, stream, or lake.

The construction of diversion devices such as deployable barriers and inflatable dams, and conveyance of water structures within a stream is subject to notification under Fish and Game Code section 1602. The ongoing operations and maintenance of instream storm flow diversion devices and conveyance of water structures is also subject to notification under Fish and Game Code section 1602 once the devices are constructed. Also, the diversion of stormwater and/or dry weather runoff that flows within streams or that have overflown the banks of streams, is subject to notification under Fish and Game Code section 1602.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure: CDFW recommends LACPW modify Mitigation Measure BIO-21c, *Obtain Wetland Permits*, to include the underlined language:

"If wetlands or jurisdictional aquatic resources are identified within the project footprint and would be affected by construction of the project, the appropriate permits will be obtained from the USACE, SWRCB or RWQCB, CDFW, and/or the CCC, as required. CDFW shall be notified pursuant to Fish and Game Code, section 1600 *et seq*. Based on this notification and other information, CDFW will determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting proposed activities. An LSA Notification shall include the following: 1) an analysis to demonstrate that concrete-lined or soft-bottom channels would not be impaired (e.g., aggraded, incised, increased suspended sediment), 2) a hydrological evaluation of the 200, 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions, 3) whether dewatering/diversion of water may be necessary, and (if applicable) 4), an analysis of whether diversion structures would impact stormwater and dry season water flow, and the extent of those impacts, during the wet season (November through March), dry season (April through October), and both above-average and below-average water year.

A6-5 cont.

Recommendation: CDFW's issuance of an LSA Agreement for project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from a lead agency for a project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 *et seq*. and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.

To compensate for any on- and off-site impacts to riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures, avoidance of resources, protective measures for downstream resources, on- and/or

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A6-5 cont.

off-site habitat creation, enhancement or restoration, and/or protection, and management of mitigation lands in perpetuity.

Comment #4: Water Diversion and Impacts on Beneficial Uses

Issue: The Project may divert surface stormwater and dry season flow from the LA River.

Specific impact: Diverting stormwater and dry season flow into stormwater catchment basins or infiltration galleries may reduce the availability and extent of water flow. There could be changes to the hydrologic regime both within the immediate area and downstream. Changes to the hydrologic regime could affect abiotic and biotic variables that support plants, fish, wildlife, and macroinvertebrates. Significant impacts to biological resources could occur, especially during a dry season proceeding after a below-average water year.

Why impacts would occur: The PEIR does not provide sufficient analysis as to whether the Project, specifically diversion devices proposed under KOP Category 2 and KOP Category 4, would impact biological resources both within a project area and downstream.

A6-6

Biological Resources: Both the concrete-lined and soft-bottom portions of the LA River support biological resources. Where the LA River overtops the concrete-lined channel, the resulting sheet flows allow phytoplankton (algae and cyanobacteria), microorganisms, and herbaceous vegetation to establish. The algae provide habitat and a food source for benthic invertebrates, a vital food source for wading birds. The LA River provides habitat for 140 species of birds (USACE 2015). The least Bell's vireo (*Vireo bellii pusillus*), an Endangered Species Act and CESA-listed endangered species, has been documented at Glendale Narrows. Least Bell's vireo depends on willow (*Salix* genus) riparian habitat. The LA River supports woody vegetation such as black willow (*Salix gooddingii*), Fremont cottonwood (*Populus fremontii*), and arroyo willow (*Salix laevigata*) (USACE 2015). The upper LA Basin watershed supports Santa Ana sucker (*Catostomus santaanae*) and arroyo chub (*Gila orcutti*) (USACE 2015). The LA River could potentially support southern California steelhead (*Oncorhynchus mykiss*) Distinct Population Segment, Pacific lamprey (*Entosphenus tridentatus*), speckled dace (*Rhinichthys osculus*), and California killifish (*Fundulus parvipinnis*).

Flow reductions, especially dry season flow, could impact beneficial uses directly or indirectly through habitat modifications. Diverting water during the dry season could reduce the availability and extent of shallow water sheet flow. This could potentially impact algae and benthic invertebrates, and eventually birds. Willow riparian habitat may be impacted if flow reductions lead to receding shoreline or lower water depth. Loss of suitable habitat may impact sensitive species such as least Bell's vireo. Fish have specific habitat requirements including water depth, velocity, and vegetation.

Seasonality: The PEIR does not analyze the potential significance of water diversion depending on the season. During the dry season, typically April through September in southern California, the LA River is largely maintained by urban runoff and discharge from wastewater reclamation plants. Diverting water could be significant during the dry season and could either significantly reduce water flow or result in complete loss of water flow.

Drought: The PEIR does not analyze the potential significance of water diversion during a below-normal water year. Since 2000, the longest duration of drought in California lasted

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between 2011 and 2019 (USGS 2021) and in southern California, between 2012 through 2016 (Los Angeles Almanac 2021). The 2017-2018 rainfall season was below normal and the driest for Los Angeles since 2006-2007 (Los Angeles Almanac 2021). Diverting water during a below-normal rainfall year may significantly reduce water flow or result in complete loss of water flow.

Cumulative Flow Reductions: The PEIR does not analyze whether the Project would result in significant impacts when considered with other existing or proposed water diversion projects in the LA River watershed. The cities of Burbank, Glendale, and Los Angeles plan to recycle more wastewater and reduce their discharges to the LA River for this purpose (SCCWRP 2021).

Evidence impacts would be significant: Changes to hydrology and channel morphology, both within a project area and downstream, are reasonable potential direct and indirect physical changes in the environment. Said changes and their potential impacts on biological resources should be analyzed and disclosed in an environmental document. Adequate disclosure is necessary for CDFW to assist a lead agency in adequately identifying, avoiding, and/or mitigating a project's significant, or potentially significant, direct, and indirect impacts on biological resources. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in a project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species by CDFW, USFWS, and/or National Marine Fisheries Service (NMFS).

A6-6 cont.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure: CDFW recommends LACPW include a mitigation measure whereby individual subsequent projects analyze potential impacts on biological resources resulting from proposed water diversion. At a minimum, an analysis and should include:

Study Reach

1) A study reach that includes an additional length of channel downstream from a project site. The additional study reach should extend a minimum of 1 mile downstream, or to the extent of the LA River downstream that could be expected to be affected similarly by a proposed project (hydraulic and ecological zones), or an appropriate distance determined by both a qualified biologist and hydrologist, whichever is greater.

Changes to Hydrology and Hydraulics

1) Under pre-project (i.e., baseline) conditions, the volume of water flow from both the project area and study reach during a) the wet (November through March); b) the dry season (April through October); and c) above-average and below-average water year (i.e., wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year). The analysis should clearly define above-average or below-average rainfall year.
2) Under proposed project conditions, the percent reduction in flow from both the project area and study reach for a wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year.
3) A quantitative analysis comparing the flow from the project area and other tributaries into the study reach, and their relative contribution to the hydrograph of the study reach.
4) An analysis of potential project-related changes to river hydraulics in both concrete-lined

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and soft-bottom reaches. This includes water depth (percent change), wetted perimeter (acres gained/lost), and velocity (percent change).

Biological Resources Impact Assessment

1) A map of plant communities and important bird foraging and nesting habitat occurring in the study reach. Plant communities should be mapped at the alliance/association level using the Manual of California Vegetation, second edition (Sawyer et al. 2009). Also, CDFW recommends an updated and thorough floristic-based assessment of plant communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018).
2) A comprehensive list of sensitive and special status plant and wildlife species, and sensitive plant communities, occurring in the study reach. For each biological resource, provide:
    a. A summary of species-specific habitat requirements;
    b. A discussion as to how the species or plant community may be significantly impacted directly or indirectly through habitat modification, as result of changes to hydrology (reduced flow) and hydraulics (water depth, wetted perimeter, velocity); and,
    c. A quantitative analysis and/or adequate discussion to evaluate whether the project would result in those significant impacts.
3) A discussion of whether construction, operations, and maintenance of diversion devices such as rubber dams, pipes, and tunnels, would have direct and/or indirect, permanent or temporal impact on biological resources.
4) An adequate discussion to address how the project may potentially affect on-going habitat recovery and restoration efforts.
5) An adequate discussion of project-related impacts on biological resources in relation to cumulative flow reductions.

A6-6 cont

Mitigation Measure #2: For projects proposing to divert water, CDFW recommends LACPW include a mitigation measure whereby individual subsequent projects develop an Adaptive Management Plan that would reduce or suspend water diversion if at any point the project may impact biological resources downstream exceeding a defined threshold/trigger.

Mitigation Measure #3: CDFW recommends project-level lead agencies/applicants provide a copy of the basis of water right (water right permit) by State Water Resources Control Board that authorizes the beneficial use of stormwater or dry weather flows diverted from streams. This information along with the LSA Notification would assist CDFW in assessing the need for an LSA Agreement. CDFW recommends including documentation of water rights in a project-level CEQA document to ensure project budgets and timelines consider CDFW's regulatory process in the implementation of projects under the 2020 LA River Master Plan.

Comment #5: Anadromous Fish Habitat and Passage

Issue: The Project may impact anadromous fish habitat and passage.

A6-7

Specific impacts: The Project may create impassable artificial barriers to the passage of anadromous fish such as the southern California steelhead Distinct Population Segment, an endangered species under the Endangered Species Act. Accordingly, the Project may further

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degrade habitat that could support southern California steelhead that may pass through the LA River or migrate upstream from the estuary in the absence of threats or stressors. Additionally, the Project may result in construction, activities, and design elements that could impede any future recovery efforts for southern California steelhead in the LA River watershed.

Why impacts would occur: The Project may include modifications to the channel, creation of platform parks on a land bridge across the channel, or installation of diversion structures. KOP Category 2 includes check dams, deployable barriers, levees, armored channels/vertical walls, remove/add concrete, channel texturing/grooving/smoothing, reshape low flow, and installation of access ramps. KOP 4 includes diversion structures such as pumps, pipes/tunnels/channels, overflow weirs, and side channels. These structures could be barriers to anadromous fish passage.

Evidence impacts would be significant: In southern California, at the southern limit of the range for southern California steelhead, it is estimated that annual runs have declined dramatically from 32,000-46,000 returning adults historically, to currently less than 500 returning adults (NMFS 2012). The LA River historically supported southern California steelhead, but the species has been extirpated from the LA River watershed (USACE 2015). Southern California steelhead has been extirpated for reasons including the channelization of the LA River, urbanization of the floodplain, barrier structures such as dams, and surface water diversions. These impacts have eliminated the ability of fish to move freely upstream-to-downstream and to find adequate locations for refuge and proliferation (USACE 2015). The LA River has a highly altered flow regime and functions more as a drainage channel than a river ecosystem. Input of gravels and cobbles are prevented, water temperatures are higher, channel morphology is simplified, and the episodic succession-setting flood regime necessary to sustain target riparian communities and native fish habitats has been altered (USACE 2015).

A6-7 cont.

The Project may result in structures that are considered very high threats or stressors to southern California steelhead and their habitat. This includes dams, surface water diversion structures, levees, and channelization (NMFS 2012). Per CEQA Guidelines section 15065(a), a project may have a significant effect on biological resources if the project has the potential to substantially reduce the habitat of a fish species or substantially reduce the number or restrict the range of a special status species. Per Fish and Game Code section 5901, it is unlawful to construct or maintain in any stream any device or contrivance the prevents, impedes, or tends to prevent or impeded, the passing of fish up and downstream. Per Fish and Game Code section 5937, the owner of any dam shall allow sufficient water at all times to pass through a fishway, or to keep in good condition any fish that may be planted or exists below the dam.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #1: CDFW recommends LACPW include measures under Mitigation Measure BIO-1 or BIO-23 (or where appropriate) whereby individual subsequent projects analyze impacts on southern California steelhead. At a minimum, an analysis should include:

1) potential direct and impacts on southern California steelhead population, habitat, and passage;
2) whether the project area supports existing structures that create barriers to southern California steelhead passage; and,
3) whether the project may affect ongoing or future native fish recovery projects throughout

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the LA River watershed per federal, State, county, city, or other agencies.

Mitigation Measure #2: CDFW recommends LACPW provide a mitigation measure whereby individual subsequent projects modify design components to the maximum extent feasible (e.g., size or location of structures) so they are not barriers, threats, or stressors to fish passage. If feasible, a project should remove existing fish passage barriers and provide fish passage around dams, diversions, and other barriers that may not be feasible to remove.

Mitigation Measure #3: CDFW recommends LACPW provide a mitigation measure whereby individual subsequent projects allow sufficient water at all times to pass through in order to allow fish passage and sustain any fish existing within the project area or downstream. This should be for both during and for the life of the project. Effort should be made to incorporate fish passage standards for velocity and depth as outlined in the Southern California Steelhead Recovery Plan (NMFS 2012) and the California Salmonid Stream Habitat Restoration Manual, 4th edition, Volume I and II (CDFW 2004). Also, a project should avoid creating any temporal barriers that would alter water velocity or depth meeting fish passage standards.

A6-7 cont.

Recommendation #1: CDFW recommends that individual subsequent projects make a concerted effort to create habitat and design a channel that could support multiple life stages and life history strategies exhibited by southern California steelhead. Essential habitat components should be provided, including refugia to allow fish to withstand high flows, soft-bottom spawning areas to bury eggs, and restoration of riffle/pool complexes. A project should consider waters and substrate necessary to southern California steelhead for spawning, breeding, feeding, or growth to maturity. Floodplain connectivity is also important for restoration of critical spawning and rearing habitats.

Recommendation #2: CDFW recommends LACPW include a section in Appendix B that would provide general design guidelines for creating habitat suitable for southern California steelhead. CDFW recommends the following sources for guidance in finalizing the PEIR and preparation of project-level CEQA documents with respect to creating fish habitat and passage: Los Angeles River Ecosystem Restoration Integrated Feasibility Report (USACE 2015), Southern California Steelhead Recovery Plan (NMFS 2012), Los Angeles River Environmental Flows Project (SCCWRP 2021), The Los Angeles River Fish Passage & Habitat Structures Design Project (CWH 2018); the State Wildlife Action Plan 2015, Chapters 5.5 and 6 (CDFW 2015), and the California Salmonid Stream Habitat Restoration Manual, 4th edition, Volume I and II (CDFW 2004).

Comment #6: Impacts on Riparian Habitat

Issue: The Project may impact riparian habitat.

Specific impacts: The Project may result in temporary or permanent loss of riparian resources.

A6-8

Why impacts would occur: According to Chapter 3.3, *Biological Resources*, the LA River contains riparian vegetation communities. This includes Fremont cottonwood Forest Alliance, black willow Woodland Alliance, and mulefat thickets (*Baccharis salicifolia)* Shrubland Alliance. These vegetation communities could be impacted during project construction and activities. This could result in temporary or permanent loss of riparian habitat. Vegetation communities may also be impacted through changes to hydrology (e.g., amount of flow) and hydraulics (e.g.,

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wetted perimeter and depth). These changes may occur if a project modifies the channel, creates a platform parks on a land bridge across the channel, or installs diversion structures. Willow riparian habitat may be impacted if reduced flow leads to lower water depth or receding shoreline. Preliminary work of the Los Angeles River Flows Project shows that black willow seedling mortality increases as water depth decreases (SCCWRP 2019). Increased sediment deposition can bury seedlings and saplings of riparian trees, resulting in increased mortality of new recruits (Kui and Stella 2016).

Evidence impacts would be significant: Only relic and fragmented riparian habitat remain along the significantly channelized, engineered, and urbanized LA River and floodplain. Over 90 percent of southern California's coastal riparian habitat have been lost (USACE 2015). The remaining fragments of LA River riparian habitat contribute significantly to the integrity of regional hydrologic connectivity, biodiversity, and habitat connectivity and wildlife movement between significant ecological areas, including the Santa Monica Mountains, the Verdugo Hills, and nationally significant San Gabriel Mountains National Monument (USACE 2015). Therefore, loss of remaining riparian habitat could affect regional hydrologic, habitat, and wildlife connectivity, and increase threats/stressors on regional biodiversity. Per CEQA Guidelines section 15065(a), a project may have a significant effect on biological resources if the project substantially reduces the habitat of a fish or wildlife species; threatens to eliminate a plant community; or has the potential to restrict the range of an endangered, rare, or threatened species.

A6-8 cont.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure: CDFW recommends that LACPW modify Mitigation Measure BIO-21e to include the underlined language:

"Impacts that result in a permanent loss of jurisdictional aquatic resources within an earthen channel, bank, or associated riparian will be mitigated at a minimum 2:1 ratio, or as specified in the aquatic resource permits. There shall be no net loss of riparian habitat within the LA River. Mitigation for impacts to riparian habitat shall be provided within the project area and/or along the LA River. Compensatory mitigation shall increase if a project would result in permanent loss of riparian habitat within a contiguous riparian corridor or loss of an isolated, remnant habitat patch. Mitigation shall increase if a project would impact a riparian vegetation community considered rare in the State (i.e., S1, S2, or S3). Mitigation shall further increase if the riparian habitat is considered very threatened or threatened (i.e., 0.1, 0.2). Mitigation shall further increase if the riparian habitat impacted supports special status species, specifically obligate riparian breeders (e.g., least Bell's vireo). Mitigation shall replace the same vegetation association/alliance that was impacted."

Comment #7: California Species of Special Concern

Issue: The Project may impact California Species of Special Concern (SSC).

A6-9

Specific impacts: According to Table 3.3-3 in Chapter 3.3, *Biological Resources,* the LA River has the potential to support SSC, which includes 10 species of birds, one fish, four amphibians, six reptiles, and 12 mammals. Project construction and activities, directly or through habitat modification, may result in direct injury or mortality (trampling, crushing), reduced reproductive capacity, population declines, or local extirpation of an SSC. Temporal or permanent loss of

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foraging, breeding, nesting, or nursery habitat for an SSC may occur.

Why impacts would occur: Impacts to an SSC could result from ground-disturbing (e.g., staging, mobilization, demolition, and grading) activities, vegetation removal, increased noise disturbances, light, human activity, and dust.

Evidence impact would be significant: A California Species of Special Concern is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

- is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
- is listed as ESA-, but not CESA-, threatened, or endangered; meets the State definition of threatened or endangered but has not formally been listed;
- is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and/or,
- has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA threatened or endangered status (CDFW 2021a)

A6-9 cont.

CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065). Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species by CDFW.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #1: If impacts are unavoidable, wildlife should be protected, allowed to move away on its own (noninvasive, passive relocation), or relocated to adjacent appropriate habitat on site or to suitable habitat adjacent to the project area. SSC should be captured only by a qualified biologist with proper handling permits. The qualified biologist should prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. A relocation plan should be prepared prior to implementing any Project-related ground-disturbing activities and vegetation removal.

While relocation is an option for mitigating impacts, it may not fully account for impacts to an SSC, such as loss of individuals, loss of habitat, or loss of natal dens/middens/burrows. Capturing, handling, or relocation are acts that may have multiple unintended negative consequences, including increased stress and mortality of relocated animals, negative impacts on resident animals at release sites, increased conflicts with human interests, and the spread of diseases. Attempts to avoid impacts to SSC should be the first option. Seeking a Scientific Collection Permits (see Mitigation Measure #2 below) in order to trap and relocate individuals should only be done if impacts cannot be avoided.

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Mitigation Measure #2: Handling and relocation of wildlife, including SSC, may be required. If so, Pursuant to the California Code of Regulations, title 14, section 650, the lead agency/qualified biologist should obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. Please visit CDFW's Scientific Collection Permits webpage for information (CDFW 2021b). An LSA Agreement may provide similar take or possession of species as described in the conditions of the Agreement.
CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650).

A6-9 cont.

Mitigation Measure #3: CDFW recommends providing compensatory mitigation for temporary and/or permanent loss of any habitat supporting SSC. There should be no net loss of habitat supporting SSC along the LA River. Compensatory mitigation for should be provided within the project area and/or along the LA River. Compensatory mitigation should be provided at no less than 2:1. Mitigation should provide upland and/or aquatic habitat (depending on the species), refugia, and habitat structures that supports that species (e.g., woody material, rocks, brush piles, pools, burrows). Any proposed mitigation area/plan should include a discussion on the territory size; nesting, breeding, foraging, and refuge, locations, invasive, non-native plant and wildlife species present, food availability, and how all life cycle functions will be mitigated. Mitigation for impacts to an SSC should adhere to CDFW and/or USFWS established protocol/guidelines if available.

Comment #8: Impacts of Fencing on Wildlife and Wildlife Dispersal

Issue: The Project's proposed temporary and permanent fencing, gates, and guardrails could impact wildlife, particularly birds and raptors, as well as create barriers to wildlife dispersal.

Specific impacts: Project fencing during the construction phase and for the life of the Project may directly impact wildlife. Fencing could result in the mortality of mammals, birds, and raptors. Additionally, permanent fencing, gates, and guardrails along the LA River where adjacent to natural areas could create barriers to wildlife dispersal.

A6-10

Why impacts would occur: Project-related fencing, gates, and guardrails could impact wildlife both during and for the life of the Project. The LA River supports habitat for hundreds of bird species including special status bird species. According to the Project's Mitigation Measure BIO-4, *Identify Work Areas and Environmentally Sensitive Areas*, environmental sensitive areas would be delineated using "fencing, flagging, and other methods of demarcation." As such, the Project may use fencing that could trap or entangle mammals, birds, and raptors. Birds can collide with fences, breaking wings, impaling themselves on barbs, and tangling in wires. Large, low-flying birds such as ducks, geese, cranes, grouse, hawks, and owls are especially vulnerable. Waterfowl fly into fences that run near or across waterways, and low-flying hawks and owls may careen into fences when swooping in on prey.

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Temporary construction fencing may also impact wildlife by creating a barrier to dispersal. Impermeable fencing such as chain link may make it more difficult for wildlife to move between locations. More permanent fixtures, such as the fences, guardrails, and gates proposed in *Appendix B Volume 1 Design Guidelines* could create permanent barriers to wildlife dispersal across the broader landscape, potentially impacting both transitory and permanent wildlife populations.

Evidence impacts would be significant: The Project may cause wildlife injury or mortality and/or local extirpation of wildlife. The Project site and surroundings is highly urbanized and developed, which has led to habitat loss, modification, or fragmentation. It is possible that the Project could increase pressures on wildlife dispersal without appropriate mitigation**.** Mammals occurring naturally in California are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species by CDFW and/or USFWS.

A6-10 cont.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure: Construction Fencing – CDFW recommends that all Project-related fencing be constructed with materials that are not harmful to wildlife. CDFW recommends LACPW amend Mitigation Measure BIO-4 to include the following underlined language to reduce potential wildlife injury or mortality:

"[…] Delineation of [Environmentally Sensitive Areas] will include fencing, flagging, and other methods of demarcation sufficient to prevent entry into the [Environmentally Sensitive Area]. Prohibited materials shall include, but are not limited to, spikes, glass, razor, or barbed wire. Use of chain link and steel stake fence shall be avoided or minimized. Fences shall not have any slack that may cause wildlife entanglement. No grading or fill activity of any type will be permitted within Environmentally Sensitive Areas […]. Environmentally Sensitive Area fencing and exclusion fencing will remain in place and be maintained until project construction is completed. If, during the project phase, wildlife becomes entangled in construction fencing, work must immediately stop, a qualified biologist notified, and dead or injured wildlife documented immediately. If injury or mortality involves a special status species, the qualified biologist shall notify CDFW and/or USFWS within three calendar days of the incident or finding. Work in the immediate area may only resume once the proper notifications have been made and/or additional mitigation measures have been identified to prevent additional injury or mortality.

Recommendation: Permanent Fencing, Gates, and Guardrails – CDFW recommends that LACPW include a section in Appendix B that would provide design guidelines for wildlife friendly and permeable fencing [see A Landowner's Guide to Wildlife Friendly Fences for additional information (MFWP 2012)]. CDFW also recommends that LACPW amend the Project's Mitigation Measure BIO-23, *Maintain Connectivity in Subsequent Project Design, Construction, and Operation*, to reference those design guidelines.

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Comment #9: Tree Diseases, Pests, and Pathogens

Issue: The Project may remove trees and spread material infected with invasive tree diseases, pests, and pathogens.

Specific impacts: The Project may spread of tree insect pests and diseases into areas not currently exposed to these stressors. This could result in expediting the loss of native trees and plant communities. Loss of trees may result in loss of foraging and perching habitat for small mammals, birds, and raptors.

Why impacts would occur: The Project may remove trees that could host diseases and pests. One such pathogen is sudden oak death. Sudden oak death has become the most common cause of mortality of oak (*Quercus* genus) and other native trees (Phytosphere 2015). Mortality rates of oak trees are greater than 50 percent in some areas impacted by sudden oak death (Phytosphere 2012). Tree dieback can have cascading impacts on the habitat and ecosystem, particularly avian distribution and abundance (Monahan and Koenig 2006). One such pest is the polyphagous shot hole borer, which hosts on many native trees species that include box elder (*Acer negundo*), California sycamore (*Platanus racemosa*), willows (*Salix* genus), oaks, cottonwoods (*Populus* genus), and alders (*Alnus* genus) (Calinvasives 2021).
Diseases such as sudden oak death can spread via equipment and transport of infected material. These fragments can be spread to new locations if equipment and tools are not disinfected or cleaned before moving to the next work location. Infected material that is transported off site for disposal may expose trees and plant communities to pest and disease. This could result in expediting the loss of southern California black walnut (*Juglans californica*), oak trees, and other native trees and plant communities within and adjacent to a project area.

A6-11

Evidence impacts would be significant: The Project may have a substantial adverse effect on any sensitive natural communities identified in local or regional plans, policies, and regulations or by the CDFW. The Project may result in a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW that are dependent on woodlands susceptible to insect and disease pathogens.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure: CDFW recommends that LACPW include a measure to mitigate the spread of invasive pests and diseases by implementing the following:

1) Prior to tree removal, a certified arborist should evaluate trees for infectious tree diseases including but not limited to: sudden oak death (*Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2021; UCANR 2021; Phytosphere Research 2012; UCIPM 2013).
2) If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist should prepare an Infectious Tree Disease Management Plan or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list should provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees should not be transported from a project area without first being treated using best available

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A6-11 cont.

management practices described Infectious Tree Disease Management Plan or list of preventative measures.

3) If possible, all tree material, especially infected tree material, should be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.

Additional Recommendations

A6-12

Rare Plant Surveys. The Project's proposed Mitigation Measure BIO-1, *Conduct Literature Review, Habitat Assessment, and Project Surveys*, as it is currently proposed, may result in missed detections of rare plants not previously known to occur at a project site. This may result in population declines or local extirpation of a rare plant species. CDFW recommends LACPW amend Mitigation Measure BIO-1 to include the underlined language:

> "[…] will be assessed for candidate, sensitive, or special-status plants and/or wildlife, aquatic resources, sensitive natural communities, wildlife corridors or nurseries, biological resources protected by local ordinances policies, such as protected trees or other regulated biological resources, while identifying and mapping all vegetation communities and land-cover types (initial study). To determine presence/absence or accurately identifying rare plants, a qualified botanist shall conduct multiple rare plant surveys throughout the growing season for any given year. Surveys shall occur during the time of year when rare plants are more likely to be visually detectable. Rare plant surveys proceeding after a low water year shall be supplemented with one or two additional rare plant surveys over a number of years depending on the rare plant species, annual weather patterns, and whether the project area was recently disturbed (e.g., fire).

A6-13

Rodenticides. CDFW recommends LACPW include second-generation anticoagulant rodenticides as a prohibited poison under Mitigation Measure BIO-17, *Prepare and Implement Pest Management Plan*.

A6-14

State Wildlife Action Plan (SWAP) 2015. The SWAP 2015 describes the key conservation factors crucial to the sustainability of California ecosystems, and for each geographic province, provides specific conservation strategies that will either reduce or ameliorate negative impacts to ecological systems or enhance the qualities vital to the natural landscapes of California (CDFW 2015). Prior to finalizing the PEIR, CDFW recommends LACPW review the SWAP and consider whether the Project could incorporate KOPs, modify mitigation measures, and/or include design components that are consistent with the SWAP. CDFW recommends LACPW consider Chapters 5.5 South Coast Province and Chapter 6 Anadromous Fish. Also, CDFW recommends the final PEIR refer to the SWAP 2015 so project-level planning is consistent with the objectives and recommendations in the SWAP 2015.

A6-15

Los Angeles Biodiversity Project. In 2015, the City of Los Angeles (City) set a goal of "no net loss" of biodiversity by 2035. In 2017, the City Council passed a Biodiversity Motion which directs the development of a biodiversity index for Los Angeles, focused on conservation and access to nature and biodiversity in urban areas. The City's biodiversity work is being led by the Los Angeles Sanitation and Environment, which recently publish a Draft 2020 Biodiversity

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A6-15 cont.

Report (LASAN 2020). "Native Species Protection and Enhancement" is a theme in the City's biodiversity index. Prior to finalizing the PEIR, CDFW recommends LACPW review the Draft 2020 Biodiversity Report and consider whether the Project could incorporate KOPs, modify mitigation measures, and/or include design components that are consistent with the City's biodiversity work. Also, CDFW recommends the final PEIR refer to the Biodiversity Report so project-level planning is consistent with the objectives and recommendations in the Biodiversity Report.

A6-16

Funding. CDFW grant programs fund projects that sustain, restore, and enhance California's fish, wildlife, plants, and their habitats. Please visit CDFW Grant Opportunities for more information (CDFW 2021c).

A6-17

Data. CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., California Natural Diversity Database (CNDDB)] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, CDFW recommends that the PEIR include measures where lead agencies of individual projects tiering from the PEIR report any special status species detected during preparation of project-level environmental impact analyses/environmental documents. Special status species information should be submitted to the CNDDB by completing the Online Field Survey Form (CDFW 2021d). The lead agency should ensure all pertinent data has been properly submitted, with all applicable data fields filled out, prior to finalizing/adopting an environmental document. The lead agency should provide CDFW with confirmation of data submittal.

A6-18

Mitigation and Monitoring Reporting Plan. CDFW recommends LACPW update the Project's proposed Biological Resources Mitigation Measures and condition the environmental document to include mitigation measures recommended in this letter. CDFW provides comments to assist LACPW in developing mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). LACPW is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided LACPW with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A).

Filing Fees

A6-19

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by Los Angeles County Public Works and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

Conclusion

A6-20

We appreciate the opportunity to comment on the Project to assist Los Angeles County Public Works in adequately analyzing and minimizing/mitigating impacts to biological resources.

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A6-20 cont.

CDFW requests an opportunity to review and comment on any response that Los Angeles County Public Works has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Ruby Kwan-Davis, Senior Environmental Scientist (Specialist), at Ruby.Kwan-Davis@wildlife.ca.gov

Sincerely,

DocuSigned by:
Erinn Wilson-Olgin
B6E58CFE24724F5...

Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

ec: CDFW
Erinn Wilson-Olgin, Los Alamitos – Erinn.Wilson-Olgin@wildlife.ca.gov
Victoria Tang, Los Alamitos – Victoria.Tang@wildlife.ca.gov
Mary Larson, Los Alamitos – Mary.Larson@wildlife.ca.gov
Ruby Kwan-Davis, Los Alamitos – Ruby.Kwan-Davis@wildlife.ca.gov
David Lin, Los Alamitos – David.Lin@wildlife.ca.gov
Andrew Valand, Los Alamitos – Andrew.Valand@wildlife.ca.gov
Felicia Silva, Los Alamitos – Felicia.Silva@wildlife.ca.gov
Frederic Rieman, Los Alamitos – Frederic.Rieman@wildlife.ca.gov
Susan Howell, San Diego – Susan.Howell@wildlife.ca.gov
CEQA Program Coordinator, Sacramento – CEQACommentLetters@wildlife.ca.gov
State Clearinghouse, Sacramento – State.Clearinghouse@opr.ca.gov

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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

Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into a future environmental document for the Project.

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		**Timing**	**Responsible Party**
REC-1- Impacts of Recreation on Wildlife	Individual subsequent projects shall analyze impacts of recreational activities on biological resources. At a minimum, an analysis shall include: 1) a project's potential direct and indirect impacts on wildlife as a function of each type of recreational activity and associated increases in human activity, noise, and lighting; and 2) potential for wildlife to be entangled in furnishings (e.g., perimeter fencing or netting around basketball courts) associated with each recreational activity.	Preparation of project-level CEQA document/ prior to finalizing project-level CEQA document	Project-level lead agency
MM-BIO-2- Impacts of Recreation on Wildlife	Recreational activities proposed by individual subsequent projects shall avoid known breeding and nursery sites for sensitive and special status species (e.g., least Bell's vireo). At a minimum, a project shall restrict or modify trails, trail dimensions, number of trails, spatial arrangement of trails, structures, and access points to avoid sensitive areas.	Preparation of project-level CEQA document/ prior to finalizing project-level CEQA document	Project-level lead agency
MM-BIO-3- Impacts of Recreation on Wildlife	Recreational activities proposed by individual subsequent projects shall incorporate appropriate setbacks or restrictions if avoidance is not feasible. An appropriate setback shall consider the species (e.g., alert and flight initiation distances) and type and intensity of recreational use proposed (e.g., trail, pavilion, lookout). A project shall restrict activities that are likely to have greater impacts such	Preparation of project-level CEQA document/ prior to finalizing	Project-level lead agency

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	as dog walking and horseback riding near sensitive and special status species habitat. A project shall restrict the size of gathering areas such as pavilions to limit the number of users to a smaller group.	project-level CEQA document	
MM-BIO-4- Impacts on California Fully Protected Birds	Impacts on California Fully Protected birds shall be avoided by implementing a minimum 0.5-mile no-disturbance buffer around each nest of a California Fully Protected bird. A qualified biologist shall develop a robust avoidance, buffer, and demarcation plan specifically for California Fully Protected birds depending on project-level specifics [e.g., project area, species, life stages(s), scope of work].	Prior to/During project ground-disturbing activities	Project-level lead agency
MM-BIO-5- Impacts on California Fully Protected Birds	A lead agency shall notify and consult with CDFW (in addition to USFWS) if an eagle nest is detected within a project area.	Prior to project ground-disturbing activities	Project-level lead agency
MM-BIO-6- Impacts on Streams	If wetlands or jurisdictional aquatic resources are identified within the project footprint and would be affected by construction of the project, the appropriate permits will be obtained from the USACE, SWRCB or RWQCB, CDFW, and/or the CCC, as required. CDFW shall be notified pursuant to Fish and Game Code, section 1600 *et seq*. Based on this notification and other information, CDFW will determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting proposed activities. An LSA Notification shall include the following: 1) an analysis to demonstrate that concrete-lined or soft-bottom channels would not be impaired (e.g., aggraded, incised, increased suspended sediment), 2) a hydrological evaluation of the 200, 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions, 3) whether dewatering/diversion of water may be necessary, and (if applicable) 4), an analysis of whether diversion structures would impact stormwater and dry season water flow, and the extent of those impacts, during the wet season (November	Prior to issuance of development /grading permits	Project-level lead agency

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	through March), dry season (April through October), and both above-average and below-average water year.		
MM-BIO-7- Impacts of Water Diversion on Biological Resources	Individual subsequent projects shall analyze potential impacts on biological resources resulting from proposed water diversion. At a minimum, an analysis and shall include: *Study Reach* 1) A study reach that includes an additional length of channel downstream from a project site. The additional study reach shall extend a minimum of 1 mile downstream, or to the extent of the LA River downstream that could be expected to be affected similarly by a proposed project (hydraulic and ecological zones), or an appropriate distance determined by both a qualified biologist and hydrologist, whichever is greater. *Changes to Hydrology and Hydraulics* 1) Under pre-project (i.e., baseline) conditions, the volume of water flow from both the project area and study reach during a) the wet (November through March); b) the dry season (April through October); and c) above-average and below-average water year (i.e., wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year). The analysis shall clearly define above-average or below-average rainfall year. 2) Under proposed project conditions, the percent reduction in flow from both the project area and study reach for a wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year. 3) A quantitative analysis comparing the flow from the project area and other tributaries into the study reach, and their relative contribution to the hydrograph of the study reach. 4) An analysis of potential project-related changes to river hydraulics in both concrete-lined and soft-bottom reaches.	Preparation of project-level CEQA document/ prior to finalizing project-level CEQA document	Project-level lead agency

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	This includes water depth (percent change), wetted perimeter (acres gained/lost), and velocity (percent change). *Biological Resources Impact Assessment* 1) A map of plant communities and important bird foraging and nesting habitat occurring in the study reach. Plant communities shall be mapped at the alliance/association level using the Manual of California Vegetation, second edition. An updated and thorough floristic-based assessment of plant communities shall follow CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. 2) A comprehensive list of sensitive and special status plant and wildlife species, and sensitive plant communities, occurring in the study reach. For each biological resource, provide: a. A summary of species-specific habitat requirements; b. A discussion as to how the species or plant community may be significantly impacted directly or indirectly through habitat modification, as result of changes to hydrology (reduced flow) and hydraulics (water depth, wetted perimeter, velocity); and, c. A quantitative analysis and/or adequate discussion to evaluate whether the project would result in those significant impacts. 3) A discussion of whether construction, operations, and maintenance of diversion devices such as rubber dams, pipes, and tunnels, would have direct and/or indirect, permanent or temporal impact on biological resources. 4) An adequate discussion to address how the project may potentially affect on-going habitat recovery and restoration efforts.		

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	5) An adequate discussion of project-related impacts on biological resources in relation to cumulative flow reductions.		
MM-BIO-8- Impacts of Water Diversion on Biological Resources	For projects proposing to divert water, individual subsequent projects shall develop an Adaptive Management Plan that would reduce or suspend water diversion if at any point the project may impact biological resources downstream exceeding a defined threshold/trigger.	Prior to water diversion construction and activities	Project-level lead agency
MM-BIO-9- Impacts on Anadromous Fish Habitat and Passage	Individual subsequent projects shall analyze impacts on southern California steelhead. At a minimum, an analysis shall include: 1) potential direct and impacts on southern California steelhead population, habitat, and passage; 2) whether the project area supports existing structures that create barriers to southern California steelhead passage; and 3) whether the project may affect ongoing or future native fish recovery projects throughout the Los Angeles River watershed per federal, State, county, city, or other agencies.	Preparation of project-level CEQA document/ prior to finalizing project-level CEQA document	Project-level lead agency
MM-BIO-10- Impacts on Anadromous Fish Habitat and Passage	Individual subsequent projects shall modify design components to the maximum extent feasible (e.g., size or location of structures) so they are not barriers, threats, or stressors to fish passage. If feasible, a project shall remove existing fish passage barriers and provide fish passage around dams, diversions, and other barriers that may not be feasible to remove.	Preparation of project-level CEQA document/ prior to finalizing project-level CEQA document	Project-level lead agency
MM-BIO-11- Impacts on Anadromous Fish Habitat and Passage	Individual subsequent projects shall allow sufficient water at all times to pass through the project area during and after project construction to allow fish to pass through and to sustain any fish existing within the project area or downstream. This shall be for both during and for the life of the project. Effort shall be made to incorporate fish passage standards for velocity and depth as outlined in the Southern California Steelhead Recovery Plan and the California Salmonid Stream Habitat Restoration Manual. Also,	During/After project construction and activities	Project-level lead agency

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	a project shall avoid creating any temporal barriers that would alter water velocity or depth meeting fish passage standards.		
MM-BIO-12- Impacts on Riparian Habitat	Impacts that result in a permanent loss of jurisdictional aquatic resources within an earthen channel, bank, or associated riparian will be mitigated at a minimum 2:1 ratio, or as specified in the aquatic resource permits. There shall be no net loss of riparian habitat within the LA River. Mitigation for impacts to riparian habitat shall be provided within the project area and/or along the LA River. Compensatory mitigation shall increase if a project would result in permanent loss of riparian habitat within a contiguous riparian corridor or loss of an isolated, remnant habitat patch. Mitigation shall increase if a project would impact a riparian vegetation community considered rare in the State (i.e., S1, S2, or S3). Mitigation shall further increase if the riparian habitat is considered very threatened or threatened (i.e., 0.1, 0.2). Mitigation shall further increase if the riparian habitat impacted supports special status species, specifically obligate riparian breeders (e.g., least Bell's vireo). Mitigation shall replace the same vegetation association/alliance that was impacted.	Prior to project ground-disturbing activities	Project-level lead agency
MM-BIO-13- Impacts on California Species of Special Concern	If impacts are unavoidable, wildlife shall be protected, allowed to move away on its own (noninvasive, passive relocation), or relocated to adjacent appropriate habitat on site or to suitable habitat adjacent to the project area. SSC shall be captured only by a qualified biologist with proper handling permits. The qualified biologist shall prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. A relocation plan shall be prepared prior to implementing any Project-related ground-disturbing activities and vegetation removal. Attempts to avoid impacts to SSC shall be the first option. Seeking a Scientific Collection Permits in order to trap and relocate individuals shall only be done if impacts cannot be avoided.	Prior to/During project ground-disturbing activities	Project-level lead agency

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MM-BIO-14- Impacts on California Species of Special Concern	Appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities shall be obtained.	Prior to project ground-disturbing activities	Project-level lead agency
MM-BIO-15- Impacts on California Species of Special Concern	Compensatory mitigation shall be provided for temporary and/or permanent loss of any habitat supporting SSC. There shall be no net loss of habitat supporting SSC along the LA River. Compensatory mitigation for shall be provided within the project area and/or along the LA River. Compensatory mitigation shall be provided at no less than 2:1. Mitigation shall provide upland and/or aquatic habitat (depending on the species), refugia, and habitat structures that supports that species (e.g., woody material, rocks, brush piles, pools, burrows). Any proposed mitigation area/plan shall include a discussion on the territory size; nesting, breeding, foraging, and refuge, locations, invasive, non-native plant and wildlife species present, food availability, and how all life cycle functions will be mitigated. Mitigation for impacts to an SSC shall adhere to CDFW and/or USFWS established protocol/guidelines if available.	Prior to/During project ground-disturbing activities	Project-level lead agency
MM-BIO-16- Impacts on Wildlife and Wildlife Dispersal	Delineation of Environmentally Sensitive Areas (ESA) will include fencing, flagging, and other methods of demarcation sufficient to prevent entry into the ESA. Prohibited materials shall include, but are not limited to, spikes, glass, razor, or barbed wire. Use of chain link and steel stake fence shall be avoided or minimized. Fences shall not have any slack that may cause wildlife entanglement. No grading or fill activity of any type will be permitted within ESAs. ESA fencing and exclusion fencing will remain in place and be maintained until project construction is completed. If, during the project phase, wildlife becomes entangled in construction fencing, work must immediately stop, a qualified biologist notified, and dead or injured wildlife documented immediately. If injury or mortality involves a special status species, the qualified biologist shall notify CDFW and/or USFWS within three calendar days of the incident or	Prior to/During project ground-disturbing activities	Project-level lead agency

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	finding. Work in the immediate area may only resume once the proper notifications have been made and/or additional mitigation measures have been identified to prevent additional injury or mortality.		
MM-BIO-16-Tree Diseases, Pests, and Pathogens	The spread of invasive pests and diseases shall be mitigated by implementing the following: 1) Prior to tree removal, a certified arborist shall evaluate trees for infectious tree diseases including but not limited to: sudden oak death (*Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*); 2) If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist shall prepare an Infectious Tree Disease Management Plan or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list shall provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees shall not be transported from a project area without first being treated using best available management practices described Infectious Tree Disease Management Plan or list of preventative measures. 3) If possible, all tree material, especially infected tree material, shall be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools shall be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.	Prior to/During project construction activities	Project-level lead agency
REC-1-Impacts on Streams	CDFW's issuance of an LSA Agreement for project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from a lead agency for a project. To minimize additional requirements by CDFW pursuant to Fish and	Prior to issuance of development /grading permits	Project-level lead agency

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	Game Code section 1600 *et seq*. and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.		
REC-2-Water Diversion	CDFW recommends project-level lead agencies/applicants provide a copy of the basis of water right (water right permit) by State Water Resources Control Board that authorizes the beneficial use of stormwater or dry weather flows diverted from streams. This information along with the LSA Notification would assist CDFW in assessing the need for an LSA Agreement. CDFW recommends including documentation of water rights in a project-level CEQA document to ensure project budgets and timelines consider CDFW's regulatory process in the implementation of projects under the 2020 LA River Master Plan.	Preparation of project-level CEQA document/ LSA Notification	Project-level lead agency
REC-3-Impacts on Anadromous Fish Habitat and Passage	CDFW recommends that individual subsequent projects make a concerted effort to create habitat and design a channel that could support multiple life stages and life history strategies exhibited by southern California steelhead. Essential habitat components should be provided, including refugia to allow fish to withstand high flows, soft-bottom spawning areas to bury eggs, and restoration of riffle/pool complexes. A project should consider waters and substrate necessary to southern California steelhead for spawning, breeding, feeding, or growth to maturity. Floodplain connectivity is also important for restoration of critical spawning and rearing habitats.	Preparation of project-level CEQA document/ prior to finalizing project-level CEQA document	Project-level lead agency
REC-4-Impacts on Anadromous Fish Habitat and Passage	CDFW recommends LACPW include a section in Appendix B that would provide general design guidelines for creating habitat elements suitable for southern California steelhead. CDFW recommends the following sources for guidance in finalizing the PEIR and preparation of project-level CEQA documents with respect to fish habitat: Los Angeles River Ecosystem Restoration Integrated Feasibility Report, Southern California Steelhead Recovery Plan, Los Angeles River Environmental Flows Project,	Prior to finalizing PEIR/Preparation of project-level CEQA document/	LACPW/project-level lead agency

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	The Los Angeles River Fish Passage & Habitat Structures Design Project, the State Wildlife Action Plan 2015, Chapters 5.5 and 6, and the California Salmonid Stream Habitat Restoration Manual, 4th edition, Volume I and II.		
REC-5-Impacts on Wildlife and Wildlife Dispersal	The 2020 LA River Master Plan should include a section in Appendix B that would provide design guidelines for wildlife friendly and permeable fencing. Mitigation Measure BIO-23, *Maintain Connectivity in Subsequent Project Design, Construction, and Operation*, shall be amended to reference those design guidelines.	Prior to finalizing PEIR	LACPW
REC-6-Rare Plant Surveys	CDFW recommends LACPW amend Mitigation Measure BIO-1 to state: […] will be assessed for candidate, sensitive, or special-status plants and/or wildlife, aquatic resources, sensitive natural communities, wildlife corridors or nurseries, biological resources protected by local ordinances policies, such as protected trees or other regulated biological resources, while identifying and mapping all vegetation communities and land-cover types (initial study). To determine presence/absence or accurately identifying rare plants, a qualified botanist shall conduct multiple rare plant surveys throughout the growing season for any given year. Surveys shall occur during the time of year when rare plants are more likely to be visually detectable. Rare plant surveys proceeding after a low water year should be supplemented with one or two additional rare plant surveys over a number of years depending on the rare plant species, annual weather patterns, and whether the project area was recently disturbed (e.g., fire).	Prior to finalizing PEIR/ Preparation of project-level CEQA document/ prior to finalizing project-level CEQA document	LACPW/project-level lead agency
REC-7-Rodenticides	CDFW recommends LACPW include second-generation anticoagulant rodenticides as a prohibited poison under Mitigation Measure BIO-17, *Prepare and Implement Pest Management Plan*.	Prior to finalizing PEIR /During/After project	LACPW/project-level lead agency
REC-8-State Wildlife Action Plan	CDFW recommends LACPW review the State Wildlife Action Plan (SWAP) 2015 and consider whether the Project could incorporate KOPs, modify mitigation measures, and/or include design	Prior to finalizing	LACPW/project-level lead agency

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	components that could dovetail with the SWAP. CDFW recommends LACPW consider Chapters 5.5 South Coast Province and Chapter 6 Anadromous Fish. Also, CDFW recommends the final PEIR refer to the SWAP 2015 so project-level planning is consistent with the objectives and recommendations in the SWAP 2015.	PEIR/Prior to finalizing/ adopting project-level CEQA document	
REC-9-Los Angeles Biodiversity Project	CDFW recommends LACPW review the Draft 2020 Biodiversity Report and consider whether the Project could incorporate KOPs, modify mitigation measures, and/or include design components that are consistent with the City's biodiversity work. Also, CDFW recommends the final PEIR refer to the Biodiversity Report so project-level planning is consistent with the objectives and recommendations in the Biodiversity Report.	Prior to finalizing PEIR/Prior to finalizing/ adopting project-level CEQA document	LACPW/project-level lead agency
REC-10-Funding	CDFW grant programs fund projects that sustain, restore, and enhance California's fish, wildlife, plants, and their habitats. Please visit CDFW Grant Opportunities for more information.	Project-level planning	LACPW/project-level lead agency
REC-11-Data	Project-level lead agencies should ensure sensitive and special status species data has been properly submitted to the California Natural Diversity Database with all data fields applicable filled out. Confirmation of data submittal should be provided to CDFW.	Prior to finalizing/ adopting project-level CEQA document	Project-level lead agency
REC-12-Mitigation and Monitoring Reporting Plan	LACPW should update the Project's proposed Biological Resources Mitigation Measures and condition the environmental document to include mitigation measures recommended in this letter. LACPW is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures.	Prior to finalizing PEIR	LACPW

CITY OF BURBANK

OFFICE OF THE CITY COUNCIL

April 13, 2021

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

RE: City of Burbank Comments on Draft Program Environmental Impact Report for the 2020 LA River Master Plan

Dear Grace Komjakraphan-Tek:

A7-1

The City of Burbank wants to thank you for the opportunity to provide comments on the Draft Program Environmental Impact Report (PEIR) for the Los Angeles County Department of Public Works' (LACDPW's or County's) proposed 2020 LA River Master Plan. As the LA River lies along/adjacent to the City of Burbank's southern boundary, we are committed to ensuring that the management and improvement of the river corridor maintains essential flood control functions; enhances multi-modal transportation opportunities; provides equitable access for pedestrians, cyclists, and equestrians; improves recreational facilities/opportunities; provides ecological and environmental benefits; protects Burbank's residents and businesses from undue environmental and social impacts; and dovetails with the City's plans and objectives, particularly those related to land use, transportation, recreation, drainage, water quality, and water supply.

Overall, the City of Burbank appreciates the County's efforts to plan for improvement of the LA River corridor and generally supports the types of improvements conceptualized in the 2020 LA River Master Plan—so long as implementing projects are properly sited, contextually designed, and do not conflict with or adversely impact nearby uses. Given the general nature of the proposed Master Plan and the absence of any specific projects or specific locations of potential improvements, the City of Burbank can only offer general comments at this time. The City respectfully requests the opportunity to comment on any specific projects implementing the Master Plan and their potential impacts prior to such projects are approved or undertaken.

The City of Burbank's comments on the 2020 LA River Master Plan Draft PEIR are as follows:

GENERAL COMMENTS

A7-2

- While the City of Burbank is generally supportive of the types of improvements identified in the draft Master Plan, the City is also generally concerned with potential adverse impacts on adjacent uses in Burbank, including sensitive residential areas. Impacts of concern include noise, lighting, parking, and similar neighborhood disruptions that could result from components of the "Common Element Typical Project," which include pavilions, cafes, hygiene facilities, and restrooms. It is unclear whether such facilities could host events, which could cause unique and potentially intense impacts on surrounding uses.

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A7-3

- The City of Burbank Water and Power (BWP) Department maintains potable and recycled water systems that are present in the Project area and have the potential to be impacted. Project elements that require water services for construction and/or operation should use recycled water when feasible. In addition, the Burbank Water Reclamation Plant (BWRP) discharges tertiary treated wastewater into the Burbank Western Channel which confluences with the Project. In the future, the City intends to reduce its wastewater discharges to the Burbank Western Channel to zero and recycle all its wastewater. Please also see the BWP Water Division's specific comments on the Draft PEIR, which are included as an enclosure to this letter.

A7-4

- The City of Burbank Transportation Division implements the transportation vision outlined in the Mobility Element of the City's General Plan, while also overseeing the design, funding, and implementation of transportation improvements throughout the City, such as bike and pedestrian paths and bridges. Generally, the Draft PEIR does not include sufficient information regarding possible proposed improvements in the study area within the City of Burbank, including specific projects identified in the Master Plan itself, to ensure that these improvements align with the Burbank Bicycle Master Plan and Complete Streets Plan and to determine if these improvements require encroachment on private property and other areas that are not publicly accessible. Please also see the Transportation Division's specific comments on the Master Plan, which are included as an enclosure to this letter.

A7-5

- The Burbank Fire Department provides a variety of services to the community, including a portion of the LA River Master Plan Area, with services including fire suppression, emergency medical services, fire prevention, hazardous materials response, emergency preparedness, and public education. Please see the Fire Departments specific comments on the Master Plan, which are included as an enclosure to this letter.

INTRODUCTION

A7-6

- Section 1.3.1.2 of the Draft PEIR describes the intended use of the LA River Master Plan Program EIR with later activities. This section states, "If an agency determines that a later activity is covered in the scope of the [Program] EIR and new or substantially more severe significant impacts would not occur, no further environmental documentation would be required." Given the very high-level of analysis provided in this PEIR, the City of Burbank would expect, and requests, that most projects under the LA River Master Plan would require project-level environmental documentation. Since the PEIR has identified significant and unavoidable impacts in many environmental categories, there may be a desire to use addenda to this PEIR for later activities with the claim that project-level impacts are not more severe than those identified in the PEIR. However, in almost all cases, the project-level impacts of later activities would constitute new information that requires further environmental documentation due to the lack of baseline information and the generalized nature of the impact analyses in this PEIR.

PROJECT DESCRIPTION

A7-7

- The Draft PEIR provides detailed conceptual plans for two typical types of projects: (1) Common Element Typical Project and (2) Multi-Use Trails and Access Gateways Typical Project. However, the Master Plan identifies multiple other types of improvements. The

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A7-7 cont. proposed "kit of parts" (KOP) includes six categories of projects: (1) trails and access gateways, (2) channel modifications, (3) crossings and platforms, (4) diversions, (5) floodplain reclamation, and (6) off-channel land assets. Only one such category, trails and access gateways, appears to be represented by the conceptual plans. Given the lack of specificity on most of the potential improvements called for by the Master Plan, the City reserves the right to comment on the potential impacts of such improvements at the time they are proposed for implementation.

- A7-8 While the City is generally supportive of the types of improvements identified in the draft Master Plan (so long as they do not cause adverse impacts on nearby uses), no information is provided regarding the long-term maintenance of such facilities. The draft Master Plan itself notes the importance of a robust operations and maintenance plan, stating on p. 117 that, "[a]ll projects proposed by the Draft LA River Master Plan Update should be planned with clear long-term O&M strategies to ensure the physical feasibility and future success of projects along the river." If any improvements or facilities are expected to be dedicated to and/or maintained by the City of Burbank, funding mechanisms for operations and maintenance will need to be identified.

- A7-9 The Draft PEIR states that the City of Burbank lies within Frames 6 (Narrows) and Frame 7 (East Valley). However, based on review of Draft PEIR Figures 2-10 and 2-11, Frame 6 appears to be just outside (east) of the City.

- A7-10 The draft 2020 LA River Master Plan appendix (p. 135) identifies "Headworks Connector" as a newly proposed project in the City of Burbank at river mile 32.8. However, no information is provided in the Master Plan about this proposed project, and the project is not referenced in the Draft PEIR. Please provide additional details (e.g., type, scale, purpose, etc.) about this proposed project to allow the City of Burbank to consider its potential impacts.

- A7-11 The draft 2020 LA River Master Plan appendix (p. 160) identifies "Olive Ave North" at river mile 34.50. However, no information is provided in the Master Plan about this project, and this project is not referenced in the Draft PEIR. Please provide additional details (e.g., type, scale, purpose, etc.) about this proposed project to allow the City of Burbank to consider its potential impacts. The Draft PEIR should consider connectivity between the Burbank Western Channel and Olive Avenue North (to Verdugo mountains) via proposed bridge improvements on Magnolia Boulevard, Third Street protected bike lanes, and Olive Avenue North Greening Project included in the City's Complete Streets Plan.

- A7-12 The draft 2020 LA River Master Plan appendix (p. 160) identifies "Warner Brothers Studio" at river mile 34.12. However, no information is provided in the Master Plan about this project, and this project is not referenced in the Draft PEIR. Please provide additional details (e.g., type, scale, purpose, etc.) about this proposed project to allow the City of Burbank to consider its potential impacts. The Draft PEIR should consider this project's consistency with the planned extension of the LA River Bikeway proposed by the NBC Universal Evolution Plan, as well as the City of Los Angeles.

- A7-13 The draft 2020 LA River Master Plan appendix (p. 160) identifies "Valleyheart Drive" as a newly proposed project in the City of Burbank at river mile 33.29. However, no information is provided in the Master Plan about this proposed project, and the project is not referenced in

A7-13 cont. the Draft PEIR. Please provide additional details (e.g., type, scale, purpose, etc.) about this proposed project to allow the City of Burbank to consider its potential impacts. River-adjacent public areas near Valleyheart Drive include important equestrian accessibility between the Rancho neighborhood and Griffith Park. Park areas also abut sensitive single-family neighborhoods. The Draft PEIR does not disclose potential impacts of a new park on this equestrian access and adjacent neighborhoods.

- A7-14 The draft 2020 LA River Master Plan appendix (p. 161) identifies "Bob Hope Drive Non-Motorized Bridge" in the cities of Los Angeles and Burbank at river mile 33.71. However, no information is provided in the Master Plan about this proposed project, and the project is not referenced in the Draft PEIR. Please provide additional details (e.g., type, scale, purpose, etc.) about this proposed project to allow the City of Burbank to consider its potential impacts. The Draft PEIR should consider the Master Plan's potential impacts to this project, which is included in the City's Bike Master Plan, Complete Streets Plan, and Mobility Element.

- A7-15 The draft 2020 LA River Master Plan appendix (p. 161) identifies "Forest Lawn Cemetery" as a newly proposed project in the City of Los Angeles at river mile 33.94. However, no information is provided in the Master Plan about this proposed project, and the project is not referenced in the Draft PEIR. Please provide additional details (e.g., type, scale, purpose, etc.) about this proposed project to allow the City of Burbank to consider its potential impacts.

- A7-16 The draft 2020 LA River Master Plan appendix (p. 161) identifies "134 Freeway Underpass/Overpass at Spreading" in the Cities of Los Angeles at Burbank at river mile 32.86. However, no information is provided in the Master Plan about this proposed project, and the project is not referenced in the Draft PEIR. Please provide additional details (e.g., type, scale, purpose, etc.) about this proposed project to determine this project's feasibility or consistency with similar proposed projects, including the LA River Bikeway proposed by the NBC Universal Evolution Plan, as well as the City of Los Angeles.

- A7-17 The draft 2020 LA River Master Plan appendix (p. 161) identifies "South Mariposa Street Pocket Park" in the City of Burbank at river mile 32.71. However, no information is provided in the Master Plan about this proposed project, and the project is not referenced in the Draft PEIR. Please provide additional details (e.g., size, scale, access, etc.) about this proposed project to determine this project's feasibility or consistency with the City's Complete Streets Plan, which proposes an equestrian bridle path along Mariposa Street between the Mariposa Bridge and Riverside Drive.

- A7-18 The draft 2020 LA River Master Plan appendix (p. 161) identifies "Burbank Equestrian Center" in the City of Los Angeles at river mile 32.38, as well as the following projects in the City of Los Angeles: "Griffith Park River Park Buffer" at river mile 32.06, "Burbank Western Channel Non-Motorized Bridge" at river mile 31.97, and "Riverside Drive North" at river mile 31.64. However, no information is provided in the Master Plan about these project, and these projects are not referenced in the Draft PEIR. Please provide additional details (e.g., size, type, scale, access, purpose etc.) about these projects to determine their feasibility.

- A7-19 The draft 2020 LA River Master Plan identifies a potential "bypass tunnel" to divert water at river mile 33 (in the City of Burbank) and return it to the river at river mile 22. The Draft PEIR does not mention this potential project, which the Master Plan describes as a concrete tunnel

A7-19 cont. that would be approximately 40 feet in diameter and nine miles long. Given the tunnel's proposed inlet in the City of Burbank, this improvement would cause adverse impacts on Burbank's residents and businesses during both construction and operation/maintenance. Of particular concern is the collection and hauling of bored and/or excavated material and the air pollution, noise and vibration, and traffic that would be caused by the necessary haul trucks and on-site construction equipment.

- A7-20 Los Angeles River Revitalization Master Plan Project 113, Pollywog Park Renovation, is not mentioned in the proposed LA River Master Plan as a previously identified project in the City of Burbank. Is this project still planned? Despite, the mention of this project in the Revitalization Master Plan, no details regarding the type, scale, or purpose of this project has been provided to the City of Burbank. If this project is being considered for inclusion in the proposed Master Plan, please provide additional details to allow the City of Burbank to consider its potential impacts.

- A7-21 The Draft PEIR should describe how the proposed bikeway would follow the LA River under SR-134 or if it would be routed along Zoo Drive. Similarly, the Draft PEIR should identify any effects on existing equestrian access between the City of Burbank and Griffith Park's equestrian trails.

- A7-22 The Draft PEIR should describe how anticipated creek naturalization and park design would integrate with the LA River path and the Burbank-proposed and -funded Bob Hope Drive Bike/Pedestrian Bridge project.

- A7-23 The Draft PEIR does not include the Burbank Channel Bikeway Project along the Burbank Western Channel between Olive Avenue and Victory Boulevard. This project opened in February 2021 and has been in the planning and design stage since 2014.

IMPACT ANALYSIS—GENERAL COMMENTS

- A7-24 For numerous impact analyses the Draft PEIR concludes that impacts would be significant when entities other than the County carry out a project, because the County cannot guarantee that other entities would implement the mitigation measures in the PEIR. Why is it reasonable to conclude that other entities would not provide sufficient mitigation for the impacts identified in the PEIR? Wouldn't any other approval entity be required to comply with CEQA and examine localized impacts starting with tiering from this PEIR and provide the same, equivalent or possibly other/additional measures to reduce impacts? The City of Burbank recommends that the County explore all possible enforcement mechanisms to ensure that the mitigation measures in the PEIR are implemented. If no enforcement mechanisms or only partial enforcement mechanisms are available, the County should provide documentation of the analysis that resulted in that conclusion. Beyond exploring enforcement mechanisms, the City recommends that the County make a good-faith effort to secure commitments from other agencies and entities that might undertake implementation projects that such agencies/entities will abide by the mitigation measures in the PEIR.

- A7-25

- A7-26 The term "Cumulative Condition" is used repeatedly in the cumulative impact analysis portions of each impact topic assessment. This is an unusual term and is not defined; it is not apparent what that represents as a way of assessing the significance of cumulative impacts. Is this

A7-26 cont. supposed to represent a cumulative baseline condition upon which the River Master Plan and other likely growth would occur and add to such conditions? The PEIR should be revised to provide a definition of this term and explain how this is applied to analyze cumulative impacts.

- A7-27 A more useful way of representing potential "typical" projects would be to describe a "worst-case" (most impactful) concept for both small and large projects, rather than the simplified trail and pavilion scenarios, which are less impactful than many other potential projects. This flaw is addressed, to some extent, by the examination of the KOP options in the various impact chapters, but that is done in an inconsistent manner and sometimes leaves out potential development scenarios that could be more impactful than what is discussed.

- A7-28 What is the point of analyzing the overall Master Plan implementation scenario? It doesn't need a construction impact analysis since there is no possibility that all elements would be constructed in the same time period. It is more of a long-term, cumulative impact scenario representing the fully built MP across the entire river course. It is also extremely vague, since there is no current definition of location and scope of any particular project, so there is no way to analyze implications of an ultimate buildout scenario. If there is some analytic value with this scenario, that could assist the City of Burbank or other affected jurisdictions in responding to this Program EIR, it is not evident. Please provide further information to allow the City to provide specific and constructive comments regarding this ultimate buildout scenario.

AESTHETICS

- A7-29 With regard to the study area setting and Frames 6 and 7, the PEIR seems to be confusing the City of Glendale with the City of Burbank. River mile 27.8 (as referenced on page 3.1-12 of the Draft PEIR) mentions Griffith Park within the City of Los Angeles and City of Burbank begins on the west bank, extending into Frame 7. Griffith Park is entirely within the City of Los Angeles, and the City of Burbank starts closer to river mile 32 farther upriver. Frame 7's discussion of scenic corridors in the City of Burbank refers to the discussion for Frame 6, which only mentions that scenic vistas within Burbank near the LA River include views of the eastern Santa Monica Mountains to the south (pages 3.1-12 and 3.1-13).

- A7-30 Photo 3 in Figure 3.1-7 (Typical Views of the LA River in Frame 7) looks like it has been misplaced. US-101 is in Frame 8 where it crosses the LA River, as indicated in the caption.

- A7-31 Page 3.1-14, last paragraph: Please explain or describe why there would be elevated view of the LA River when it is depressed compared to the surrounding uses.

- A7-32 Pages 3.1-14 and 3.1-15: The east bank is north of the LA River in Frame 7. Please explain why Griffith Park is identified on the east bank with Burbank when they are across the river from each other. Similarly, Warner Bros Studios and Lakeside Golf Club are located on the east bank, not the west bank.

Impact 3.1(a)

- A7-33 Page 3.1-58: I-110 does not cross over the LA River near Griffith Park (also mentioned on page 3.1-67). Also, in the last paragraph, please explain what is being depicted as coastal areas (possibly limited to Frame 1 but not noted) and undeveloped hillsides.

- A7-34 Please explain why impacts to scenic vistas during construction of the two types of typical projects and KOP categories are determined to be less than significant with mitigation or significant and unavoidable but not during operation (except KOP Category 6). If scenic views within the LA River are limited in nature, please explain why the impact determination would not be the same (i.e., less than significant) for both construction and operation, particularly when construction impacts are short-term and temporary.

- A7-35 Significant and unavoidable impacts related to scenic vistas during project operation seem to be limited to KOP Category 6; however, based on the previous comment, please explain why impacts under all KOP Categories are determined significant when scenic views within the LA River are limited in nature. The significant and unavoidable determination should be specifically limited to KOP Category 6.

Impact 3.1(c)

- A7-36 Construction impacts related to conflict with applicable zoning and other regulations governing scenic quality are determined to be less than significant when a project is carried out by the County but significant and unavoidable when not carried out by the County. The conclusion stems from the introduction of new visual elements in the form of construction equipment, staging areas, and other visual elements that could be incompatible with the surrounding visual environment. The substantiation does not seem to respond to the actual threshold of conflicting with applicable zoning and other regulations that govern scenic quality. The discussion should address which regulations that govern scenic quality relate to the protection of existing residential neighborhoods from encroachment of incompatible uses, which also need to be identified or defined. If it is related to zone change or impacts to a scenic corridor or scenic highway, those impacts need to be generally identified. Similarly, please explain why construction impacts, which are temporary, are significant and unavoidable, but impacts related to operations are less than significant.

Cumulative Impacts

- A7-37 If construction impacts and lighting impacts during operation are determined to be significant and unavoidable when a project is not carried out by the County, please explain why these impacts were not identified in the cumulative impacts discussion. Projects that are determined to have significant and unavoidable impacts tend to contribute to cumulative impacts that are significant, especially when the number and location of the projects under the Master Plan, as well as those projects within the region, are unknown.

AIR QUALITY

- A7-38 Ambient Air Quality Data in Table 3.2-1 of the Draft PEIR should be updated to reflect the last three years of available data (2017 to 2019).

Impact 3.2(b)

- A7-39 The Localized Significance Threshold (LST) analysis in the Draft PEIR utilizes the LST screening criteria for sensitive receptors at a distance of 25 meters from a typical project. However, as acknowledged in the Draft PEIR, there are sensitive receptors, including

A7-39 cont. residences and recreational uses, that are within 10 meters of the river ROW (particularly the top of the levee). While the South Coast Air Quality Management District's (SCAQMD's) LST Methodology allows for use of the 25-meter screening criteria for receptors closer than 25 meters, given the fact that PM_{10} emissions approach the LST screening criteria (Table 3.2-8 estimates PM_{10} emissions to be 2.3 pounds per day, just under the screening threshold of 3 pounds per day), please consider whether sensitive receptors closer than 25 meters to the project site would experience significant concentrations of air pollution. This is a concern for the City of Burbank because, as an example, there are residences on W. Valley Heart Drive within 10 meters of the LA River and Buena Vista Park immediately adjacent to the LA River.

- A7-40 Please include the assumptions (number of trips, type of use, size of use, etc.) used for estimating the daily operational regional mass emissions presented in Table 3.2-7 and Table 3.2-11.

- A7-41 Please explain why operational impacts related to the KOP Categories were determined to be significant and unavoidable. Please identify what types of uses under each of the KOP Categories would result in operational emissions that exceed thresholds for regional and localized pollutant emissions. It seems that the potential for a significant and unavoidable impact would be limited to KOP Category 6 only.

Impact 3.2(c)

- A7-42 Please identify what type of existing structures would result in asbestos dispersion during demolition under all KOP Categories unless it is limited to KOP Category 6 only. Even if the emissions would be controlled according to SCAQMD and US Environmental Protection Agency (EPA) regulations, examples of sources should be identified to inform the affected jurisdictions, including the City of Burbank, of the sources and potential impacts.

- A7-43 Construction impacts related to exposure of sensitive receptors within 1,000 feet of projects have been identified as significant and unavoidable, which seems to be contradictory with the determination that the LSTs would not be exceeded and impacts would be less than significant under Impact 3.2(b).

- A7-40 Similar to the comment under Impact 3.2(b), please explain whether sensitive receptors within 25 meters of a project site would be exposed to significant concentrations of PM_{10}.

- A7-44 While specific location and design details for implanting projects are not currently known, it is reasonable to assume that no project under the Master Plan would generate a daily traffic volume of 100,000 vehicles, which seems to be the general threshold for a CO hot spot to occur. The statement that "it is not possible to analyze the effect of project-generated traffic on LOS for unknown intersections or daily traffic volume for unknown roadways in the project area" seems inaccurate. The analysis continues to misstate that "it is unlikely that 1-hour or 8-hour CO concentrations generated along project vicinity roadways would **not** exceed CAAQS for CO."

- A7-45 Even without specific details, please identify what types of projects (common element, multi-use trails/access gateways, or any of the KOP Categories) would generate DPM emissions from operation that could result in cancer or non-cancer health risks that exceed SCAQMD's

A7-46 thresholds. The discussion should provide examples of conceptual projects that could be assumed to result in the significant and unavoidable impact that is being disclosed.

- A7-47 Please explain how the analysis of KOP Category 6 is different from KOP Categories 1 through 5. It seems the level of analysis is the same, and the only difference is the identification of a sample project in KOP Category 6, but the analysis still remains qualitative and generic while identifying a significant unavoidable impact without providing any assumptions or examples as to the impact determination.

Impact 3.2(d)

- A7-48 Please explain why a typical project under the two types would be found less than significant for odors, but KOP Category 1, which is similar to the Multi-Use Trail/Access Gateways Typical Project, would be found significant and unavoidable if not carried out by the County.

- A7-49 The discussion of the KOP Categories under the analysis of odors is confusing. The first sentence under construction and operation of KOP Categories 2 through 6 refers to projects that are typically associated with odor complaints according to the SCAQMD, but the next sentence continues to state that KOP Categories 2 and 3 would have no land uses associated with odor complaints but that KOP Categories 4 and 6 would. The third sentence then identifies KOP Categories 4, 5, and 6 as having design components associated with odor complaints. These statements need to be reconciled to show consistent information (not contradictory to each other). It seems that KOP Category 6 is the only one with a component that may potentially result in odor impacts. Please identify what types of odor sources could be generated by projects under the other KOP Categories.

- A7-50 The discussion of impacts related to the typical projects and KOP Categories needs to be consistent with the overall discussion of impacts presented under the "Overall 2020 LA River Master Plan Implementation," as well as how the different conceptual projects are described in Chapter 2, Project Description, of the Draft PEIR.

Cumulative Impacts

- A7-51 The discussion of impacts under Impact 3.2(b) indicates that air quality impacts are less than significant based on both construction and operational emissions remaining below the regional and localized screening thresholds. However, the discussion of impacts under Impact 3.2(c) indicates that air quality impacts to sensitive receptors may be significant and unavoidable as emissions may exceed SCAQMD's LSTs. Please explain why these impacts were not identified in the cumulative impacts discussion. Projects that are determined to have significant and unavoidable impacts tend to contribution to cumulative impacts that are significant, especially when the number and location of the projects under the Master Plan, as well as those projects within the region, are unknown.

BIOLOGICAL RESOURCES

Setting

A7-52
- According to page 3.3-8 of the Draft PEIR, a database search and literature review were conducted to identify any habitat conservation plans (HCPs), natural communities conservation plans (NCCPs), or other approved local, regional, or State HCPs/NCCPs are applicable to the study area. Please explain if any plans are applicable to the study area.

A7-53
- Figure 3.3-11 of the Draft PEIR identifies a small patch of southern cottonwood willow riparian forest, a CNDDB special-status vegetation community, along the southern boundary of the study area within the City of Burbank; this area seems to correspond to Johnny Carson Park. Please explain why this vegetation community is not included in Tables 3.3-5 and 3.3-8, which list vegetation community and land cover types, acreages, sensitivities, and locations within the study area and Frames 6 to 8, respectively. Table 3.3-10 identifies the southern cottonwood willow riparian forest as no longer present; information should be consolidated and make consistent to avoid any discrepancy in what is being presented in the PEIR.

Methods

A7-54
- According to page 3.3-97 of the Draft PEIR, a database search and literature review were conducted to determine if any project under the Master Plan would conflict with any HCPs, NCCPs, or other approved local, regional, or State HCPs. Per the comment above, it is not clear if any plans have been identified to determine if such impact would occur.

Impact 3.3(a)

A7-55
- The Draft PEIR identifies a potential significant unavoidable impact to sensitive and special-status species to result from any project implemented under the Master Plan and includes 19 mitigation measures to address impacts related to these biological resources. There should be a discussion regarding the effectiveness of the mitigation measures identified, particularly when a project is not carried out by the County.

Impacts 3.3(b)

A7-56
- There does not seem to be any sensitive riparian habitat in the study area within the City of Burbank. However, the Draft PEIR identifies a potential significant unavoidable impact to result from any project implemented under the Master Plan and includes several of the 19 mitigation measures identified for Impact 3.3(a) and Mitigation Measures BIO-20a and BIO-20b to address impacts related to riparian habitats. There should be a discussion regarding the effectiveness of the mitigation measures identified, particularly when a project is not carried out by the County.

Impact 3.3(c)

A7-57
- There does not seem to be any wetland habitat in the study area within the City of Burbank, with the exception of a freshwater pond to the north of the eastern portion of the Lakeside Golf Club. However, the Draft PEIR identifies a potential significant unavoidable impact to result from any

A7-57 cont. project implemented under the Master Plan and includes Mitigation Measures BIO-21a through BIO-21e, as well as Mitigation Measure BIO-1 (from Impact 3.3(a)), to address construction impacts, and Mitigation Measures BIO-22a and BIO-22b, as well as Mitigation Measure BIO-9 (from Impact 3.3(a)), to address operational impacts related to wetland habitats. There should be a discussion regarding the effectiveness of the mitigation measures identified, particularly when a project is not carried out by the County.

Impact 3.3(d)

- A7-58 There does not seem to be any wildlife corridor or nursery sites in the study area within the City of Burbank. However, the Draft PEIR identifies a potential significant unavoidable impact to result from any project implemented under the Master Plan and includes Mitigation Measure BIO-23, as well as Mitigation Measures BIO-9 through BIO19 (from Impact 3.3(a)), to address construction and operational impacts to wildlife corridors and native wildlife nursery sites. There should be a discussion regarding the effectiveness of the mitigation measures identified, particularly when a project is not carried out by the County.

Impact 3.3(e)

- A7-59 The Draft PEIR identifies a potential significant unavoidable impact related to a project implemented under the Master Plan to conflict with local policies or ordinances protecting biological resources, specifically for projects not carried out by the County. The Draft PEIR identifies Mitigation Measure BIO-24 as sufficient mitigation to reduce impacts from projects carried out by the County to a less-than-significant level. There should be a discussion regarding the effectiveness of the mitigation measures identified, particularly when a project is not carried out by the County.

Impact 3.3(f)

- A7-60 The acknowledgement that no HCPs, NCCPs, or other approved local, regional, or state HCPs first appears in the discussion of Impact 3.3(f). This should have been identified in the setting discussion. See comment under "Methods."

Cumulative Impacts

- A7-61 The discussion of cumulative impacts states that the "proposed Project would not reduce habitat, but rather would increase it. Implementation of the *2020 LA River Master Plan* would potentially have beneficial permanent direct effects on wildlife connectivity and nursery sites with creation and restoration of native upland and wetland habitats, enhancements to wildlife connectivity, and features supporting nursery sites. This does not seem to be consistent with the potential significant and unavoidable determination in Impact 3.3(d). Please explain this discrepancy.

CULTURAL RESOURCES

- A7-62 In the Setting section under Resources within the Project Study Area, the first sentence under Burbank (Frame 7) on page 3.4-52 should be corrected to refer to the City of Burbank and not the City of Glendale. Glendale does not appear in Frame 7 according to Figure 2-11 in Chapter 2, Project Description of the Draft PEIR.

- A7-63 The methodology discussion on page 3.4-53 is for aesthetics, including scenic vistas, visual quality, and light and glare. Please revise to address cultural resources specifically.

Impact 3.4(a)

- A7-64 Construction impacts to historical resources are very generalized. Impacts to historic resources should be identified by frame since the discussion of resources within the study area indicates that 10 of the 18 local jurisdictions do not have historic resources in the study area. In addition, since archaeological resources are addressed under a separate threshold question, this impacts discussion should be focused on the built environment, and ground disturbance should not have been the primary factor for determining impacts to historic resources to be significant and unavoidable.

- A7-65 The Draft PEIR concludes that activities related to the operation of the Common Elements and Multi-Use Trails and Access Gateways Typical Projects have the potential to cause significant impacts on historical resources due to the potential for damage to historical resources from water and/or waste leakages from hygiene facilities, restrooms, and/or water features, and from potential increased foot traffic affecting the integrity of materials of existing historic resources. Given the unknown location of potential future improvements and the purely hypothetical potential for future facilities to leak water and/or waste, this impact seems like a remote potential and too speculative to meaningfully evaluate/consider.

- A7-66 Mitigation Measures: Mitigation Measure CR-1a should have been completed as part of the Draft PEIR to inform the public and the decisionmakers in the different affected local jurisdictions of the location of cultural resources within the study area. It seems some of the required information sources have been reviewed and consulted to identify the resources within the study area as part of the setting discussion.

- A7-67 Please explain why impacts to historic resources are determined to be significant and unavoidable. There should be a discussion regarding the effectiveness of the mitigation measures identified.

- A7-68 Please explain why there is a mitigation measure for the preparation of a noise and vibration plan for operation when the impacts discussion did not identify impacts related to noise and vibration. Please identify what types of noise- and vibration-generating uses could be developed as a result of the Master Plan implementation.

- A7-69 Please explain why impacts under all the KOP Categories are determined to have a potentially significant impact to historic resources and identify what types of projects could be developed as a result of the Mater Plan implementation that would result in this potentially significant impact. An example was provided for KOP Category 6, but an example under the other KOP Categories or of any of the 107 projects should be identified as well. Similar to the comment above, there should be a discussion regarding the effectiveness of the mitigation measures identified to substantiate the significant and unavoidable determination.

275 E. Olive Avenue · P.O. Box 6459 · Burburbank, California 91510-6459 · (818) 238-5751 · FAX (818) 238-5757

Impact 3.4(b) and Impact 3.4(c)

- A7-70 Please explain why construction impacts to archaeological resources and human remains are determined to be significant and unavoidable when considering the typical projects, KOP Categories, any of the 107 projects, and the overall implementation of the Master plan. There should be a discussion regarding the effectiveness of the mitigation measures identified.

- A7-71 Under operational activities, please explain how development of a Common Elements or a Multi-Use Trails and Access Gateways Typical Project, the KOP Categories, any of the 107 projects, and the overall implementation of the Master Plan would have a substantial adverse change in the significance of an archaeological resource and disturb human remains (beyond the effects of project construction). Please also explain why impacts to archaeological resources and human remains are determined to be significant and unavoidable during project operation. There should be a discussion regarding the effectiveness of the mitigation measures identified.

GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES

Impacts 3.6(a), 3.6(c), and 3.6(d)

- A7-72 The Draft PEIR includes a figure presenting the earthquake hazard zones for Frame 7 that identifies the entire study area within the City of Burbank as being in a liquefaction zone; no areas in Burbank are identified within a landslide zone. Accordingly, please correct the analysis on page 3.6-42 for Frame 5 through Frame 9 to exclude the City of Burbank from the landslide zone.

- A7-73 Construction and operational impacts related to seismic hazards and unstable soils, including liquefaction, as well as expansive soils, are typically less than significant as a result of applicable strict building codes and regulations, particularly in California, with which projects are required to comply. There should be a discussion regarding the effectiveness of the mitigation measure identified and an explanation as to why the impact determination is significant and unavoidable, particularly when a project is not carried out by the County. Regardless of who implements a project, regulatory compliance remains mandatory.

Impact 3.6(f)

- A7-74 Please explain why construction impacts to paleontological resources or unique geologic feature are determined to be significant and unavoidable when considering the typical projects, KOP Categories, any of the 107 projects, and the overall implementation of the Master plan. There should be a discussion regarding the effectiveness of the mitigation measures identified.

- A7-75 Under operational activities, please explain how development of a Common Elements or a Multi-Use Trails and Access Gateways Typical Project, the KOP Categories, any of the 107 projects, and the overall implementation of the Master Plan would destroy paleontological resources or unique geologic features (beyond the effects of project construction). Please also explain why impacts to paleontological resources and unique geologic features are determined to be significant and unavoidable during project operation. There should be a discussion regarding the effectiveness of the mitigation measures identified.

Cumulative Impacts

A7-76
- Please explain what it means to have "a cumulative condition with respect to geology, soils, and paleontological resources" and whether that statement is equivalent to identifying a significant cumulative impact. Similar to previous comments, any project in California, regardless of type and size, is required to comply with strict building codes and regulations, including those that address seismic hazards. The cumulative analysis states that construction activities associated with the Project would not be expected to cause significant geologic events or create a geologic hazard by causing or accelerating instability related to erosion and that adherence to Construction General Permit requirements would reduce potential impacts during construction to less-than-significant levels and that impacts related to geology and soils would not be cumulative considerable. This is contradictory to the analysis under Impacts 3.6(a), 3.6(c), and 3.6(d) which determine that impacts would be significant and unavoidable.

A7-77
- Similarly, the cumulative analysis on page 3.6-64 of the Draft PEIR states that the "proposed Project would require notification and inventory of paleontological resources and implementation of an unanticipated discovery plan to mitigate potentially significant impacts (Mitigation Measures GEO-2, GEO-3, and GEO-4). Therefore, the 2020 LA River Master Plan would not make a cumulatively considerable contribution to impacts on paleontological resources." This is contradictory to the analysis under Impact 3.6(f), which determines that impact to paleontological resources and unique geologic features would be significant and unavoidable.

GREENHOUSE GAS EMISSIONS

A7-78
- The Draft PEIR discusses the City of Burbank's 2013 Greenhouse Gas Reduction Plan. Please note that the City is currently in the process of updated the Greenhouse Gas Reduction Plan.

A7-79
- The Draft PEIR's quantification of GHG emissions is limited to the two typical types of projects described in the Draft PEIR: (1) Common Element Typical Project and (2) Multi-Use Trails and Access Gateways Typical Project. While those types of projects may be the most well defined, they do not appear to be the most intense. For example, the extra-large projects noted in the proposed Master Plan, such as the bypass tunnel, would be anticipated to generate more emissions. Moreover, the Draft PEIR notes that up to 107 implementation projects could be implemented over the Master Plan's 25-year horizon; however, the Draft PEIR does not attempt to estimate the total GHG emissions from such projects.

HAZARDS AND HAZARDOUS MATERIALS

A7-80
- The Draft PEIR analysis of Impact 3.8(a) relies on compliance with a construction NPDES General Permit for Stormwater Discharges to conclude that impacts regarding transport, use, and disposal of hazardous materials during construction would be less than significant. However, while the construction NPDES General Permit would be mandatory for projects greater than 1 acre, projects under 1 acre, such as the category of extra-small (less than 1 acre) projects, as identified in Draft PEIR Section 2.5.1.3 and in the Draft 2020 LA River Master Plan, may not be subjected to a construction NPDES General Permit. Please include provisions to address construction hazardous waste management for the smaller projects.

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A7-81
- Mitigation Measure HAZ-1 provides hazardous materials assessment and management practices for project sites that have been listed in hazardous materials-related databases. However, this mitigation measure does not address sites that have not been previously listed on a database but may have potential contamination. Given the history of development in the City, there is a potential for hazardous materials contamination from prior uses. The Draft PEIR should include measures to prepare a Phase I Environmental Site Assessment in accordance with ASTM standards to evaluate project sites, regardless of any database listing, for the potential contamination, and in the event that recognized environmental conditions (RECs), controlled recognized environmental conditions (CRECs), and/or historical recognized environmental conditions (HRECs) are identified, provide appropriate measures to characterize, remediate, and manage prior contamination.

A7-82
- Mitigation Measure HAZ-1 identifies implementation of a soil management plan to "provide administrative, procedural, and analytical guidance to expedite and clarify decisions and actions if contaminated soils are encountered." (DEIR page 3.8-48) Given the wide range of previous and current uses in the study area, including industrial, commercial, and military operations, there is the potential for a similarly wide range of resulting potential contaminants in the study area. While the Soil Management Plan is described as containing procedures for handling, stockpiling, screening, and disposing of excavated soil, it is not clear whether other remediation practices would be considered that may be more appropriate to address and remediate various types of pollutants. The EIR should include mitigation to remediate and manage hazardous materials in the manner that is feasible and appropriate for the contaminant and the proposed use, with DTSC and local CUPA coordination.

HYDROLOGY AND WATER QUALITY

Comments:

A7-83
- Table 3.9-1 of the Draft PEIR identifies the waterbodies with potential to be affected by the implementation of the Master Plan. Please identify how the LA River reaches correspond to the frames addressed in each of the environmental topics. Please confirm that LA River Reach 4 incorporates Frame 7, which includes the City of Burbank.

A7-84
- Page 3.9-20 of the Draft PEIR discusses that the County MS4 Permit allows permittees the flexibility to develop Watershed Management Programs or Enhanced Watershed Programs to implement the requirements of the permit on a watershed scale through customized strategies, control measures, and BMPs. Please include a discussion of the Enhanced Watershed Management Program Plan for the Upper Los Angeles River Watershed Management Group, which includes Burbank, Glendale, the County, and LACFCD.

Impact 3.9(c)

A7-85
- As discussed under "Construction–Frames 5 through 9" on page 3.9-60 of the Draft PEIR, "several reaches in the LA River in Frames 5 through 9 do not meet existing design standards for flood conveyance capacity.... As a result, baseline conditions of the system capacity are exceeded in large storm events." Since areas with a 100-year floodplain have been mapped,

A7-85 cont. more specificity by frame should have been included in the analysis. In particular, since Burbank is primarily located outside the 500-year flood zone, only those areas that do not meet existing design standards should have been specifically identified.

- A7-86 Please explain why construction impacts to flooding are determined to be significant and unavoidable when considering the typical projects, KOP Categories, any of the 107 projects, and the overall implementation of the Master plan. There should be a discussion regarding the effectiveness of the mitigation measures identified, particularly when a project is not carried out by the County. Required compliance with the NPDES Construction General Permit and implementation of Mitigation Measures HYDRO-1a and HYDRO-1b should not be limited to the County for compliance and implementation. Regardless of who implements a project, regulatory compliance remains mandatory, and the identified mitigation measures should be extended to any project proponent.

- A7-87 As discussed under "Operations–Frames 5 through 9" on page 3.9-63 of the Draft PEIR, "[t]here are several regions within Frame 6 and Frame 7 along the river that are hydraulically unstable, which may result in large and unstable surface waves.... River reaches throughout Frame 5 through Frame 9 also have capacity constraints for the 1 percent storm event (100-year) flood, and could exceed the capacity of the channel in a large storm event.... As a result, during operation, the Common Elements Typical Project could create or contribute surface water runoff in Frames 5 through 9 that could exceed the capacity of existing stormwater drainage systems." Please identify the portions of the study area in Burbank that are affected. Similarly, there should be a discussion regarding the effectiveness of the mitigation measures identified, particularly when a project is not carried out by the County.

Cumulative Impacts

- A7-88 Please explain what it means to have "a cumulative condition related to hydrology and water quality" and whether that statement is equivalent to identifying a significant cumulative impact. The cumulative analysis states that "[e]ven with compliance with water quality, drainage, and flood safety regulations and policies, impacts on hydrology and water quality would be cumulatively significant. Please explain the basis of that conclusion. Similar to other comments provided above, there should be a discussion regarding the effectiveness of the mitigation measures identified, particularly when a project is not carried out by the County. The only area where significant and unavoidable impacts are identified relates to the alteration of existing drainage patterns, which would typically be addressed by compliance with applicable regulations, including, but not limited to, NPDES permitting requirements, the County's MS4 Permit requirements, and the County's and local municipalities' Low Impact Development (LID) standards.

LAND USE AND PLANNING

- A7-89 Draft PEIR p. 3.10-31 states, "Off-channel land asset design components would likely entail greater levels of construction than the other five KOP categories and would occur outside the ROW. KOP Category 6 design components would be anticipated to be considerably larger than the other KOP categories' design components, resulting in more extensive environmental effects during construction. **This KOP category could occur within established neighborhoods and could result in temporary road closures and obstructions to community facilities, which could divide an**

established community. Site-specific and project-specific design details of subsequent projects would determine their construction schedules and would ultimately be driven by the County's needs or the needs of any other jurisdictions implementing these subsequent projects under the *2020 LA River Master Plan*. For these larger KOP Category 6 design components, a potentially significant impact could occur as a result of physical division of an established community. **[Bold added.]**

A7-89 cont.

With regard to the bolded text, the Draft PEIR does not explain how these temporary construction impacts could divide an established community. What might that entail in the adjacent Burbank neighborhoods? Examples of specific circumstances in which there could be a physical division of an established neighborhood or other coherent physically linked community are requested to examine the scope and magnitude of such potential effects and to help determine the efficacy of proposed mitigation measures.

- The *KOP-6—Operational Impact Analysis* indicates there could be a permanent physical division of an established community resulting from design of a KOP-6 element, such as road closure, walls, "or other project features that would disrupt community connectivity." The Draft PEIR then concludes, without explanation, that implementation of MM LU-3, requiring alternative design to avoid a physical division or to provide suitable alternatives to maintain connectivity would not be sufficient to avoid a significant impact, if activities were carried out by entities other than the County.

A7-90

Examples of specific circumstances in which there could be a physical division of an established neighborhood or some other 'coherent' physically linked community are requested to examine the scope and magnitude of such potential effects and to help determine the efficacy of proposed mitigation measures. What kinds of significant impacts might occur in Burbank?

- The analysis of the *Master Plan Kit of Parts Categories 1 and 2 – Operations Impacts* with regard to potential conflicts with land use policies, plans, and programs concludes impacts would be significant and unavoidable, even with MM LU-4, which requires consultation with affected agencies along the river to review proposed plans to identify and avoid land use planning conflicts. This conclusion is not explained or evident from the context of the discussion. What kinds of significant conflicts with Burbank land use plans/policies could occur from development of KOPs 1 and 2?

A7-91

- The analysis of the *Master Plan Kit of Parts Category 6 – Construction Impacts* with regard to potential conflicts with land use policies, plans, and programs concludes impacts would be significant and unavoidable, even with MM LU-1 and LU-2, which requires a construction management plan and consultation with affected local agencies. Why is this considered significant and unavoidable if temporary? What kinds of construction impacts could be so severe that it would represent a conflict with Burbank's land use plans and policies to avoid or mitigate environmental impacts?

A7-92

- The analysis of the *Master Plan Kit of Parts Categories 1, 2, and 3 – Operations Impacts* with regard to potential conflicts with land use policies, plans, and programs concludes that projects in KOP Categories 1, 2, and 3 could be out of scale with adjacent development and thus impacts would be significant and unavoidable. This conclusion

A7-93

A7-93 cont. is not explained or evident from the context of the discussion. What kinds of Master Plan implementation projects could be out of scale with land uses in Burbank?

NOISE

- Regulatory Framework: The Draft PEIR identifies that the primary noise source during operations of the Common Elements Typical Project is visitors speaking. However, it is also possible that visitors may use audio devices during hiking and recreational activities. Please observe that the City of Burbank Municipal Code also includes additional restrictions on noise uses in proximity to parks or on a right of way adjacent to a park use in Burbank Municipal Code Section 9-3-213.5, Radios, Television Sets and Similar Devices in and Adjacent to Park Facilities, which states the following:

A7-94

A. *Disturbing Residents: No person in a park (including public parking lots) or on a right of way adjacent to a park shall use or operate any radio receiving set, musical instrument, phonograph, television set or other machine or device for the producing or reproducing of sound or other sound amplification systems in such manner as to disturb the peace, quiet, and comfort of neighboring residents or any reasonable person of normal sensitiveness residing in the area.*

B. *Prima Facie Violation: Any person who operates or permits the operation of an outdoor sound amplification device which can be heard seventy five feet (75') or more away: 1) from the closest boundary of the park, when the source of the noise is within the boundaries of a park; or 2) from the actual source of the noise, when the source is of noise is located in the right of way adjacent to a park; shall be deemed to be prima facie evidence of a violation of this section.*

C. *Exceptions: This prohibition shall not apply to a park permit or other City approval that expressly authorizes the use of outdoor sound amplification devices. [Added by Ord. No. 3642, eff. 7/24/04.]*

- The Draft PEIR identifies Mitigation Measure NOI-7: Locate Project 200 Feet or More from Occupied Structures or Prepare Vibration Study and Implement Findings (Draft PEIR page 3.12-136) under the Common Elements Typical Project and Mitigation Measure NOI-8: Locate Project 400 feet or More from Occupied Structures or Prepare Vibration Study and Implement Findings (Draft PEIR page 3.12-139) under the Multi-Use Trails and Access Gateways Typical Project scenarios in Frames 1 through 9. With regard to this impact:

A7-95

  - Without more specificity on the potential project locations, it is unclear as to which structures may be affected.

A7-96

  - In the case of the nearest residences along Bob Hope Drive and Valleyheart Drive that are adjacent to the river ROW, residence structures are located approximately 20 feet from the river ROW. As a result, projects along the north side of the river may not be feasibly located 200 feet or more from the residences.

A7-97

  - The remaining conditions in Mitigation Measure NOI-7 identify measures that could be included, but are not limited to: using less vibration-intensive construction equipment;

A7-97 cont.

timing construction so that structures would not be occupied when high levels of vibration are expected; and informing residents of the timing of construction and that vibration may be noticeable during these times. The mitigation measure requires more information that demonstrates that less vibration-intensive construction equipment would be a feasible option. The latter two provisions to time construction so that structures would not be occupied and inform residents of construction timing may not be sufficient or practicable for residents to avoid exposure to high vibrations.

A7-98

- The Draft PEIR identifies a significant and unavoidable noise impact on sensitive receptors in the City of Burbank during project operation when implementing projects are undertaken by entitles other than the County. Please provide additional description/characterization of this significant noise impact, including how it could affect sensitive receptors in Burbank. What will the level of disruption be for neighboring properties? Are there effects other than annoyance that could occur, such as disruption of normal daily activities, sleep disturbances, or adverse health effects?

A7-99

- Given the lack of specificity on the location and scope of implementing projects, it is the City of Burbank's expectation that the County and/or other entities undertaking projects within or in the vicinity of Burbank will coordinate with the City to develop and implement noise minimization techniques for both construction and operation noise sources. In particular, due to the close proximity of the nearby residences, the City requests coordination and notification of construction activities in the future to ensure compliance with the City's ordinance for projects located within 500 feet of residential areas.

POPULATION AND HOUSING

A7-100

- While the Draft PEIR provides an estimate that more than 7,500 people experiencing homelessness live in communities along the LA River, the source of this estimate is not cited, and the DEIR also states that "no count of the population within the fence line were identified…" In order for the EIR analysis to identify the extent of the homeless population that would be impacted and the extent that shelter, housing, and other services would be affected, the number of homeless individuals and families requires an accurate estimate.

A7-101

- Without identification of the status of the referenced programs to assist the homeless or the capacity and resources of available shelters, the Draft PEIR does not disclose whether existing programs and shelters can accommodate the homeless population that would be relocated from the river prior to construction. In the event that existing programs and shelters do not have sufficient capacity to provide services to the homeless, additional construction of expanded or new shelters or housing may be required, for which the impacts should be identified and disclosed in the EIR.

A7-102

- The PEIR should identify a means or mitigation measure(s) to address the relocation of the homeless population and the provision of resources and shelter or housing.

PUBLIC SERVICES

A7-103
- Impact analyses indicate that construction activities could increase demand for police and fire protection services but doesn't explain why/how. What activities could increase demand for response from Burbank Police and Fire Depts?

A7-1054
- The analyses indicate a significant and unavoidable impact for Police and Fire, despite routine mitigation to coordinate with each local agency during design, construction and implementation of every project. This determination of a significant and unavoidable impact is not explained and is not apparent from the context of the discussion. What ramifications would this have on Burbank's Police and Fire Departments' service performance standards and could it result in a need for more staffing, resources, and facilities than would otherwise occur due to growth?

A7-105
- The cumulative impact analysis has unsubstantiated conclusion of "result in permanent population increase, there would be localized visitor population increases that would increase the demand for public services, which would result in a cumulatively considerable contribution." If the overall Master Plan implementation would have a "cumulatively considerable contribution" to impacts on public services, that implies a significant impact that requires mitigation. Yet there is no statement of impact significance and no mitigation offered for this alleged significant contribution. How could this "cumulatively considerable contribution" impact Burbank public services? Would some form of programmatic mitigation be required to reduce potentially significant impacts to less than significant levels?

RECREATION

A7-106
- For Category 6, which could include off-channel "affordable housing projects". First, what is the definition of "affordable housing projects"? Second, there is no impact analysis associated with new housing, which would create a larger local population and add to the demand and level of use of existing parks and recreational resources and facilities.

A7-107
- There is little or no discussion of potential indirect impacts related to new recreational fields or other recreational areas built within (over) the channels, such as more vehicle traffic, on-street parking, noise, trash, etc. from occasional or frequent large group events in those areas. Would any of the recreational fields be used for organized sports, for example, which could attract significant populations of both users and audiences? Does the Master Plan contain any provisions to indicate there could not be such organized activities at these larger recreational areas?

A7-108
- Page 3.15-84 of the Draft PEIR states, "Enforcement of existing parkland dedication requirements would serve to reduce the potential for deterioration of facilities by allowing for adequate funding for the provision and maintenance of recreational facilities. While existing regulations, general plan update policies, and implementation programs address in part the need for parkland acquisition and maintenance, considering the deficit of parkland compared to the County goal, a cumulative condition with respect to recreation exists in the County." However, existing parkland dedication requirements are not intended (and potentially not legally available) to providing funding for any maintenance of recreation facilities. Rather, such funds are only for acquisition of additional parkland or perhaps some other method of

A7-108 cont. expanding existing parks and recreation areas/facilities. How does this mistaken estimate of how parkland dedication funding relates to maintenance costs affect the Master Plan assumptions and expectations for funding to cover increased costs of maintenance for new recreation facilities developed under the Master Plan?

- A7-109 What does the statement that "a cumulative condition with respect to recreation exists in the County" mean?

- A7-110 The impact analysis fails to address cumulative impacts involving the first threshold regarding increasing use of existing parks and recreational resources to an extent that physical deterioration could occur. While it appears unlikely that cumulative impacts would be any different or more severe than impacts associated with implementation of the Master Plan only, some analysis of this should be provided. Would the project-level mitigation measures adequately address potential cumulative impacts?

TRANSPORTATION

- A7-111 The Draft PEIR includes several policies and projects that are inconsistent with the City's Complete Streets Plan, Bicycle Master Plan, and General Plan. The Draft PEIR does not reference the City's Complete Streets Plan as a supporting or source document or disclose potential land use and transportation impacts to City of Burbank plans and policies.

- A7-112 P. 3.16-26 of the Draft PEIR states, "Implementation of the *2020 LA River Master Plan* will allow for an increased share of trips to be completed via active transportation instead of by private vehicle. Of importance in a county without many long-distance Class I bicycle trails in developed areas, **the *2020 LA River Master Plan* will allow for cross-county commuting via active transportation. Increasing the active transportation mode share and the ability to replace long-distance vehicle commute trips with an active transportation trip will reduce VMT**, consistent with State and regional policy initiatives, including SB 743 and SCAG's RTP. It is also consistent with RTP Goal 6, which seeks to protect the environment and the health of SCAG region residents by improving air quality and encouraging active transportation. [**Bold added**.]

  The bolded text makes an unsubstantiated claim that the Class I riverside bike trails will somehow replace long distance vehicle commute trips with "an active transportation trip" that will reduce VMT. Since the riverside trails would not provide access to any employment centers, it is unlikely that there would be a substantial number of commute trips currently taken by automobile that would transition to a bicycle, scooter or walking/running mode of travel. It is much more likely that the vast majority of "trips" along the river bike trail would be recreational in nature, not commuting in nature. The claim (or implied claim) that this river bike trail is going to result in substantial reduction of VMT associated with commuting is not supported by any facts or analysis. Is there something in the Master Plan that would somehow facilitate connections by bike trail users from the trail to an employment area? If so, that has not been identified. There is no evident benefit to Burbank residents in terms of being able to travel over the river bike trail to get to/from work instead of using their private automobiles or some form of automotive transportation that burns gas or diesel in the propulsion system. Perhaps the Master Plan could be amended to add provisions to facilitate trail to employment

A7-112 cont.

center linkages for bicyclists, walkers, and people on non-motorized scooters. Or is the proposed Master Plan assuming that the river trails could be used by motorized scooters? If so, that could create a variety of conflicts with pedestrians and bicyclists that are not discussed in this section. Could that include scooters powered by internal combustion engines as well as electric battery power? Also, why is travel by scooters considered to be "active" transportation in this section, if the scooters could be motorized?

A7-113

- With regard to VMT impacts, the Draft PEIR a concludes potential for significant impacts during construction but does not explain why/how. It is not clear how there could be a potential for a short-term but significant effect involving increased VMT from projects originating/ending in Burbank. Why would the construction activities required to build Typical Projects somehow result in longer than typical construction related commuting trips? The PEIR should be revised to provide such an explanation so that the City has an opportunity to provide a comment on some type of specific adverse impact that might occur.

A7-114

- Draft PEIR p. 3.16-33 indicates a potential for significant impacts associated with vehicle trips generated by a Tier II Pavilion or an Art/Performance space. No explanation for this conclusion is provided. It is not evident why these special purpose facilities could result in different/longer VMT metrics than such facilities located elsewhere, outside of the project study area. Does the MP propose some additional vehicle parking areas to accommodate people who want to drive to the river trail to access it for recreational travel? The PEIR should provide such an explanation, so the City can determine whether some VMT-related adverse impacts could occur in Burbank or affect Burbank VMT characteristics.

A7-115

- With regard to Draft PEIR Table 3.16-2 Typical Projects – VMT Impact Evaluation Matrix, how could the various trail projects listed below Common Elements have a potential to generate VMT? Is that for people who drive to access the river trails and transport their bicycles or horses with them? If this is what is contemplated, does this represent new vehicle trips generated by the river trail improvements? Same questions with respect to the Multi-Use Trails and Access Gateways in the last row.

A7-116

- The Draft PEIR concludes that a large/regional serving equestrian facility (KOP-1) would result in a significant/unavoidable VMT impact. This is not explained or evident from the context of the discussion. Is this because it would be a new facility that would generate a significant amount of daily trips that would not otherwise occur? Would such trips be longer than existing trips to an equestrian facility? Could this result in Burbank residents with horses somehow driving a longer distance for access to the river equestrian trail?

A7-117

- The Draft PEIR concludes that terraced channel improvements (KOP-2) could result in significant VMT impacts. The explanation of this (p. 3.16-46) is that such improvements could be used for amphitheaters for public performances or parks. Is this suggesting that such occasional, seasonal, special purpose activities within the channel area could have a permanent effect on subregional VMT patterns and volumes? If so, this requires further explanation so that the City of Burbank and others can comment more meaningfully on such potential effects.

A7-118 • The Draft PEIR concludes that large platform projects (KOP-3) that support public recreational uses could result in significant VMT impacts. No explanation of this is provided and it is not evident from the context of the discussion. This requires further explanation so that the City of Burbank and others can comment more meaningfully on such potential effects.

A7-119 • The Draft PEIR concludes that potential educational programming for side channel improvements (KOP-4) result in a significant VMT impact. No explanation of this is provided and it is not evident from the context of the discussion. This requires further explanation so that the City of Burbank and others can comment more meaningfully on such potential effects.

A7-120 • With regard to Threshold (c), the conclusion in the Draft PEIR that construction activities conducted by entities other than the County would cause a significant and unavoidable impact related to traffic hazards because the County cannot guarantee that such other entities would not impose the same or similar mitigation measures to avoid such hazards is not plausible. Any entity who proposes a project authorized by the Master Plan would be obligated to prevent temporary traffic hazards through appropriate construction management plans. It is virtually inconceivable that some public entity would design a project and move ahead with construction that could result in a significant traffic hazard. The PEIR does not explain why or how such dangerous conditions could occur and if this is a real concern, such explanation is necessary to allow the City of Burbank or others to provide meaningful comments on such potentially significant impacts.

A7-121 • With regard to cumulative transportation impacts, the Draft PEIR does not address Thresholds (a) or (c); therefore, it is not possible to determine if there could be significant cumulative impacts involving those thresholds and how such impacts might affect the Burbank area. The PEIR should be revised to provide such an assessment.

TRIBAL CULTURAL RESOURCES

Impact 3.17(a)

A7-122 • Please explain why construction and operational impacts to tribal cultural resources are determined to be significant and unavoidable when considering the typical projects, KOP Categories, any of the 107 projects, and the overall implementation of the Master plan. There should be a discussion regarding the effectiveness of the mitigation measures identified (from Impacts 3.4(a) and 3.4(b)), as well as Mitigation Measure TCR-1 for construction and Mitigation Measures TCR-2 and TCR-3 for operation. Typically, implementation of mitigation measures, particularly Native American monitoring, is sufficient to reduce impacts to tribal cultural resources to a less-than-significant level.

Cumulative Impacts

A7-123 • Please explain what it means to have "a cumulative condition" related to tribal cultural resources and whether that statement is equivalent to identifying a significant cumulative impact. The cumulative analysis states that "[a]lthough implementation of the mitigation measures (Mitigation

A7-123 cont. Measures CR-1a-b, CR-4a-d, CR-5, TCR-1, TCR-2, and TCR-3) would help reduce the impacts, considering the existing significant cumulative impacts for TCRs in the greater Los Angeles region, it would be reasonable to infer that the Project could result in localized significant impacts on TCRs. Therefore, the Project's contribution to cumulative tribal cultural resources impacts would be considerable." Please explain the basis of that conclusion. Similar to other comments provided above, there should be a discussion regarding the effectiveness of the mitigation measures identified.

UTILITIES/SERVICE SYSTEMS

Impact 3.18(a)

- A7-124 KOP 1-6: The analysis for these 6 KOP categories indicates there would not be a significant impact involving expansion of existing infrastructure or construction of new infrastructure. Nonetheless, the discussion ends with a determination that there could be localized utility deficiencies and mitigations are identified to require preparation of project specific Utilities Plans to determine the need for infrastructure improvements and provide such improvements or ways to reduce impacts, as appropriate. A final conclusion is then presented that impacts could be significant and unavoidable, which contradicts the earlier analysis that indicates there should not be a need for infrastructure improvements that could result in significant impacts. This inconsistency should be resolved in revisions to the PEIR.

A7-125 Further, it is not clear that there would not be a need to expand or construct new infrastructure connections to the City of Burbank utility network for a major project within Frame 7, such as the Headworks Connector project, or possibly for off-channel projects such as affordable housing or wastewater treatment facilities. More analysis is requested to explain why no infrastructure improvements associated with Burbank's utility networks would be required for any KOP elements, especially the larger ones that could occur under KOP's 5 and 6.

Impact 3.18(b)

- A7-126 KOP 6: The analysis notes that it is not possible at this stage to prepare a water supply assessment for overall potential water demand for this category of projects, and even with a mitigation measure to require preparation of a WSA for subsequent projects that would trigger that effort due to the volume of water demand, there could be significant and unavoidable impacts to water supplies. That conclusion is not explained and represents a serious consideration for adopting statement of overriding considerations in order to approve the proposed River Master Plan. That may prove to be very challenging, since accepting such a significant impact, despite the direct conflict with project objectives and the serious nature of such an impact, requires an extraordinary demonstration of why this is both accurate and appropriate. It is suggested, therefore, that this analysis be re-drafted to provide better examination of potential effects and perhaps identification of ways in which significant impacts on water supplies would be avoided.

Impact 3.18(c)

- A7-127 KOP 6: The conclusion of a significant and unavoidable impact on the wastewater treatment systems is both highly conservative and unnecessary. It could also be argued that

A7-127 cont.

preparation/implementation of Utilities Plan would result in sufficient means of providing whatever additional wastewater conveyance and/or treatment infrastructure might be needed for some major project that could exceed existing capacity in the conveyance and treatment facilities. It is recommended that the PEIR be revised to address this more carefully and provide sufficient explanation to support a finding of less than significant impacts after mitigation.

Impact 3.18(d)

A7-128

- KOP 6: The conclusion of potentially significant impacts on landfill capacity and then ultimately significant and unavoidable impacts for projects undertaken by entities other than the County, even with the mitigation to recycle and reuse construction wastes is both highly conservative and unnecessary. It is recommended that the PEIR be revised to address this more carefully and provide sufficient explanation to support a finding of less than significant impact after mitigation for all projects, including those undertaken by non-County entities.

WILDFIRE

A7-129

- On p. 3.19-4, in the description of wildland fire hazards within Frame 7, it is noted that there is a Very High Fire Hazard Severity Zone in the southernmost part of Burbank, south of the Ventura Freeway, adjacent to Griffith Park, and that this area includes studio buildings and a residential area. This is consistent with Figure S-1, Fire Zones, of the Safety Element of the Burbank 2035: General Plan, which shows this area to be a "Mountain Fire Zone." However, given that parts of this area are developed with studio buildings and residential uses, please provide context for this VHFHSZ classification, and explain why it is designated as such given the developed condition of the land.

Impact 3.19(a)

A7-130

- Construction/Common Elements, Multi-use Trails and Access Gateways,KOPs1-6, and Overall LA River Master Plan Implementation: The analysis indicates a potential for a significant impact due to possible temporary road closures or other impediments to vehicle travel, including emergency vehicles and fire trucks. It is not explained why this could "substantially impair" an adopted emergency response plan or emergency evacuation plan and the PEIR should explain that, because these types of common construction impacts are not typically regarded as a substantial impairment to an adopted emergency response plan or emergency evacuation plan that cover broad areas of concern. A suitable mitigation measure is identified, requiring coordination with emergency and fire services to ensure there is adequate avenues for emergency response and possibly evacuation during construction activities. Then, the final conclusion is that this would be sufficient to reduce impacts to less than significant for projects carried out by the County, but not for projects carried out by other entities. This is an unnecessarily conservative conclusion, not explained and not reasonable. Why would any party that carries out an implementing project approve a plan that would interfere with emergency response or evacuation during construction activities? This should be analyzed more carefully, and an effort made to demonstrate that appropriate measures

A7-130 cont. would be taken by any party that carries out an implementing project to maintain adequate emergency response and evacuation if needed during construction.

Impact 3.19(b)

- Construction/Common Elements, Multi-use Trails and Access Gateways,KOPs1-6, and Overall LA River Master Plan Implementation: The analysis indicates a potential for a significant impact due to the potential for construction related ignition sources to cause a wildfire in VHFHSZs where there are steep slopes that may not be adequately prevented or suppressed through compliance with a host of existing regulatory requirements. A suitable mitigation measure is identified, requiring preparation and implementation of a Construction Fire Protection Plan. While it is not actually stated, it is presumed that such a Plan would be developed in coordination with emergency and fire services to ensure there are adequate measures in place. Then, the final conclusion is that this would be sufficient to reduce impacts to less than significant for projects carried out by the County, but not for projects carried out by other entities. This is an unnecessarily conservative conclusion, not explained and not reasonable. Why would any other party that carries out an implementing project approve a project in a VHFHSZ that doesn't include a Construction Fire Protection Plan to prevent wildland fires? This should be analyzed more carefully, and an effort made to demonstrate that appropriate measures would be taken by any party that carries out an implementing project to adequately prevent wildland fires during construction.

A7-131

- Operations/Common Elements, Multi-use Trails and Access Gateways,KOPs1-6, and Overall LA River Master Plan Implementation: This analysis indicates that despite application of all pertinent regulatory standards and preparation/implementation of a Fire Protection Plan, there would still be significant and unavoidable wildland fire impacts for projects constructed in or adjacent to a VHFHSZ. This conclusion applies to any project, whether carried out by the County or another party. This conclusion is not explained and does not seem reasonable. It is also not reasonable to approve a project that would result in such a significant and unavoidable impact. It is recommended, therefore, that further, more careful analysis be conducted to support a determination that with existing regulatory compliance and a Fire Protection Plan, impacts would be reduced to a less than significant level.

A7-132

Impact 3.19(c)

- Construction/Common Elements, Multi-use Trails and Access Gateways,KOPs1-6, and Overall LA River Master Plan Implementation: The analysis indicates a potential for a significant impact due to the potential for construction related ignition sources to cause a wildfire for projects located in a VHFHSZ. A suitable mitigation measure is identified, requiring preparation and implementation of a Construction Fire Protection Plan. While it is not actually stated, it is presumed that such a Plan would be developed in coordination with emergency and fire services to ensure there are adequate measures in place. Then, the final conclusion is that this would be sufficient to reduce impacts to less than significant for projects carried out by the County, but not for projects carried out by other entities. This is an unnecessarily conservative conclusion, not explained and not reasonable. Why would any other party that

A7-133

A7-133 cont.

carries out an implementing project approve a project in a VHFHSZ that doesn't include a Construction Fire Protection Plan to prevent wildland fires? This should be analyzed more carefully, and an effort made to demonstrate that appropriate measures would be taken by any party that carries out an implementing project to adequately prevent wildland fires during construction.

A7-134

- Operations/Common Elements, Multi-use Trails and Access Gateways,KOPs1-6, and Overall LA River Master Plan Implementation: This analysis indicates that despite application of all pertinent regulatory standards and preparation/implementation of a Fire Protection Plan, there would still be significant and unavoidable wildland fire impacts for projects constructed in or adjacent to a VHFHSZ. This conclusion applies to any project, whether carried out by the County or another party. This conclusion is not explained and does not seem reasonable. It is also not reasonable to approve a project that would result in such a significant and unavoidable impact. It is recommended, therefore, that further, more careful analysis be conducted to support a determination that with existing regulatory compliance and a Fire Protection Plan, impacts would be reduced a to less than significant level for any implementing project.

Impact 3.19(d)

A7-135

- Construction/Common Elements, Multi-use Trails and Access Gateways,KOPs1-6, and Overall LA River Master Plan Implementation: The analysis indicates a potential for a significant impact due to the potential for projects located in a VHFHSZ to be severely impacted by post-wildfire events that could result in flooding or landslides that could subject people or structures to significant risks, even with implementation of all existing regulatory compliance requirements. Several suitable mitigation measures are identified, requiring preparation of drainage studies, geotechnical reports to provide adequate stabilization of construction sites and a Post-Fire Risk Reduction Plan. Then, the final conclusion is that this would be sufficient to reduce impacts to less than significant for projects carried out by the County, but not for projects carried out by other entities. This is an unnecessarily conservative conclusion, not explained and not reasonable. Why would any other party that carries out an implementing project approve a project in a VHFHSZ that doesn't include these same kinds of mitigation measures to prevent significant post fire impacts? This should be analyzed more carefully, and an effort made to demonstrate that appropriate measures would be taken by any party that carries out an implementing project to adequately prevent significant impacts during construction. Absent that, how can this River MP be approved?

A7-136

- Operation/Common Elements, Multi-use Trails and Access Gateways, KOPs1-6, and Overall LA River Master Plan Implementation: The analysis concludes that by merely placing new structures and people within a VHFHSZ, that would exacerbate existing wildland fire hazard risks. There is no explanation of how these circumstances would worsen existing physical conditions involving slopes, landslides, and potential for significant post-fire impacts due to such conditions. Then, suitable mitigations are identified including preparation of drainage plans, geotechnical analysis, and a Post-Fire Risk Reduction Plan, that would adequately reduce impacts for projects carried out by the County, but not for projects carried out by other

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A7-136 cont. parties. This is an unnecessarily conservative conclusion, not explained and not reasonable. Why would any other party that carries out an implementing project approve a project in a VHFHSZ that doesn't include these same kinds of mitigation measures to prevent significant post fire impacts? This should be analyzed more carefully, and an effort made to demonstrate that appropriate measures would be taken by any party that carries out an implementing project to adequately prevent significant impacts during construction.

- A7-137 Cumulative Impacts/Geographic context: This is identified as the entire six-county area that comprises the SCAG region. This is a grossly overestimated geographic area of concern, as the LA River corridor occurs only within Los Angeles County and activities conducted along this corridor could not influence or be influenced by projects undertaken in the other counties, or even in other parts of Los Angeles County that are separated from the river corridor by a substantial distance, particularly areas that are heavily urbanized. The PEIR should be revised to establish a much narrower geographic context that extends along the project corridor area as the overly broad definition proposed results in an artificial basis for examining cumulative impacts and thus an overstating of potential cumulative impacts.

- A7-138 Contribution of the Project to Cumulative Impacts: This discussion indicates that despite implementation of all existing regulatory standards for construction within VHFHSZs and the mitigation measures set forth in this chapter, the project would still have a "cumulatively considerable contribution" to wildfire impacts. This conclusion is forced by the overly conservative determinations made with respect to project-level impacts, as noted in the earlier comments. If the PEIR is revised to explain how the project would not result in significant and unavoidable impacts through regulatory compliance and implementation of the mitigation measures identified in this chapter, the conclusion regarding cumulative impacts could also change to less than significant.

OTHER CEQA CONSIDERATIONS

- A7-139 Essentially all of the technical analysis sections (Sections 3.1 through 3.19) identified significant and unavoidable impacts. Please explain why only certain resource areas are identified in Section 4.1.

- A7-140 The identification of impacts found to be less than significant does not match the impacts identified in Sections 3.1 through 3.19. Many of the impacts identified in the Draft PEIR are identified as significant and unavoidable, particularly those projects not carried out by the County. Please explain the discrepancy.

- A7-141 Pursuant to CEQA Guidelines Section 15126.2(c), where there are significant unavoidable impacts, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

ALTERNATIVES

- A rationale for Alternative 2 – No In-Channel Improvements is not provided. There is no explanation offered as to which of the project's significant environmental effects would be avoided or reduced, as well as any other attributes that are considered to be an improvement of some sort, compared to the proposed Master Plan, as a statement of the intent of this alternative. A rationale should also indicate which of the project objectives would be met and any that would not. The PEIR should be revised to state this rationale, to enable any reader to comprehend the intent and environmental benefits of this alternative, without having to refer to the comparative impact analyses that occur later in this chapter.

A7-142

- Were any alternatives considered that would include application of more stringent hydraulic design standards for channel improvements related to better flood risk protection and resiliency, to address potential changing storm characteristics resulting from climate change? For example, should design criteria for future river channel or other flood risk improvements address a more intensive design-year storm? If so, could that change the scope and characteristics of any of the proposed Master Plan improvements?

A7-143

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CITY OF BURBANK

OFFICE OF THE CITY COUNCIL

On behalf of the entire Burbank City Council, I want to thank you again or providing an opportunity to comment on the Draft PEIR for the proposed 2020 LA River Master Plan. If you have any questions regarding the comments in this letter, please feel free to contact Community Development Director Patrick Prescott or Assistant Community Development Director Fred Ramirez at: (818) 238-5250.

Sincerely,

Bob Frutos, Mayor

Jess A. Talamantes, Vice Mayor

Sharon Springer, Council Member

Konstantine Anthony, Council Member

Nick Schultz, Council Member

Enclosures:

- Burbank Water and Power, Water Division Comments on 2020 LA River Master Plan Draft Program Environmental Impact Report
- City of Burbank, Transportation Division Draft 2020 LA River Master Plan Comments
- Burbank Fire Department, 2020 LA River Master Plan Memorandum, 3/17/2021

Copy:

County of Los Angeles Board of Supervisors

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BURBANK WATER AND POWER
WATER DIVISION COMMENTS ON 2020 LA RIVER MASTER PLAN DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

	Page	Comment
A7-144	ES-42	Dust-control measures should utilize recycled water where feasible.
A7-145	ES-89	New construction design guidelines should utilize recycled water where feasible, including but not limited to irrigation and HVAC cooling.
A7-146	ES-91	New construction design guidelines should utilize recycled water where feasible, including but not limited to irrigation and HVAC cooling.
A7-147	ES-133	Water Supply Assessment should take existing and proposed Water Code Section 1211 Change Petitions into account for increased water recycling and reduced wastewater discharges into the Project. The City of Burbank intends to eventually recycle (for non-potable and potable reuse purposes) all its wastewater and reduce recycled water discharges into the Burbank Channel to zero.
A7-148	2-13	Proposed channel modifications should take Water Code Section 1211 Change Petitions into account for increased water recycling and reduced wastewater discharges into the Project, which will minimally affect stream flows. The City of Burbank intends to eventually recycle (for non-potable and potable reuse purposes) all its wastewater and reduce recycled water discharges into the Burbank Channel to zero.
A7-149	2-22	LA River Planting Guidelines within the channel should take Water Code Section 1211 Change Petitions into account for increased water recycling and reduced wastewater discharges into the Project, which will minimally affect stream flows. The City of Burbank intends to eventually recycle (for non-potable and potable reuse purposes) all its wastewater and reduce recycled water discharges into the Burbank Channel to zero. Plants that require supplemental water should be irrigated with recycled water when feasible.
A7-150	2-29	Pavilion Best Practices should include usage of recycled water when feasible such as for irrigation, construction, and cleaning of outdoor surfaces.
A7-151	Figure 2-11	Walt Disney Studios should also be featured on the figure.
A7-152	3.1-14	The Los Angeles Equestrian Center is not within the City of Burbank.
A7-153	3.1-15	Corrected the BWP potable water system description: *"BWP's potable water system includes approximately 276 miles of pipelines ranging in size from 30 inches to 1.5 inches in diameter, 27 booster pumps, 22 tanks and reservoirs, eight wells, five MWD connections, and over 26,000 service connections…* *The annual potable water sales for 2011 through 2015 averaged 5,660 million gallons or 17,338 AF. Over the same 5 years, the average water demand was 15.9 mgd. Annual maximum day demands averaged 21.9 mgd."*
A7-154	3.1-15	The Lakeside Golf Club is not within the City of Burbank.
A7-155	3.1-56	Burbank Water and Power Rules and Regulations mandate the usage of recycled water, when feasible, for existing and proposed projects located near existing and proposed recycled water mains. The usage of recycled water is also required for construction purposes when feasible.

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	BURBANK WATER AND POWER WATER DIVISION COMMENTS ON 2020 LA RIVER MASTER PLAN DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT	
	Page	**Comment**
A7-156	3.7-32, 3.7-35	Water Conservation and Efficiency Guidelines should also utilize recycled water when feasible.
A7-157	3.18-15	BWP also provides recycled water outside of the City via interconnections and exchange agreements with the City of Glendale and the City of Los Angeles.
A7-158	3.18-15	The statement on recycled water distribution in Burbank is incorrect. The correct statement should read: *"Of the 935 million gallons of reclaimed water distributed in 2019, 35 percent was used for power generation purposes, 7 percent was used at the DeBell Golf Course, 3 percent was used at the City of Burbank Landfill, and the remaining 55 percent was used for other purposes such as landscape irrigation and HVAC cooling."*
A7-159	3.18-34	Water Code Section 1211 Change Petitions are state regulations relevant to impact analysis of utilities in this PEIR. The City of Burbank intends to eventually recycle all its wastewater (for non-potable and potable reuse purposes) and reduce recycled water discharges into the Burbank Channel to zero.
A7-160	3.18-66	Water Conservation and Efficiency Guidelines should also utilize recycled water when feasible.
A7-161	3.18-74	There is no mention of the City of Burbank's Recycled Water System in this section. The City of Burbank can also potentially supply recycled water, where feasible, for the Project.

WATER REPLENISHMENT DISTRICT

DIRECTORS
JOHN D. S. ALLEN, PRESIDENT
SERGIO CALDERON, VICE PRESIDENT
WILLARD H. MURRAY, JR., SECRETARY
ROB KATHERMAN, TREASURER
VERA ROBLES DEWITT, DIRECTOR

May 10, 2021

Attention: Grace Komjakraphan-Tek
Los Angeles County Public Works
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

Dear Ms. Komjakraphan-Tek,

I am writing on behalf of the Water Replenishment District (WRD) to provide you with the District's perspective regarding the Los Angeles River Management Plan (Plan). As a member of the Plan's Steering Committee, WRD is pleased to see the positive impact this project may bring to the Los Angeles Region. Specifically, WRD is pleased to see how recycled water is incorporated into the project and the positive attributes it can bring to the community.

A8-1 Headquartered in Lakewood, California and established by a vote of the people in 1959, WRD manages and protects local groundwater resources for over four million residents in southern Los Angeles County (11 percent of California's population). WRD has over 60 years of experience in water management. We work with regional partners to maintain healthy water levels in groundwater basins. Our service area includes 43 cities that use about 82 billion gallons of groundwater annually which accounts for approximately half of the region's water supply.

In 2019, WRD achieved the goals of its Water Independence Now (WIN) program. The goal of the WIN program was to create a supply of locally sourced and drought resilient water to be used for groundwater replenishment. The cornerstone project of WIN was the Albert Robles Center (ARC) for Water Recycling and Environmental Learning, which treats 3.25 billion gallons of water each year to near distilled levels. The completion of ARC created a new source of water for groundwater replenishment. Thanks to WIN, WRD no longer imports water and half of southern Los Angeles County's water supply is 100% locally sustainable and drought resilient.

A8-2 Now that WRD has completed its WIN initiative, our next major goal is to complete our Water Independence for All (WIN 4 All) program. The goal of WIN 4 All is to create a 100% locally sustainable water supply for the entire region. This means all water needs would be met by a drought resilient water supply. It is exciting to see that components of the WIN 4 All program aligns with project proposals in the Plan. In the next two decades, WRD aims to create new recycled water sources and increase stormwater capture to achieve the goals of WIN 4 All. WRD is encouraged to see that the Plan includes proposals for a network of pipelines for recycled water to be used for replenishment purposes and proposed plans to increase stormwater capture.

A8-3 The Plan also includes proposals to develop corridor-based water quality projects, technical support for feasibility studies, expand stormwater capture for groundwater recharge and debris

A8-3 cont.

removal from water. WRD has spearheaded similar projects in its service area and is available to provide support as these projects are further developed. WRD is especially interested in serving as a resource for cities that are included in the Plan and WRD's service area; these cities include the Cities of Vernon, Bell Gardens, South Gate, Compton and Long Beach. WRD is hopeful that by working through partnerships, proposed projects can help increase the local supply of available recycled water and improve water quality in the region.

A8-4

WRD is especially supportive of the Plan's proposal to treat stormwater, which can later be used for groundwater recharge. There are also benefits to increased recycled water flows in the Los Angeles River.

As you continue to move forward with implementing proposed projects, please count on WRD as a resource. If you have any questions or concerns, please contact Angelina Mancillas at AMancillas@WRD.org.

Kind Regards,



John D. S. Allen
President
WRD Board of Directors

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Parks Make Life Better!"
Norma E. García-González, Director
Alina Bokde, Chief Deputy Director

May 6, 2021

TO: Grace Komjakraphan-Tek
Genevieve Osmena
Department of Public Works

FROM: Sean Woods
Chief of Planning

SUBJECT: **DRAFT LA RIVER MASTER PLAN (LARMP), DRAFT DESIGN GUIDELINES & DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR)**

The Department of Parks and Recreation (DPR) has reviewed the Draft LARMP, Draft Design Guidelines and Draft PEIR. Please note our detailed comments as follows:

DRAFT LARMP

Implementation Matrix

Through DPR's involvement on the Internal County Team, we know that equity has been a through-line embedded in the fabric of the draft LARMP. With the successful implementation of the LARMP in mind, we recommend strengthening the equity language in the Implementation Matrix to ensure that the actions and methods: reflect the input of the stakeholders and communities involved in this process; are clearly defined and not subject to interpretation; and aim to serve disadvantaged communities with high and very high park needs.

A9-1

Accordingly, please include language within the Implementation Matrix chapter to:

(1) Prioritize implementation of projects in communities with high and very high park need;

(2) Prioritize increasing shade in communities that are lacking in trees and parks;

(3) Promote equitable and inclusive access to the river by implementing bi-lingual and multi-lingual signage; and

(4) The Design Guidelines include a section on Environmental Graphics and has details on bilingual, ADA, Indigenous Peoples language required on signage. This is helpful information, but it can only be found in the appendix. We recommend that the language translation be reflected within the methods.

A9-1 cont.

Page 46 and 47, Literature Review

- Include DPR's Regional Trail System Map as identified in the County's General Plan (General Plan, Fig. 10.1) as part of the Literature Review to show access and connectivity to the larger regional trail system contemplated in the General Plan.

Page 48, Jurisdictions, Ownership, and Rights

- Include that DPR has multi-use trail jurisdiction along ~10 miles of the LA River.

Page 452, Implementation Matrix

Action 2.1

- Include DPR as a partner.

Method 2.1.2

- Revise with the following: Utilize river channel right-of-way and adjacent areas to increase park space and prioritize implementation of ROW projects in disadvantaged and/or high and very high park need communities.

Method 2.1.4

- Revise with the following: ~~Use~~ Develop river channel right-of-way and adjacent areas ~~to assist in ensuring~~ equitably to ensure that all LA County residents live within a half mile of a park.

Method 2.1.7

- Revise with the following: Secure ongoing and long-term funding for land acquisition, construction and maintenance of additional parks and recreational facilities, and prioritize funding for park facilities in high and very high park need areas to ensure that funding benefits the communities with the greatest need.

Action 2.2

- Include DPR as a partner.

Method 2.2.5

- Revise with the following: ~~Increase shade along the trail, where possible using shade trees (LA River Design Guidelines).~~ Promote shade equity by increasing shade amenities along the trail, prioritizing areas that are lacking in trees and parks.

Method 2.3.1

- Revise with the following: Ensure there is a shaded place to rest every half mile, on average, along the river, and prioritize implementation in communities that are lacking in trees and parks.

- Add another method: **Method 2.3.6** Ensure signage includes best practices for universal accessibility and multi-lingual translation.

Page 453

Action 2.6

- Revise with the following: Repurpose single-use spaces, such as power-line easements, rail rights-of-way, or flood infrastructure, to serve multiple functions such as multi-use trails or habitat, and prioritize spaces that are in high and very high park need areas.

Method 2.6.1

- Revise with the following: Develop master agreements with utilities for easements to maximize use of ground space under overhead or above buried utility lines for parks, open space, and trails, and prioritize agreements in high and very park need areas.

A9-1 cont.

Page 457

Actions 4.2

- Include DPR as a partner.

DRAFT DESIGN GUIDELINES

Pages 54-58, Frames 3 and 2

- Include DPR's multi-use trail as a notable feature in Planning Frames 2 and 3, to support the Design Considerations for Frame 2 that reference equestrian trails within the Frame.

Pages 66-79, Access and Mobility

- The Plan contemplates separate paths for active transport, pedestrians, and equestrians. While separating uses within large rights-of-way can be beneficial, separate trails pose a maintenance challenge for the operating agency, and limits use in areas where there is limited right-of-way. DPR's existing trail along the LA River accommodates, pedestrians, equestrians, and cyclists, and is somewhat represented in the minimum multi-use trail combination cross-section shown on page 67; however, equestrian use should be shown furthest from the riverside, and the cross section on page 67 should be revised to reflect as such.

- Apply consistent language to the cross sections in the Access and Mobility chapter of the Design Guidelines. The Minimum-Preferred trail combination cross sections on pgs. 67 and 68 should reference the right of way combinations identified on pg. 70. For cross sections that describe trail combinations in narrow right-of-way, equestrian and pedestrian use should be combined.

A9-1 cont.

Pages 80-81, Paving Materials

- Add Equestrians as a user for the Stone Fines + Decomposed Granite surface type
- Add Pedestrians as a user for Compacted Earth surface type

DRAFT PEIR

Page 3.15-2, Regional Trails

- The County operates two separate trails along segments of the LA River. The Department of Public Works maintains the bike trail, which is described in this section. DPR operates and maintains the ~10-mile multi-use trail that runs from Imperial Highway south to Willow Street. Please revise this section to include the natural surface multi-use trail. Establish consistent terminology for trails throughout the document and distinguish when the trail is referring to the bike path, the multi-use trail, or both.

Figure 3.15-1.2- Frame 2. Parks and Recreational Facilities

- Revise #47 72nd Street Staging Area to 72nd Street Equestrian Park.

A9-2

Figures 3.15-2.1, 2.2, 2.3 and 2.4: Trails and Access Point

- Revise the legend to change "Dept. of Regional Planning Trails" to either County Trails or distinguish between DPW bike paths and DPR Trails.

Pages 3.15-8, -11, -16, -17, -18, -24, -25, -29, -30, -32, -36, -39 and -40

- Revise the source: “Los Angeles County, Department of Recreation 2020” to “Los Angeles County Department of Parks and Recreation 2020.”

Page 3.15-3, Table 3.15-1. Los Angeles County Park Classifications

- The Draft EIR has the description of park amenities condensed in one paragraph. The park amenities should be categorized as passive park amenities, active park amenities, and park facilities. Please update the table as follows:

Park Type	Classifications
Local Park System	
Community Park	Acres per Thousand Population: 4/1,000 Suggested Acreage: 10 to 20 acres Service Area: 1 to 2 miles Passive park amenities including but not limited to: informal open play areas, children's play apparatus, family and group picnic areas with overhead shelters, barbecues. Active sports activities including but not limited to: lighted sports fields, basketball courts and tennis courts. Additional amenities may include aquatics complex, skate park, arena soccer, roller hockey, community gardens, and dog parks. Park facilities including but not limited to: public restrooms, concession building, community buildings, maintenance building and onsite parking and information kiosks.
Neighborhood Park	Acres per Thousand Population: 4/1,000 Suggested Acreage: 3 to 10 acres Service Area: 1/2 mile Passive park amenities including but not limited to: informal open play areas, children's play apparatus, group picnic areas with overhead shelters, barbecues. Active park amenities including but not limited to: practice sports fields, basketball, tennis, and volleyball courts. Park facilities including but not limited to: public restroom, onsite parking and information kiosks.
Pocket Park	Acres per Thousand Population: 4/1,000 Suggested Acreage: less than 3 acres Service Area: 1/4 mile Passive park amenities including but not limited to: picnic areas and seating areas. Active park amenities including but not limited to: children's play apparatus.
Park Node	Acres per Thousand Population: 4/1,000 Suggested Acreage: 1/4 acre or less No service radius area Can include: plazas, rest areas, playgrounds, landmarks and public

A9-2
cont.

	art installations
Regional Park System	
Community Regional Park	Acres per Thousand Population: 6/1,000 Suggested Acreage: 20 to 100 acres Service Area: up to 20 miles Passive park amenities including but not limited to: informal open play areas, children's play apparatus, group picnic areas with overhead shelters, barbecues. Active sports activities including but not limited to: lighted sports fields, basketball courts and tennis courts. Additional amenities may include one or more of the following features: multiple sports facilities, aquatics center, fishing lake, community building and gymnasium, and scenic views and vistas. Park facilities including but not limited to: public restrooms, concession building, community buildings, maintenance building and onsite parking and information kiosks.
Regional Park	Acres per Thousand Population: 6/1,000 Suggested Acreage: greater than 100 acres Service Area: 25+ miles Passive park amenities including but not limited to: group picnic areas with overhead shelters, barbecues. Additional amenities may include one or more of the following features: lakes, wetlands, auditoriums, water bodies for swimming, fishing and boating, and sports fields.
Special Use Facilities	Acres per Thousand Population: 6/1,000 No size criteria No assigned service radius area Generally, single purpose facilities. Can include passive features such as: wilderness parks, nature preserves, botanical gardens and nature centers. Active uses can include: performing arts, water parks, golf driving ranges and golf courses.

A9-2 cont.

Page 3.15-11, Table 3.15-10. Parks and Recreational Resources within Frame 2

- Revise #47 72nd Street Staging Area to 72nd Street Equestrian Park.
- List #47 72nd Street Equestrian Park under Special Use Parks/Facilities.

A9-2 cont.

Page 3.15-13, Existing Local Resources, 2nd paragraph, last sentence

- Revise the size of Los Amigos Golf Course to 120.75 acres.

Page 3.15-16, Table 3.15-10. Parks and Recreational Resources within Frame 3

- Move #74 Los Amigos Golf Course under Special Use Parks/Facilities.
- Revise the size of Los Amigos Golf Course to 120.75 acres.
- Move #88 Washington Ave Park under Pocket Parks.

A9-3

Page 3.15-41, Regional Regulatory

- Add the following paragraph regarding the County Trails Manual after the Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment:

  Los Angeles County Trails Manual

  The LA County Trails Manual provides guidance to County departments that interface with trail planning, design, development and maintenance of hiking, equestrian, and mountain biking trails. The Manual provides guidelines for implementation of multi-use trails within the unincorporated communities of LA County and recognizes the existence of the broader regional trail network in the County of LA and surrounding counties that provides access to recreational resources operated by federal, state, and local agencies. The Manual sets the guidelines for reviewing plans and specifications for trails that are provided in conjunction with land use planning and the entitlement process for projects proposed for development within the County. Proposed developments are reviewed for consistency with the Trails Manual. The goal of the Trails Manual is to establish well-defined trail types, guidelines, and priorities to facilitate the development of high-quality trails that benefit the public.

Thank you for including this Department in the review of the draft LARMP and DEIR. If you have any trails-related questions, please contact Ms. Sheela Mathai Kleinknecht at smathai@parks.lacounty.gov. If you have any other questions, please contact Ms. Julie Yom at jyom@parks.lacounty.gov.

DEPARTMENT OF CITY PLANNING

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

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DANA M. PERLMAN
YVETTE LOPEZ-LEDESMA
JENNA HORNSTOCK
VACANT
VACANT

CITY OF LOS ANGELES
CALIFORNIA

ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
(213) 978-1271

VINCENT P. BERTONI, AICP
DIRECTOR

KEVIN J. KELLER, AICP
EXECUTIVE OFFICER

SHANA M.M. BONSTIN
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP
DEPUTY DIRECTOR

LISA M. WEBBER, AICP
DEPUTY DIRECTOR

VACANT
DEPUTY DIRECTOR

May 13, 2021

Grace Komjakraphan-Tek
Los Angeles County Public Works
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

RE: 2020 LA River Master Plan – SCH# 2020070128 GTS# 07-LA-2020-03308 Vic. LA Multiple

Dear Grace Komjakraphan-Tek,

A10-1

Thank you for including the City of Los Angeles, Department of City Planning in the environmental review process for the above referenced project. The proposed 2020 LA River Master Plan builds upon the adopted 1996 Master Plan and other previous studies. The program involves a series of projects that will improve a two-mile wide corridor along 51 miles of the LA River aimed at improving health, equity, access, mobility, and economic opportunity for the diverse communities it traverses from the Santa Susana Mountains to the Pacific Ocean in Long Beach. The 2020 LA River Master Plan proposes six categories of project improvements, or kit of parts (KIP) over the next 25 years: 1) Trail and Access Gateways; 2) Channel Modifications; 3) Crossings and Platforms; 4) Diversions; 5) Floodplain Reclamation; 6) Off Channel Land Assets.

The LA River Master Plan includes 9 frames, of which frames 5-9 are within the City of Los Angeles and traverse 12 of the City's 35 Community Plan Areas from east to west including: Boyle Heights, Central City, Central City North, Northeast Los Angeles, Silver Lake-Echo Park-Elysian Valley, Hollywood, North Hollywood- Valley Village, Sherman Oaks-Studio City-Toluca Lake - Cahuenga Pass, Van Nuys-North Sherman Oaks, Reseda-West Van Nuys, Encino-Tarzana, and Canoga Park-Winnetka-Woodland Hills-West Hills at the river's headwaters.

A10-2

Given this scope, it will be important for the Master Plan EIR and subsequent projects to reflect the diversity of communities, ecology, and land uses along the course of the River, and ensure enhanced community connections to the resource are made at every opportunity.

After reviewing the Draft PEIR, Los Angeles Department of City Planning has the following comments:

Overall Comments

A10-3 The City of Los Angeles has a regulatory framework implemented by many City agencies including the Departments of Public Works, City Planning, Building and Safety, Transportation and others and is continuously updating its ordinances to reflect state laws and regional standards. The PEIR should meet or exceed the City's Regulatory Framework. The PEIR preparer should review the City of Los Angeles's CEQA Regulatory Framework document and include any footnotes and references contained therein. (See: Regulatory Framework - Google Drive; please contact the Department of City Planning if there are issues accessing the document).

A10-4 Additionally, the City of Los Angeles adopted the LA River Improvement Overlay (LA RIO), Section 13.17 of the Los Angeles Municipal Code (Ordinance Nos. 183144 and 183145 which became effective on August 11, 2014). The Master Plan PEIR and all subsequent Projects will be subject to the LA RIO standards.

A10-5 The City of Los Angeles would like to see clarification on the implementation of the 2020 LA River Master Plan Design Guidelines document included as Appendix B. The City of Los Angeles would like to see the Design Guidelines be included as Project Design Features to ensure that they are enforceable.

Finally, the Los Angeles City Planning Department would like to provide the following comments related to specific CEQA impact areas and their analysis.

Aesthetics:

Within the City of Los Angeles frames numbered 5-9, all development must adhere to LA RIO standards with respect to nighttime illumination and views. The RIO includes development standards to ensure the screening of electrical and mechanical equipment from public view as well as lighting standards to prevent glare, light spillover, and encourage downcast and dark sky compliant lighting. See excerpt below and amend Aesthetic mitigation measures as appropriate.

A10-6 "Electrical transformers, mechanical equipment, water meters and other equipment shall be screened from public view. The screening may be opaque or perforated, provided that not more than 50 percent of the face is open. The screen shall be at least 6 inches taller than the equipment and not more than 2 feet taller than the equipment.

Exterior Site lighting. (a) All site and building mounted lighting shall be designed such that it produces a maximum initial luminance value no greater than 0.20 horizontal and vertical foot candles at the site boundary, and no greater than 0.01 horizontal foot candles 15 feet beyond the site. No more than 5.0 percent of the total initial designed lumens shall be emitted at an angle of 90 degrees or higher from nadir (straight down). (b) All low pressure sodium, high pressure sodium, metal halide, fluorescent, quartz, incandescent greater than 60 watts, mercury vapor, and halogen fixtures shall be fully shielded in such a manner as to not exceed the limitations in Subdivision 3(a), above."

(Note: see also comments under the Land Use section)

Aesthetics
3.1(d): Would the proposed Project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

A10-6 Mitigation Measure AES-3a: Design Exterior Lighting to Minimize Nighttime Illumination Spillover. Exterior lighting will be designed to shield and direct illumination to the subsequent project sites and minimize light spillover to any adjacent residential uses.

Mitigation Measure AES-3b: Design Exterior Structures to Minimize Glare. The exterior of the proposed buildings/structures will be constructed of materials such as high-performance, tinted, non-mirrored glass; painted metal panels; and pre-cast concrete or fabricated wall surfaces.

Biological Resources:

A10-7 The Biological Resources Analysis does not include any mention of the Southern California Mountain Lion, which has been observed throughout Griffith Park in Frame 6. In April 2020, the California Department of Fish and Game Commission granted mountain lions Los Angeles' environmentally sensitive areas "candidate status" under the California Endangered Species Act (CESA). The City of Los Angeles is currently developing a Wildlife Protection Pilot ordinance in the Santa Monica mountains. However, mountain lions are known to traverse large expanses of areas and have been observed in urban areas outside of Griffith Park. As such, areas along the LA River and tributaries are critical for wildlife migration. The PEIR must be amended to reflect the known presence of this critical Special Status species. (See Table 3.3-1. CNDDB Special-Status Wildlife Observed within the LA River Study Area). Furthermore, additional analysis is warranted to determine if additional mitigation measures are necessary to protect this candidate species during construction and operation.

Cultural Resources, Section 3.4:

A10-8 The document includes context for the Zanja Madre, and states that it is included as "historical facts that are most important to understanding the types of cultural resources that could be located in the project study area" on page 3.4-11. The inclusion of the context is an acknowledgement of the potential to discover this resource or type during a project. Extensive information on the Zanja Madre is not included in the report likely due to the classification of archaeological resources.

A10-9 On page 3.4-32, the Los Angeles Cultural Heritage ordinance is referred to as "a historic preservation ordinance," this section should be amended to more accurately call it the Cultural Heritage Ordinance.

A10-10 The first sentence of the first paragraph on page 3.4-33, should read "in the Conservation Element of the City of Los Angeles General Plan" versus "in the City of Los Angeles General Plan".

A10-11 Page 3.4-42 includes "SurveyLA historic resource information at the City's website Historic Places LA" as the sole source to search for all historic resources data. The section should additionally include the datasets and various individual surveys completed for the Community Plan Areas (CPAs) and overlays within the City of Los Angeles frames, which include: Boyle Heights, Central City, Central City North, Northeast Los Angeles, Silver Lake-Echo Park-Elysian Valley, Hollywood, North Hollywood- Valley Village, Sherman Oaks-Studio City-Toluca Lake - Cahuenga Pass, Van Nuys-North Sherman Oaks, Reseda-West Van Nuys, Encino-Tarzana, and Canoga Park-Winnetka-Woodland Hills-West Hills at the river's headwaters. Additional overlays such as Cornfield Arroyo Seco Specific Plan Area (CASP), Northeast Los Angeles River Revitalization Area (NELARRA), and the Adelante Eastside Redevelopment Area should also be reviewed. If

A10-11 cont.

Historic Places LA is not available, researchers should know where else they can look for this information. The historic resources surveys are:

- SurveyLA CPA Historic Resources Survey for Boyle Heights
- SurveyLA CPA Historic Resources Survey for Northeast Los Angeles
- Historic Resources Survey for the Confield Arroyo Seco Specific Plan Area
- Historic Resources Survey for the Northeast Los Angeles River Revitalization Area
- Intensive Historic Resources Survey for the Adelante Eastside Redevelopment Area

A10-12

The table that starts on Page 3.4-44 titled "City of Los Angeles Historical Resources within 1 mile to Either Side of the LA River" appears to only include designated HCMs. The table should also include properties determined eligible through Section 106 and those recorded through a historic resources survey. It does not appear that the table includes any Section 106 determined eligible, SurveyLA, or CRA survey historic resources. A note clarifying that these are missing from the table would be helpful to not mislead readers into assuming the list is the full extent of the resources present.

A10-13

On page 3.4-55, Under "Office of Historic Preservation" add "Built Environment Resource Directory (BERD)" as this resource includes many of the 2-status code properties the CHRIS is missing.

Land Use:

A10-14

The Department of City Planning is interested in broadening connections within the LA River network and KOP projects to neighborhoods in the study area and providing equity of access to river improvements. During the site selection process and feasibility studies, the County should consult with the City of Los Angeles to ensure that site selection, planning, and design meet requirements of Zoning Information (Z.I) NO. 2358, River Improvement Overlay Supplemental Use District, LAMC Section 13.17, the Citywide Design Guidelines, adopted Community Plans and overlay districts and any other applicable regulations.

A10-15

Amend Mitigation Measure LU -1: Construction Management Plan
Require signs to be posted at least 30 days prior to construction to inform community members that construction will begin, provide detour signage, and wayfinding to nearby amenities during LA River pathway closure. See also REC-1.

A10-16

Amend Mitigation Measure LU-3: Alternative Connectivity.
During the subsequent project design process, determination will be made whether the project design would result in a physical barrier to the community in the form of road closures, walls, or other project features that could disrupt connectivity within the community. If it is determined that physical barriers would result, the implementing entity or person shall meet with the jurisdiction having authority of the site and will do one or more of the following:

- Redesign the project to avoid the impact.
- Provide alternative connections that maintain connections across the community. This may include constructing off-site street connections, including alleys and other roadways, that maintain community connectivity and access, to the satisfaction of the local jurisdiction.

Amend Mitigation Measure LU-4: Site Selection Process.

A10-17 *Add language:* During site selection and feasibility studies for future development within the City of Los Angeles, consult with LA City Planning to ensure that site selection, planning and design meet requirements of Zoning Information (Z.I) NO. 2358, River Improvement Overlay Supplemental Use District, LAMC Section 13.17 and any other applicable regulations.

Recreation:

During construction activities for the life of the Master Plan it is likely that construction will result in periodic disruptions in the availability of the LA River bicycle and pedestrian trails, both as recreational trails and as thoroughfares for commuters. As such, Los Angeles City Planning recommends the following amendment to ensure that users have adequate advance notice of closures due to construction.

A10-18 Amend Mitigation Measure REC-1: Minimize Disruption of Recreational Uses During Construction. As specific subsequent project and location information is identified during detailed design, the implementing agency will confirm the timing, duration, and area extent of construction activities that would occur. If temporary closures of existing recreational facilities would be necessary for construction, the specific increase in use of other nearby recreational facilities will be evaluated. Factors to be considered in the evaluation include the duration of the closure, acreage and type of facility that would be unavailable due to the closure, and existing usage levels at the relevant nearby recreational facilities. If there is an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or is accelerated, the implementing agency will apply measures including, but not limited to, one or more of the following:

- Minimize duration of construction period.
- Modify construction phasing to limit disturbance of existing recreational facilities.
- Avoid construction during peak use periods.
- At least 30 days prior to initiating construction activities, post courtesy signage at start/end points and at points along pathway informing ~~users~~ community members of the duration of construction, with additional wayfinding to adjacent facilities with similar amenities.

See comment above: Add language to bullet #4 and to CMP (MM LU-1). Signs must be posted prior to start of construction to inform community members of LA River pathway closure, and provide alternative routes.

Transportation:

A10-19 For portions of the LA River within the City of Los Angeles, the PEIR and subsequent Projects, should utilize Los Angeles Department of Transportation's VMT calculator to determine screening criteria rather than LA Country VMT criteria. See LADOT Development review processes and procedures: https://ladot.lacity.org/businesses/development-review. Mitigation Measure TRA-1a. "Determine VMT Based on Type of Subsequent Project" should be modified accordingly.

Amend Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT

Clarify TRA-1b to include TDM strategies that promote pedestrian use and other modes of active transportation. Los Angeles Department of City Planning recommends the following modification to MM TRA-1b:

A10-20

The implementing agency (County or other jurisdictional agency) will implement a subsequent project-specific program utilizing transportation demand management (TDM) strategies and neighborhood or site enhancements to reduce VMT, and any other appropriate strategies to address identified impacts and reduce VMT to the River Corridor. The program to reduce VMT will be based on the suite of eligible TDM strategies included in the County Guidelines or other measures with substantial evidence, or, if the subsequent project is located in an incorporated city, the program will be based on Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise) Significance after Mitigation (when carried out by County) Significance after Mitigation (when not carried out by County) that city's list of qualifying VMT mitigation strategies. Specific measures can include but are not limited to:

- Increasing transit accessibility
- Relocating a project in order to be adjacent to transit
- Pricing any provided parking at river access sites to discourage vehicle trips to the River Corridor
- *Add:* <u>Providing bicycle parking</u>
- Implementation of neighborhood or site enhancements such as pedestrian network improvements (for example, high-visibility crosswalks, continuous sidewalks, and Americans with Disabilities Act [ADA]-compliant directional curb cuts at intersections), and traffic calming measures such as speed humps or chicanes

Thank you for your consideration of these comments. Please feel free to contact us at michelle.levy@lacity.org with any questions.



Sincerely,
Michelle Levy
Senior City Planner, Urban Design Studio

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

May 13, 2021

Grace Komjakraphan-Tek
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
Program Environmental Impact Report (PEIR) – Metro Comments

Dear Ms. Komjakraphan-Tek:

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.

A11-1 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 Metro's comments on 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.

[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.

General Comments

Metro Policy Planning Efforts

Metro would like to advise the County that it has adopted four 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.

A11-2

1. Long Range Transportation Plan: Adopted September 2020, the revised Long Range Transportation Plan (LRTP) provides a detailed roadmap for how Metro will plan, build, operate, maintain, and partner for improved mobility in the next 30 years. The LRTP will guide future funding plans and policies needed to move LA County forward for a more mobile, resilient, accessible, and sustainable future. More information is available at: https://www.metro.net/projects/lrtp/

A11-3

2. 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/

A11-4

3. 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/

A11-5

4. 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 is 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 (SCRRA), which operates Metrolink, on their capital planning efforts.

A11-6

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 2028. The project is currently in the Environmental Phase with anticipated selection of a locally preferred alternative (LPA) by 2023. More information may be found online

A11-6 cont.

at: https://www.metro.net/projects/lariverpath/.

A11-7

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 (PE ROW/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.

A11-8

3. Rail to Rail/River Active Transportation Project: Metro's Active Transportation Corridor Project, Segment B, referred to as "Rail to River," as it connects the Metro A Line (Blue) east to the Los Angeles River, will ultimately connect to the Segment A portion ("Rail to Rail") and once complete, the entire Active Transportation Corridor Project will span roughly 10 miles and use an existing, underutilized railroad right-of-way (ROW) and convert it into a multi-purpose pedestrian and bicycle transportation corridor on the western end of the corridor and create connections to the Los Angeles River on the eastern end of the corridor. The project is currently in a Supplemental Alternatives Analysis to determine a locally preferred alternative at Randolph St. where the West Santa Ana Branch Project is located. For more information please go to www.metro.net/r2r.

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

A11-9

1. Rail Operations: 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 SCRRA, portions of which use Metro-owned ROW. Buses and trains operate 24 hours a day, seven days a week in these facilities.

2. Impact Analysis: Due to the Project's proximity to the G Line (Orange), A Line (Blue), and Metrolink, the PEIR should analyze potential effects on light rail operations and identify mitigation measures or project design features for subsequent implementation actions as appropriate. Critical impacts to be studied should include (without limitation): impacts of Project construction and operation on and potential damage to the structural and systems integrity of tracks and related infrastructure; disruption to light rail service; and temporary and/or permanent changes to customer access and circulation to the stations. Specific impacts and mitigation measures that should be studied include:

A11-10

   a. Overhead Catenary System (OCS) Setback: Overhead catenary wires and support structures adjacent to the Project power Metro trains. OCS wires should be treated like any high voltage electrical utility wires. Construction equipment such as cranes or aerial work platforms for installing Project landscaping or utilities may be in close proximity to the OCS and can pose an electrocution hazard during Project construction and operation.

      Recommended mitigation measure: The Project Sponsor shall take all necessary measures to protect the OCS from damage due to Project activities during and after construction, pursuant to applicable California Department of Industrial Relations regulations (Cal. Code of Regulations, Title 8). The Project Sponsor shall post proper signage for equipment working around the OCS wires. Any

A11-10 cont.

landscaping shall be set back at least ten (10) feet from the OCS wires and support structures.

In addition, Metro strongly recommends that the following standard Project Design Features be incorporated into the Project to address these potential impacts:

b. Technical Review: The Project Sponsor will submit civil engineering and landscaping drawings and calculations, as well as construction work plans and methods for any utility work in the public right-of-way and any crane placement and radius, to evaluate any impacts to Metro or Metrolink infrastructure in relationship to the Project. Before the start of any construction activities, the Project Sponsor will obtain Metro's approval of final construction plans.

c. Construction Safety: The construction and operation of the Project shall not disrupt Metro's and/or Metrolink's operation and maintenance activities, or the structural and systems integrity of Metro's or and/or Metrolink's 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:

A11-11

i. Work in close coordination with Metro to ensure that Metro and/or Metrolink service, visibility, and structural integrity are not compromised by construction activities or permanent build conditions;

ii. Notify Metro of any changes to construction activities that may impact the use of the ROW;

iii. Permit Metro staff to monitor demolition and/or construction activities to ascertain any impact to Metro and/or Metrolink infrastructure.

d. ROW Entry Permit: For any temporary or ongoing access to Metro 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 Project Sponsor shall apply for and obtain such approval from Metro not later than two months before the start of Project construction. The Project Sponsor shall apply for and obtain approval from Metro for any special operations, including the use of a pile driver or any other equipment that could come into proximity to the OCS or support structures, not later than one month before the start of Project construction.

Specific PEIR Comments

1. *Chapter 3, CEQA Environmental Impact Assessment,* **Page 3-10:**

A11-12

a. NextGen Bus Plan: As the Plan raises issues around connection/access to the river, it should discuss how Metro's NextGen Bus Plan may change accessibility to the river. It

A11-12 cont. may also be worthwhile to mention Metro's plans for Rail to River Active Transportation Path, Segment B as it relates to the Plan.

A11-13 b. It may also be good to include language on how the Metro LA River Path project is funded by Measure M, since Measure M is listed as an existing LA County Funding Source (p442) but there is no language on the project directly related to the Plan that Measure M funds.

A11-14 2. *Chapter 3, CEQA Environmental Impact Assessment,* **Page 3-10:** Metro's Board of Directors adopted the 2020 Long Range Transportation Plan (LRTP) on September 24, 2020. Last sentence: change "The 2020 Draft LRTP " to "The 2020 LRTP" to refer to the final document.

A11-15 3. *Chapter 3, CEQA Environmental Impact Assessment,* **Page 3-10, 3.16-9:** LRTP section can have more language on Metro's footprint in the LA River development such as focused language on Metro plans for the LA River Path (San Fernando Valley and Central LA) and Rail to River Active Transportation Corridor Segment B.

A11-16 4. *Chapter 3, CEQA Environmental Impact Assessment,* **Page 3.16-1:** Hard to understand last three sentences of paragraph 3, regarding mitigation measures carried out by County on activities not to be carried out by the County under the Plan. Rephrase to clarify.

A11-17 5. *Chapter 3, CEQA Environmental Impact Assessment,* **Page 3.16-4:** 1st paragraph last sentence: hard to read- suggested change to "primary means of regional movement of people and goods, providing for direct vehicular access to river access points, places of employment, services such as healthcare and recreation, and goods".

6. General:

A11-18 a. Consider adding temporary construction phase artwork banners in place of, or in addition to, "screening" at fences as a mitigation.

A11-19 b. Include existing and planned Cultural Resources such as Judith Baca's "the Great Wall," the future potential water wheel, "Bending the River" by Lauren Bon, Defining Line by Debra Scacco, and the SELA Arts Festival to name a few.

A11-20 7. General, 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.

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

CITY OF LONG BEACH

Office of the City Manager
411 West Ocean Boulevard, 10th Floor Long Beach, CA 90802
(562) 570-6711

May 12, 2021

Attention: Grace Komjakraphan-Tek
Los Angeles County Public Works
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
Email: LARiverCEQA@pw.lacounty.gov

Re: 2020 LA River Master Plan PEIR Comments

Dear Ms. Komjakraphan-Tek:

Thank you for the opportunity to comment on the Los Angeles River Master Plan (LARMP) Draft Program Environmental Impact Report (PEIR). The LA River Watershed covers a land area of 834 square miles and is shaped by the path of the LA River, flowing from river mile 51.0 in Canoga Park within the City of Los Angeles to mile 0 in Long Beach where the river meets the Pacific Ocean. The LA River study corridor (1 mile on each side of the river) passes through 18 local jurisdictions.

A12-1 As provided in the Draft PEIR, two frames encompass the City of Long Beach. Frame 1 (Estuary) is primarily within the City of Long Beach and extends 4.0 miles from river mile 0.0 to 4.0, and it encompasses approximately 10.79 percent of the total 2020 A River Master Plan study area. This portion of the LA River is characterized by brackish water year-round and is identified as an important bird habitat. The Shoreline Aquatic Park and the Queen Mary are in the Long Beach Port near river mile 0.0; Santa Cruz Park, Golden Park, and Cesar Chavez Park are on the left bank at river mile 0.3 to 0.8; and Wrigley Greenbelt is on the left bank of the LA River from river mile 2.9 to 4.0. Frame 2 (South Plain) is in the Cities of Long Beach, Carson, and Compton and unincorporated County areas, and it extends 4.4 miles from river mile 4.0 to 8.4. Frame 2 encompasses approximately 8.66 percent of the 2020 LA River Master Plan study area and has some of the widest right-of-way (ROW). Industrial and residential development, transmissions easements, Interstate 710, and SR-91 cut into the landside ROW in the northern portion of the frame. This frame is identified as having freshwater year-round and is an important bird habitat area. DeForest Park and DeForest Wetlands is between river mile 6.8 and 7.5 along the left bank.

The City of Long Beach has the following comments on the LARMP Draft PEIR:

Parks and Open Space

A12-2

- The underlying GIS information used to generate maps for the LA River Master Plan and subsequent EIR omits certain parks and open space in Long Beach and includes incorrect spatial information:
    - Certain parks are shown as developed that are undeveloped.
    - Certain parks are omitted altogether, but have been developed, open, and publicly accessible for several years, and should be included on maps and in tables.

- Park inventory information used in tables in the PEIR – referencing the source as Los Angeles County, Department of Recreation 2020 – does not reflect certain Long Beach parks and open space, double counts certain sites, or are misclassified.

- The Existing Resources section on page 27, and subsequent tables, are missing several parks and open space in this section of the map.

A12-3

- The listing of Long Beach regulatory documents on page 61 is missing references to other adopted City of Long Beach plans, including, but not limited to Climate Action and Adaptation Plan, Long Beach RiverLink, Sustainable City Action Plan, Uptown Open Space Vision Plan, DeForest Park Vision Plan, Hamilton Loop Vision Plan, Drake Chavez Vision Plan, General Plan Mobility Element, CX3 Plan and Bike Master Plan.

- This information was previously submitted, and the document has not been corrected. City staff requests that the above be rectified prior to the adoption of the LARMP.

LA River Master Plan Supplemental Comments

The following are supplemental comments that apply to the LA River Master Plan document that correspond to comments on the PEIR.

A12-4

- The underlying GIS information used to generate opportunity maps on pages 353, 395, 399 of the LA River Master Plan continue to be incorrect, omitting developed and open Long Beach parks and wetlands. This page also omits key opportunity sites identified in the City's adopted Uptown Open Space Vision Plan, DeForest Park Vision Plan, and Hamilton Loop Vision Plan shown in the links below.
    - Uptown Open Space Vision Plan: http://longbeach.legistar.com/LegislationDetail.aspx?ID=3554305&GUID=CE055640-ABF1-48F8-A970-C3E5C9F8EA1D
    - DeForest Park Vision Plan: http://longbeach.legistar.com/LegislationDetail.aspx?ID=4665783&GUID=A91099AD-0726-4375-9286-2FB577C274BC

A12-4 cont.

- Hamilton Loop Vision Plan: http://longbeach.legistar.com/LegislationDetail.aspx?ID=4749654&GUID=7F167952-C4BB-4EE0-83AD-CCCA6A01F8DF

A12-5

- Similarly, the map in the EIR shown on page 4 in Figure 3.15-1.2 - Frame 2 is incorrect, omitting developed and open Long Beach parks and wetlands. The map is also incorrectly labeled with corresponding numbers not aligning with the proper names of parks.

A12-6

- There appears to be a series of pages missing after 357 that show the opportunity sites at the mouth of the LA River in Long Beach, which appeared in a previous draft of the plan. These missing pages reflected the image on page 399. The missing pages and Page 399 need to be updated to reflect adopted open Long Beach parks and wetland opportunities identified in the adopted Drake Chavez Vision Plan. This information was previously submitted, and the document not corrected. These corrections need to be rectified prior to the adoption of the Master Plan. http://longbeach.legistar.com/LegislationDetail.aspx?ID=4057684&GUID=865C218F-D400-4EF9-AABD-D8560BD23FAE

- City staff requests that the above be rectified prior to the adoption of the LARMP.

Transportation (Section 3.16)

A12-7

- Page 3.16-1, second paragraph. Why were there not trip generation assumptions made if the modeling data was not available?

A12-8

- VMT analysis is good and acceptable practice.

A12-9

- Page 3.16-1, last paragraph. Does this mean that the impacts could be significant if agencies other than the County do not perform the mitigation measures? If so, then the County should coordinate with outside agencies to ensure that all elements are put in place to mitigate the potential impacts of the project.

A12-10

- Excellent chart 3.16-1.

A12-11

- 3.16-4 and 3.16-13: The City of Long Beach adopted the Safe Streets Long Beach Action Plan (Vision Zero) in July 2020. Please include this information for the streets located in the High Injury Network within Frame 1 and Frame 2. https://www.longbeach.gov/globalassets/go-active-lb/media-library/documents/programs/safe-streets-lb-action-plan---final

A12-12

- Page 7. Consider adding to the end of the first paragraph the following: “Although such reductions could be perceived as lofty targets, all projects should strive to achieve those goals.”

A12-13

- All items in 3.16.3.2 would be undesirable.

A12-14

- Page 3.16-25, Item 5. Please clarify bike rental facilities. Does this mean Bike Hubs like Bikeshare? If so, consider calling out Bike Hubs and not Bike rental facilities.

A12-15
- Page 3.16-25, Item 14 and 15. May be very cost prohibitive and not feasible. Too many crossings would be too redundant and not realistic. Too many crossings would take away from the aesthetics of the waterway.

A12-16
- Page 3.16-52. Please confirm that the VMT baseline forecasts are the most recently available data. Consider discussing how impacts of COVID19 on commuting could change the baseline.

A12-17
- Continue to see the terminology “Impacts would be significant and unavoidable for later activities not carried out by The County.” What does this exactly mean? This phrase is utilized in many places in the document. What are the implications of such a statement?

A12-18
- Page 3.16-54, middle paragraph. Is a 12’ wide pathway/roadway feasible along the full extent of the project?

A12-19
- Page 3.16-54. Given all the previously stated unknowns, can this be guaranteed?

A12-20
- Page 3.16-57, second to last sentence. While this is an aspiration, can it be guaranteed? Perhaps leading the second to last sentence with “Ideally” would better reflect this reality.

<u>Additional Comments</u>

A12-21
- City staff would like to underscore the importance of access from the LA River to adjacent neighborhoods, including connectivity with surrounding uses, equitable access points, and adequate lighting. This includes access and safety considerations, such as walkway connectivity and lighting, around Caltrans overpasses.

A12-22
- City staff recommends that nature-based solutions be named and considered as options for site remediation when possible. Such nature-based solutions may include phytoremediation and conversion of brownfield sites to public greenspaces.

A12-23
- The PEIR should explain the relationship between the LARMP and city land use plans. Specifically, the LARMP does not supersede city land use plans and zoning land use designations. The City of Long Beach’s General Plan Land Use Element (LUE), adopted in 2019, establishes PlaceTypes to organize land uses. The City will adopt new zoning regulations consistent with the (LUE) PlaceTypes. Along the LA River in Long Beach, PlaceTypes include single-family and low-density residential (FCN), neo-industrial (NI), neighborhood serving center (NSC-L), as well as open space (OS). These PlaceTypes and current and future zoning designations will supersede the LARMP.

A12-24
- City staff would like to underscore the importance of preventing displacement of low-income residents. The PEIR states that it is important to proactively implement a meaningful strategy for preventing displacement and ensuring continuing affordability of housing in river adjacent communities (1.1.3.6) and that the 2020 LA River Master Plan seeks to improve neighborhoods without causing negative effects of displacement. Low-income communities and communities of color in

A12-24 cont.

Long Beach are more likely to live along the LA River channel. The City seeks to ensure affordability of housing in river adjacent communities and to maximize opportunities for affordable housing development throughout the City.

A12-25

- The City seeks partnerships with LA County and other municipalities within the LA River Watershed on actions that help adapt to flooding and other climate change impacts. As described in the Long Beach Climate Action and Adaptation Plan (CAAP) and its appendices, a 500-year floodplain, which represents a scenario that will become more likely in the future due to the increased intensity of precipitation events, covers an area that includes certain disadvantaged populations along the Los Angeles River and includes key infrastructure and public facilities. CAAP actions that help prepare for flooding along the LA River include FLD-5.4: Explore opportunities for tree planting in sub-watershed areas with the lowest urban forest cover to minimize stormwater runoff and help protect the area from flooding during intense storm events; FLD-7: Review and conduct studies of combined riverine/coastal flooding and increased severity of rainfall events on watershed flooding; and FLD-11: Based on results of a riverine flood study (FLD-7), work with partner agencies to elevate channel banks and levees to provide enhanced flood protection.

Thank you for considering our comments on the Draft PEIR. If you have any questions regarding this letter, please contact Kevin Jackson at (562) 570-5028 or Kevin.Jackson@LongBeach.gov.

Sincerely,

Thomas B. Modica
City Manager

cc: Kevin Jackson, Deputy City Manager
Tyler Curley, Government Affairs Manager
Oscar Orci, Director of Development Services
Patricia Diefenderfer, Planning Bureau Manager
Brent Dennis, Director of Parks, Recreation and Marine
Meredith Reynolds, Park Planning and Partnerships Manager
Eric Lopez, Public Works Director
Carl Hickman, Traffic and Transportation Manager

METROLINK.
SOUTHERN CALIFORNIA REGIONAL RAIL AUTHORITY
900 Wilshire Blvd. Suite 1500 Los Angeles, CA 90017
metrolinktrains.com

May 13, 2021

Ms. Grace Komjakraphan-Tek
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue
Alhambra, CA 91803

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

Dear Ms. Komjakraphan-Tek:

The Southern California Regional Rail Authority (SCRRA) has recently received the Notice of Availability for review of the Draft Program Environmental Impact Report (PEIR) for the 2020 LA River Master Plan. Thank you for the opportunity to comment on key issues related to SCRRA and our operations of the railroad adjacent to the LA River.

As background information, SCRRA is a five-county Joint Powers Authority (JPA) that operates the regional commuter rail system known as Metrolink. Additionally, SCRRA provides rail engineering, construction, operations and maintenance services to its five JPA member agencies. The JPA consists of the Los Angeles County Metropolitan Transportation Authority (LA Metro), San Bernardino County Transportation Authority (SBCTA), Orange County Transportation Authority (OCTA), Riverside County Transportation Commission (RCTC) and Ventura County Transportation Commission (VCTC).

A13-1

A portion of the proposed Master Plan, specifically *Frame 5: Heights*, is adjacent to a heavily trafficked railroad corridor and the Metrolink Central Maintenance Facility (CMF). The railroad corridor runs along the east side of the LA River north of SR-110 and diverges into two separate corridors south of SR-110; with one corridor on the west side of the LA River and one corridor on the east side of the LA River. The railroad corridors that run parallel to the LA River between mile 20.5 and mile 31 of the River Mile System (Figure 13) are operated and maintained by SCRRA and owned by LA Metro. There are currently 30+ Metrolink train frequencies that operate on weekdays through this corridor due to COVID-19 schedule reduction. Fewer trains operate on the weekends. In addition, there are Amtrak trains and several freight trains per day. Rail traffic along this corridor occurs 24 hours a day, 7 days a week, and is expected to increase in the future to address growing demand.

Please find the general comments to the 2020 LA River Master Plan – Draft PEIR related to SCRRA and our operations listed below.

A13-2

1. All drainage from any proposed improvements must drain away from the railroad corridor. This includes any irrigation runoff for landscaping along the railroad corridor.

A13-3

2. All trees must be set back from the ROW line so that when fully matured, the trees do not hangover the ROW line onto railroad property.

A13-4 3. For any proposed trails along the railroad corridor, a 6' fence is required along the railroad Property line. Furthermore, adequate lighting should be provided to deter anyone from trespassing onto the railroad ROW.

A13-5 4. All trails that require crossing through the railroad corridor and across the tracks will need to be grade separated and must be coordinated with SCRRA and the California Public Utilities Commission (CPUC).

A13-6 5. Any proposed utility crossings with the railroad must be coordinated with Metro and SCRRA.

A13-7 6. Site development plans (grading, drainage, landscaping, lighting, etc.) should be provided to SCRRA for review.

A13-8 To assess any requirements for construction (including demolition or alteration of structures) adjacent to the railroad, plans for construction should be sent to the SCRRA Engineering Department at the following address:

SCRRA Engineering Department
Attn: Joe McNeely, Principal Engineer
2558 Supply Street
Pomona, CA 91767
mcneelyj@scrra.net

Please consult SCRRA Engineering and Construction standards and guidelines as necessary, including Right of Entry permit concerns, at the following web address:

https://metrolinktrains.com/about/agency/engineering--construction/

Thank you again for allowing us to review and provide commentary. If you have any questions, please contact Roderick Diaz, Director of Planning and Development at (213) 452-0455 or via e-mail at diazr@scrra.net.

Sincerely,



Todd McIntyre
Chief Strategy Officer

Cc: Jeanet Owens, LA Metro

BRENDA OLMOS
Mayor

VILMA CUELLAR STALLINGS
Vice Mayor

ISABEL AGUAYO
Councilmember

LAURIE GUILLEN
Councilmember

PEGGY LEMONS
Councilmember

PARAMOUNT
THE CITY
Safe, Healthy, and Attractive

May 13, 2021

Los Angeles County Public Works
Stormwater Planning Division
Attn: Genevieve Osmeña, Senior Civil Engineer
900 S Fremont Ave
Alhambra, CA 91803

SUBJECT: City of Paramount comments – DRAFT EIR – LA River Master Plan

Dear Ms. Osmeña,

On behalf of the City of Paramount, I would like to thank you the opportunity to comment on the LA River Master Plan and Draft Program EIR.

A14-1 Regarding the Master Plan specifics and the Los Angeles River in general, Paramount is strongly invested in the joint jurisdictional and community efforts to revitalize the River into an environmental, recreational, cultural, and economic jewel while preserving a mix of housing types and documenting and celebrating a shared history. The City participated as an active member of the Lower LA River Working Group and continues as part of the Lower LA River Implementation Advisory Group. We look forward to bringing the River to the forefront as a true community asset.

A14-2 In terms of Art and Culture, Paramount was an early adopter of a one percent development fee toward public art. Paramount sees the arts as an important form of communication that bridges divides, and public art can help bring the River into the everyday conversation. We appreciate the discussion of the arts in the Plan, and we support all proposals for grants or assistance in bringing more artistic opportunities to the cities along the River. As an example, one program under consideration in Paramount involves connecting artists with owners of industrial properties that line the River for a series of River and community-related murals to be applied to the River-facing building facades.

A14-3 While we are glad to see specific attention to the City of Paramount, it is disingenuous to classify the "Compton-Paramount Connectivity Corridor" as such given the entirety of the River and adjacent areas are completely outside of the Paramount city boundaries. More so, the proposed cap park concept strikes us as an overly costly prospect. [As a side note

A14-3 cont. with the understanding of no nexus to the River project, we believe a deck park is more appropriate to cover freeways such as the Century (I-105) Freeway, not a River.]

A14-4 Regarding Actions bringing improvements to bicycle infrastructure and connectivity, Paramount is in full support. We ask for attention to the LA River Trail connection to the West Santa Ana Branch multiuse trail, which is a priority project for the City of Paramount, and a bike hub is a prime component.

Beginning with minor corrections to the Draft PEIR, please make the following revisions:

A14-5
- Page 300 – Please note that the Paramount Municipal Code numbering was reorganized effective December 17, 2020. Chapter 10 is now Chapter 15.04 (Buildings).

A14-6
- Page 380 – There is a statement that "None of the policies in the Paramount General Plan directly address air quality." However, please note the following two references to air quality in the Paramount General Plan:
  - *Resource Management Element Policy 21.* The City of Paramount will continue to cooperate with the other agencies that are charged with improving air and water quality in the region.
  - Implementation Element. *Air Quality Planning*. The City of Paramount will continue to participate in the regional planning efforts being undertaken by the South Coast Air Quality Management District (SCAQMD) and the Southern California Association of Governments (SCAG) to develop and implement strategies to improve regional air quality. The City of Paramount will continue to work with the SCAQMD and SCAG and the surrounding cities in improving air quality.

A14-7
- Page 559 (tree ordinances).
  - Public land – refer to Chapter 12.32 of the Paramount Municipal Code.
  - Private land – refer to Section 17.44.270 and Section 17.96.030(G) of the Paramount Municipal Code

A14-8
- Page 1482. Fire is under now under Chapter 8.08 of the Paramount Municipal Code.

Please contact me at 562-220-2049 or jking@paramountcity.com if you have any questions.

CITY OF PARAMOUNT



John King
Assistant Planning Director

ECO-RAPID TRANSIT

Eco-Rapid Transit, formerly known as the Orangeline Development Authority, is a joint powers authority (JPA) created to pursue development of a transit system that moves as rapidly as possible, uses grade separation as appropriate, and is environmentally friendly and energy efficient. The system is designed to enhance and increase transportation options for riders of this region utilizing safe, advanced transit technology to expand economic growth that maximizes ridership in Southern California.
The Authority is composed of the following public agencies:

City of Artesia
City of Bell
City of Bell Gardens
City of Cudahy
City of Cerritos
City of Downey
City of Glendale
City of Huntington Park
City of Maywood
City of Paramount
City of South Gate
Burbank-Glendale-Pasadena Airport Authority

Chair
Karina Macias
Councilmember
City of Huntington Park

Vice-Chair
Ali Sajjad Taj
Councilmember
City of Artesia

Secretary
Sean Ashton
Councilmember
City of Downey

Treasurer
Vrej Agajanian
Mayor
City of Glendale

Internal Auditor
Jose R. Gonzalez
Mayor
City of Cudahy

Executive Director
Michael R. Kodama

General Counsel
Teresa L. Highsmith

Ex-Officio
William Rawlings
City Manager Representative

May 13, 2021

Los Angeles County Public Works
Stormwater Planning Division
900 South Fremont Avenue
Alhambra CA 91803

Attention: Genevieve Osmena, Senior Civil Engineer

RE: LA River Master Plan EIR Comments

A15-1
Eco-Rapid Transit appreciates having an opportunity to comment on the LA River Master Plan Draft Program Environmental Impact Report. The proposed 51-mile-long project with a 2-mile-wide corridor impacts many of our cities. Planning for recreation, open space and connections to nature are very valuable for our cities.

Established in 2003, the Eco-Rapid Transit Joint Powers Authority (JPA) consists of 12 members: the cities of Artesia, Paramount, Cerritos, Downey, South Gate, Cudahy, Bell, Maywood, Huntington Park, Bell Gardens, Glendale and the Burbank Glendale Pasadena Airport Authority are working together to improve and implement rail transit service while promoting transit-oriented development and jobs. The JPA's 34-mile corridor has a population that would be the 2nd largest in the state of California. It includes one of Los Angeles Metro's top priority projects, the 19.4-mile West Santa Ana Branch rail transit project from Artesia to Union Station in Downtown Los Angeles. It also includes regional rail transit improvements in a 14-mile corridor from Burbank Airport to Union Station.

A15-2
- We appreciate your efforts to include anti-displacement and equitable development policies and urge you to work with Gateway Cities COG and our member cities on this important issue.

A15-3
- It is important to bring recreational amenities to our communities. Please make sure to include access from the LA River to the proposed West Santa Ana Branch light rail project (S Line). This includes current stations planned along the route such as the Pacific/Randolph, Florence/Salt Lake, Firestone/Atlantic, Gardendale, I-105/Green Line and Paramount/Rosecrans. It should also consider the potential inclusion of a Rio Hondo Confluence Station in South Gate (located at the confluence of the Los Angeles River and Rio Hondo).

Eco-Rapid Transit appreciates having an opportunity to provide comments and looks forward to working with you. If you have any questions, please contact me at mkodama@eco-rapid.org or 562 663-6850.me

Sincerely,

Michael R. Kodama
Executive Director

STATE OF CALIFORNIA–THE NATURAL RESOURCES AGENCY GAVIN NEWSOM, *Governor*

SANTA MONICA MOUNTAINS CONSERVANCY
LOS ANGELES RIVER CENTER AND GARDENS
570 WEST AVENUE TWENTY-SIX, SUITE 100
LOS ANGELES, CALIFORNIA 90065
PHONE (323) 221-8900
FAX (323) 221-9001

May 13, 2021

Ms. Grace Komjakraphan-Tek
Los Angeles County Public Works
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

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

Comment Letter for the 2020 LA River Master Plan:
Draft Programmatic Environmental Impact Report

Dear Ms. Komjakraphan-Tek:

A16-1

The Santa Monica Mountains Conservancy (Conservancy) respectfully submits the following comments to the County of Los Angeles, Department of Public Works (Public Works) on the Draft Program Environmental Impact Report (Draft PEIR) for the proposed 2020 Los Angeles 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 Conservancy is one of two state conservancies that have jurisdiction in the Los Angeles River watershed, where the proposed Project area 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, spanning 17 cities and unincorporated Los Angeles County. Although the LA River was channelized between the late 19th and mid-20th centuries to protect lives and property from flooding as the Los Angeles region rapidly grew and transformed to a largely urbanized area, habitat and wildlife have flourished throughout and along the LA River and its tributaries.

The Conservancy was established by the California State Legislature in 1980. Since that time, it has helped to preserve over 80,000 acres of parkland in both wilderness and urban settings, and improved more than 114 public recreational facilities throughout Southern California. Through direct action, alliances, partnerships, and joint powers authorities, the Conservancy's mission is to strategically buy back, preserve, protect, restore, and enhance treasured pieces of Southern California to form an interlinking system of urban, rural and river parks, open space, trails, and wildlife habitats that are easily accessible to the general public. The Conservancy has been one of the lead agencies in revitalizing the LA River and its tributaries. In 2001, the Conservancy and its

partner conservancy in the Lower LA River, the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC) and the California Natural Resources Agency adopted "Common Ground", a Watershed and Open Space Plan for the San Gabriel and Los Angeles Rivers.

More recently, in June 2020 the Conservancy adopted the Upper Los Angeles River and Tributaries (ULART) Revitalization Plan; a legislative initiative that authorized the creation of an appointed Working Group within the Conservancy to develop a revitalization plan for the Upper LA River and its tributaries using a community-centric, watershed management approach, with a prioritization on disadvantaged communities. Since its approval, the ULART plan is considered an amendment to Common Ground.

A16-1 cont.

As a lead agency investing in the LA River, the Conservancy has filled a void between local government, state and federal agencies by working on resources in a locally relevant and sensitive manner, such as the river and its tributaries, and by serving as a coordinator among citizen groups, agencies and landowners. The Conservancy has actively acquired and supported the development of open space and planning efforts that have produced parks with a natural aesthetic, public space, including greenways and trails, habitat restoration and improved water quality benefits, while protecting wildlife resources and enhancing recreation in the LA River watershed. As an official member of the LA River Master Plan steering committee, the Conservancy brings forth the following items we hope can be addressed before the draft PEIR is approved. In general, all of our comments will begin at the northern berm of the City of Vernon and will not stray to portions of the Plan outside of the Conservancy jurisdiction.

Geography

The existing analysis and study area for the PEIR is comprised of the 51-mile LA River corridor and one mile on each side of the LA River. However, environmental impacts of the 2020 LA River Master Plan would have cumulative effects that would extend well beyond the study area indicated. We believe limiting the PEIR to a corridor plan also limits opportunities for cumulative and substantial regional environmental impacts that could mitigate regional issues such as climate change, flood, fire, climate resiliency and heat island effect to name a few. With other plans available that address such issues beyond the river corridor and into the watershed that incorporate the tributaries, such as the ULART Revitalization plan, a plan with a regional approach can have greater impacts. We ask that the PEIR seize a unique opportunity to expand its reach into the tributaries, specifically those in the ULART Plan, all of which are in the County of Los Angeles and are consistent with the mission of the 2020 LA River Master Plan.

A16-2

A16-3

While much of the Los Angeles County Drainage Area (LACDA) system is already under the responsibility of the County, there is an active proposal for the Los Angeles County

A16-4

Flood Control District to assume responsibility from the U.S. Army Corps of Engineers which would deauthorize the Corps' role in the river and expand the County's responsibility. Should the Corps undergo this divesture from the river and the LACDA system, the County would be the primary entity responsible for the river and its tributaries- further rationalizing the need to expand the scope of the PEIR into the watershed and beyond the corridor which would indicate the County's commitment to regional, watershed wide, environmental improvements and impacts. However, given the existing authority of the Corps, NEPA is also strongly encouraged to be performed in addition to CEQA. Lastly, all of the tributaries in the Upper LA River watershed are within the Conservancy zone (see map), which could produce more opportunities for environmental conservation, enhancement and public access for urban constituencies for overall connectivity and regional benefits.

A16-4 cont.

Land Use/Planning/Air Quality

There have been significant planning efforts that overlap with the PEIR study area. From the federally led Los Angeles River Ecosystem Restoration Area with Restoration Benefits and Opportunities for Revitalization (ARBOR) Alternative 20, by the Corps and is supported by all levels of government, which we expect to be funded in phases, to the Rim of the Valley Trail Corridor Masterplan; also a multi-agency initiative to preserve important resources within the Rim Corridor while providing public recreation whose study area that spans the LA River, Verdugo Mountains to the Santa Monica Mountains, and is currently at approximately 40% completion. As well as the latest regional plan that encompasses the northern part of the LA River watershed, the Upper LA River and Tributaries Plan which identifies optimal, multi-benefit opportunities for habitat enhancement, river restoration and connectivity. In its current state, the PEIR does not satisfactorily embed and include other plans which are critical to land uses, zoning and future planning. We urge the County to review these relevant plans and be consistent, and in particular should be certain as to not create adverse impacts or regress efforts of these plans. All the plans once implemented are expected to reduce Greenhouse Gas (GHG) emissions and sequester carbon, and mitigate climate issues such as heat island effect and urban tree canopy, which should also be a goal of the Project, although visitation to the river by vehicles is expected to rise, there should be clear environmental mitigations that account for and provide solutions for such impacts.

A16-5

Hazards and Hazardous Materials

Thank you for including maps indicating contaminated and clean-up sites, but this section fails to identify the double benefit of addressing legacy and groundwater contamination that has affected communities and would bring more opportunity sites into play. The investment of cleaning up these sites will bring significant health benefits to the surrounding community. Cleanup costs are very significant, but they are a one-time expense that should be prioritized over developing new spaces such as platforms.

A16-6

Aesthetics

Public perception toward the LA River has greatly shifted, a primary factor being the river aesthetic that has been protected and allowed to thrive. Water is the source of all life, which is especially true for the wildlife and habitat that is found in the river; the existing vegetation is a byproduct of a flowing stream with intermittent flows and depths. 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. Very few naturalized areas in the LA River where habitat has thrived remain. These areas should be prioritized for preservation and include the Sepulveda Basin, Griffith Park, and the Glendale Narrows. The probable impacts of the Project should not include 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.

A16-7

Biological Resources

A rich riparian ecosystem has been flourishing in the river even after its channelization. To this day, wildlife is found not only in the LA River, but also on the riverbanks and adjacent areas—areas within the 2-mile-wide PEIR study area. There are an abundance of biological resources in river corridor, both 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 flyaway 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 U.S. Fish and Wildlife Service as well as the California Department of Fish and Wildlife. When considering biological resources in the PEIR, the Project should prioritize for the preservation of the unique soft bottom areas where the river contains a plethora of environmental biological resources— in the Sepulveda Basin, Griffith Park, and the Glendale Narrows, where biological monitoring should be required to take place and mitigate any potential impacts by the Project.

A16-8

Additionally, while achieving the required flood capacity, 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 the Wildlife Conservation Board, endemic and native endangered fish could be reintroduced which would be an obvious impediment to biological enhancement.

A16-9

A16-10 Under one of the Project's kit of parts categories which discusses infrastructure and urban river design typologies, 'Category 3: Crossings and Platforms', the PEIR should analyze and include potential impacts that will have consequential results that could be indefinite. Specifically, as the Project it relates to 'platforms' as a design component, implementation platforms over the River raise concerns the Conservancy because of the complete and total lack of re-establishing a natural connection to the River they impose. While platforms could physically re-unite communities that have long been separated by mono-functional gray infrastructure, they would also come with great financial cost and long-term consequences to River restoration. We note in the platform Technical Appendix section illustrations, the potential to be completely disconnected from the surrounding neighborhoods and River, as they are found to be up to 18' higher than the surrounding areas. It would greatly benefit the Plan to establish parameters and criteria

A16-11 for the platformed spaces that include maximum width and length recommendations. There are contemporary local examples of bridges that provide connectivity for both people and wildlife, such as the recently completed Park to Playa Mark Ridley-Thomas Bridge and the future Liberty Canyon 101-Freeway Wildlife Bridge that do not need large footprints to offer significant benefits.

A16-12 Projects that seek to encourage wildlife movement, from fish passage to quadrupedal migration, could become threatened by new barriers that large decking over the River may bring which will hinder and create the absence of light needed for habitat and wildlife to thrive. Additionally, platforms would not allow for in channel public use for recreation. Aesthetically speaking, a platform sends the message to communities that the River is an eye-sore to cover up, when we should be looking more towards it and investing in the contents of the River as well as the spaces surrounding it. We support re-connecting communities through bridges, crossings and utilizing the River itself as a connector that enables it to be a multi-functional space.

A16-13 Furthermore, criteria to demonstrate the superior need for platformed spaces should be developed that includes identification of trade-offs, habitat capabilities, systems required, comparison of operation and maintenance needs vs typical on-land, and a cost analysis compared against acquisition of nearby River sites, amongst others. Other considerations by the PEIR should analyze the extent of habitat that a platform would be able to support according to structural integrity, potential soil depths on a platform, tree weight and tree canopy capacity, as well as an analysis which determines the habitat a platform would structurally be able to support.

A16-14 The Conservancy's role is limited to the Upper LA River, where there are many opportunities for connections to large regional open spaces and habitat corridors. However, in areas with fewer opportunities for open space, the viability for platforms may be the best option. Where platforms over the River are considered necessary and

A16-14 cont.

supported by surrounding communities, as we understand is the case in the Lower LA River outside of Conservancy jurisdiction, a scaled down version of a platform with uses that maximize public use could be deemed appropriate, whereas any private development, housing and parking are not appropriate uses for platforms.

Hydrology/Water Quality

A16-15

While the PEIR seeks to analyze the differences between the existing and future conditions with respect to Hydrology and Water Quality in the river, all impacts of the Project relating to hydrology and water should be better accounted for in the PEIR. There is a current study underway by the State Water Resources Control Board (State Water Board) which seeks to analyze river flows; the effects of altered flows on habitat, wildlife and recreational resources. Not only do the hydrological conditions and flows affect habitat and wildlife, but also the river's water quality. Due to historic ground water contamination, water quality in the river is actively monitored; water treatment takes place in the San Fernando Valley, and treated water from waste water treatment/reclamation plants is discharged into the river— contributing to the necessary dilution that makes the river habitable for wildlife and useable for recreational activities. Realizing the importance of water and water quality in the river, the Conservancy contributed to the development of the study.

A16-16

The PEIR analysis currently does not, and therefore should also consider the State Water Board study and analyze water quality, pollutant sources and concentration of pollutants, the effects of altered hydrology and the impact on habitat, wildlife and human/recreational uses, while making the connection to the Federal Clean Water Act and upholding these standards while working to achieve water quality standards beyond existing compliance standards. Hydrological changes in the impervious surfaces, application of stormwater infrastructure, and discharges, affecting sensitive habitats such as the estuary should also be considered within the Project. In order to meet hydrological needs throughout the study area, the PEIR should look beyond the river, and into the tributaries, specifically in the upper LA River watershed so as to not overwhelm the study area, and seek opportunities to incorporate existing underutilized infrastructure to accommodate for flooding and water storage needs. The ULART plan refences such areas that would reduce stress on the LA River and disperse water while slowing down water flow and offering hydrological solutions to our region's needs.

Tribal Cultural Resources

A16-17

Due to the historic nature of the River and project area, additional work pertaining to tribal cultural resources should be given more significance. Additional and substantive consultation with tribes that are indigenous to the area as well as those that associate to the project area should be further consulted and integrated into design regarding specific planned improvements, particularly those that suggest new and additional

A16-17 cont. infrastructure which would further disrupt the river and surrounding natural lands to determine what is appropriate.

A16-18 Furthermore, the Plan should acknowledge that there are Indigenous tribes that are not Federally recognized, but still exist as they are actively involved in the leadership of their communities and should equally benefit from participating in the revitalization of the LA River.

Wildfire

A16-19 The PEIR should not only identify and address potential wildfire impacts that may result from implementation of the 2020 LA River Master Plan but should also develop suggested fire prevention and mitigation strategies. The PEIR does identify Fire Hazard Severity Zones (FHSZs), where solutions to fire prevention should be thoroughly assessed and recommended based on urban interface risks. Furthermore, additional coordination with the conservancy should be required given the conservancy's role in the state Regional Forest Fire Capacity program, where joint wildfire prevention practices are being developed and implemented which could be applicable to designated FHSZ areas within the project area which have already been identified.

Recreation

A16-20 Since the River was designated a navigable waterway, recreation in channel has become a popular passive activity that has expanded usage of the River to the public. Improvements and concepts as described in the 2020 LA River Master Plan should enhance recreational access and opportunities, rather than hinder and reduce the existing recreation available to the public. The project does not currently go far enough to plan for increased recreational usage and limits the public to the riverbanks rather than expanding usage within the channel. The PEIR analyzes data pertaining to parks along the project area, including location, acreage, and amenities offered, as well as park provisions such as park acreage per 1,000 Residents versus the adopted standards. However, still lacking in the project is the direct access or lack thereof to the river from the parks identified, an identification of barriers, and solutions to create riparian connectivity. Furthermore, the PEIR undergoes little to no analysis of the existing recreational activities and amenities, both of which may inform project opportunities.

Public Services

A16-21 Most of the public services identified in the PEIR relate to municipal police departments. Alternatively, a comprehensive strategy for public services derived from a state mandated plan was developed in 2019 in partnership with local jurisdictions, the County and river adjacent communities which serves as a framework and blueprint for existing and needed public services in the project area. Input and meetings contributed to this substantive plan, the Los Angeles River Ranger Establishment Plan which goes beyond

A16-21 cont.

policing and provides recreational, social, educational, interpretive, and public safety services to neighbors and visitors of the project area and beyond. The PEIR defers project responsibility to local police departments, when historically, communities have requested less policing and likewise, local police departments have refused to assume the river as part of their responsibility. Being that the project is a public amenity and natural resource, management and providing public safety would be better and more appropriately served by a Ranger, which is a designated role for open space, parks, habitat protection and public safety. The project should defer and seek to fund an already locally recognized plan, such as the LA River Ranger Plan which developed criteria and cadence for services that should be provided throughout the project area.

A16-22

Compatibility with State Investment
Since its inception, the Conservancy has invested in the LA River watershed to address the region's environmental needs. Through the California Resources Agency, the Conservancy in conjunction with the RMC jointly developed the Watershed and Open Space Plan for the San Gabriel and Los Angeles Rivers, Common Ground. The plan sets forth principles for future open space, water resources, and habitat projects, to advance restoration of the watershed, and also aims to extend the discussion of restoring balance between human and natural systems from beyond the rivers to the entire watershed.

Projects currently underway that are aligned with previous river plans are those such as the Bowtie and G2 parcels at Taylor Yard, which have a commitment from the State of California and City of Los Angeles totaling more than $100 million dollars in public spending to acquire 100-acres of public open space at Taylor Yard for the purposes of habitat restoration, open space and public access to the river. The ULART plan, as recognized by the State Public Resources code, section 33220 is also an example of state investment in the upper LA River watershed which has elevated the principles of Common Ground to tangible opportunities that are optimal for implementation throughout the PEIR study area and beyond. The Project too should seek to provide compatibility with State investments and uses, while being on par to support fruition of the regional open space improvements in planning.

Thank you for your consideration of our comments. Please address any future documents, notices, and questions to Paul Edelman at edelman@smmc.ca.gov.

Sincerely,

IRMA R. MUÑOZ
Chairperson

Attachments: A – Santa Monica Mountains Conservancy Map

cc: Wade Crowfoot
Angela Barranco

From: PW-LA River CEQA
To: Lim, Daniel
Cc: Mach, David; Molina, Giova
Subject: RE: LA River Master Plan GIS Data
Date: Wednesday, March 24, 2021 5:36:00 PM

Hi Daniel,

Our team downloaded the files for the 2020 LA River Master Plan Draft Program EIR from the following County website:
https://egis-lacounty.hub.arcgis.com/search?q=trails

You can find the shapefiles for the trails and bike paths from that link. Please let us know if this works or if you would like further assistance.

Thank you.

-LA River Master Plan CEQA Team

From: Lim, Daniel <DLim@TorranceCA.gov>
Sent: Tuesday, March 23, 2021 12:14 PM
To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Cc: Mach, David <DMach@TorranceCA.gov>; Molina, Giova <GMolina@TorranceCA.gov>
Subject: Re: LA River Master Plan GIS Data

CAUTION: External Email. Proceed Responsibly.

Hello,

Yes, we will be making comments in relation to the Draft Program EIR with the information we are requesting. We hope that we could help serve this project or provide comments on how this project would provide more benefits to our riders.

Respectfully,

Daniel Lim

Management Aide, Transit Department
City of Torrance | 20500 Madrona Avenue | Torrance CA 90503 | 310.618.6974
DLim@TorranceCA.Gov | www.TorranceCA.Gov

From: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Sent: Wednesday, March 17, 2021 4:28 PM
To: Lim, Daniel
Cc: Mach, David; Molina, Giova
Subject: RE: LA River Master Plan GIS Data

WARNING: External e-mail
Please verify sender before opening attachments or clicking on links.

Hi Daniel,

Will Torrance Transit be making comments in relation to the Draft Program Environmental Impact Report with the information you are requesting? We would like to forward this request for GIS data/shapefiles appropriately.

Thank you.

- LA River Master Plan CEQA Team

From: Lim, Daniel <DLim@TorranceCA.gov>
Sent: Tuesday, March 16, 2021 2:55 PM
To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Cc: Mach, David <DMach@TorranceCA.gov>; Molina, Giova <GMolina@TorranceCA.gov>
Subject: LA River Master Plan GIS Data

CAUTION: External Email. Proceed Responsibly.

Hello,

A17-1 My name is Daniel Lim and I work for Torrance Transit. I am wondering if you can provide GIS data/shapefiles related to the LA River Master Plan because we would like to find out whether or not some of our transit routes are within a half-mile of the corridor. If so, then we may be able to serve riders that seek to access the bike/walking trails by the river. Please let me know if you have any questions.

Thank you,

Daniel Lim

Management Aide, Transit Department
City of Torrance | 20500 Madrona Avenue | Torrance CA 90503 | 310.618.6974

DLim@TorranceCA.Gov | www.TorranceCA.Gov

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CITY ENGINEER

1149 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

http://eng.lacity.org

May 19, 2021

Submitted via email

Grace Komjakraphan-Tek
Los Angeles County Public Works,
Stormwater Quality Division
900 South Fremont Avenue
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

RE: 2020 LA River Master Plan Draft PEIR Comments

Thank you for the opportunity to review and comment on the 2020 LA River Master Plan Draft Program Environmental Impact Report (PEIR). The City is excited to see the County's work on the LA River move forward and will continue to look for synergies between the City's and County's LA River planning processes. The following comments were prepared by staff based on their review of the Draft PEIR:

General Comments

A18-1 The PEIR should make sure to include in its analysis the findings from the Los Angeles River Environmental Flows Study developed by the Southern California Coastal Water Research Project in 2021.

A18-2 *The PEIR should include the Los Angeles City adopted and congressionally authorized Los Angeles Ecosystem Restoration Project (EIR/EIS certified in 2016) in section 3.0.2.3.*

A18-3 Regarding the County vs Non-County Impact Determination, presumably if an impact can be reduced by the stated mitigation measures, and a jurisdiction or entity other than the County is implementing the proposed Project and choses to rely on the PEIR for CEQA compliance, they would and should be committing to the responsibility to implement the mitigation measure. Any jurisdiction/entity that follows the same mitigation measures to address the same type of impact would achieve the same reduction in impacts and should have a similar CEQA finding.

Specific Comments

Executive Summary

A18-4 The Executive Summary references channelization beginning in the late 19th century, but there are no references provided to document this, and further in the document it states that channelization began in the 1900's. Please clarify and provide references in the PEIR.

A18-5 The icons for Rio de Los Angeles State Park and Sepulveda Basin are in the wrong location in the Executive Summary frame slides.

Biological Resources

A18-6 Figures 3.3-7, 3.3-9 and 3.3-11 fail to include existing native vegetation communities within the channel and adjacent to the channel in areas such as the Glendale Narrows and the Valley.

Hydrology Resources

A18-7 The document should identify and analyze the potential impacts from the construction of the Kit of Parts (KOP) 1-6 separately on existing beneficial uses of the LA River to aid in prioritization of future project implementation.

Thank you for considering our comments. Should you have any questions, please feel free to contact me at Jan.Green.Rebstock@lacity.org.

Thank you,

Dr. Jan Green Rebstock
Environmental Supervisor II

Ariana Villanueva

From: Barry Johnson <bjohnson4166@sbcglobal.net>
Sent: Monday, February 8, 2021 10:58 AM
To: PW-LA River CEQA
Cc: Councilmember KrekorianLos Angeles; Karo Torossian; Randy Fried
Subject: 45 DAYS IS NOT ENOUGH TIME - 2020 LA River Master Plan Draft PEIR Comments

CAUTION: External Email. Proceed Responsibly.

February 8, 2021

Grace Komjakraphan-Tek
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
833-993-1739

Dear Ms. Komjakraphan-Tek,

O1-1 45 days is just not enough time for our Studio City Neighborhood Council to adequately address our comments to the massive Draft PEIR with our monthly rotation of committee and Board meetings. Can we have 90 days total ?

Sincerely,

Barry Johnson
Studio City Neighborhood Council Transportation Committee Chair

Ariana Villanueva

From: Jessica Prieto <jessicap.eycej@gmail.com>
Sent: Wednesday, February 10, 2021 7:23 PM
To: PW-LA River CEQA
Subject: Spanish translation of PEIR

CAUTION: External Email. Proceed Responsibly.

O2-1 Hello, we have various community members who are reading the LARMP, however we saw that the Program EIR is only available in English and cannot find a Spanish translation of the PEIR. We have community members requesting to read the PEIR and submit comments but are unable to because there are monolingual spanish. Could you please send a spanish translation of the PEIR?

Best,
Jessica

Jessica Prieto, M.U.R.P.
Community Stability Policy Organizer
East Yard Communities for Environmental Justice
2317 S. Atlantic Blvd. Commerce, CA 90040
Cell: 213-545-1248 | Tenant Hotline: 562-999-2863
Website| Facebook| YouTube| Twitter| Instagram

Ariana Villanueva

From: art HYPE <arthype@aol.com>
Sent: Sunday, March 7, 2021 2:55 PM
To: PW-LA River CEQA
Subject: LA River Comments

CAUTION: External Email. Proceed Responsibly.

Dear project managers,

O3-1 We hope the city note than fairly compensates any displaced people or homes, and plants as many trees as possible in the bee green spaces.

Thank you!
KW Sarrow

Sent from the all new Aol app for iOS

GLASSELL PARK
IMPROVEMENT ASSOCIATION
WORKING TO BETTER OUR COMMUNITY SINCE 1968

15 March 2021

LARiverCEQA@dpw.lacounty.gov

To whom it may concern:

The L.A. River Master Plan has value as a compilation of river-related studies, past plans and completed & proposed projects; but it is merely an overview of what currently exists. It contains no plan.

O4-1 The L.A. River Master Plan includes a huge amount of valuable information about the river and river-adjacent communities that can be used to create a "master plan", but doesn't actually provide that plan. Instead, it focusses on "kits" for future, undescribed projects alongside the river while leaving the river itself the same cement-sided, inaccessible trough the Army Corps of Engineers created years ago.

O4-2 Results of the County's community outreach show that our river-adjacent communities want one thing above all others: a cohesive, integrated, ecologically sound rehabilitation of our river as natural habitat.

O4-3 The Glassell Park Improvement Association, of course, was most interested in the future of projects such as Bowtie State Park, the Paseo del Rio Project and G2/Taylor Yard. Imagine our surprise when a keyword search for "Glassell" yielded only four mentions: 1-Glassell Park on a map of all the river adjacent communities along the river; 2-a historical photo of the Pigeon Ranch along the river; 3-a credit for that photo; and 4-two paragraphs about Taylor Yard/G2 project under "Planned Major Project Spotlight". Neither of the two appendices had a single mention of Glassell Park.

O4-4 A search for "Bowtie" that we expected would describe the plans for the State Park on that parcel, had five mentions in the Master Plan. Two of the mentions were captions in generic photos, two were the sources for those photos, and one includes only the name, "G1 Bowtie", in a list titled "Project List by Impact" on page 239. In Appendix 1, the only mention of "Bowtie" is in photo captions, and in Appendix 2 there is no mention at all.

O4-5 Searching for the word "Paseo", as in "Paseo del Rio Project", had "no result" in the Master Plan or either appendix.

O4-6 If a document is to be called a "Master Plan", it should contain a plan. This draft contains a wealth of information about the river's history and current state. It lists existing and proposed projects along the river. What it doesn't do is provide an actual plan.

Thank you,

Helene Schpak, President

Cc: Congressmember Jimmy Gomez
Congressmember Adam Schiff
State Senator Maria Elena Durazo
Assemblymember Wendy Carrillo
L.A. County Supervisor Hilda Solis
Mayor Eric Garcetti
Councilmembers Cedillo, O'Farrell, Ridley-Thomas, Koretz, de León, Krekorian
Eric Villanueva
LARiver@dpw.lacounty.gov
Friends of the L.A. River

CITY OF LOS ANGELES

LOS FELIZ
NEIGHBORHOOD COUNCIL

TREASURER Erica Vilardi-Espinosa | VICE PRESIDENT Celine Vacher - Communications | PRESIDENT Jon Deutsch | VICE PRESIDENT Dan McNamara - Administration | SECRETARY Misty LeGrande

March 16, 2021

Attention: Grace Komjakraphan-Tek
Los Angeles County Public Works
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803
Email: LARiverCEQA@pw.lacounty.gov

Re: 2020 LA River Master Plan and PEIR Comments

Dear Ms. Komjakraphan-Tek,

O5-1 The Los Feliz Neighborhood Council commends the County of Los Angeles for its dedication to revitalizing the Los Angeles River. The draft LA River Master Plan and the draft Program Environmental Impact Report (EIR) reflect years of thoughtful analysis and community engagement. We are convinced that the LA River can be revitalized so that it serves as an urban oasis for the larger LA community. But we are concerned that the draft Master Plan and accompanying environmental analysis do not go far enough to achieve that goal.

O5-2 Revitalization of the LA River presents an unprecedented opportunity to prioritize critical environmental and social issues at a time when our County so urgently needs to do so. LA County, California, the nation, and the world face a climate crisis of our own making. Record-breaking heatwaves, ever expanding and worsening fire seasons, and increasing weather extremes are just some of the effects we are already experiencing from climate change. In LA County, we are often up against droughts. And many neighborhoods are extremely park poor, lacking open space where kids can play and enjoy nature. Simultaneously, LA faces a homelessness crisis of unequaled scope, and the COVID-19 pandemic has left many residents on the brink of housing insecurity. Our County also suffers from racial and class-based inequities that have long persisted and were laid bare in the past year.

O5-3 There is much the LA River revitalization effort can do to recognize and address these crises. First, the revitalization effort needs to ensure that it reflects the most sustainable and ecologically friendly approach possible. That means developing and implementing projects that minimize greenhouse gas emissions and, in fact, serve as carbon sinks. It also means maximizing rainwater capture and renaturalizing the River to the maximum extent possible to allow water infiltration. And it means prioritizing water quality improvements and committing to open space along, rather than above, the River. We do not believe that pouring more

O5-4 concrete into or above the River would achieve these goals. Further, the Master Plan could do more to address climate change by better facilitating zero-emission bike transit throughout LA County. In this sense, the LA River is not just a point of leisure, but a resource. The LA River

O5-4 cont. bike path could be expanded to create a bike “freeway” that would connect more communities and allow for safer bike transit.

O5-5 Further, we urge the County to prioritize equity concerns by ensuring that all communities are heard and are part of the revitalization effort and to do more to address the risk of displacement of communities along the River. A number of creative proposals have been presented to better ensure that the voices of local communities are heard and that these communities are strengthened rather than displaced as a result of the LA River revitalization. We encourage the County to look closely at these proposals and incorporate the most effective ones into the final Plan. In particular, we urge the County to engage with and listen to the voices of indigenous people, whose knowledge of the history of the River and of flood control could result in better revitalization solutions.

O5-6 With respect to the draft Program EIR, we urge the County to ensure that its environmental analysis thoroughly captures the enormous scope of this Master Plan. We are concerned, for instance, that the scope of analysis which includes an area two miles from the River may not sufficiently address the impacts that communities may feel from the LA River Master Plan.

O5-7 Further, we are concerned that in combining a Program EIR with subsequent project-level analyses, certain environmental impacts will not be fully analyzed. We therefore urge the County to commit to fully analyzing all potentially significant environmental impacts of each project rather than relying only on the program-level analysis to sidestep critical environmental analyses. For each project, the public must have an opportunity to fully engage with the proposal and draft environmental analysis before the project is finalized.

O5-8 Finally, we have heard concerns that the Master Plan and Program EIR process has been confusing to the public and that many people do not find it very accessible. We commend the County for having conducted many stakeholder meetings in the development of its Master Plan. But we urge the County to make the draft Master Plan and Program EIR more accessible to the public through additional public meetings and opportunities for clarification about the purpose of each of the documents that have been released to date.

As a community that abuts the LA River, we are excited about the revitalization efforts that are underway. We look forward to the LA River serving as a more naturalized urban oasis for communities all along it. And we encourage the County to better emphasize the environmental and social issues that are so important to ensuring an inclusive, equitable, and healthy Los Angeles.

Sincerely,



Jon Deutsch, President
Los Feliz Neighborhood Council

By:

Julia Forgie
Chair, LFNC Environmental Affairs Committee

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

March 11th, 2021

RE: Los Angeles County 2020 Los Angeles River Master Plan (LARMP) and Programmatic Environmental Impact Report (PEIR)

Dear Mayor Garcetti, Councilmember O'Farrell, and Councilmember Raman,

The Atwater Village Neighborhood Council requests immediate relief for our community members. Our riverfront community is not represented in the County's 2020 LA River Master Plan.

O6-1 We are requesting an addendum for our segment of the river. (Miles 26-30) In addition, we request a review extension to properly review the corrected version of the 2020 LA River Master Plan draft. We do not take this request lightly. There are egregious errors in the Master Plan. Due to the burdensome amount of corrections that are needed before an assessment can take place, this situation has placed undue hardship on our community members.

We have been reviewing the immense 2020 LARMP documents for weeks. Our review has revealed dozens of omissions and errors in the plan. Below are a few highlighted concerns: *This is, by far, not the full list of our concerns; it simply reflects many of the larger errors in the plan.*

2020 LA River Master Plan, Atwater Village errors & omissions:

O6-2 1. Omission: Multiple LA River access points (residential, multifamily, equestrian and multi-use) on the East Bank along our 4 mile border with the river.
O6-3 2. Incorrect West Bank access labeling
O6-4 3. Inaccuracies to proposed access/sites
O6-5 4. Incorrect references to 2007 Los Angeles River Revitalization Master Plan (LARRMP) projects
O6-6 5. Omission of a known community park on Los Feliz Blvd.
O6-7 6. Omission of infrastructure connectivity for river trail along the East Bank
O6-8 7. Clear evidence of lack of outreach to proposed residential and residential adjacent sites
O6-9 8. Inconsistent mapping throughout main document and technical volume
O6-10 9. The plan does not address needs of current access points, which have been operational since the late 90-early 2000s
O6-11 10. Atwater Village Equestrian District not acknowledged: bridle trail (adjacent to multi-use trail), Griffith Park access tunnel and public riding ring.

O6-12 In addition, the CEQA process has been faulted by missing and incorrect information which should have been included by the project team prior to publication. The public "Atwater Village" is providing basic known LA River information, which should have been included from community members who attended multiple community outreach events conducted by the LA River Master Plan team or in the review of past plans.

O6-13 Since Atwater Village's community input and information has been excluded from the current Master Plan, the PEIR's foundational information is also incorrect. Therefore any "not significant" impacts in the PEIR for the 4 miles of Atwater Village in frame 6 are questionable, at best.

The following pages point to our Atwater Village specific grievances in the 2020 LA River Master Plan and PEIR.

O6-14

Planned projects:
We disagree with LA County's underlying notion for a PEIR, that there are no planned projects in the LA River Master Plan. In the LA River Master Plan main document, on page 334, two new projects "Located at Los Feliz Boulevard, this Tier III Gathering Pavilion has left and right bank structures", projects are presented and detailed on pages 334 to 339. These two projects have never been presented to community members.

- **New "planned" project:** your documents incorrectly reference the 2007 LARRMP, project number 149 at the site of the Los Feliz Boulevard River Bridge.

  A "river bridge" is described on page 5-32 of the LARRMP (2007) "Vehicle roadway bridges will continue to serve as a primary means of crossing the River for non-motorized users. As such, they must be retrofitted or expanded to include enhanced bicycle and pedestrian facilities."

  - ➢ Guidelines: as described on page 5-32
    - Create safe bike lanes on bridges according to Los Angeles Department of Transportation (LADOT), CALTRANS HDM, California 2006 MUTCD, and 2003 MUTCD standards for bike paths.
    - Construct overlooks and belvederes to view the River.
    - Include lighting below bridges for safe undercrossings.
    - Integrate modifications to avoid impacting the character of historic River Bridges.

O6-15
- The 2020 LARMP proposes a Tier III Gathering Pavilion at the same site of the Los Feliz Bridge, described as follows: "The left bank facility utilizes the existing bridge piers to create a unique user experience over the channel and connects to the Los Feliz bridge while providing shade, amenities, and community space."
  - This project clearly and demonstrably conflicts with the Glendale Narrows Flood section, "Bridges In The Narrows", on page 300, under the subheading, "Los Feliz Blvd", stating that, "this bridge is high priority. See the "High Priority Bridges" section for more details."
    - Page 302: Bridge Examples, Los Feliz Boulevard, "The 1-D modeling indicates that the bridge deck will be impacted and possibly overtopped during the 4% flood event, although additional analyses may be needed to confirm this. Modeling indicates that better than 1% flood event capacity can be achieved through modifying the bridge to be clear span,..."
  - This project is at one of only three major roadways to cross the LA River, into and through Atwater Village.

O6-16
  - This project proposes to be a gathering spot, yet offers no parking, offers no bike lanes on a major thoroughfare which has no parking, no stopping and no loading zones.

- **New, improved access**: The right bank pavilion at the I5 Northbound entrance, which consists of multiple structures providing numerous services such as a café and restrooms. (3 buildings)

O6-17
  - You have to define what an "improvement" is, this is more than an improvement based on the description. It goes beyond what one would assume to be an improvement.
    - We would summarize this as a S/XS project, due to its scale and impact.

O6-18
  - River experience: A cafe next to the i5 on ramp is a questionable place to suggest enjoying a coffee or meal by the LA River.

O6-19
  - See notes above for information on Los Feliz Blvd. as a major roadway and thoroughfare for Atwater Village.

- Proposing a 2nd Cafe at this location would take customers from the river adjacent Golf Course Cafe and divert potential river driven business from our local cafes and eateries on Los Feliz Blvd. one of our main business districts.

O6-20

O6-21 **Maps:**
The maps throughout the documents are difficult to read for understanding of the LARMP projects

- The maps do not clearly show streets.
- Project sites are not labeled;
  - This requires a reader to reference multiple pages for street, location and/or project information.
  - "Dislocation" of information, one must have river knowledge to assess maps and projects.

O6-22

O6-23
- Inconsistency in maps, the main document map is different from the tech volume connectivity map, which is different from the existing access point “ruler” mapping (figure 80)… all of which are in need of corrections. (see ERRORS AND OMISSIONS: MAPPING/CONNECTIVITY)

Proposed/Planned projects:

O6-24 References to the LARRMP are incorrect, changed or non-existent.
(see ERRORS AND OMISSIONS: PROJECT LIST ERRORS)

Lack of community outreach and input: LARMP Goal #7

O6-25 There has been no opportunity for community members to learn about LARMP proposed projects and locations until this publishing, in 2021. There has been no outreach at proposed sites or adjacent to residential areas. The LARMP as a 25 year plan, fails to acknowledge and address community concerns at residential access sites. Those concerns are typical of “open space” issues which include 24/7/365 access, parking, trash, public safety and noise level increases to name a few. These proposed sites and access improvements include: Tyburn/Ferncroft, Sunnynook River Park & Los Feliz Blvd.

O6-26 Regarding the communitywide goal of connectivity, LA River connectivity is not realized in this 25 year implementation period. There appears to be no proposed projects to connect over the 4 mile of trail of this plan: Colorado Bridge Underpass, Los Feliz Blvd Overpass (or crosswalk), Glendale-Hyperion (G-H) Bridge Underpass or Fletcher Drive Underpass, all of which are called out in the 07 LARRMP.

O6-27 Missing the community led **Atwater Village East Bank Riverway.** City of LA planned project, North Atwater Village East Bank Riverway multi-use trail improvement from Doran St. to Los Feliz Blvd. This grant project is supported by the community’s work done to connect the trail, Atwater Village East Bank Riverway.

O6-28 Based on the Master Plan draft, the lack of transparency or community inclusion, we are hard pressed to believe that goal #7 (Foster opportunities for continued community engagement, development, and education) is realistic or honest. (see **Atwater Village participation in 2020 LA River Master Plan Processes**)

Public Safety: Master Plan and PEIR

O6-29 On Pg. 161 Master Plan reads — *"Community members named SAFETY as THE TOP reason they do not use the LA River."* If safety is the top reason why the public is not using the river, then we feel that the Master Plan does not do anything significant to prioritize public safety.

O6-30 From PEIR - Section 3.14 reads *"Public services have been actively developing in tandem with growth in the communities and the region."* This above statement is simply not correct. Law enforcement agencies have not been *"actively developing in tandem with growth."* According to LAPD, there is currently no active law enforcement on the LA River itself. In addition, the LA River is not mapped in the 311 system City of LA residential call system; therefore when a resident tries to place a service request, city agencies often are not able to locate the issue (i.e. trash, graffiti, homeless outreach needs, environmental waste, etc.).

O6-31 The Master Plan needs to, at the very minimum, prioritize a thorough mapping (with mileage markers and wayfinding signage) on BOTH banks of the river. In addition, we recommend the plan needs to prioritize increased county and city funding for staffing along the river to address public safety, including the placement and upkeep of emergency call boxes along the river.

Connectivity: LARMP Goal #2

1. LA River Master Plan, Public Draft, Jan 2021, Pg 280 states: “After the completion of the 51-mile river trail along one bank, further efforts to have continuous access along both sides of the river, though important, will take many more decades given the spatial restrictions along the right-of-way.”
   a. We believe not addressing connectivity on the East Bank in the LA Master Plan now is a serious omission. Atwater Village shares a 4 mile border with the east bank of the LA River and the connectivity both along its length and into and out of the river in our community is of vital importance.

O6-31 cont.

2. The east bank of the LA River in the community of Atwater Village is highly segmented. Each region is isolated from the other. To pass along the river from one segment to the next a biker or pedestrian would have to either (1) leave the river to the East and enter the neighborhood for as much as a quarter mile to the nearest cross walk, (2) pass under the overpasses on the slopes of the river, or (3) cross a bridge to the west bank and then cross back to the east bank (in Central Atwater the Sunnynook bridge is not designed for bike traffic.)

O6-32

3. The Atwater Village, East Bank, riverfront is an anomaly! We have more access points along the East Bank’s unconnected trail than the bike path, regarding your statement “Access points, like the path, tend to be located on one side of the river at a time”.

O6-33

4. The current access points have provided years of service, they should be upgraded for ADA access and public safety, included in the 25 year implementation of this plan. Possibly, including neighborhood gates and regular maintenance. The burden of residential access falls hardest on the connecting streets and first block of residents.

O6-34

5. Atwater Village shares a significant relationship to the river and is home to many diverse points of interest for the city such as an equestrian district unique in the city of Los Angeles, various parks and planned developments at the Bowtie Parcel and the water treatment facilities. Connecting these valuable city assets together and to the other significant developments just south of Atwater Village’s border at Taylor Yard and 100 Acre Park requires an LA River Master Plan that considers the seamless connectivity along the east bank of the LA River.

O6-35

6. The current mapping suffers from lack of project explanation and missing information. The only references to the S and XS project are in the Technical Appendix II, and provide a dearth of information, such as the below. More information is needed to effectively evaluate the plan.

O6-36

XS, S SITES INDEX: RIVER MILE 28.77 - 25.72

RM	Name and Location	Frame	City	Source	Existing Access Points To Improve	Newly Proposed
27.97	**Sunnynook Pedestrian Bridge** Sunnynook Dr / River Right	6	Los Angeles		X	
27.71	**Red Car Park** Ferncroft Rd & Glendale Blvd	6	Los Angeles	LARRMP		
27.71	**Glendale Blvd South** Glendale Blvd at Golden State Fwy / River Right	6	Los Angeles		X	
27.56	**Ferncroft Rd & Tyburn St** Ferncroft Rd & Tyburn St	6	Los Angeles			X
27.13	**Project 153: Silver Lake Boulevard Pocket Park** Silver Lake Blvd	6	Los Angeles	LARRMP		

Figure 1: LA RIver Master Plan, Pg. 379





1. Current access points at Dover Street, Legion Lane and Arcesite Street are not shown.
2. Lack of connectivity along multi-use path on the east bank at Colorado, Los Feliz, Glendale and Fletcher not documented.
3. No connected bike paths into any LA River access point from the east bank.
4. Glendale Blvd dedicated bike paths end well before the river access, which is currently only on the west bank, requiring bikers to cross the river on the Glendale-Hyperion Bridge north access road to the 5 highway. Also, the sidewalk for pedestrians is **very narrow.**

Figure 2: LA River Master Plan, Appendix Volume II, Technical Backup Document, Pg. 183



LOCAL CONNECTIVITY: FRAME 6

Existing Conditions

- Municipal Boundaries
- LA River Mile Point
- Tributaries and Streams
- LA River Trail
- Multiuse Trails and Class I Regional Trails
- Local/Protected Bike Lanes
- Local/On-Street Bike Lanes
- Transmission Lines
- Existing Private Right-of-Way
- Existing Park
- School
- Existing Access Point to Remain Unchanged
- Metro Transit Station
- Arts and Cultural Point of Interest

LA River Master Plan Design Proposals

- XS, S Planned Project
- XS, S Proposed Project
- Existing Access Point To Improve
- Metro Transit Station
- LA River Trail
- Multiuse Trails & Class I Regional Trails
- Local/Class IV Trails
- Local/Class II Trails
- Green Streets
- Proposed LARMP Connectivity
- Proposed Regional Connectivity Loops
- M, L, XL Planned Major Project
- M, L, XL Proposed Project Site

Frame 6 Master Plan M, L, XL Sites

31.9	Burbank Western Green Network
31.0	Glendale Riverwalk Non-Motorized Bridge
30.9	Ferraro Fields Side Channel
30.8	Glendale Narrows Riverwalk
30.7	San Fernando Railroad
30.65	San Fernando Path
30.6	Verdugo Wash
30.5	River Glen Wetlands
30.4	River Glen Wetlands
29.3	Central Service Yard
29.1	North Atwater Crossing
27.7	Red Car Bridge
26.2	G1 Bowtie
25.6	G2 Taylor Yard
25.3	Dorris Place Sanitation Yard
25.2	Taylor Yard Non-Motorized Bridge

1. Connectivity at Tyburn is questionable given street size and parking.
2. Please define the San Fernando Railroad and San Fernando Path projects at RM 30.7 and 30.65. Is it being proposed to connect Tyburn to those projects? How is that accomplished given the restricted access created by the rail tracks? Since this is a 25 year plan, why is the trail project not connecting to the City's 100 Acre Park?
3. Consider connecting Glendale Blvd to the river given it is a destination as a commercial high street.

Noise: PEIR 3.12
Atwater Village's community currently experiences excessive noise from Interstate 5 (I5). The PEIR noise study does not represent the current ambient noise in Atwater Village: the LA River bike path, east bank trail or the rail corridor all have planned and proposed sites in the LARMP.

Our community is situated between infrastructure on all sides:
West: Interstate 5 (LA River)
East: Railroad
O6-37 South: 2 Freeway
North: 134 Freeway

Your study did one short-term measurement, ST8, at the north side of Los Feliz Golf Course, on May 14th, 2020, 2:30 PM for a duration of 20 minutes. On page 3.12-7 you state "ST measurement locations were selected to supplement LT measurements at surrounding land uses". The north corner of the Los Feliz Golf Course is not reflective of our general or sensitive land use areas: residential homes adjacent to the LA River trail, current residential access points or your planned and proposed project sites near sound sensitive areas.

This site, ST8 is not reflective of current access points or future planned and proposed, bike path and riverfront projects. We need a baseline, a long-term sound study in Atwater Village.

On page 3.12-8, Table 3.12-4. Summary of Noise Measurement Results (Short Term)1. The a footnote 1 reads *"It should be noted that field measurements were conducted during the time frame when the COVID-19 Stay-at-Home Order (Executive Order N-33-20) was in effect throughout Los Angeles County. Therefore, traffic volumes along local roadways may have been depressed."*

ST8's date, time and location:

Site#	Location/Frame	Date	Time of Day	Hourly Leq Values (average), dBA	Lmax Values
ST8	Los Feliz Golf Course/6	05/14/20	14:30	64.3	73.3

O6-38

ST8's 64.3 hourly average with an Lmax high value of 73.3 shows our community needs further study:

- This location is isolated and not reflective of Atwater Village riverfront land uses.
- i5 noise not accurately measured:
    - Thursday afternoon
    - Non-peak travel time of 2:30 PM
    - Stay at home order in effect
- Site not located near any major local roadways in Atwater Village
- Atwater Village has southern(?) afternoon/evening breezes (sound was measured with windscreen)

LARMP and PEIR

- The LARMP (and this study) omits miles of riverfront homes and residential access points
    - Dover Street to Glendale Blvd
    - Glendale Blvd to Silver Lake Blvd

O6-39

- The LARMP (and this study) omits miles multiunit and single family homes adjacent to, near river parks and mixed use river trail
    - Chevy Chase Drive to Fletcher Drive

O6-40

- The LARMP (and this study) omits equestrian district access points
  - Noise on mixed use trails which include equestrian use
  - Vol II Tech page 161, 28.77 “Rigali Ave” (Proposed non-motorized bridge) Noise impacts on potential bridge ending at bike path at i5.
    - **North Atwater Crossing horse incident (death), 1/17/20 (due in part to i5 noise)**

O6-41

- ST8 does not adequately measure for LARMP planned project sites (and future noise from operations)
  - Los Feliz Blvd (LARMP p334-339)
    - Pavilion, Café, Restrooms, Showers, Lockers: at i5 entrance along bike path (river bike path abutting i5 north entrance)
    - Pavilion, Café, Restrooms, Lockers, Showers, Gathering Bldgs.: parallel to Los Feliz Blvd adjacent to i5, Bond Park and the adjacent residential homes

O6-42

- ST8 does not adequately measure for LARMP “M” project “**San Fernando Railroad** *Glendale Bike Plan”* 4.5 miles impacting residential homes abutting and across from the rails from Los Feliz Blvd to Tyburn St.

O6-43

- LA River Master Plan omits most of our current East Bank river access sites

O6-44

- ST8 does not adequately measure for LARMP X/XS Sites (LARMP Vol. II tech pages 161-162)

O6-45

- ST8 does not adequately measure for LARMP M/L/XL Sites (LARMP Vol. II tech pages 136-139)

O6-46

- ST8 does not measure LA River bike path and proposed river sites

O6-47

As we have noted, the LA River Master Plan in its current form is full of errors and omission along Atwater Village’s 4 mile riverfront East Bank, West Bank bike path and along our Rail Road border.

O6-48 The sound study’s ST8 is incapable of assessing current noise levels in Atwater Village, let alone at future projects along the bike path and adjacent to i5. Projects that include Cafés, Showers, Restrooms, Lockers, Gathering Spaces and etc., will have 24/7/365 access, which also increases the ambient noise all hours of the day. Let's imagine sitting in an outdoor Café, next to i5?

- The success of the LARMP implementation will hinge on community impacts being acknowledged and addressed.

O6-49

- The success of the LARMP projects will hinge on comfort, usability of bike path and river amenities!

O6-50

This sound study, as a tool for 25 year planning purposes, fails the present. Therefore, it fails our future, we demand a more robust sound study in Atwater Village. A long term study that measures current access points and future project and access points locations along the LA River and our Railroad border.

O6-51

- **Mitigation Measure NOI-5: Prepare Focused Noise Study and Implement Findings.**
- **Mitigation Measure NOI-6: Prepare a Noise Study**

FLOOD: LARMP Goal #1

To date, the County and City have not improved or proposed improvements to reduce flood hazard either for Atwater Village or the wider Glendale Narrows. The 1992 LACDA study did not provide any flood risk mitigation measures due to "cost/benefit" analysis that seemingly prioritizes fiscal prudence over human life and property. Due to this lack of action, when FEMA digitized the map lines in 2008, there were 115 parcels added to the Special Flood Hazard Area (SFHA), 3-4 have a LOMA. (Currently the City doesn't acknowledge the SFHA on it's planning site, Zimas).

In 2016 the City/USACE announced the Glendale Narrows "potential SFHA" to all parcels within the potential flood area. In 2017, the City moved forward with the Glendale Narrows LOMR, which begins the FEMA remapping process. If that remapping were to take place the number of Atwater Village parcels would increase exponentially. This could have impacts on housing affordability and displacement issues. The heaviest impact would be felt by South Atwater Village, which is classified as a disadvantaged community.

O6-52 Page 90 states; It is estimated that approximately 3,300 parcels will be impacted by a 1% flood event [56].

EN# 56 USACE 2016. U.S. Army Corps of Engineers, Los Angeles District: Hydraulics Report, Floodplain Analysis, Los Angeles River: Barham Boulevard to First Street, floodplain Management Services Special Study, Los Angeles, California, October 2016.

Cost of High-Risk Flood Insurance 2021 dollars:

Single family home NFIP $3,400.00
Single family home Private Insurer $1,100.00

Cost rises every year. (Multifamily, non-occupied and commercial rates trend higher, each building must be individually quoted for actual cost)

LA County is the State appointed lead for flood matters and we understand that the County is planning to take over the ARMY Corp controlled river jurisdiction in the Glendale Narrows. Since the county intends to claim this portion of the LA River, it is surprising that there are no planned projects for flood protection.

On page 88 of the 2020 LARMP, the flood hazard is openly and clearly acknowledged, "The Narrows reach (RM 33 to RM 22) has known deficiencies that are exacerbated by the heavy vegetation that has established itself in the soft bottom of the trapezoidal channel. Despite the presence of levees along portions of this reach, the flood capacity level is worse than 2% (50-year), with many regions having worse than 10% flood (10-Year) capacity and as low as 25% flood capacity (4-Year)."

Further explication of floodplain risks, beyond floodwaters, is presented on page 90. Residents and infrastructure within the floodplains may be substantially impacted by flood events. Of paramount importance during such emergencies are critical facilities where emergency operations are conducted, including police and fire stations, medical care facilities, and schools that may be used as evacuation centers. Also of importance are hazardous materials sites, that may pose a significant threat to public safety and health and the environment should they become inundated with water.

In the flood section pages 288-313, there are over 10 pages dedicated to the Glendale Narrows (p. 292-303) which directly impacts Atwater Village. On page 292, it's stated that "A combination of this approach with other flood risk
O6-53 reduction strategies, including bridge modifications and a bypass tunnel, could potentially bring the LA River in the Narrows up to the 1% flood event capacity goal." None of those items are in the proposed or planned project lists? Furthermore, we question the feasibility of these suggestions/proposals.

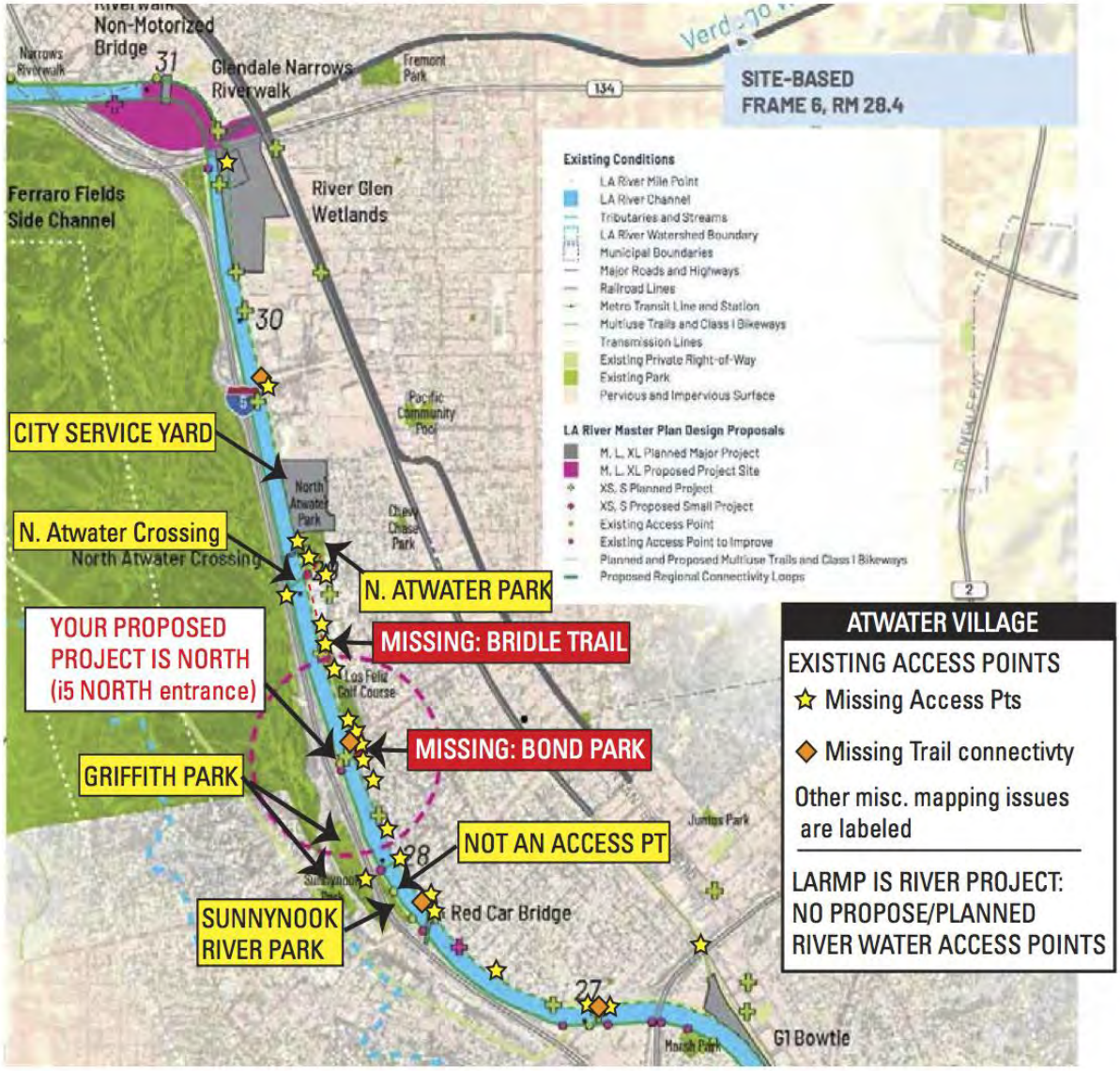
- Channel rehabilitation program:
  - Jurisdiction of ARMY Corp, the county hasn't funded any of these activities. (Channel built as rating is 51-year IF totally cleared)
- Bridge modifications: none are planned in the 25-year LARMP
  - Colorado St
  - Los Feliz Blvd: High Priority Bridge
  - Glendale Blvd: High Priority Bridge
  - Fletcher Dr: High Priority Bridge

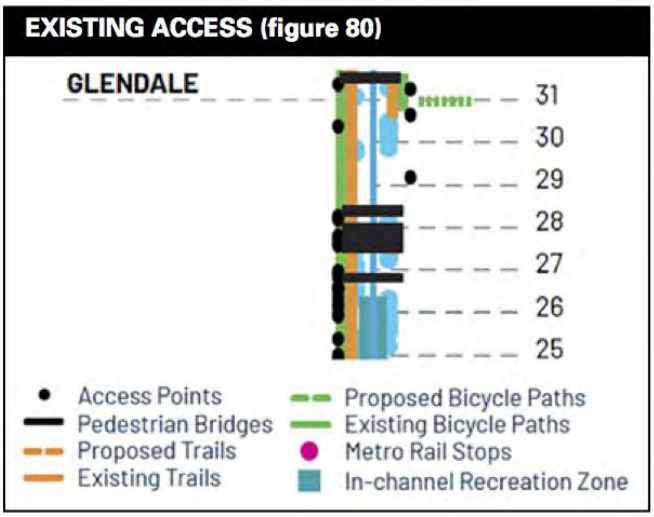
O6-53 cont.

- Bypass Channel:
    - What is the County's commitment to this concept? This proposal represents a massive and costly civil engineering effort, with outsized importance in the wider flood reduction effort for the Glendale Narrows portion of the channel, and due to it's high cost, it would likely be the most endangered part of any flood mitigation effort by the County, and hence, not a very plausible solution.
    - We understand that this concept was previously considered, and later dropped by the ARMY Corp due to cost.
- Bypass Channel Alternatives: Flood mitigation and water conservation
    - We would like to see the County couple future flood mitigation efforts together with water conservation and sustainable water practices, and consider smaller public works projects that emphasize water capture and storage along the watershed, in the spirit of the City's Green Streets initiative. In reducing stormwater run-off from ever reaching the river in the first place, this could potentially serve an important role with the City and County's larger mission of achieving independence from imported water and becoming 100% self reliant on local water sources by the year 2050.

Based on the LARMP, we see no commitment to flood risk reduction.

ERRORS AND OMISSIONS: MAPPING/CONNECTIVITY





DUE TO THE QUALITY OF YOUR MAP: ATWATER VILLAGE ACCESS POINTS ARE AN APPROXIMATION - EXACT POINTS CAN BE PROVIDED.

ERRORS AND OMISSIONS: PROJECT LIST ERRORS

XS, S SITES INDEX: RIVER MILE 34.90 - 26.96

RM	Name and Location	Frame	City	Source	Existing Access Points to Improve	Newly Proposed	
32.06	**Project 118: Griffith Park River Park Buffer** Between Ventura Fwy & Zoo Dr	7	Los Angeles	LARRMP			
31.87	**Project 117: Burbank Western Channel Non-Motorized Bridge** Burbank Western Channel Confluence	7	Los Angeles	LARRMP			
31.64	**Riverside Dr North** Riverside Dr North	6	Los Angeles	LARRMP			
31.12	**Ferraro Fields** Ferraro Fields	6	Los Angeles			X	
30.68	**Project 133: River Glen Opportunity Area Outdoor Classroom** Verdugo Wash Confluence, north of Ventura Fwy	6	Glendale	LARRMP			
30.56	**Project 127: Doran Street and San Fernando Road Enhanced Intersection** Ventura Fwy & San Fernando Rd	6	Glendale	LARRMP			
30.56	**Zoo Drive** Zoo Dr / River Right	6	Los Angeles		X		
30.49	**Project 131: River Glen Non-Motorized Bridge** Verdugo Wash Confluence	6	Los Angeles	LARRMP			
30.17	**Project 137: Brazil Street Paseo** Brazil Street	6	Los Angeles	LARRMP			
30.06	**Project 135: Brazil Street and San Fernando Road Enhanced Intersection** Brazil St & San Fernando Rd	6	Glendale	LARRMP			COMPLETE/HSR IMPACT
30.03	**Electronics Street Paseo** Electronics Pl	6	Los Angeles	LARRMP			
29.71	**Project 142: Colorado Boulevard Non-Motorized Park** SE of Colorado St Fwy & Golden State Fwy Intersection	6	Los Angeles	LARRMP			REFERENCE ERROR: THIS IS A "BRIDGE"
29.13	**Project 145: North Atwater Park (River Vista Expansion)** West of North Atwater Park	6	Los Angeles	LARRMP			COMPLETE?
28.86	**Equestrian Center** Rigali Ave	6	Los Angeles	LARRMP			REFERENCE ERROR
28.77	**Rigali Ave** Rigali Ave	6	Los Angeles	LARRMP (Proposed non-motorized bridge)			REFERENCE ERROR
28.39	**Project 149: Los Feliz Boulevard River Bridge** Los Feliz Blvd & LA River	6	Los Angeles	LARRMP			REFERENCE ERROR/ NO OUTREACH
28.36	**Los Feliz South** Los Feliz Blvd at Golden State Fwy / River Right	6	Los Angeles				NO OUTREACH
28.15	**Project 150: Legion Lane Park** Legion Ln	6	Los Angeles	LARRMP			PROPERTY SOLD
27.97	**Sunnynook Pedestrian Bridge** Sunnynook Dr / River Right	6	Los Angeles				NO OUTREACH
27.71	**Red Car Park** Ferncroft Rd & Glendale Blvd	6	Los Angeles	LARRMP			REFERENCE ERROR
27.71	**Glendale Blvd South** Glendale Blvd at Golden State Fwy / River Right	6	Los Angeles	G-H RETROFIT PROJECT			
27.56	**Ferncroft Rd & Tyburn St** Ferncroft Rd & Tyburn St	6	Los Angeles				NO OUTREACH
27.13	**Project 153: Silver Lake Boulevard Pocket Park** Silver Lake Blvd	6	Los Angeles	LARRMP			
27.08	**LA River Bicycle Park at Crystal St** Crystal St / River Right	6	Los Angeles		X		
26.94	**Project 156: Fletcher Drive River Bridge** Fletcher Dr & LA River	6	Los Angeles	LARRMP			
26.91	Clearwater Crystal St & Clearwater St / River Right	6	Los Angeles				
26.75	Elroy Elroy St at Glendale Fwy / River Right	6	Los Angeles				
26.70	Ripple Ripple Pl at Glendale Fwy / River Right	6	Los Angeles				ELYSIAN VALLEY
26.60	Lewis MacAdams Riverfront Park Near Cloverdale Dr / River Right	6	Los Angeles				
26.58	**Project 154: Fletcher Avenue and San Fernando Road Enhanced Intersection** Fletcher Dr & San Fernando Rd	6	Los Angeles	LARRMP			

07 LARRMP Project List

Project Number	Potential Project (see Note 1, below)
121	South Mariposa Street Pocket Park
122	Glendale Riverwalk Non-Motorized Bridge
123	Ferraro Fields Opportunity Area
124	Ferraro Fields Park
125	River Glen Opportunity Area
126	Doran Street Industrial Green Street
127	Doran Street and San Fernando Road Enhanced Intersection
128	Verdugo Wash Non-Motorized Bridge
129	River Glen Wetlands
130	River Glen River Park
131	River Glen Non-Motorized Bridge
132	River Glen Regional Gateway
133	River Glen Opportunity Area Outdoor Classroom
134	River Glen Opportunity Area Riverside Street
135	Brazil Street and San Fernando Road Enhanced Intersection
136	Brazil Street Industrial Green Street
137	West end of Brazil Street Paseo
138	134 Freeway to Colorado Greenway Promenade
139	Acquisition of property near Brazil and the River
140	Electronics Street Industrial Green Street
141	West end of Electronics Street Paseo
142	Colorado Ave Non-Motorized Bridge
143	North Atwater Greenway
144	Goodwin Avenue Primary Local Green Street
145	N. Atwater Park – River Vista Expansion
146	Verdant St. Non-Motorized Bridge
147	Los Feliz Equestrian/ Non-Motorized Bridge
148	Los Feliz Boulevard Arterial Green Street
149	Los Feliz Boulevard River Bridge
150	Legion Lane Park
151	Sunnynook River Park
152	Silver Lake Boulevard Primary Local Green Street
153	Silver Lake Boulevard Pocket Park
154	Fletcher Avenue and San Fernando Road Enhanced Intersection
155	Fletcher Driver Arterial Green Street
156	Fletcher Drive River Bridge
157	Fletcher Avenue and on/off ramp to the 2 Freeway Enhanced Intersection
158	Fletcher Drive under 5 Freeway Portal
159	Silver Lake Primary Local Green Street

THESE COMMENTS ARE PARTIAL: DUE TO MULITPLE LOCATIONS OF YOUR PROJECT INFORMATION.

ATWATER VILALGE COMMENTS CAN BE PROVIDED ON PROJECT EXCEL FILE SHEET

LARMP M, L, XL SITES INDEX:

RM	Project Type	Name and Location	
30.7	M, L, XL SITES	San Fernando Railroad	NO OUTREACH/CITY OF LA NOT NOTED ON PROJECT
30.6	M, L, XL SITES	Verdugo Wash	
30.5	M, L, XL SITES	River Glen Wetlands - M / 4.6 acres	
30.4	M, L, XL SITES	River Glen Wetlands - ULART - L / 57.6 acres	
29.3	M, L, XL SITES	Central Service Yard - City of LA - M / 26.1 acres	
29.1	M, L, XL SITES	North Atwater Crossing - City of LA Bureau of Engineers - M / 0.7 acres	COMPLETED
27.7	M, L, XL SITES	Red Car Bridge - City of LA Bureau of Engineers - M / 0.9 acres	COMPLETED
26.2	M, L, XL SITES	G1 Bowtie - ARBOR Study, State Parks, TNC - M/20.4 acres	

Atwater Village participation in 2020 LA River Master Plan Processes

- Atwater Village community members participated in 2018 and 2019 outreach events
- Atwater Village community members read the NOP PEIR information
- The AVNC sent a NOP letter in support of community member concerns, *with no knowledge of the Master Plan itself, due to County document delivery timing.*
- Atwater Village Community members read the 2020 LA River Master Plan draft
- The AVNC river committee hosted: 2020 LARMP County Planning Team zoom meeting, February 24th
- Atwater Village community members participated in 2020 LA River Master Plan PEIR online public meeting

56

Atwater Village: involvement in LA River meetings, plans and projects:

- City of LA: LA River Revitalization and Restoration Master Plan
- City of LA/USACE: LA River Ecosystem Restoration Feasibility Study (AKA the ARBOR Study)
- MRCA: Upper LA River and Tributaries Working Group
- HUD Grant: *NELA* Vision Plan The Northeast Los Angeles *Riverfront Collaborative* (*NELA* RC)
- AVNC/NPS technical service Grant: Atwater Village East Bank Riverway (community)
- The Trust for Public Land: Los Angeles River & Verdugo Wash Confluence Feasibility Study
- City of LA: North Atwater Village East Bank Riverway Grant project
- Additional: LARMMP project implementation community meetings, comments and input.

57

Thank you,





Courtney Morris, Co-Chair

Edward Morrissey, Co-Chair

CC:
Honorable Supervisor Sheila Kuehl 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 Senator María Elena Durazo
Honorable State Assemblymember Laura Freidman
LA County CEQA team: LARiverCEQA@pw.lacounty.gov
LA County LARMP team: LARiver@dpw.lacounty.gov

BOULEVARD MANAGEMENT

Business Management ◆ Tax ◆ Financial Consulting

Lester J. Knispel *
Todd C. Bozick

Michael C. Feinstein
Teresa A. Nicholl
Grace S. Stalica

* Also a Certified Public Accountant in Arizona and Florida.

21731 Ventura Boulevard, Suite 300
Woodland Hills, California 91364-1851

Woodland Hills
(818) 592-2000
Facsimile (818) 592-6363
Beverly Hills
(310) 278-8788
Facsimile (310) 278-8588

www.blvdmgmt.com

January 14, 2021

Letter of Direction: Change in Business Management Relationship
Stephen R. Perry, and all related entities

Boulevard Management has been engaged to provide business management services to Stephen R. Perry and his related entities. On a going-forward basis, Todd Bozick and/or Lynda Burton of Boulevard Management will be my primary contacts for all banking, accounting, tax, royalty statements and administrative matters relative to their accounts.

Please update your records to reflect the new contact information:

O7-1

Boulevard Management
21731 Ventura Blvd., Suite 300
Woodland Hills, CA 91364
818-592-2000

Thank you in advance during the transition period.

Boulevard Management

Lynda Burton

By: _____
Stephen R. Perry

Public Works
LOS ANGELES COUNTY

ATTN: GRACE KOMJAKRAPHAN-TEK
LA COUNTY PUBLIC WORKS, STORMWATER QUALITY DIVISION
900 SOUTH FREMONT AVENUE, 11TH FLOOR
ALHAMBRA, CA 91803
LARIVERCEQA@PW.LACOUNTY.GOV

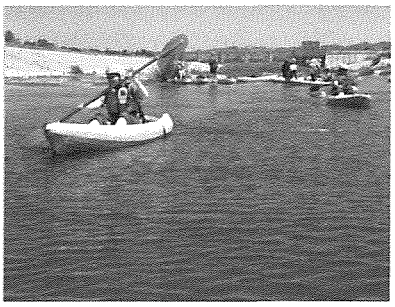
5-DIGIT 90064 668 165989

NEW ADDRESS:
THE WS TRUST
21731 Ventura Blvd., #300
Woodland Hills, CA 91364

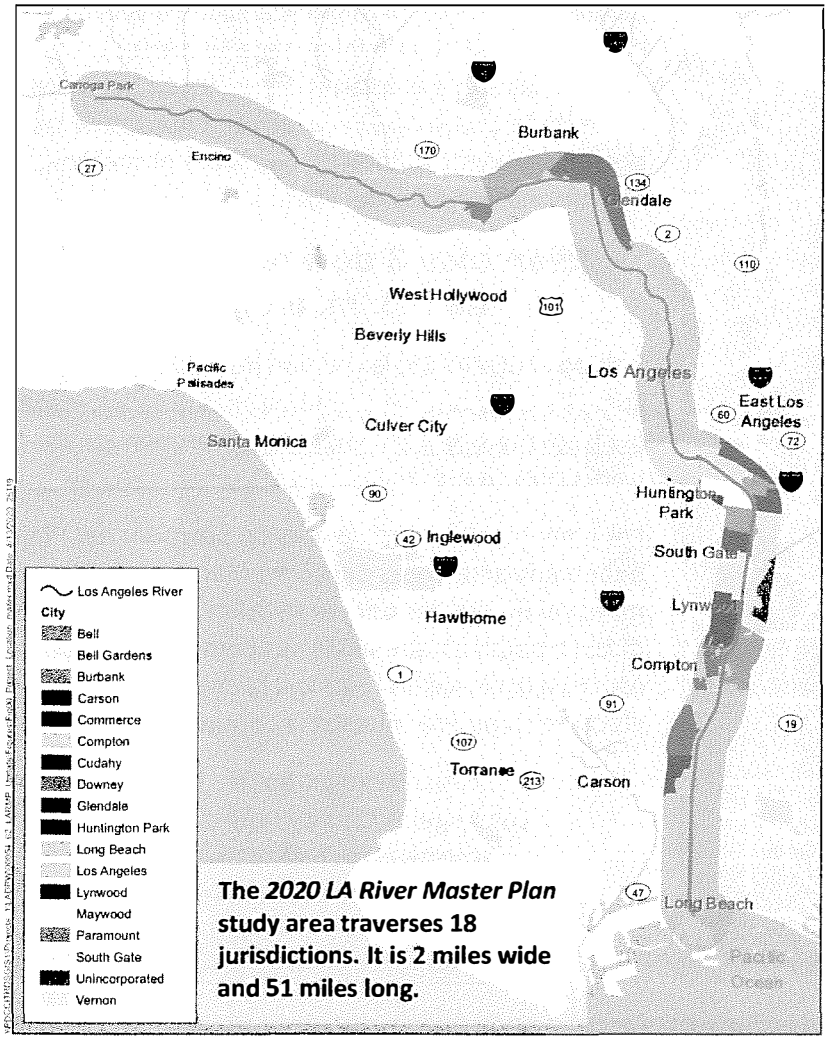
RECEIVED
FEB 19 2021
BOULEVARD MANAGEMENT

LA RIVER MASTER PLAN

Draft Program EIR
PUBLIC MEETING







The County of Los Angeles has prepared a Draft Program Environmental Impact Report (PEIR) to assess the potential environmental impacts of implementing the *2020 LA River Master Plan*.

To access the Notice of Availability, and Draft PEIR and related documents, including the description of significant environmental effects and the identified hazardous waste sites within the study area, please visit pw.lacounty.gov/go/larmpcega.

A public meeting on the Draft PEIR will be held to inform interested parties about the Draft PEIR's analysis of the Project and to gather input from interested persons and agencies on the content of the Draft PEIR.

Wednesday, March 3 2021
6 p.m. to 8 p.m.

Due to COVID-19, the public meeting will be held online. For registration and details, please visit pw.lacounty.gov/go/larmpcega. Spanish translation will be provided.

Comments on the Draft PEIR are due March 18, 2020, which marks the end of the 45-day public review period. Please send comments in writing to the physical address or e-mail address shown below.

Grace Komjakraphan-Tek
Los Angeles County Public Works,
Stormwater Quality Division
900 South Fremont Avenue
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

Friends of Griffith Park
P.O. Box 27573
Los Angeles, CA 90027-0573
friendsofgriffithpark.org

May 11, 2021

Attention: Grace Komjakraphan-Tek
Los Angeles County Public Works
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

via email: LARiverCEQA@pw.lacounty.gov

RE: Response to LA River PEIR

Dear Ms. Lomjalraphan-Tek,

Friends of Griffith Park is the non-profit advocacy organization for Griffith Park. FoGP has several concerns to share with the Los Angeles Country River Master Plan Update (LARMP). We are focusing our comments primarily on Frame 6, the Glendale Narrows area.

O8-1 First, Friends of Griffith Park was very disappointed to see that although Appendix II p. 245 lists all the advocacy groups that LARMP met with, Friends of Griffith Park was not one of them. Griffith Park is quite large at 4,310 acres; so how was our organization overlooked? Since four and a half miles of the river flows through Griffith Park, what happens in and around the river is very important to the Park and to our organization. Because we know the park, its habitat, and its wildlife well, we could serve as a valuable resource to the LARMP. Likewise, LARMP failed to include the Griffith Park Advisory Board in its advocacy groups. This is a serious oversight on the part of LARMP.

As specific projects are proposed along the river where it flows through Griffith Park, we respectfully request that Friends of Griffith Park be included in the design and review of the individual projects that will impact the Park.

O8-2 FoGP has concerns about how the LARMP will interact with the city-adopted "Vision for Griffith Park" both broadly and specifically. We are particularly concerned about increasing access to the river and wildlife connectivity. One of the possibilities proposed for increasing flood capacity in the river was to convert the trapezoidal concrete channel on the west side of the river to a vertical wall. We are pleased that the LARMP recognizes that this would have a serious negative impact on wildlife's ability to access the river. For that reason the current trapezoidal walls should remain.

O8-3 Although the LARMP briefly references the City of Los Angeles River Revitalization Plan a few times, little heed has been paid to its recommendations. The goal of the City's plan was to make the Los Angeles River look and act as much like a river as possible within the constraints of the concrete channels. That concept appears to be minimized in the LARMP.

O8-4 FoGP was very surprised to see the bypass tunnel running underneath Griffith Park and residential communities from Headworks to Piggyback Yard in the LAMRP (p. 298). At 40 feet in diameter and 9 miles long, it is a massive and expensive project. This diversion tunnel was one of the alternatives proposed and evaluated for the Los Angeles City River Revitalization Plan, and was soundly rejected due to the excessive cost. In order to make the LARMP financially feasible, this bypass tunnel should be eliminated as an option from the LARMP.

O8-5 The LARMP contains some flood plain restoration opportunities. The large MRCA project at the southeast junction of the I-5 and the 134 is an excellent example of an area to create wetlands to increase the capacity of the river during flood periods. The proposed Ferraro Fields Side Channel is another prime example of maximizing additional river capacity (p. 340). Each acre of wetlands can store 1-1.5 million gallons of floodwater which would help protect communities like Atwater Village from flooding. This approach has the additional benefit of increasing habitat connectivity from Griffith Park to the river.

O8-6 We would like to see more opportunities for side channels. The City plan included another side channel near the golf course on the east side of the river at approximately mile 30. It also proposed terracing along the west side of the river between mile 29 and 30 that would create narrow landscaped areas containing trees where people could sit and watch the river flow by. Another benefit: the placement of more trees along these areas would help combat climate change currently plaguing the globe and further reduce air pollution in the LA Basin.

O8-7 Friends of Griffith Park would like to propose an additional project to increase wildlife connectivity and access to the river – a wildlife bridge spanning Forest Lawn Drive from an area just northeast of Mount Sinai Memorial Park to Headworks (mile 33). Currently, wildlife is forced to cross the busy Forest Lawn Drive near a freeway ramp which unfortunately results in extensive wildlife deaths. And once Headworks' habitat restoration is complete, it will attract more wildlife and even more deaths will occur. A wildlife bridge from the hill of Mt. Sinai to Headworks would provide safe access for animals to navigate over the road. Construction of a ramp to the river could also be provided, allowing wildlife to cross, unimpeded by man-made obstacles to the river. This concept was enthusiastically received by Army Corps of Engineer biologists as well as city staff when it was explored in depth a few years ago.

O8-8 The Kit of Parts contains "platform parks" which bear no resemblance whatsoever to a natural looking river. Indeed, they add more concrete into the river and cover the river blocking natural sunlight from reaching the water. They make the river look more like an amusement park than a river. Currently, numerous footbridges allow people to safely crisscross the river, and engage with the more natural environment. FoGP recommends removing these platform parks from the Kit of Parts.

O8-9 We commend the LARMP for providing consistent designs in the Kit of Parts and signage so the river will have coherent and cohesive elements.

We also commend the LARMP for its efforts to increase biodiversity along the length of the river.

O8-10 The map of the Glendale Narrows on p. 378 - 379 needs some clarification to make it as accurate as possible. Bond Park, located on the southeast intersection of Los Feliz Boulevard and the river, is not

O8-10 cont. identified on the map. Are all access points identified correctly? Is the Atwater Bridge correctly located?

O8-11 The gray area labeled North Atwater Park appears to be the Central Service Yard for the Los Angeles City Department of Recreation and Parks. As a service yard it is not open to the public. That said, there have been numerous discussions over the years about consolidating services or moving some to another location that is not on prime riverside property so that North Atwater Park could be expanded into this service yard. Does the gray "Planned Major Project" indicate conversion of the service yard into parkland is in progress? That would indeed be welcome news.

O8-12 Questions we would like resolved:
What is the Headworks Connector project identified in pink in the map on p. 378?

O8-13 What is the source of funding for these projects? Is each project separately funded?

O8-14 Once built, what entity is responsible for maintaining each project? Would all projects built on Griffith Park acreage be maintained by the Department of Recreation and Parks?

While we hope our concerns will be addressed, Friends of Griffith Park is looking forward to the improvements being made along the river that will make the oft-maligned and ridiculed Los Angeles River more natural. We are particularly excited to see the River Glen Wetlands move toward completion.

Sincerely,



Gerry Hans
President

About Friends of Griffith Park:
Friends of Griffith Park (FoGP) is a California non-profit 501(c) (3) dedicated to preserving and protecting Griffith Park's natural habitat, biodiversity, and historic features, for current and future generations. FoGP is committed to ensuring that Griffith Park, a public park and Los Angeles' largest Historic-Cultural Monument, remain open, natural, and free to all citizens of Los Angeles.

Griffith Park Advisory Board
Community Stewards of LA's Largest Park & Great Urban Wilderness
Department of Recreation and Parks, City of Los Angeles
www.laparks.org/griffithpark/advisory

May 12, 2021

Ms. Genevieve Osmeña

Ms. Grace Komjakraphan-Tek

Los Angeles County Public Works

Re: LA River Master Plan Comments

Dear Ms. Osmeña & Ms. Komjakraphan-Tek,

Devising a cohesive Master Plan for the entirety of the LA River is a nearly herculean effort requiring thoughtfulness and finesse to bring many disparate stakeholders to the table. We therefore salute the effort to update the prior 1996 plan and provide an overall, forward-looking vision for the river. Despite its length, we did our best to digest the draft LA River Master Plan (LARMP) in order to parse out the long-term implications for Griffith Park. In our role as park stewards, we would like to underscore the importance of the relationship between the LA River, Griffith Park, and the many users of both. We believe the Master Plan provides an opportunity to truly connect the park, the river and the surrounding communities – and we look forward to working together in seeking to realize this goal.

O9-1 At this time, our board is evaluating the merits of the draft LARMP from the perspective of its framework and conclusions rather than focusing on the identified "proposed projects," several of which are large and would have major impacts on Griffith Park. Our understanding, from reading the available documents and attending the April 2021 Virtual Meeting, is that these projects are more illustrative of potential solutions arising from the iterative process that the LARMP has outlined - based on the framework goals, kit of parts, and common elements - rather than foregone conclusions about what may be built. We will therefore withhold comment on specific projects until they are brought forward for review on their own merits.

Broadly speaking, we are pleased to see that several of the framework goals are directly aligned with the values of our board. Providing equitable, inclusive, and safe parks, open space and trails is a lens that we consistently apply when considering various proposals that impact Griffith Park. Similarly, as a large urban wilderness, it is crucial to support healthy, connected ecosystems. We appreciate that there is not a one-size-fits-all solution for each of the challenges along differing stretches of our 51-mile river. We have had the opportunity to see feedback letters from other organizations that we respect, several of which have articulated concerns or outright rejection of the LARMP. For the sake of our analysis, we tried to focus on how the guiding principles of the LARMP would impact frames 6 & 7 – those that abut Griffith Park. Through this lens, we are cautiously optimistic about the conclusions of the Master Plan. At our April board meeting we voted to support the major goals of the LARMP; we would, however, like to raise several issues that need to be addressed.

BOARD MEMBERS: Chair – Jason Greenwald; Vice Chair – Michelle Crames; Secretary – Bryan Mercke;
Past Chair – Ron Deutsch; Gene Gilbert; Mike Hain; Chris Laib; Alex Phillips; Karen Thornton

O9-2 The draft LARMP consistently highlights the breadth of community outreach and engagement as a testament to a thorough, feedback-driven process. Unfortunately, we were surprised to find in *Appendix Volume II - Technical Backup* (pg. 246-248) that our board is notably absent from the list of "Advocacy Organizations." Nor has our board yet received any direct outreach from the project team. Given our role as community stewards for Griffith Park, which shares several miles with the LA River, we would like to be included in future outreach as this process continues. Further, given that we work directly with relevant City of LA officials on park-related issues, we can help to ensure that river improvements make use of sites already in place - along both sides of the river - so they augment existing traffic flow and location specifics. While we understand that the current phase of the process is not about agreeing to any specific projects, even those labeled as "proposed," we want to ensure that our board will have a voice in the Master Plan and its implementation in the decades to come, especially considering how much of the LA River borders and intermingles with Griffith Park.

O9-3 In much the same way that the Master Plan will be the definitive, guiding vision for the LA River, Griffith Park has its own guiding plan, *A Vision for Griffith Park*, which was adopted by the City of Los Angeles in 2014. We urge the LARMP Steering Committee and project team to familiarize themselves with the contents of this document, which recognizes the unique nature of this urban wilderness and great city park. We would like to be assured that any and all future projects as part of the LARMP will work in unison and under the tenets of the Vision for Griffith Park, which include major goals that pertain to the park's urban wilderness identity, as well as significant mobility and access objectives.

O9-4 Another point we would like to address is operations and maintenance. We appreciate the focus on ensuring that projects are fully funded for at least three years' worth of O&M. This approach is both thoughtful and timely given the current financial situation for many government agencies as a result of the pandemic. Our partners at City of LA Recreation and Parks have found themselves hit particularly hard, especially in the area of maintenance. We would like to be assured that any projects resulting from the Master Plan will have a sensible, financially sound plan that does not leave LA Recreation and Parks responsible for unexpected or costly ongoing O&M outside of the mandated three-year window.

O9-5 While there are certainly more questions and objections we would raise if we were discussing some of the highlighted "proposed projects" from the draft Master Plan that would directly impact Griffith Park – such as blasting a nine-mile-long, 40-foot-wide diversion tunnel through a large portion of the park – we will withhold our initial thoughts on these ideas until the appropriate stage for such community feedback. At this point, we look forward to responses on the major points highlighted above, as well as an assurance that our board will be included in further conversations and planning for the evolution of the LA River as presented by the draft Master Plan.

In closing, it is worth recalling that the LA River once ran along a wider swath of Griffith Park – until the construction of Interstate 5 along the river's western bank in the 1950s separated the two entities for a long stretch. It is our sincere hope that this Master Plan will enable new connections and access points between these two great natural features. In so doing, the Los Angeles community would be well-served.

Please let us know if you have any questions about the comments as outlined above. We look forward to working together as the Master Plan begins to take shape.

Sincerely,



Jason Greenwald

Chair, Griffith Park Advisory Board

cc: LA Board of Recreation and Parks Commissioners

Mike Shull, AP Diaz, Stefanie Smith – LA Recreation and Parks

Ana Guerrero, Mayor's Office

Sarah Tanberg, Council District 4

From: Michael J. Connor
To: PW-LA River CEQA
Subject: Email address
Date: Wednesday, May 12, 2021 2:30:08 PM

CAUTION: External Email. Proceed Responsibly.

O10-1 We are preparing comments on the LA River Master Plan and on the PEIR. We have an email address for the PEIR comments but cannot locate an email address for submitting comments on the LA River Master Plan itself. Or are you accepting comments on both the Plan and the PEIR? Unfortunately, the LA River Master Plan website comment forms will not accept attachments and I have received no response to my question when I posted via the comment form.

Thank you for any help you can provide,

Michael

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

May 12, 2021

Attention: Grace Komjakraphan-Tek
Los Angeles County Public Works
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

Via U.S. Mail and Electronic Mail to LARiverCEQA@pw.lacounty.gov

Re: LA Waterkeeper – 2020 LA River Master Plan PEIR Comments

Dear Ms. Komjakraphan-Tek:

On behalf of Los Angeles Waterkeeper ("Waterkeeper"), I submit this comment on the LA River Master Plan Draft PEIR ("Draft PEIR"). The Draft PEIR claims that the *2020 LA River Master Plan* ("Master Plan") has nine goals, two of which relate to the ecological health of the LA River watershed:

O11-1

3. Support healthy connected ecosystems; and
9. Promote healthy, safe, clean water.

As it stands now, the Draft PEIR does not sufficiently take into account the current and future ecological health of the LA River mainstem and tributaries. The Draft PEIR and the Master Plan in general must fully consider and address the River's ecology and apply a watershed approach as opposed to the current fragmented approach.

O11-2

In order to assist Los Angeles County Public Works in this effort, I have attached to this comment letter a Waterkeeper report authored by our former Watershed Programs Manager, Melissa von Mayrhauser, and titled *River Assessment Fieldwork Team: Connecting our Los Angeles River Watershed Community through Bioassessment* ("RAFT Report"). The RAFT Report presents and discusses the results of a two-year long study in which "LA Waterkeeper trained over 100 community members in the California Rapid Bioassessment Protocol to monitor eight sites along the LA River and its tributaries," including natural, soft-bottom, and concrete-lined sites. The study evaluates the ecological condition and integrity of each site through indicators such as organism abundance, taxa richness, taxa evenness, temperature, pH, and level of dissolved oxygen. The RAFT Report makes clear that we need to stop treating the LA River "as a flood control channel, and fully recognize it once again as a river."

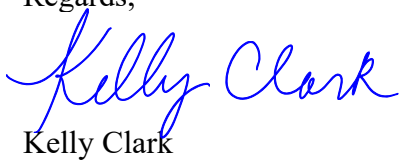
O11-3

Importantly, "[t]he results show that we cannot assume that more natural sites are ecologically healthy just because they do not have concrete bottoms or levees, and they need to be monitored regularly." Every single soft-bottom and concretized site scored low on the Family Level Index ("FLI"), indicating high levels of degradation. Some soft-bottom sites scored even lower than

O11-3 cont. concretized sites. These sites face consistent "upstream pollution, artificially high flows, lack of connection to floodplain, ongoing sediment removal and other pressures [which] continue to prevent a return of ecological integrity." It is futile to expect the addition of "superficial elements to the river (i.e. planter boxes, terraced vegetation, etc.) [to] increase ecological structure or function."

O11-4 I will let the attached RAFT Report's data and recommendations speak for themselves. It is imperative to realize that in order to meet the aforementioned goals laid out in the Draft PEIR and Master Plan, we must treat the River as a River.

Regards,



Kelly Clark
Senior Staff Attorney
Los Angeles Waterkeeper
120 Broadway, Suite 105
Santa Monica, CA 90401
kelly@lawaterkeeper.org

L.A. River Walkers & Watchers

19333 KITTRIDGE STREET
RESEDA, CA 91335

May 13, 2021

Submitted via Email: <LARiverCEQA@pw.lacounty.gov>
<LARiver@pw.lacounty.gov>

Attention: Grace Komjakraphan-Tek
Los Angeles County Public Works
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

Comments on the 2020 LA River Master Plan and the 2020 LA River Master Plan Program Environmental Impact Report

Dear Planners:

These comments on the 2020 Los Angeles River Master Plan ("LARMP") and the Los Angeles River Master Plan Draft Program Environmental Impact Report ("PEIR") are submitted by the *Los Angeles River Walkers and Watchers* and by the individuals listed below.

The *Los Angeles River Walkers and Watchers* ("LARWW") is a diverse 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 and state government agencies 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 a 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 hours to cleaning up the Los Angeles River Bike Path and making this key resource safer and more user-friendly for all.

O12-1

LARWW members and volunteers are residents who live by the river and its tributaries. Our members use the Los Angeles River for a multitude of purposes including walking, hiking, and biking for exercise and transit purposes, bird and wildlife watching, photography, and simply enjoying the beauty of being by running water. Because the Los Angeles River is such a key component of our immediate environment, LARWW members have participated throughout the planning process including attending public meetings and submitting scoping comments for the PEIR process. More information on LARWW can be found on our website <http://www.larww.org> and Facebook page <https://www.facebook.com/LARiverWW>.

Centralized Coordination and Management is Needed for the LA River Master Plan to Help Ensure a Reimagined LA River:

As we pointed out in our scoping comments, "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 Country 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." The PEIR ignored consideration of our requested alternative.

O12-2

Unfortunately, what the draft Plan does offer for future management along the Los Angeles River is nebulous and self-limiting. We are told that, "LA County Public Works shall establish an implementation team responsible for ongoing coordination after the completion of the Master Plan." LARMP at 50. With all due respect to the County's overworked Public Works employees, "ongoing coordination" is the current situation and it is inadequate to the tasks at hand. Instead, the Plan should designate a specific entity responsible for implementing the Master Plan that is capable of bringing a comprehensive vision to the transformation of the Los Angeles River.

Our experience as volunteers working to help protect and preserve the Los Angeles River Bike Path in the west San Fernando Valley has taught us that the Los Angeles River clearly needs a responsible and responsive management agency with oversight powers if it is to be "reimagined" as a river for all Angelinos. Unfortunately, the draft Master Plan lacks a core management component, and has no explicit provision for direct public input and oversight of the future "ongoing coordination". Instead of having a defined management structure to tap into, members of the public will still have to wade through a jurisdictional nightmare to get simple things done in our own communities along the river. Frankly, it is difficult to see a County departmental "implementation team responsible for ongoing coordination" doing any more than shepherding through a few piecemeal development projects. This is a far cry from the grand vision that was put forward by the planners. The PEIR failed to address this key issue.

Los Angeles River Ranger Program:

The PEIR at 3.13-11 lists the Los Angeles River Ranger Program Establishment Plan ("River Ranger Plan") that was developed in response to Cristina Garcia's Assembly Bill 1558, Los Angeles River: River Ranger Program. That bill was enacted in 2017 to address river-adjacent communities' limited contact with and responsibility for the Los Angeles River, as well as to coordinate with current revitalization plans working to enhance the river to increase its ecological, social, and recreational opportunities. The bill provides for a network of River Rangers to assist the public at sites along the Los Angeles River and its tributaries.

O12-3

Over the last three years, LARWW has worked closely with the Office of Los Angeles City Council Member Bob Blumenfield to 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. This pilot project finally went into effect in late April of this year (April 2021).

O12-3 cont.

Despite Assembly Bill 1558 being explicitly aimed at increasing ecological, social, and recreational opportunities along the Los Angeles River in planning efforts, the draft LA River Master Plan does not even mention River Rangers or similar programs along the Los Angeles River. While Assembly Bill 1558 is listed in the PEIR, the PEIR lacks any analysis of the Master Plan's compliance with the bill, the PEIR fails to explain any role for Los Angeles County in promoting River Rangers, the PEIR lacks any analysis of the beneficial or negative impacts of River Rangers, and the PEIR fails to explain what if any of the coordination envisioned by AB 1558 actually occurred.

Under the California Environmental Quality Act, a project's potential impacts on land use and public safety should be disclosed and analyzed. In our scoping comments, we urged the planners to make public safety a key issue and to address that issue. The County's own data shows that 61% of residents report not using the river due to safety concerns. LARMP at 152. But the proposed measures listed in the Master Plan under "2.8. Promote public safety along the river" are largely aspirational and punt public safety to third parties. Knowing that the LARMP will "Encourage adjacent neighborhood watch groups to include the river in their areas of influence"; and "Encourage local police departments to employ community policing best practices along the river" (LARMP at 161) will not assuage residents' fears of using the river. As we stated in our scoping comments, we consider that having rangers patrolling all 51 miles of the river to be an essential component of revitalizing the river, and of key importance in making the Los Angeles River a safe and healthy environment for all residents to enjoy. The Master Plan and PEIR simply ignore this straightforward approach to community safety, health, and welfare. We urge the County to seriously rethink its approach to public safety along the Los Angeles River.

O12-4

Maintenance Provisions:

All too frequently we have seen projects along the Los Angeles River implemented, but then left unmaintained and unpatrolled. Until members of LARWW took the initiative and numbered the street lamps along the LA River Bike Path in the west San Fernando Valley there was no mechanism to even report the location of problems there. 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. The Master Plan should require that all projects approved under the program include specific provisions explicitly requiring that the project will be routinely maintained for the entire life of that project, that the parties responsible for the project's maintenance are explicitly identified so that the public can provide input and oversight, and that the parties responsible for decommissioning a project at the end of its life be explicitly identified. For example, if information kiosks and signage are proposed, the project should specify their expected lifespan, should designate the parties responsible for their routine maintenance including graffiti removal over the life of the project,

O12-5

O12-5 cont. and should designate the party that will be responsible for removing (or replacing) the signage when its lifespan has expired.

O12-6 The current language in the Master Plan with respect to schedules for making routine checks for vandalism, graffiti, or weathering is too weak. Routine checks should be required not simply recommended. LARMP Design Features at 155. Making routine checks a requirement will ensure that projects fully allow for maintenance and that project budgets incorporate realistic funding for maintenance.

The L.A. River Walkers and Watchers and the individuals listed below thank you for providing this opportunity to comment.

Yours sincerely,

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

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

Bob Akre <agentschoice@aol.com>

Sandra Knapton <sandraknapton@yahoo.com>

Joe Macias <joe@mipr.net>

Evelyn Aleman <evelyn@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

LOS ANGELES CONSERVANCY

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

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

May 13, 2021

Sent Electronically

Ms. Grace Komjakraphan-Tek
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 Draft Program Environmental Impact Report (PEIR)

Dear Ms. Komjakraphan-Tek:

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

O13-1 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. 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, unincorporated L.A. County communities and various other government agencies that exist within the L.A. River.

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.

We thank the L.A. River Master Plan team for meeting with the Conservancy on May 10, 2020 in an effort to better understand its scope and impacts and to open a dialogue between the two parties. During that meeting we raised concerns about the following issues.

I. The Master Plan should include detailed language regarding conflicting priorities amongst various agencies and jurisdictions within the Master Plan Area

O13-2

The Los Angeles River Master Plan Area encompasses roughly twenty jurisdictions that include local municipalities, the Army Corps of Engineers, Amtrak, and California High Speed Rail Authority. Because of its intersection with a multitude of government agencies, the Plan should clearly articulate processes for future proposed projects that may have competing priorities between agencies. Given there are multiple goals, including heritage conservation, we strongly encourage you to articulate this specifically within the plan by stating them and adding none is overriding or more important than another. Such language would help position future discussions and planning efforts to ensure there is a thoughtful and balanced approach for considering competing priorities. Further, this approach can help mitigate impacts to the overall Plan and provide a road map for non-County agencies.

O13-3

One such example is the High-Speed Rail Authority's L.A. to Anaheim Extension. As currently proposed, the project would have negative impacts on the collection of historic Los Angeles River Viaducts. Constructed between 1909-1939 by the City of Los Angeles, the grouping of bridges are not only iconic civic monuments but also tell an important history of urban growth and its intersection with the River before and after channelization. To meet HSR regulations, the Project will construct barriers along the bridges above the train lines. These barriers are likely to cause potential adverse impacts to the historic resources.

In this case as well as others, the Master Plan has the opportunity to be a tool to guide competing agencies with clearly defined communication protocols in an effort to successfully meet Master Plan goals. The benefit of including this language is not exclusive to historic preservation, rather all areas of environmental review would benefit.

II. Historic Resources within the Study Area should be surveyed and compiled into a publicly accessible database

As stated in the PEIR, the Plan Area extends one mile in either direction from the river's banks along it's fifty-one-mile course. Stretching from Canoga Park to Long Beach, countless historic resources are within the Plan Area. Historic resources along the river are integral to telling the story of Los Angeles County. The communities that have formed along the river's banks are as diverse as the County itself with unique stories and experiences.

O13-4

Historic resource surveys are intended to help identify eligible individual historic resources and concentrations of contributing resources that qualify as potential historic districts. Historic resources may include individual buildings, structures, public art, natural features, and sites connected to important events. The incorporation of historic resources into the Plan help to tell the history and celebrate cultural identity within L.A. River communities.

On page 61 of the Master Plan, surveys are referenced as part of the River's "Arts and Culture Assets." However, the Plan does not provide concrete survey objectives and timelines. We

O13-4 cont.

strongly urge the County to incorporate a more detailed plan for future surveys and the accessibility of survey data in a single user-friendly database.

On page 458, the County has referenced the Los Angeles Conservancy as a potential partner for identifying and activating cultural assets along the LA River corridor. We welcome the opportunity to meet with the County and partners on this matter.

III. Historic Preservation objectives and goals to be clearly articulated within Master Plan

O13-5

Historic preservation should be more strongly incorporated throughout the Master Plan and a section dedicated to preservation goals. Presently historic preservation is briefly referenced in the Plan but does not have a strong presence. Preservation should be incorporated more wholistically as it impacts the following 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.

O13-6

Including a dedicated section for historic preservation in the Master Plan is important for the County's preservation program as well as to encourage river communities with dormant or nonexistent programs to save their historic resources. Preservation is a powerful tool for empowering and celebrating underrepresented communities by engaging stakeholders to save historic places. Connections to the historic environments provide an important tangible link to history that cannot be achieved through literature. Historic preservation is an equitable solution to history and community engagement.

IV. The Conservancy requests additional meetings with the **County's** 2020 Los Angeles River Master Plan representatives, steering committee, and community partners.

O13-7

The Conservancy is appreciative of time the Master Plan took to meet with us. Continued dialogue with County staff and community partners is welcomed as we believe it ensures a more well-rounded Master Plan that fully incorporates historic Preservation. As the Plan moves forward, the Conservancy can provide further insight into the role of preservation and how it may positively impact and strengthen the Plan. We hope a meeting with County representatives will facilitate a meaningful dialogue and help to create a more well-rounded 2020 Master Plan.



V. Conclusion

O13-8 The 2020 Los Angeles River Master Plan is an important tool for future projects along the river. The L.A. River is one of the County's most important resources that impacts many communities along its fifty-one-mile length. The Conservancy is encouraged by the opportunity for the County's Master Plan to provide equitable access to the river and celebrate its significant cultural resources. The Conservancy recommends the following for the finalized Master Plan:

1. The Master Plan should include detailed language regarding conflicting priorities amongst various agencies within the Master Plan Area
2. O13-9 Historic Resources within the Study Area should be surveyed and compiled into a publicly accessible database
3. O13-10 Historic Preservation objectives and goals to be clearly articulated within Master Plan
4. O13-11 The Conservancy requests additional meetings with the County's 2020 Los Angeles River Master Plan representatives, steering committee, and community partners.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 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
Senior Director of Advocacy

cc: Los Angeles Department of City Planning, Office of Historic Resources

2020 LA RIVER MAST PLAN PROGRAM EIR COMMENTS

May 13, 2021

O14-1

Natural habitat restoration, historic preservation, cultural significance and respect for stakeholders should be the vision for the LA River Master Plan. The Lower Los Angeles Revitalization Bill “AB530” was written to carry out those tasks and started this entire process. The CA State Legislature acknowledged that “No one entity could consider all the complex issues along the river corridor”. The necessity for cooperation in planning with thorough environmental review, to include accountability must be required for all planned projects on public and private land in the corridor, if the mission is to become reality.

The vision of collaboration is the essence of the law. There must accountability to the LA River Master plan, to include real sanctions, if it is not followed. There needs to be a steering committee and multiple agency review. During all phases and particularly during the CEQA process, adherence to the master plan needs to be evaluated if the primary objective to “revitalize” the river corridor is to be achieved with equity and justice.

O14-2

When a project is proposed in the corridor 1 mile zones, whether public or private property, LA County Flood Control District “LACFCD” and the US Army Corps of Engineers “USACE” should be consulted for review to include storm drain infra-structure. Those structures are all ancillary to the flood control channel and on a project-by-project basis need to be assessed and compared for any impacts, changes or deficiencies to the “on-the-whole” system. This is an obligation of LACFCD and local municipalities and is an example of critical cooperation and a basis requirement as agreed with the Federal entity the Army Corps.

O14-3

The Master Plan proposes a “Program EIR” that unsuccessfully places accountability for adherence to the master plan in the lap of the local entities. Based on past history, local level project review in the LA River corridor is insufficient - the City of Long Beach continues to exhibit such conduct with projects such as the Wrigley Greenbelt and 3701 Pacific Place. The result is continued cumulative negative impacts in this fragile river habitat that used to be a vibrant, rich and lush resource. Natural habitats, culturally significant equestrian trails and stakeholder communities all suffer while the regional complex review promised in the legislation NEVER happens.

The Program EIR is based on the assumption that the local entity would use a “kit of tools” or review in 5 mile segments. The problem with that is the river has features that should not be broken into segments – such as the historic equestrian trail. The linear nature of the natural river habitat and trail must be considered in its’ entirety. The demise of just one small section can have a cumulative and permanent negative consequence and change that cannot be re-stored. This is been a consequence of local level planning and without larger scale accountability to the master plan of flooding along with historic features such as the equestrian trail is why, in order to address all the

O14-3 cont.

complex issues when planning a project large or small, broad or site specific along the LA River corridor, a regional “committee” approach beholden to the Master Plan is needed instead of assuming entities will “do the right thing” through Program EIR. A different approach and sanctioning powers are needed.

2020 LA River Master Plan Objectives:

Flood control risks

O14-4

The storm drain infrastructure is currently incapable of handling the rain run off for current density in the City of Long Beach within the LA River sub-watershed vicinity. Those deficiencies require many steps to cooperate in planning, permitting, review, corrective action, documenting, reporting and mitigation. Any projects and added density/development within the river 1 mile zone that do not also have through review for compliance with flood control policies, permits and procedures will stress an already under-sized flood control storm drain system. Due to lack of proper permitting, review or collaboration with many other entities such as at the USACE, LACFCD, or an “LA River 41 Member Steering Committee” level, additional flood impacts that could be avoided will be compounded and may become catastrophic. 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.

Provide Equitable, Inclusive and Safe Parks Open Space, and Trails
Page #153 GOAL TWO and Page #250

O14-5

The 1996, 2006 and 2020 LA River master plans identified Wrigley Heights North and South, approx 70 acres of public and private land, as open space necessary to retain and/or acquire. It was listed as “the jewel of the river”. It is both critical and necessary in order to protect the little remaining habitat viable for restoration. To set in motion it’s preservation/acquisition will also achieve more equity balance for park and open space deficiencies for the citizens in the south LA River zones and west side of Long Beach. This is also part of the larger Wrigley Greenbelt, also culturally significant land with historic equestrian zones and trails and habitat. Due to lack of collaboration by the local entities, these lands represent the largest swath of land along the river adjacent to the historic horse bridle-equestrian/hiking trail with habitat, cultural and open space/recreation significance. The trails and open spaces are the life-line for the horse culture. Un-obstructed trail passage and safe mobility is critical and that requires detailed trail planning and design with equestrian expertise to include signage, education and consideration for safe horse right of way passage at all gateways, destination, crossings, trailheads and mergers. Proposals for development of county and private lands within the equestrian zones and the 1 mile river corridor zones continue to put at risk the health, safety and livability needs for these animals. Also the river corridor trail serves as the main lifeline for the integrity of the trail and the master plan. The program EIR should require linear review to prevent 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

O14-5 cont. equestrian zones and that EIR should be considered in projects within the Master Plan scope.

Support healthy connected ecosystems
Page #165 GOAL THREE

O14-6 This is a large linear environmental corridor that many species depend upon. As a resource, the river has been vastly and negatively altered since it was deeded to the State of CA. The south LA River, is sovereign land - owned by the people of the State of CA. The resource continues to experience negative impacts every time development occurs on or adjacent to the river habitats and trails. The corridor ecosystem is not defined by the man-made parcel lines. The river corridor and trails were once all open space; however encroachment development right up to the levee 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

O14-7 The corridor includes wild species and domestic horses, habitat and historic and established underserved communities that need open space and protection. It is not equitable that these established stakeholders be overtaken and their survival threatened due to lack of collaboration or “buy in” by any single entity. The City of Long Beach, for example, which simply opts out of this Master Plan, is replacing habitat and historic resources with high density, impermeable spaces without thorough EIR and Master Plan compliance review.

Embrace and enhance opportunities for arts and culture

O14-8 The reality of the historic flow patterns of the river that the Tongvan seasonal villages encompassed is what we now identify as the watershed. Contemporary Tongva and other indigenous people rely on access to the river and engagement with its diverse riparian, woodland and fresh water habitats. Therefore the entire river, the watershed and adjacent lands once part of the historic flow patterns should be considered a fragile area worthy of protection for its cultural significance. The life of the river cannot be extracted from the life of the people who have depended on it since time immemorial. Therefore the land, and indeed the river itself, should be considered a living tribal cultural resource and treated as such. Priority should be given to rehabilitate and naturalize the river, its’ tributaries, and watershed areas wherever possible. This is especially true throughout Long Beach, where plans have been in place to create naturalized green parks favoring naturalized habitat - yet ignored, for decades.

O14-8 cont.

Preservation and restoration of the entire historic equestrian trail network and protecting the horse culture is culturally significant and provides for many education opportunities. Natural habitat restoration and tribal lands protections will enhance what otherwise will be lost if entities are allowed to ignore this master plan and other such documents such Long Beach Riverlink and the 1947 Equestrian Trail act. As long as any local or private entity does not adhere to the master plan and related documents, the master plan serves only as a guideline without any real teeth and complex negative impacts will persist and this extensive master planning process will be in vain.

O14-9

Address potential adverse impacts on housing affordability and people experiencing homelessness

This needs to be done in a balance manner so that adverse impacts are not further created by too much density with disregard for existing communities and their needs as well.

O14-10

Foster opportunities for continued community engagement, development and education

The community has engaged over these master plans for the last 3 decades and yet the City of Long Beach actively ignores those historic efforts that include full scale EIR review to establish protected river adjacent equestrian trails, horse overlay zones and associated open spaces earmarked for recreation and habitat. Until there is accountability for these plans that truly include the needs and wishes of the people and environmental concerns, none will be realized.

O14-11

Improve local water supply reliability
Page #: 207 Goal Eight

The deficient storm drain pipes, a known condition in the south LA River Sub-watershed in the City of Long Beach, allow the excess to flow overland, outside the pumps and site construction without proper permits and review allows for sub-watershed and sheet-flow risks that continue to pose many flood risks and non-compliance issues.

Promote healthy, safe clean water
Page #: 215 Goal Nine

This requires a larger scale review and collaborative effort that is not achieved in the “five mile”, “program EIR” or “tool of kits” concept in planning.

O14-12

Jurisdictions, Ownership, and Rights
Page #: 48 **Paragraph #**: 1
This section of the report is isolated to water issues when so many other major concerns must be addressed such as a broader and more in depth review of projects similar to those found in an EIR. . It should be transparently outlined who the chain of

responsible parties are, starting with the US Army Corps of Engineers (USACE), to LA County Flood Control District (LACFCD) “District Operator” to municipalities “Local Operator” and so on. If an agency, such as a municipality, neglects to responsibly evaluate environmental conditions and explore viable and better alternates in favor an economic or some other outcome over health, environmental justice, water retention, habitat, downstream impacts, the adverse impacts of climate change, then this Master Plan is not doing its job.

We cannot allow tacit approval of adverse uses when we can and must do better for our environment and our very survival. We need our governing bodies to be more responsible for actually implementing the mitigating measures they portend to support. Words on paper have no value if they are never acted upon. The Master Plan needs actionable efforts to make incremental progress toward a healthier region.

Role of the County
Page #: 50
A statement must be included to disclose the layers of responsibility (LA County, LACFCD, Municipalities) regarding who is the steward of the River, watershed and existing open space. There are serious issues that must be overseen and evaluated before allowing development. A Program EIR is inadequate to address the numerous uses and elements that must be adhered to without identifying the responsible parties and layers jurisdictional gaps that remain un-resolved.

O14-12 cont.

For example: does a proposed housing development on a toxic site or a self-storage facility with nearly 600 RV parking spaces take precedent over the documented need for a safe watershed management, best management practices, healthy environment, habitat, and a health-related need for open space and greening in the most disadvantaged areas? This is where life spans on the north and west side of Long Beach are now several years less than those on the east and south. Environmental justice issues must be addressed.

Another example is dangerous motorized vehicles/cycles allowed to travel the levee pathways in exponential numbers creating enormous public, levee and habitat safety risks. This is an obligation of LA County and LACFCD to maintain the safety integrity of the levees as agreed with the USACE. The responsibility conveyed without transparency, the buck is passed off to the Cities or Sheriffs, due to “jurisdictional cross-overs” and the problem goes un-checked. In the meantime with no clear line of action or recourse for the public nothing is being done to resolve this enormous safety issue along the entire river corridor.

There are already agencies in place with technical expertise, along with the “steering committee” that should be able to independently and diligently evaluate projects and alternatives for the best outcome not continually favoring economic interests over the health and welfare of its citizens. These agencies and and/or a committee should not and cannot be the usual political supporters of so many poorly considered projects. The chain of command with a presence armed with jurisdictional powers should be

O14-12 cont.

exercised as outlined by Federal legislative Acts and contractual agreements. Following those pre-ordained agreements would outline a more secure process, where this plan fall short - to ensure homes will not be built on toxic sites, that water tables and the health of the river and surrounds will be improved, not threatened.

A long term commitment must be made in improving soil and water conditions, while diligently addressing the impacts of climate change and the environmental damage done by industries and permitted by various jurisdictions. The river and surrounding land must be healed for our own survival. We must with confidence have a responsible and accountable body in the USACE, LACFCD, Coastal Commission and municipalities such as the City of Long Beach that will ensure honest and thorough evaluations rather than tacit approvals for blatant violations of best management practices and healthy outcomes. We cannot continue to allow the responsible agencies, districts and parties to ignore the obvious issues that must be addressed during their watch.

In summary, the master plan must be embraced and the vision of restored natural habitats, respect for environmental concerns, social equity, historic, cultural and stakeholder input and accountability must be primary for this to be a successful master plan.

Thank you for your consideration.

Respectfully submitted on behalf of:

Riverpark Coalition
www.riverparkcoalition.org

Renee Lawler
562-433-0757
renee_matt@live.com
Riverpark Coalition
Equestrian Assn of Southern California
Equestrian Assn of Wrigley Heights
Citizens About Responsible Planning

East Yard Communities For Environmental Justice

Fighting for Life

East Yard Communities for Environmental Justice – 2317 Atlantic Blvd. Commerce, CA. 90040

May 12, 2021

Los Angeles County Public Works
Stormwater Planning Division
Attn: Genevieve Osmeña
900 S Fremont Ave
Alhambra, CA 91803

Re: Draft LA River Master Plan Comments

Dear Ms. Osmeña

On behalf of East Yard Communities for Environmental Justice (EYCEJ), we submit these comments on the Draft Program Environmental Impact Report (PEIR) for the Los Angeles River Master Plan (LARMP). While most of the following comments are directly in response to the PEIR, many of these concerns and recommendations allude to the LARMP and ***we request that the LARMP Project Team and LA County Public Works also take these comments into consideration for the LARMP itself***.

PROJECT SUMMARY & OUR PROCESS

In this comment letter, you will find that we have various questions, concerns, and recommendations as it pertains to the following topics:

O15-1

1. Tribal Consultation
2. Population and Housing
3. Land Use and Planning
4. Biological Resources
5. Public Services
6. Hydrology and Water Quality
7. Hazards and Hazardous Materials
8. Recreation
9. Transportation

Over the course of two months, a group of EYCEJ members from East Los Angeles, Southeast Los Angeles, and Long Beach met to read the Draft Program EIR for the LARMP and draft a

O15-1 cont.

collective comment letter on behalf of the organization. Throughout this reading period, members annotated and recorded key concerns, brainstormed responses and recommendations, as well as observed major gaps and limitations in the document. Although this letter can in no way cover the full extent of our ideas and sentiments, we all agree that the points and concerns addressed in this letter represent the group's attitude and vision of the LARMP, and therefore EYCEJ memberships' comments. We write this letter with questions, concerns and observations regarding the over 1,992 page document, and materials which were only provided in English to a population that also is heavily Spanish speaking, because we feel that it is our responsibility to address questions and concerns that the PEIR overlooks.

1. Indigenous communities have not been invited to consult, review, and make recommendations for the LA River Master Plan.

We urge the county to invite all CA Native American tribes with territories along the Los Angeles watershed and indigenous people local to Los Angeles County to consult, review, and make recommendations for the LA River Master Plan.

O15-2

The Paayme Paxaayt/Orit/Wanüt has always been, and will always be, a place of significance to the Native American Tribes through whose ancestral homelands the River flows, including the Fernandeño Tataviam Band of Mission Indians, the Gabrieleno/Tongva San Gabriel Band of Mission Indians, and the Kitz Nation Gabrieleno Band of Mission Indians. There are dozens of Tongva and Tataviam villages along the River. Both communities' connection to land and water was disrupted with the establishment of the Spanish mission system. For the Tongva this disturbance arose in 1771 with the founding of the Mission San Gabriel. For the Tataviam, their Spanish period began in 1797 with the "recruitment and enslavement of Indians[1] to Misión del Señor San Fernando Rey de España (San Fernando Mission), the Seventeenth established mission in California."[2]

The current status of the Los Angeles River and Tributaries is first and foremost a result of colonialism and it is Native American Tribes and indigenous groups that have been most impacted by this. The State of California and County of Los Angeles share responsibility for the loss, trauma, and displacement experienced by tribal community members from the Native Nations through whose homelands the River flows.

[1] http://www.tobevisible.org/timeline.html
[2] https://www.tataviam-nsn.us/heritage/history/historical-timeline/

It is therefore important for the cities and County to recognize the connection Indigenous communities have with the LA River and their traditional ecological/ cultural/ social knowledge pertaining to the River that has been passed down over many generations. In addition, they should be engaged in the implementation and governance of the Los Angeles River Master Plan. The fact that the LA River Master Plan's steering committee did not have any Tongva representatives and did not sufficiently represent the indigenous diaspora along the Los Angeles River should in itself invalidate this process and document. Multiple families should be representing the voice of the river, and that was not the case with the development of the LARMP and PEIR analysis.

O15-2 cont.

Recognizing that the River is part of a larger system, the Plan should consider more creative governance models that include representation from all of the California Native American Tribes[3] with territories along the river to establish cohesive management over the watershed. California Native American Tribes are sovereign nations and there are multiple scenarios, including related to watershed management, river restoration, and development, which require state and local agencies to engage in government-to-government consultation with Native American Tribes as part of the planning process. Therefore the LARMP and PEIR must include Tribal Representation on all Governance and Advisory Bodies. Representation from all tribes along the River and on all future governance and advisory bodies created as a result of the Plan should be mandatory.

The United Nations Declaration on the Rights of Indigenous Peoples, adopted by the UN General Assembly in 2007, supported by the United States in 2010, adopted by California Assembly Joint Resolution 42 in 2014, and ratified by the Organization of American States in 2016, uplifts the concept of Free, Prior and Informed Consent in Article 32[4], Section 2:

> "States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other

[3] California Native American Tribe is defined in California Public Resources Code Section 21073 "California Native American tribe" means a Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission for the purposes of Chapter 905 of the Statutes of 2004. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB52

[4] UNDRIP Article 32, 1. Indigenous peoples have the right to determine and develop priorities and strategies for the development or use of their lands or territories and other resources. 2. States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.

resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources."

O15-2 cont.

As is, both the LARMP and PEIR has failed to do this. While the plan alludes to recreation and economic growth opportunities it fails to acknowledge that to inidgenous tribes, both the river and surrounding land is not just recreation, it is sacred land that is significant for ceremonies and cultural and ecological practices.

2. The LA River Master Plan and its Program EIR does not treat ongoing displacement and gentrification as an environmental justice issue and therefore fails to analyze the significant environmental impacts this would have on LA River communities.

The current status of the Los Angeles River and Tributaries is first and foremost a result of settler colonialism and it is Native American Tribes and indigenous groups that have been most impacted by this act of displacement and dispossession. The State of California and County of Los Angeles share responsibility for the loss, trauma, and displacement experienced by tribal community members from the Native Nations through whose homelands the River flows.

O15-3

"It is difficult to be Indian under any circumstances; think what it must be like to see a phenomenon like Los Angeles spreading over your meadows and valleys, diverting your rivers, building parking structures on your holy sites, transforming the land that nurtured your ancestors into something unrecognizable."[5]

As is the LARMP and PEIR does not treat both the ongoing displacement of Black, Indigenous, unhoused, and communities of color as an environmental justice issue and therefore does not analyze nor mitigate potential environmental impacts as a result. The plan lists all the policies and programs that each city, located near the LA River basin, has implemented that specifically respond to housing needs. However, it is very clear and alarming that there are uneven protections across these cities. Especially in Southeast LA, there is a lack of strong tenant protections and programs for unhoused and rent-burdened folks. Not all communities have sufficient and comprehensive enough policies and programs to support housing needs which is crucial as these LA River projects will definitely increase housing prices, maximize policing of these areas which will impact the unhoused, Black, Indigenous and People of Color, and already disenfranchised folks, and will cause further displacement across all these regions. The County needs to work towards increasing these protections and programs so that

[5] L. Frank Manriquez and Kim Hogeland, First Families-A photographic History of California Indians (Berkley: Heyday Books, 2007), 93.

O15-3 cont.

all the cities by the LA River basin have the resources necessary to respond adequately to housing needs. The report needs to be clear and direct with its approaches to combat the potential displacement of folks in these communities especially as housing injustices are being exacerbated due to the COVID-19 pandemic. The plan and the EIR analysis of the plan needs to treat this displacement and gentrification as a result of the LARMP as an environmental impact on local communities.

O15-4

The plan also states that the LA River Projects will "accommodate" anticipated growth and not induce new growth in housing/population. However, this statement relies on data they gathered prior to the COVID-19 pandemic and does not reflect the current situation of cities by the LA River basin. The PEIR needs to be updated with data from the current COVID-19 pandemic because this report does not take into consideration the socioeconomic hardships that have been exacerbated by this crisis such as unemployment, poverty, eviction, displacement, food insecurity, etc.

O15-5

Additionally, we are concerned with the statement that no existing permanent housing structures will be displaced but that construction of these projects will displace unhoused communities. Unhoused folks are people, and they will be displaced even if existing permanent housing will not. In addition, although the permanent housing will not be demolished, the residents living there might be displaced due to rising housing prices caused by the LA River projects. This impact analysis is focusing on structures and not on the people who will be potentially impacted by these projects!!! This analysis needs to use language that is more people centric as well as include impacts that decenter housing structures and instead, focus on people who will be relocated or displaced such as unhoused folks, low income and or housing insecure families and individuals, etc.

O15-6

Lastly, we are concerned with the statement that the project will not result in a cumulatively considerable impact on its own. It discusses that the proposed project could only produce impacts in combination with other projects within the County. These proposed projects will generate significant impacts on their own as they will contribute to pre existing housing insecurity, gentrification, and policing/criminalization. The report needs to stop trying to distance their projects from displacement and population growth. These projects are not isolated from ongoing trends of displacement, criminalization, etc. This impact report desperately needs to take into consideration how displacement and gentrification are environmental justice issues!!! These projects will drastically change the social environment of these communities as people will be relocated, businesses led by community members will be socioeconomically impacted, and the various community spaces and networks that have been formed by these folks will be forever changed. By not assessing the cumulative impacts of the LARMP and resulting projects,

O15-6 cont. the Program EIR fails to adequately assess and analyze the full extent of environmental impacts the LARMP will have on local communities.

3. When envisioning the land use and planning for LARMP, it is important for LA County to consider <u>all</u> users of the LA River, which includes residents, indigenous people, and unhoused individuals who live by and in the immediate community. The Program EIR fails to study this.

O15-7 To protect residents, the PEIR must address important questions and concerns related to land use and planning. It is the County's duty to protect these residents and to ensure that communities remain socially, economically, and culturally stable in the long term. One question that must be addressed is, given that gentrification is real and ongoing in most Black, Indigenous, Communities of Color near the LA River, how is the county ensuring that all users enjoy the benefits provided by these public spaces? As is the PEIR is inadequate until it requires the LARMP to fully outline an anti-gentrification plan to meet land use planning, policy, and regulation goals.

O15-8 Another important question our community members have is: Why is the PEIR analysis defining the division of a community only through connectivity to other areas? Division can happen within an established community. The PEIR should analyze how the LARMP can divide neighborhoods within a community and how communities can be divided from each other, socially and spatially. For example, the operation analysis section fails to outline how building amenities such as pavilions, cafes, and performing arts spaces can create division by fostering gentrification, centering white affluent visitors (soon to be gentrifiers) as premier amenity users, and displacing existing local neighborhood businesses that already offer such amenities (i.e.: bringing in a new coffee shop when there is one down the block that has served the community for decades). A thorough analysis and mitigation plan that incorporates the already existing Lower Los Angeles River Revitalization Plan Community Stability Toolkit is needed.

O15-9 PEIR states that Construction and Operation for Kit of Parts (KoP) would be less than significant, but once again, Green Gentrification[6] is real— it is violence—and yet is not considered as a potential impact. Often, when affordable units are built, there is no guarantee that those units will be for community members from the local neighborhoods. KOP 6 does not strictly prioritize these units for locals. If these limitations are in place, PEIR should indicate the policies or measures in place and the assessment that proves induction of a population will not take place. Additionally, we are aware that affordable housing nonprofits maintain their own

[6] As defined by Gould and Lewis, 2016

O15-9 cont. running list of possible candidates. This could bring in unplanned growth to the neighborhoods and this concern should be addressed in the PEIR if housing for locals only truly is the goal.

With regards to the LARMP's consistency with the Lower LA River Revitalization Plan, the document stated, "Typical Projects, 6 KOP categories, and the overall 2020 LA River Master Plan Yes. Please see above consistency discussion for SoCal Connect policies." The information “above” fails to outline how the LARMP is inconsistent with the goals outlined in the Lower LA River Revitalization Plan. Here are the goals the PEIR must properly address:

O15-10 1. Prevent gentrification and resulting residential and commercial displacement through comprehensive community-driven and informed policies and programs such as, but not limited to affordable housing, rent stabilization, enhanced infrastructure financing districts (EIFDs), community land trusts, city housing policies, thoughtfully planned commercial development, and additional LA River multi-use trail and bikeway access points to avoid real estate hot spots. Not a single paragraph was written in the Land Use and Planning Section about how the PEIR integrates anti-gentrification and community stability safety nets. Our question is the following: Which of the above mentioned policies and programs are in place to protect tenants and community members and thus, allow such development by the River to begin?

O15-11 2. Address homelessness by preventing residential displacement, support regional initiatives such as increasing the affordable housing stock, long-term homelessness interventions, and incorporating support services for the homeless into river revitalization projects. PEIR fails to mention unhoused folks who currently shelter near the LA River and how PEIR will abide by goals outlined in the Lower LA River Revitalization Plan.

4a. As proposed, the LA River Master Plan may lead to the decline or displacement of biological resources and therefore cause a significant environmental impact on the LA River and adjacent communities.

O15-12 The PEIR analysis states that construction, maintenance, and operational activities along the LA River can potentially and significantly decline species and their natural habitat. This instills in us worries about the longevity of habitats and species and potential displacement of biological resources. Although prevention measures are planned, indigenous tribes were not consulted, and potential impacts are still significant. We recommend the county explore alternate mitigation measures and work with different preceptors to significantly reduce impacts.

O15-13 California Native American Tribes and Traditional Ecological Knowledge (TEK)--the value of TEK in land and watershed planning should be uplifted in the Plan. “Traditional

O15-13 Ecological Knowledge (or TEK) refers to the evolving knowledge acquired by indigenous and local peoples over hundreds or thousands of years through direct contact with the environment….TEK is an accumulating body of knowledge, practice, and belief, that encompasses the world view of indigenous people which includes ecology, spirituality, human and animal relationships, and more." The Plan should cite California Landscape Conservation Partnerships Traditional Ecological Knowledge Resources page for additional information related to California Native American Tribes and TEK.

O15-14 It is stated that, as a mitigation, permit distribution will be required for projects that will pose risks to biological resources. For example, Mitigation Measure BIO-21c: states: "If wetlands or jurisdictional aquatic resources are identified within the project footprint and would be affected by construction of the project, the appropriate permits will be obtained from the USACE, SWRCB or RWQCB, CDFW, and/or the CCC, as required. The permittee will implement all measures and conditions included in those permits". After reading this, we asked ourselves, "What will these permits implement? What about obtaining these permits makes construction a more secure process?". This is not clearly stated and creates a concern about any gaps permits may not be able to address. We recommend an explanation for what the permits will address and how they will make construction a more secure process. "Permanent construction" is also indicated in the plan. However, this is not defined, and no scenarios or reasons are given to why construction will be permanent.

The PEIR also states the use of pesticides, herbicides, and fungicides can have a detrimental effect on biological resources. It is stated that pesticides and herbicides can indirectly impact species and "increase invasive plant species". Additionally "herbicide use can degrade habitat and remove floral resources", pesticide use can cause "mortality" and have "sublethal effects", and fungicides "can also lead to increased susceptibility to pathogens and parasites".

O15-15 The PEIR should also consider the impacts of pesticides used on biological resources would have on nearby communities and users of the LA River. There is an emphasis on the usage of pesticides, but no serious effort to ban them. They put adjacent communities at risk, including Indigenous members who connect with the land for ceremony and for cultural practices. For example, tribal members of Los Angeles engage in basket weaving along the LA River and collect plants for medicinal purposes[7]. If plants are sprayed with pesticides, there is a risk of ingesting and coming in contact with toxins. There is also the potential for pesticides to contaminate stormwater runoff. Pesticide exposure has been linked to a number of acute and

[7] California Indian Basketweavers Association Statement on Pesticides
https://ciba.org/ciba-policy-statement-on-pesticides/

O15-15 chronic health problems including a variety of different cancers, diabetes, Parkinson's disease, asthma, and neurological damage. Based on the health risks to community members and biological resources, we recommend that these pesticides are banned.

O15-16 Another concern of ours is attributed to the PEIR primarily highlighting biological resources that are recognized and protected by various agencies. This largely leaves out the impact to biological resources found in the community and in homes. For example, the report must consider and conduct an analysis on how LA River construction, maintenance, and operations may lead to water run-offs, pesticides, dust, etc. affecting community biological resources.

4b. The naturalization of the LA River DOES NOT and SHOULD NOT equate to displacement.

O15-17 Communities that, traditionally, have not had access to green spaces are worthy of green spaces without needing to worry about potential increase to living costs (including housing), direct and indirect displacement, or gentrification. LA County is making the argument that naturalization would lead to displacement. Our communities are not asking for a complete and vast development along the entire LA River. Naturalization does not mean we have to remove concrete that will uproot houses and communities. We believe that the county can and should work on designing a realistic and achievable plan: naturalizing certain parts of the LA River that would not uproot homes and to put protections in place against skyrocketing rent and house prices and also reserving affordable housing to locals along the corridors in which naturalization does take place. Other ways in which we can promote greenery and the existence of biological resources without taking extreme measures can and should be explored by the Program EIR.

4c. The Program EIR is more concerned with economic growth rather than ecological growth. Revitalizing the LA River should mean prioritizing naturalization over economic development.

O15-18 The Program EIR assesses the environmental impacts to biological resources caused by construction, operations, and maintenance along the LA River. After analyzing both the master plan and PEIR, we believe "revitalizing" the LA River is centered around development rather than naturalization. It centers impacts to biological resources around developmental projects, such as pavilions, cafes, and spaces that offer entertainment and recreation. However, there is no emphasis on naturalization and supporting current ecological development or restoration efforts of native life. It fails to commit and mandate the healing and remediation of the existing river, its watershed, and surrounding land. The proposed LA River Master Plan holds potential

O15-18 cont.

to bring ecological life back to the River. However, its current focus is misguided and short-sighted. A true and just revitalization of the LA River should emphasize and advocate for ecological development. We recommend projects related to ecological development, backed by community input, be prioritized and assessed as well.

4d. The county has not honored Indigenous community members' connection to ecological life. Nor have they consulted with them about ecological knowledge of the LA River.

We recommend that the County and LARMP Project team use the aspiration gathered at community meetings as the starting point for tribally-led projects, specifically those that emphasize habitat restoration and community education forums. Both the LARMP and PEIR must recognize local tribes as partners in ideas, and programs, especially in stewardship programs and strive for Indigenous stewardship & co-management.

O15-19

Indigenous community members, whose families have lived by and have gathered by the LA River for generations, have a deep connection with the LA River. Their vast knowledge on ecological life and restoration should be considered important expertise, yet the majority of CA Native American tribes with territories along the LA watershed have not been invited or consulted to review the plans. The Program EIR is incomplete and should be invalidated without their review. LA County must acknowledge their role in the violent history of the water wars and how their decisions have impacted Indigenous communities residing by the River. For example, Paiute people and Owens Valley people have been suffering severe health impacts, such as asthma and cancer, due the channelization of water, which caused today's dust emitted from the shallow river bed that was once abundant, rich with ecological life, and health. Los Angeles's lack of regard for Indigenous life on and by rivers has been detrimental and by still not consulting with them, they continue to disrespect communities whose lives have been negatively impacted by their decisions and are posing risks to village communities adjacent to the LA River. By not acknowledging Los Angeles's violent water history and engaging with Indigenous communities in developing the LA River Master Plan and PEIR, the project produced will be unethical and unjust.

4e. Recognize the River as a Living Being

O15-20

Both the LARMP and the PEIR must incorporate local Indigenous languages, theories and practices throughout the document to carry out the true spirit of revitalization. Native American Tribes and Indigenous Peoples around the world have adopted similar stances regarding Rivers, Mountains and other land and water entities within their ancestral homelands. Most recently the Yurok Tribe in California adopted a resolution recognizing legal rights for the river. 4

5a. The Program EIR's analysis of public services within the LA River Master Plan does not adequately address how first responders will assist community members on the LA River.

O15-21

The section lists an inventory of police service providers for jurisdictions in the LA River Study Area but does not assess how police, sheriffs, and public safety departments will oversee the LA River. Outlining their duties and the extent of their presence on the LA River will be beneficial to help us understand their roles.

Our community members would also like to know if the county plans to utilize other first response providers aside from the police to protect the LA River? For example, the EIR does not mention anything relating to the LA River Ranger program that is being considered to monitor the Lower LA river. Additionally, as BIPOC members of Los Angeles, we fear unwarranted policing towards local community members and excessive force towards unhoused locals or individuals who experience mental health struggles. The LARMP and PEIR fails to

O15-22

analyze how increased policing and criminalization due to the LARMP could potentially harm local communities. Currently, unhoused, Indigenous folks, and other local residents access the river for cultural or day to day use. Criminalizing these uses or making these populations feel unsafe with increased police presence, would cause environmental impacts which are not analyzed in the PEIR. As an alternative the Lower Los Angeles River Revitalization proposed the creation of a River Ranger Public Safety Ambassador program. The LARMP and PEIR analysis on public services does not mention this program nor how this plan may conflict with this program, which provides an alternative to armed policing. This program actually discusses the need to educate and build cultural competence for whoever leads public safety in the river. However the LARMP does not discuss this.

Additionally, it is mentioned that there may be localized road closures and detours that

O15-23

could increase response times for emergency services that would be required on the LA River. No mitigation measures are mentioned for this hazard. We recommend the county to consider having first responders stationed at hard to reach areas.

5b. Program EIR's analysis of public services within the LA River Master Plan fails to acknowledge unhoused people and Indigenous communities as LA River user groups.

The County needs to plan and design with the unhoused and Indigenous communities in

O15-24

mind. People experiencing houselessness utilize public services more than any other user group. In addition, the LARMP and PEIR fails to acknowledge or be in conversation with indigenous communities and what their needs for public services are as a result of the LARMP. Indigenous people are often criminalized for ceremonial practices or for "trespassing" on their

O15-24 cont. own land. Both the LARMP and PEIR fail to assess to what extent the LARMP will encroach on tindigenous people's birthright to use the LA River for these practices.

5c. The Program EIR's analysis of public services within the LA River Master Plan does not include an assessment that studies long term growth rate or implications related to LA River development.

O15-25 The section states that public services have been actively developing in tandem with growth in the communities and the region, but does not include an assessment that studies growth rate or implications related to potential LA River development.

6. The Program EIR does not adequately assess the environmental impacts the LA River Master Plan will have on Hydrology and Water Quality.

O15-26 Various industrial facilities expose and contaminate the Lower LA River and adjacent communities to industrial waste. This has current impacts on the river, wildlife, and residing community members and makes the river unsafe. Yet within this section, there is no commitment to addressing, repairing and protecting the river from present and future harm. This is critical for the plan, no development should be happening without this being at the center.

O15-27 Additionally, during construction there is an expected temporary contamination. There should be a commitment for any proposed construction to use zero-emission equipment and provide appropriate monitoring to prevent runoff contamination.

O15-28 Lastly, we believe the County and Project Team needs to fully analyze and consider naturalizing the river in a way that will not displace adjacent communities. This will allow the river to breathe, it can expand ecology and wildlife across the river, and offer outdoor learning opportunities that Lower LA River communities currently lack access to. Specifically the County and Project team needs to analyze and consider ways to reclaim the floodplain that will not directly and indirectly displace residents within and along the LA River. As is, the PEIR does not list this as an alternative and therefore fails to study the merits of this alternative.

7. The Program EIR analysis on Hazards and Hazardous Materials is inadequate

O15-29 As is the PEIR did not not consult with indigenous governance structures when it comes to oversight and handling toxic materials. This section also fails to mention hazardous runoff that goes into water and there is no mention nor analysis of impacts to adjacent homes (who live near hazardous sites) .

8a. The Program EIR analysis of Recreation is inadequate, as it fails to mention how the LARMP's park access goals will be equitable across different cities in LA county.

Many cities along the LA River have their own goals set forth in their general plans. Cities should prioritize allocating more resources to public spaces. This should especially be considered in communities that lack recreational and green spaces. Providing more recreational spaces can lead to healthier and more environmentally equitable communities.

O15-30 In order to achieve true equity of recreational use across cities, the county should invest in disinvested cities so that they are not left behind when it comes to tree canopy coverage, open spaces, and other basic needs or resources. We must ask, how do we make sure that there is an adequate amount of open space available to cities with a higher density population, such as cities with multigenerational households? The fact that the LARMP prioritized developing green spaces but not remediating contaminated land or regulating polluting facilities that will be adjacent to these proposed opportunity sites demonstrates how the LARMP fails to address true community concerns. The fact that the PEIR fails to see this speaks to how inadequate the PEIR analysis is. As a result the LARMP fails to address the health of the river and river-adjacent communities. We are also worried about who is categorizing these new open spaces and if there is community involvement for this process. We are also interested in knowing the walkability and rideability per access point to the L.A. River/per trail. We propose an in-depth study for use, accessibility, and equity, all of which are related to the environment and should be considered for the PEIR.

O15-31 Additionally, it is concerning that it is known that recreational resources are inadequate, yet these resources available may be shut down due to construction. If the PEIR recognizes that there will be accelerated deterioration of recreational facilities, there should be funds allocated to neighborhoods that already have a shortage of open space and facilities.

O15-32 Lastly, it would be beneficial to require and prioritize the construction and expansion of recreational facilities that might have an adverse physical effect on the environment. Our recommendation is prioritizing jurisdictions that would suffer adverse physical effects on their environment and requiring recreational expansion in these areas first.

8b. There was no community input in deciding whether mitigation measures proposed would be sufficient.

O15-33 It is recommended that there be input from Black, Indigenous, unhoused communities and communities of color in deciding whether the mitigation measures proposed will be sufficient. As is, the PEIR failed to consult with these communities. Both the LARMP and the

PEIR failed to consult the traditional ecological and cultural knowledge of local indigenous tribes. Therefore the mitigation measures and alternatives proposed in the PEIR are incomplete without this initial engagement. This is exemplified in Section 3.04 within “Cultural Resources", where the phrase “prehistoric setting” is used. This phrase is white supremacist settler terminology that insinuates there was “no history” prior to the Spanish colonial conquest of indigenous land through settler colonialism and genocide. Both the development of the LARMP and PEIR analysis are examples of violence on BIPOC communities. These acts of violence are facilitated through state-enacted micro-aggressions, such as the use of this phrase, and a refusal to intentionally engage with and follow the lead of BIPOC communities. As long as the LARMP follows a top down approach, does not consult with BIPOC and unhoused communities, and in fact doesn’t take the lead of these communities, this plan and its implementation will replicate ongoing racist and settler colonial structures that created many of the injustices the plan claims to want to address in the first place.

O15-33

8c. As an act of equity and compensation, there should be an equitable distribution of greenery in highly polluted areas.

Our concern is that communities such as the Southeast LA cities, where there are elevated pollutants from industry, are already lacking in green open spaces and canopy coverage. There should be more greenery in highly polluted areas to compensate for the pollution. Our recommendation is to repurpose contaminated and industrialized spaces for restoration. Remediation and restoration of contaminated sites, brownfields, and vacant or industrial sites are an example of this. Implementing a strategy like this could clean contaminated urban runoff and yet is not listed as an option to mitigate environmental impacts as a result of the LARMP. In addition this approach will actually meet the LARMP’s vision of revitalizing the LA River. As is the Plan (and the PEIR which enables this plan) only economically “revitalize” the river yet fails to ecologically and socially revitalize and stabilize the river and adjacent communities. This also points to the fact that the LARMP doesn’t make this distinction and therefore erroneously claims revitalization, since their implementation of revitalization conflicts with how the community sees revitalization.

O15-34

For example, LARMP’s Frame 4 depicts an insufficient amount of green open space (15). Wetlands would be a beneficial best water management practice in this location due to the amount of industrial land use. We believe that restoration strategies should be prioritized along industrial land use areas. Due to Exide, we now have lead in our surrounding soils. This affects the air quality as well as our water. Therefore, a good way to remediate this would be to introduce more greenery and wetlands in place of Exide and other similar locations. Both the LARMP and PEIR fail to analyze how remediation, restoration, and reclamation are viable alternatives to just further development without addressing past harms. In addition, the plan and

O15-34 cont.

the PEIR fail to consult with indigenous tribes on recreation, water and air quality, hazardous waste and other factors which could potentially create environmental impacts on recreational uses. Indigenous partners should therefore be consulted for both the LARMP and PEIR due to their traditional ecological knowledge (for example there are traditional ways to mitigate water and soil contamination which could increase park access if done intentionally.)

O15-35

Frame 4 also depicts proposed trails along heavily industrialized adjacent sites (15). We feel that these proposed trails should be prioritized projects for repurposing contaminated open space. Our recommendation is to prioritize heavily industrialized areas such as those belonging to Frame 4 for remediation projects to help contamination and pollution immediately.

8d. The Los Angeles County General Plan's goal of 4 acres of local parkland per 1,000 people requires further explanation and reassessment.

O15-36

Our community members would like to know the metrics involved in holding this goal accountable. It is also concerning that all park classification is the same throughout the county when there are clearly some contaminated and polluted areas that should require more than 4 acres of green space per 1000 people. Are all local park systems in the county classified the same?

O15-37

Additionally, this PEIR is insufficient because it is trying to move forward with this project without first addressing disparities pointed out by its own referenced Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment (2016). According to Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment (2016) City of Bell Study Area ID number 71 has a disparity of parks in the vicinity. Currently in the City of Bell there are 0.4 park acres available per 1000 people. This is well below the park classifications requirement. It is problematic that this PEIR would consider moving forward with this project when the amount of park land provided per resident is already inadequate based on current standards' . We recommend addressing the shortage of open spaces available to current residents before moving forward with new project development and to secure more open space for these residents so that there is no need to put a stress on current recreational facilities.

O15-38

9. The Program EIR analysis for Transportation is insufficient. There are many unknowns in regard to trip generation, safety, and traffic because a lot of these projects along the river are not yet solidified.

The preparation of trip generation estimates and distribution of trips for individual project elements and intersection operational analysis is crucial and the analysis without it is inadequate. It is recommended it be used for a proper and sufficient analysis.

The 2-mile wide, 51-mile long study area of the PEIR is also insufficient. The report doesn't take into account that displaced community members may have to have longer commutes causing an increase in traffic and therefore increasing Greenhouse Gas Emissions and Particulate Matter 2.5/10 exposure. When considering traffic, we must also take into account current and on-going beautification projects at the local city level such as medians that add to the congestion in our communities. These medians that are inconveniently placed along main streets leading to the Los Angeles River, eliminate left turn movements, subsequently diverting these movements to adjacent intersections, which in our communities have historically already been heavily congested and areas marked with many pedestrian fatalities.

O15-39

Which implores us to ask, how are these projects considering the safety and well-being of our community members? The current PEIR is inadequate in addressing this question and Collision Concentration Corridors and fails to connect how on-going projects in our communities are contributing and exacerbating traffic related deaths. In driving along our communities, we see how prior projects have centered and catered to industrial businesses as we see designated "do not block" intersection markings and median cut-outs, conveniently placed at the driveways of major industries in our cities. With signs indicating that drivers are not allowed to turn in these areas, these spaces remain clear for industrial trucks to take their turns and join traffic. It is astounding to see the level of detail that is possible in these projects. This same project, however, failed to consider how narrow travel lanes force bicyclists and motor vehicles to share the same space, failing further in not designating a space to safely distance bicyclists from vehicles. As we engage in new projects, and particularly move forward with the LARMP, we need all entities involved to prioritize the health and safety of our residents, and take actionable steps in all levels of design consideration and execution to accommodate bicyclists and pedestrians

O15-40

9b. The LARMP and PEIR does not adequately study and analyze active transportation user safety and infrastructure. As is the PEIR's mitigation efforts are inadequate.

The PEIR as is, does not accurately account for our safety. There aren't enough safety measures in place for pedestrians and bicyclists to access the LA River safely, especially when there are so many diesel trucks in our communities. Throughout the plan we see that many bikeways proposed in our communities are Class 3, in essence, a painted symbol on a road shared with motor traffic. It is important to understand the communities we live in, situated along freeways, railyards, and the ports. Back in 2014, it was estimated that there are up to 260,000 cars and over 50,000 diesel trucks traveling on the I-710 daily. This number has since grown tremendously as we have seen a rise in e-commerce in most recent years and an unprecedented boom in sales alone in 2020 with the COVID-19 pandemic. Our communities are the ones that see these changes, that see the increase of truck traffic as new Amazon facilities

O15-41

O15-41 cont. appear in our cities bringing in countless diesel trucks and delivery vans to consume our streets. Class 3 bikeways are not a viable solution for our communities and to even consider them just adds to the perpetual negligence we experience daily.

O15-42 In place of Class 3 bikeways, we'd like to see Class 2 bikeways, enhanced with buffered protections as this type of bike lane provides greater separation from adjacent traffic lanes and/or between the bike lane and on-street parking. In addition to this, the PEIR, proposes Class 2 bikeways along our cities roadways with higher motor traffic speeds or volumes. This is also inadequate, as these are the areas where we see higher collisions and pedestrian fatalities. Our communities deserve to have proper safety measures in place and on heavily-trafficked corridors we deserve nothing less than a Class 4 separated bikeway, for the exclusive use of bicycles, physically separated from motor traffic with a vertical feature. This separation may include, but is not limited to, grade separation, flexible posts, inflexible barriers, or on-street parking. By providing physical separation from motor traffic, Class 4 bikeways can reduce the level of stress, improve comfort for more types of bicyclists, and contribute to an increase in bicycle volumes and mode share. All of which help to accomplish the regional goals the city has set out to improve mobility, accessibility, reliability, and travel safety for people and goods.

O15-43 The LARMP is proposing a change to our physical environment. In vetting these proposed bikeways, pathways, and any other transportational aspects, we need to honor the ancestral homelands of our Indigenous communities and ensure that we aren't creating additional harm to their lands; their ceremonial gathering sites, their burial grounds, medicinal areas, and all that they hold sacred. Indigenous communities should be consulted in ensuring that our proposed changes to the natural landscape do not increase decades of harm to their homelands.

Our recommendation is to expand the Transportation analysis and include a study on the increases in traffic from displacement of community members as a result of gentrification, lack of planning of prior projects, and lack of consultation from Indigenous communities.

ADDITIONAL CONCERNS

O15-44

1. **The entity that will produce the least significant impact and is committed to addressing past harms should be designated to carry out projects related to the LA River.**

Throughout the PEIR, it is stated that "impacts would be significant and unavoidable for later activities when not carried out by the county" and "impacts would be less than significant

for later activities when carried out by the county". If certain activities are not carried out by the county, we can potentially see significant impacts. It is problematic that this PEIR admits that because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated and that the impact would be significant and unavoidable when these activities are not carried out by the County. This should not absolve the County of its responsibility to mitigate significant impacts. It is recommended that significant measures be taken in advance to enforce and guarantee that the mitigation measures be incorporated in later activities not carried out by the County. The LARMP and PEIR fails to study whether the County or an agency or governance structure could be designated to take jurisdiction rather than non-county entities if there is potential for significant impacts to occur. Additionally, we would like to know how these decisions are made. Our recommendation would be to grant jurisdiction to the entity (either county, or to study the creation of a new entity (whether a Joint Powers Authority, regional district, new governance structure, etc) that would create the least impact and be committed to address past and future manifestations of environmental racism. The PEIR and LARMP should also clearly state the jurisdictional power and roles the county versus cities versus other entities will have along the LA River. In addition to whether these governance structures will change or remain the same as a result of this LA River Master Plan. As is, both the LARMP and PEIR fail to study this.

O15-44 cont.

2. Noise compliance and mitigation during construction must be adequately addressed in the PEIR.

No procedures are in place to make sure that construction noise levels really do comply with local noise regulations. Also, an adequate study on current noise levels that may already be a burden to communities does not exist. Continual, loud noise can lead to anxieties in our communities and can contribute to the noise pollution which adversely affects health. In addition, noise pollution can also have an adverse impact on biological resources along the river.

O15-45

Our recommendation is for the county and preceptors to first study current and potential disturbances and noise levels before bringing in excavators, dump trucks, etc. Another recommendation is to properly train city departments, property owners, and property managers on tenants' rights to live in habitable housing, the health effects of environmental hazard exposure, and appropriate management of environmental hazards such as lead and noise pollution to prevent tenant exposure. Communities, for example, should be provided proper windows that can better block out construction sounds.

3. **Mitigation measures to minimize disruption during construction are inadequate and must be reassessed.**

O15-46 The PEIR says that a mitigation measure to minimize disruption during construction is to minimize duration of construction period. However, this is insufficient since the implementing agency has yet to specify subsequent project and location information nor has it confirmed the timing, duration, and the aerial extent of the construction activities. Our recommendation is for the implementing agency to first specify project location information and confirm the timing, duration, and aerial extent of the construction.

O15-47 Another mitigation measure proposed by the PEIR is to avoid construction during peak use periods, however, this is not specific enough. Most residents use recreational facilities year-round and communities such as the Southeast LA cities already have a shortage of recreational facilities. We recommend being more specific about what is meant by avoiding construction during peak use periods and also recommend being mindful that all periods are peak periods in communities with a shortage of green spaces and recreational facilities.

4. **There is no analysis revealing actual environmental impacts to schools.**

O15-48 The report needs to identify areas for available public and accessible green space outside of traditional parks (pocket parks, community gardens, or other green spaces). These areas constitute part of the LA River ecosystem and also fulfill communities with necessary resources.

5. **The environmental impact study area should be expanded beyond the 1-mile radius that is currently being proposed from the river.**

O15-49 It is important to survey for biological resources beyond the 2-mile radius from all sides of the river since they exist beyond this radius. A plan must be established for their protection, and for their expansion since the development is considering revitalizing parts of the river. Environmental impacts of the LA River Master Plan may also affect the other topics assessed in the PEIR beyond the 2-mile radius and, therefore, the extent of impact should be further investigated and assessed. Specifically, the implementation of the LARMP can have a negative impact on population and housing, land use planning, public services and transportation use beyond the one-mile radius studied by the LARMP.

CONCLUSION

East Yard Communities for Environmental Justice – 2317 Atlantic Blvd. Commerce, CA. 90040

O15-50 On the whole, the PEIR suffers from incomplete and inaccurate assessments and findings. The public comment period and process was marred by inaccessible documents and severely limited outreach. The fact that this public review process and outreach for it was pushed through during a pandemic is also very problematic. Key populations are rendered invisible in both the LARMP and the PEIR analysis. Significant environmental impacts in the areas of water quality, noise, population and housing, recreation, demographic and neighborhood change, public services, land use and planning, transportation, cultural resources, and hazardous waste are overlooked or grossly understated. The PEIR fails to adequately assess the cumulative impacts for every single section, completely ignoring that there are several projects along the LARMP alone that will also have a detrimental impact on housing, population growth, traffic, neighborhood change, etc. This PEIR does not account for those cumulative impacts.

O15-51 The PEIR does not provide adequate mitigation measures to address potential pollution, gentrification, and displacement, caused by the Master Plan itself to the river or to those living, visiting, or using the LARMP or any of the mentioned opportunity sites. As is, the PEIR fails to provide adequate mitigation measures for any of these concerns. The mitigation measures for air, soil, and soil quality proposed in the PEIR are insufficient and do not make clear who will enforce the measures and by what timeline.

O15-52 For the mitigation measures the PEIR does study, there was a failure to consult with Black, Indigenous, and unhoused communities and communities of color. By failing to engage with these communities in the development of the LARMP and PEIR and failing to mention how they will be engaged or consulted in the implementation of the plan, the LARMP fails to address the past harms and will instead replicate and further facilitate these injustices. This has resulted in a disingenuous process by the County and the Project Team which developed this LARMP. For all of these reasons, both the LARMP and the PEIR should be redrafted, recirculated and amended to address these and other matters.

We appreciate your consideration of these comments and welcome dialogue to further clarify the concerns we have raised.

On behalf of East Yard Communities for Environmental Justice and our membership,

Jessica Prieto
Community Stability Policy Organizer

CC:
Carolina Hernandez, LA County Public Works

P.323-263-2113 F.323-263-2114 – www.eycej.org

East Yard Communities
For Environmental Justice

Fighting for Life

East Yard Communities for Environmental Justice – 2317 Atlantic Blvd. Commerce, CA. 90040

Jessica Henson, The Olin Studio
Mark Hanna, Geosyntec Consultants

Via e-mail to: LARiverCEQA@pw.lacounty.gov, chernandez@dpw.lacounty.gov, gosmena@dpw.lacounty.gov, jhenson@theolinstudio.com, and mhanna@geosyntec.com, lariver@dwp.county.gov

355 South Grand Avenue, Suite 100
Los Angeles, California 90071-1560
Tel: +1.213.485.1234 Fax: +1.213.891.8763
www.lw.com

LATHAM & WATKINS LLP

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File No. 021662-0016

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VIA E-MAIL

Grace Komjakraphan-Tek
Los Angeles County Public Works
900 South Fremont Avenue, 11th Floor
Los Angeles, California 91803
LARiverCEQA@pw.lacounty.gov

Re: 2020 LA River Master Plan Draft PEIR Comments (SCH# 2020070128)

Dear Ms. Komjakraphan-Tek:

On behalf of Forest Lawn Memorial-Park Association, we respectfully provide the following comments on the Draft Program EIR for the 2020 LA River Master Plan (SCH# 2020070128) (the "Draft PEIR"). Forest Lawn is a non-profit, mutual benefit corporation that has operated cemeteries in the Los Angeles area for over a hundred years.

O16-1

Forest Lawn's approximately 444-acre Hollywood Hills property, which is located in Frame 7 (East Valley) of the draft 2020 LA River Master Plan, was approved for cemetery use by the City of Los Angeles in 1948 and has served the community for over 70 years. Forest Lawn Memorial-Park, Hollywood Hills currently includes approximately 300,000 individual interment spaces, and received a public benefit approval from the City in 2012 (Case No. CPC-2007-1059-DA-PUB-ZV-SPR; ENV-2007-1060-EIR), as well as a Development Agreement in 2013 (Ordinance No. 182609), for the long-term development of the memorial-park over the next few decades.

In addition, a portion of Forest Lawn Memorial-Park, Glendale, is located in Frame 6 (Narrows) of the draft 2020 LA River Master Plan. The Glendale Memorial-Park is approximately 305 acres, located partially within the City of Glendale and largely within the City of Los Angeles. Forest Lawn Memorial-Park, Glendale opened in 1906 and has served the community for 115 years. It currently includes over 460,000 individual interment spaces.

The LA River Master Plan & Draft PEIR Should Acknowledge Existing Cemeteries

O16-2

The Draft PEIR should acknowledge the existence of Forest Lawn Memorial-Park, Hollywood Hills within Frame 7 of the LA River Master Plan and of Forest Lawn Memorial-Park, Glendale within Frame 6. The description of Frame 7 in Section 2.3.7 of the Project Description does not mention Forest Lawn Memorial-Park, Hollywood Hills (or the adjacent Mount Sinai Memorial Park) as an existing use in the study area. The description of Frame 6 in

Section 2.3.6 does not mention Forest Lawn Memorial-Park, Glendale. Neither description even generically identifies that there are cemetery uses within the study area, nor does the existing land uses discussion in the Land Use section of the Draft PEIR. Except for a few isolated references, this omission appears to occur throughout the Draft PEIR. The public and decision-makers would not have sufficient information from the Draft PEIR's descriptions and analysis to understand that there are existing cemetery uses within Frames 6 and 7 of the 2020 LA River Master Plan.

O16-2 cont.

Cemeteries are a distinct use, of a unique and sensitive nature. The memorial park fulfills a significant need, as a sacred resting place for generations of Angelenos, in a serene and beautiful setting where families come to visit and remember loved ones. The cemetery is a private place dedicated to interment, worship and reflection (Forest Lawn Memorial-Park, Hollywood Hills includes two churches and a chapel, for example), quiet respect, and reverence. Forest Lawn's Memorial-Parks also function as a gathering place for various cultural and community events for the benefit of the public consistent with the primary mission as a place of interment.

O16-3

Further, state law requires that a dedicated cemetery must be held, occupied, and used exclusively for a cemetery and for cemetery purposes.[1] Given the unique and sensitive nature of the use, it is important that the Draft PEIR consistently recognize this use throughout the analyses.

The LA River Master Plan & Draft PEIR Should Protect Cemetery Uses

Given the nature of the cemetery use, it is important for guests and visitors to have a peaceful and dignified experience at the Memorial-Parks. To that end, Forest Lawn respectfully requests that the 2020 LA River Master Plan and any projects that are implemented pursuant to it recognize the sensitive nature of the cemetery use and that the environmental analyses incorporate all feasible design features and mitigation measures to minimize impacts to the Memorial-Parks.

O16-4

For example, any construction or operational activities related to the LA River Master Plan that would increase noise sources in the vicinity of the Memorial-Parks should be addressed, and coordination with Forest Lawn ensured to minimize impacts during graveside services and other sensitive activities. The noise measurement locations identified in Figures 3.12-1- Frame 6 and –Frame 7 are not near the Memorial-Parks and are not representative of noise-sensitive cemetery land uses along the study area, which are not identified in the analysis. Mitigation Measure NOI-3 should include specific additional noise-reducing measures to protect cemetery uses (including but not limited to advance coordination to minimize disruption to graveside services and to avoid interference with funeral processions).

O16-5

In addition, construction management plans for river projects near the Memorial-Parks should include: advance coordination with Forest Lawn, prior to commencement of construction, to discuss construction plans and schedules, general traffic mitigation plans, and visual

[1] California Health and Safety Code, Section 8553.

O16-5 cont.

mitigation measures (e.g., screening of machinery and equipment, no visible construction staging); direct access for Forest Lawn to construction site management to address immediate issues that may arise; no construction on Sundays and holidays; prioritizing funeral procession traffic; and 72-hour notice of any major impairments to roadways near the Memorial-Parks. Mitigation Measure LU-1 (Construction Management Plan) does not include specific measures to address potential impacts to nearby cemetery uses; therefore, Forest Lawn respectfully requests that they be included.

The Biological Resources Analysis Incorrectly Identifies a Freshwater Pond

O16-6

We understand the biological resources analysis, as with most of the analyses in the Draft PEIR, was largely performed on a desktop basis and covers a very broad area and range of conditions. We further understand that future projects implemented under the LA River Master Plan will be subject to site-specific and project-level review. Therefore, Forest Lawn expects to have the opportunity to comment on any future analyses that purport to identify resources within or adjacent to the Forest Lawn Memorial-Parks. However, at this time, we note that Figure 3.3-41 (National Wetland Inventory within Frame 7) and Figure 3.3-45 (National Wetland Inventory Impacts within Frame 7) incorrectly identify a "Freshwater Pond" on the Forest Lawn Memorial-Park, Hollywood Hills property.

O16-7

In the area of the Memorial-Park identified as a freshwater pond on Figures 3.3-41 and 3.3-45, there is a decorative fountain. There is no freshwater pond on the Forest Lawn property.

Location of Potential Future River Plan Projects

O16-8

While unclear with the scale of the figures in the Technical Appendix, it appears that one of the projects identified in the draft 2020 LA River Master Plan (RM 33.5 – Sennett Creek) is depicted to be located partially within Forest Lawn Memorial-Park, Hollywood Hills. For the reasons described above, the memorial-park is not a viable location for any public river plan projects. Any planning documents or diagrams that show potential future river-related projects within the memorial-park should be corrected.

We appreciate the County's consideration of these comments and respectfully request to be included in the distribution of further notices and information about the LA River Master Plan process and environmental review.

Very truly yours,



Shivaun Cooney
of LATHAM & WATKINS LLP

cc: Susan Rule Sandler, Forest Lawn Memorial-Park Association
George Mihlsten, Latham & Watkins LLP

Hermosa Beach Office
Phone: (310) 798-2400
San Diego Office
Phone: (858) 999-0070
Phone: (619) 940-4522

Chatten-Brown, Carstens & Minteer LLP
2200 Pacific Coast Highway, Suite 318
Hermosa Beach, CA 90254
www.cbcearthlaw.com

Michelle Black
Email Address:
mnb@cbcearthlaw.com
Direct Dial:
310-798-2400 Ext. 5

May 13, 2021

***By U.S. Mail and Email**: LARiverCEQA@pw.lacounty.gov*

Ms. Grace Komjakraphan-Tek
Los Angeles County Public Works
Stormwater Quality Division
900 South Fremont Avenue
Alhambra, CA 91803

Re: Draft Programmatic Environmental Impact Report and Selection of Alternatives for the Los Angeles River Master Plan Update

Dear Ms. Komjakraphan-Tek,

These comments are submitted on behalf of Los Angeles Waterkeeper in connection with the draft programmatic environmental impact report (DPEIR) prepared for the Los Angeles River Master Plan Update ("Project"). Los Angeles Waterkeeper's mission is to fight for the health of the region's waterways and for sustainable, equitable and climate-friendly water supplies. Consistent with its mission, Los Angeles Waterkeeper has been actively engaged in the County's planning for the Master Plan Update at every level. Waterkeeper is a member of the Steering Committee for this process and has submitted comments on the draft Master Plan Update and at each stage of the accompanying CEQA review. (See, Attachment 1 [March 2020 Comments on Draft Master Plan Update]; Attachment 2 [August 2020 Notice of Preparation Comments]; Attachment 3 [May 16, 2009 Comments on Draft Master Plan Update]; Attachment 4 [November 11, 2020 Comments on Draft Master Plan Update].)

O17-1

The Master Plan "is intended to be a visionary and practical document for all 18 local jurisdictions within the study area." (DPEIR p. 2-7.) The Master Plan has 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.

(DPEIR p. 2-7.) However, in lieu of actual project information, the DPEIR states, "In addition to common elements that projects need to include, to achieve the nine objectives, the 2020 LA River Master Plan proposes six categories of project improvements, or "kit of parts" (KOP), consisting of infrastructure and urban river design typologies that illustrate the range of possible strategies that the proponents of subsequent projects, including the County, can use along the river." (DPEIR p. 2-8.) The KOP categories and potential included components are:

O17-1 cont.

- Trails and Access Gateways (pedestrian, equestrian, bike, and multi-use trails; lookouts, boardwalks, vehicular access, habitat corridor)
- Channel Modifications (Terraced bank, check dam, levee, armored channel, concrete bottom, soft bottom/concrete removal)
- Crossings and Platforms (bridges, cantilever, platform)
- Diversions (pipe, side channel, tunnel, overflow weir, wetland)
- Floodplain Reclamation (side channel, wetland, naturalized bank, field, recreation field, storage)
- Off-Channel Land Assets (urban agriculture, solar power, composting, natural treatment system, wetland, recreation field, storage, injection well, water treatment facility, spreading ground, affordable housing, art and culture facility)

(DPEIR pp. 2-8 – 2-9.) The DPEIR claims to analyze these diverse (and internally conflicting) KOPs as well as two "typical projects." The Common Elements Typical

Project would consist of pavilions, cafes, restrooms, benches, water fountains, bike racks, lighting, fencing, stormwater BMPs, and performance spaces implemented individually or in any combination on a site up to 3 acres in size or arranged along up to one mile of river. (DPEIR p. 2010.) The Multi-Use Trails and Access Gateways Typical Project would consist of a continuous multi-use path and welcoming access gateways to the River. For purposes of analysis, each project is assumed to be 5 miles long and 40 feet wide. (DPEIR p. 2-11.) Although Typical Projects have a generally recognizable form, they lack information about location. Even the same project will have differing effects in different locations. Projects consisting of the KOPs, however, could take almost any form in almost any location. For example, Channel Modifications could consist of increasing concrete lining – which has a certain set of adverse environmental impacts – or of *removing* concrete lining – which has altogether different long-term benefits and impacts. The DPEIR provides, "Under the 2020 LA River Master Plan, the multi-benefit design components can be implemented individually or in combination with other design components as subsequent projects under the 2020 LA River Master Plan." (DPEIR p. 2-12.) Thus, the Master Plan is a menu, not a project.

O17-1 cont.

The California Environmental Quality Act (CEQA) serves two basic, interrelated functions: ensuring environmental protection and encouraging governmental transparency. (*Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal. 3d 553, 564.) CEQA requires full disclosure of a project's significant environmental effects so that decision-makers and the public are informed of these consequences before the project is approved to ensure that government officials are held accountable for these consequences. (*Laurel Heights Improvement Ass'n of San Francisco v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.) The environmental impact report (EIR) process is the "heart of CEQA" and is the chief mechanism to effectuate its statutory purposes. (*In Re Bay-Delta Programmatic EIR Coordinated Proceedings* (2008) 43 Cal. 4th 1143, 1162.) Waterkeeper is concerned the DPEIR fails to adequately disclose, analyze, and mitigate the Project's significant adverse environmental impacts.

O17-2

Although an EIR need not be perfect, the County "must use its best efforts to find out and disclose all that it reasonably can." (CEQA Guidelines § 15144.) If important information cannot be obtained, the EIR must explain why. (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 519-522.) The County must also "ensure that CEQA [GHG] analysis stays in step with evolving scientific knowledge and state regulatory schemes." (*Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 519.)

O17-3

Throughout the administrative processes, Waterkeeper has documented its concerns about the vagueness of the Master Plan and urged the County to prioritize the

O17-4

Plan's lofty but often competing goals. (See, Attachment 1.) While Waterkeeper lauds the County's efforts to incorporate the goals of a broad stakeholder community, it reminds the County that the purpose of a Master Plan is to provide a workable road map for future restoration and development decisions along the Los Angeles River. Unfortunately, despite Waterkeeper's detailed feedback, the Master Plan Update remains more of a vague vision statement than any kind of defined plan. It does not contain defined projects at defined locations and, instead, seems to permit opposing projects at all locations. Consequently, the Draft Programmatic EIR fails to adequately define a "project" as needed for CEQA review. The failure to define the Project cascades into the DPEIR's failure to provide any useful information about the Project's likely impacts on biological resources, recreation, displacement, hydrology, land use, hazards, and others, on an area stretching 200 square miles. Without adequate disclosure, the DPEIR further fails to adequately analyze and mitigate the Project's impacts. In short, the Project, as described, is not ripe for environmental review.

O17-4 cont.

The DPEIR also fails to include useful project objectives, to provide an alternatives analysis directed at reducing the Project's potentially significant environmental impacts, to provide concrete and enforceable mitigation for activities as varied as installing and removing concrete channel bottoms, and to analyze hydrology, impacts on biological resources, and other important environmental concerns in a useful way.

O17-5

Los Angeles Waterkeeper understands the importance of flexibility in Master Planning, but that doesn't obviate the need for the County to adopt a Master Plan that provides clear direction about the types of uses that will be permitted and cultivated along the river and that ranks objectives to provide at least a modicum of certainty in future planning. After this, the County should revisit its environmental review to ensure it actually discloses, analyzes, and mitigates the Master Plan's potential adverse environmental impacts. However, in the interest of preserving its legal rights if the County chooses to certify this inadequate programmatic EIR, Waterkeeper provides the following CEQA comments.

O17-6

I. The Programmatic EIR Fails to Define a Project.

"An accurate, stable and finite project description is the Sine qua non of an informative and legally sufficient EIR." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192–193.) To the contrary, a "curtailed or distorted project description may stultify the objectives of the reporting process" and does not allow "outsiders and public decision-makers [to] balance the proposal's benefit against its environmental cost,

O17-7

consider mitigation measures, assess the advantage of terminating the proposal (i.e., the 'no project' alternative) and weigh other alternatives in the balance." (*Ibid.*)

Instead of following this central CEQA requirement, the DPEIR relies on a vague and unstable project description. The project description first includes two basic outlines of what it considers typical projects: a common elements project, which includes pavilions along the River with varying levels of public facilities; and multi-use trails and access gateways. (DPEIR pp. 2-10 to 2-11.) The DPEIR assumes pavilions that will provide the greatest number of public services when analyzing impacts but provides no basis for that assumption. While these Tier III pavilions would likely take up the most space, they would also provide services that could potentially reduce impacts as compared to the Tier I and II pavilions – services including public safety stations, bike rental and repair and indoor showers. Thus, the DPEIR's analysis of only Tier III pavilions fails to provide an adequate assessment of the plan's potential impacts. It also fails to provide necessary information to the public and decisionmakers to use when commenting on and adopting the plan.

O17-7 cont.

The project description then includes six kit of parts (KOPs) along with the two typical, although only vaguely defined, projects. The DPEIR includes a long list of potential activities that could fit within each KOPs. While the DPEIR claims these KOPs are intended to inform future projects, many of listed potential activities are competing or contradictory. For example, KOP Category 2 "Channel Modifications" include both installing concrete bottoms and removing concrete bottoms. (DPEIR p. 2-9.) KOP Category 1 "Trails and Access Gateways" includes pedestrian, bike, and equestrian trails to increase nonvehicular connectivity, but it also includes "vehicular access" which may counter the safety or benefit of multi-modal trails. (DPEIR p. 2-9.) KOP Category 3 "Crossings and Platforms" contains both habitat/wildlife bridges, which would promote habitat connectivity, and platforms, which might destroy habitat beneath them. (*Ibid*.) KOP Category 4 "Diversions" include pipes, pumps, and wetlands. (*Ibid*.)

O17-8

The design components within a single KOP could also serve competing interests, with different environmental impacts. For example, the DPEIR describes Trails and Access Gateways with similar cross sections and arrangements that could either serve recreational uses with playing fields or ecological uses with habitat corridors and vegetated buffers. (DPEIR p. 2-12.)

O17-9

Adding to the confusion, the DPEIR references "up to 107 potential projects ranging in size from extra-small (less than 1 acre) to extra-large (150+ acres/10 miles) that would be implemented over the 25-year horizon period," but the DPEIR never

O17-10

O17-10 cont.

describes what these projects are. (DPEIR p. 2-15.) The next two sentences appear intended to provide this exposition, but only serve to confuse a reader:

> These would include the two Typical Projects…that would be constructed at a specified cadence, or spacing, along the river to ensure equitable distribution of facilities throughout the 51-mile-long corridor and help improve access and safety; and additional subsequent projects from the KOP categories; multi-benefit design components. These elements together comprise the entirety of the 202 LA River Master Plan.

(DPEIR p. 2-15.) The DPEIR next states these 107 potential projects are identified in the Master Plan as well as in several other published plans. (*Ibid*.) But they are not reproduced here. CEQA does not permit an EIR to outsource its project description to a list of other documents.

O17-11

The project description includes no identification of project phases by priority or any other means. Instead, the project description serves as nothing more than a laundry list of vaguely described potential activities that does not allow for an assessment of potential impacts, the development of mitigation or an assessment of project alternatives. The DPEIR has provided only a "blurred view of the project" and thus fails an informational document. (*Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 12–13.)

O17-12

As to actual activities and what will happen on which part of the River and when, little information is included. An EIR's purpose is to eliminate this confusion:

> The CEQA process is intended to be a careful examination, fully open to the public, of the environmental consequences of a given project, covering the entire project, from start to finish. This examination is intended to provide the fullest information reasonably available upon which the decision makers and the public they serve can rely in determining whether or not to start the project at all, not merely to decide whether to finish it. The EIR is intended to furnish both the road map and the environmental price tag for a project, so that the decision maker and the public both know, before the journey begins, just where the journey will lead, and how much they-and the environment-will have to give up in order to take that journey.

(*NRDC v. City of Los Angeles* (2002) 103 Cal.App.4th 268, 271.) The LA River Master Plan DPEIR contains no such road map.

The County's use of a program EIR, as opposed to a project-specific EIR, does not excuse the obligation to provide clear and detailed information to the public. "The ultimate inquiry . . . is whether the EIR includes enough detail 'to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.' " (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 516.) As circulated, the DPEIR does not include the requisite detail.

The Court of Appeal provided recent guidance about the distinctions between program and project EIRs:

> Designating an EIR as a program EIR . . . does not by itself decrease the level of analysis otherwise required in the EIR. [I]n considering a challenge to a program EIR, 'it is unconstructive to ask whether the EIR provided 'project-level' as opposed to 'program-level' detail and analysis. Instead, we focus on whether the EIR provided 'decisionmakers with sufficient analysis to intelligently consider the environmental consequences of [the] project.'

O17-13

(*Cleveland National Forest Foundation v. SANDAG* (2017) 17 Cal.App.5th 413, 426.). Even if more precise information may be available during project-specific review, the County "must still provide reasonably obtainable information, or explain (supported by substantial evidence) why it cannot do so. '[I]f known impacts are not analyzed and addressed in a program EIR, they may potentially escape analysis in a later-tier EIR.' (Forest Foundation, supra, 17 Cal.App.5th at p. 440.)" (*Golden Door v. County of San Diego* (2020) Slip. Opinion, pp. 101-102.)

Waterkeeper supports efforts to expand recreational access, equity, and environmental restoration along the River, but CEQA requires the activities involved in these efforts be clearly delineated for public understanding.

The project description fails to provide adequate information regarding the activities allowed under the Master Plan to allow for useful environmental review and is essentially unripe. The DPEIR fails to achieve the advantages of a program EIR identified by CEQA. A program EIR is intended to "provide an occasion for a more exhaustive consideration of the effects and alternatives that would be impractical in an EIR on an individual action." (CEQA Guidelines §15168(b)(1).) The DPEIR instead provides only general consideration of effects and limited assessment of alternatives.

O17-14

II. The DPEIR Cannot be Used for Future Tiering.

While CEQA does allow for tiering of environmental review, it does so only when there are issues currently ripe for consideration. (Pub. Resources Code § 21093.) The Notice of Availability provides, "It is anticipated that the County or other agencies may use the PEIR as the first-tier analysis when considering subsequent discretionary actions." (NOA, March 8, 2021, p. 4.) The DPEIR further explains "the two Typical Projects are analyzed in greater detail in this PEIR than the other elements. The six KOP categories and related design components – as well as the 2020 LA River Master Plan in its entirety – are analyzed qualitatively at a program level." (DPEIR p. 2-10.) Thus, it appears the County intends to use this Programmatic EIR to limit the environmental review required for future projects based on the Typical Projects and the KOPs anywhere along the River's 51-mile reach. (See, DPEIR p. 2-2 ["study area is defined as a 2-mile-wide corridor – 1 mile on each side of the river – that follows the centerline of the LA River for its entire 51 miles" and "subsequent projects could be located anywhere in the 2-mile-wide study area."].)

O17-15

However, as discussed above, the project as described in the DPEIR does not present an issue ripe for decision. The DPEIR seems to acknowledge this, finding "The wide-ranging functions, characteristics, and complexity of the KOP categories and their respective design components – along with the lack of specific sites or detailed design information – make it particularly challenging to make informed assumptions about reasonable construction and operations scenarios." (DPEIR p. 2-12.) While the DPEIR contains valuable information about a wide range of opportunities for expanding access and restoration along the River, the DPEIR has limited value for purposes of environmental review pursuant to the California Environmental Quality Act (CEQA).

CEQA permits the County to rely on an *adequate*, certified EIR as the basis for future entitlements. As the DPEIR document is not specific as to the activities covered (or really, what those activities could even be), Waterkeeper is concerned about the DPEIR's use for activities whose environmental impacts have not been adequately disclosed, analyzed, or mitigated. If the DPEIR is relied upon by the County or the 17 River cities, there is no guarantee of future environmental analysis for projects employing the often-conflicting KOPs anywhere along the Los Angeles River. As a practical matter, the lack of specificity regarding what the DPEIR "covers" is likely to result in confusion as to what activities are covered, and may lead to uncertainty, wasted time, wasted resources, and CEQA abuses. Preparing and certifying an EIR now serves no purpose but to insulate the approval of the activities under the KOPs from future environmental review, when the impacts, mitigation and alternatives could and should truly be assessed.

O17-16

III. The DPEIR Fails to Provide Project-Level Information on Known, Future Projects.

While on the one hand the Master Plan Update provides limited information on unknown future projects, on the other hand the County has been working with Gehry Partners, LLC on proposed Los Angeles River Platform Parks and other well-defined projects for several years. These projects would be located within the Master Plan Update study area and are well-defined on public websites. (See, Attachments 7 and 8.) The project description cannot fail to describe key elements of the Project. (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730-35.) Despite the obvious relationships between these projects in space and time, the DPEIR fails to disclose, discuss, analyze, or mitigate the impacts of these projects.

O17-17

According to the website for the Lower LA River Revitalization Plan, "The Rio Hondo Confluence Area Project, also known as RHCAP, was identified in the 2018 Lower Los Angeles River Revitalization Plan and is located at a key opportunity site along the Lower Los Angeles River. Conceptual development is exploring options to connect communities to the RHCAP and create a key gathering place for Southeast Los Angeles." (See https://lowerlariver.org/riohondoconfluence/.) The map on this website depicts several platform parks that would have significant environmental consequences that must be evaluated in an EIR. Yet none of these projects are discussed in any detail in the DPEIR.

The LA River Platform Park "is situated over the LA River and creates approximately 22 acres of new opportunities for recreation and habitat." (Attachment 8.) Similarly, "[t]he Rio Hondo Platform Park is situated over the Rio Hondo and creates approximately 11 acres of new opportunities for recreation, art, and habitat." (Attachment 8.) RHCAP documentation provides more than enough detail to enable useful environmental review of these platform parks. For example, the Site Design Concepts for the RHCAP describe the LA River Platform Park in great detail:

O17-18

> The LA River Platform Park is situated over an approximately 3,200-foot stretch of the LA River. The platform park site is bounded to the north by the LA River channel jurisdiction line between the LACFCD and the USACE. A separate project could potentially extend the platform park north of that line in the future, creating the Southern Avenue Bridge Park. This continuation of the platform would allow for a connection of communities on the east and west of the LA River, in alignment with Southern Avenue. To the south, the platform park boundary is offset a minimum of 300' feet from the nearest platform wall and

O17-18 cont.

> staggered away from the residential neighborhoods directly to the west. The eastern and western edges of the platform park are defined by the location of the flood channel parapet walls, or the inner edge of the levee when no parapet walls are present.

(Attachment 7.) The document also analyzes the practical challenges of implementing the LA River Platform Park and includes design options to minimize challenges:

> A major challenge of the LA River Platform Park is the coordination of the existing UPRR and future Metro WSAB line, which will have significant implications on the hydraulics, structure, and pedestrian access. The design of the platform park must allow for easy visitor access over this rail corridor in order to maintain continuity across the park experience. The Design Team has developed two distinct options for how the platform park will coordinate with these rail crossings. Option A, assumes full replacement of the UPRR bridge and Metro WSAB addition. Option B, assumes the Metro WSAB crossing will be an extension of the existing UPRR bridge crossing. Furthermore, as the platform park will need to be positioned above the LA River channel and the surrounding grade, the western and eastern edges of the platform park will need to be designed in
>
> O17-19
>
> such a way as to achieve an acceptable visual impact for the surrounding residential neighborhoods. The design will need to find ways to create convenient access and connectivity to and from the platform park, as well as between the northern and southern portions of the platform park.

(Attachment 7.) Beyond this, the document contains detailed drawings and schematics of cross-sections and layouts for the park. (*Ibid*.) Pages discussing "Platform Strategies" specifically call for 4 inches of soil across the platform. There are pages discussing and showing design options for different approaches to River hydrology. These pages analyze impacts to railroad bridges, potential rebuild and relocation of the railroad bridges, river channel modifications, and detailed structural support design options. (*Ibid*.) This is more than enough information needed to enable informed environmental review of these platform parks. These documents contain similarly detailed design options for the Rio Hondo Platform Park. (Attachment 7.) An EIR reviewing these platform parks could assess hydrological impacts, impacts to biological resources from changed sunlight and hydrological conditions, construction impacts, land use impacts, recreational impacts, and many others. And it is far more information than the DPEIR contains about the general impacts of KOP 3, to which platform parks would belong. For example, while the DPEIR acknowledges that impacts to tidewater goby could occur due to shading from generalized platform-type projects, the DPEIR fails to give any

O17-19 cont. indication of the extent of the impact on the species, or the size of the population that could be affected. (DPEIR pp. 3.3-139, 140.)

CEQA requires analysis of the "whole of a project" and prohibits analyses that divide Projects into pieces in order to minimize cumulative impacts. (CEQA Guidelines § 15003(h).) The statute recognizes, "environmental considerations do not become submerged by chopping a large project into many little ones -- each with a minimal potential impact on the environment -- which cumulatively may have disastrous consequences." (*Bozung v. Local Agency Formation Commission* (1975) 13 Cal. 3d 263, 283-284.) The omission of any real analysis of the potential impacts of the platform
O17-20 parks is a failure to provide an adequate Project Description under CEQA as well as a possible segmentation deficiency. The court in *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214 set out three items to be used to determine what constitutes the whole of a project: (1) relationship in time, (2) physical location, and (3) the entity undertaking the action. (*Id*. at 1227.) Here, (1) the platform parks have been under consideration for years, contemporaneous with the Countywide discussion about updating the Master Plan, (2) are located in and over the LA River channel itself, and (3) would be implemented by the County and the same partners as the Master Plan Update.

Regardless, these are future projects that belong in this environmental analysis. In *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, 1127-28, the court defined probable future projects as "any future project where the applicant has devoted significant time and financial resources to prepare for any regulatory review should be considered as probable future projects for the purposes of cumulative impact." As demonstrated by Attachments 7 and 8, the County and its partners have devoted very significant time and
O17-21 resources to produce detailed descriptions, drawings, engineering solutions, and layouts for these platform parks. Gehry Partners, LLC helped lead the County Public workshop on the release of the Master Plan Update. The Los Angeles Times has reported on the County and Gehry Partners' long partnership on Los Angeles River matters. (Attachment 11.) Review of these parks is required. Future environmental documents prepared for these parks cannot rely on the lack of analysis in this PEIR to avoid full and thorough environmental review.

Moreover, CEQA requires that environmental review occur before momentum becomes unstoppable and alternatives to a project become foreclosed. (*Save Tara v. City*
O17-22 *of West Hollywood* (2008) 45 Cal.4th 116.) The longer that Gehry Partners, the County, and others shop these platform parks, and the greater the design detail becomes, the harder it will become to shape these projects to avoid environmental impacts or to reject

O17-22 cont. them altogether if the County ultimately determines the environmental costs to be too great.

IV. The Project Objectives Identified in the DPEIR Fail to Provide Adequate Direction to Guide Future Projects or Allow for a Comparison of Alternatives.

The project description is also required to identify the project objectives. "A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits." (CEQA Guidelines § 15124.)

O17-23 The DPEIR fails to provide a clearly written statement of objectives to allow for development of alternatives or the evaluation of the benefits of the Project. The vague and generalized goals identified for the Master Plan Update fail to prioritize goals for activities along the LA River. It includes competing goals with no identification of which goals should take priority if there is a conflict, or where limited financial resources should be given priority. (DPEIR p. 2-7.)

For example, the DPEIR project objective of addressing potential adverse impacts on housing affordability is overly broad. The steering committee's intent in raising the issue of housing affordability was to ensure the Master Plan Update prevents housing displacement and addresses impacts to homeless populations along the river. (Attachment 1.) In recent years, the broad goal of housing affordability has been used to push through numerous market rate housing developments that promise to reserve a very small number of units as affordable. The DPEIR and Master Plan Update must clarify this project objective to ensure the broadly stated goal of "housing affordability" is not used to support market rate housing developments along the River.

V. The Alternatives Analysis is Inadequate.

O17-24 Section 15126.6 of the CEQA Guidelines requires an EIR "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives . . . even if these alternatives would impede to some degree the attainment

of the project objectives, or would be more costly." This discussion must include "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project," and expressly must address "[t]he specific alternative of 'no project,'" the purpose of which "is to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project." (*Ibid*.)

O17-24 cont.

The DPEIR fails to provide a reasonable range of alternatives, including only two: the No Project Alternative and the Channel Avoidance Alternative. (DPEIR p. 5-2.) For a program that covers 834 square miles and includes numerous and varied potential actions under the Master Plan Update, this limited assessment of alternatives is inadequate. The lack of an adequate alternatives analysis is due in large part to the lack of an accurate, stable and finite project description as discussed above. (Section I.) The DPEIR provides an inadequate project description and overly generalized project objectives that do not allow for a balancing of "the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the 'no project' alternative) and weigh other alternatives in the balance." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192–193.)

A revised DPEIR must assess additional alternatives to the proposed project to provide the required reasonable range of alternative assessment. The following alternatives should be considered:

O17-25

- An alternative focused on environmental contaminant clean-up to allow for reuse of brownfield and other sites adjacent to the LA River as parks, instead of committing to the impactful "platform parks." (See, Section III, above, re Platform Parks.) Although not included in the DPEIR, the LA River and Rio Hondo Platform Parks are sufficiently well-developed to enable environmental review. It is important that alternatives permitting clean-up be discussed now, in the Master Plan Update process, so the County does not foreclose options other than platform parks without adequate CEQA review, in violation of *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116.)

- An alternative focused on enhancing access to nature and a healthy natural river while mitigating flood risk. The attached January 2021 LA River: River Management Strategy for the Glendale Narrows Feasibility Study should be relied upon in developing this alternative. (Attachment 6.)

O17-25 cont.

- The DPEIR should also assess an alternative that combines the No Project alternative with natural flood reclamation measures, such as those set forth in the above referenced Feasibility Study.

Additionally, the analysis of the No Project alternative included in the DPEIR fails to meet the requirements set forth by CEQA. "The purpose of describing and analyzing a no project alternative is to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project." (CEQA Guidelines § 15126.6.) "When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy or operation into the future … the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan." (*Ibid*.)

O17-26

Here, the DPEIR has correctly identified the No Project Alternative as a continuation of the existing 1996 LA River Master Plan. However, the DPEIR fails to cogently disclose the differences between this 1996 Master Plan and the 2020 Master Plan Update. There is inadequate information included in the alternatives analysis to allow for a true comparison of the impacts of the existing plan with the proposed plan. Moreover, in the limited discussion provided, the DPEIR discloses that the 1996 Master Plan would eliminate or substantially lessen a number of impacts associated with the Master Plan Update, making it the environmentally superior alternative. For example, the 1996 Master Plan "would result in fewer hydrology and water quality impacts when compared to the proposed *2020 LA River Master Plan*." (DPEIR p. 5-21.) While the DPEIR claims the Master Plan Update would have benefits that make it more desirable than 1996 Master Plan, only uncertain potential benefits are discussed. The DPEIR lacks adequate information to allow for a comparison of the benefits stemming from the project and alternatives. The DPEIR refers to Master Plan Update potential actions that may or may not be implemented as the benefits of the Project. The DPEIR also fails to address why flooding and water quality benefits could not be achieved under the existing plan. Moreover, to the extent the existing plan does not allow for these impacts to be addressed, an additional alternative should be considered that combines the No Project Alternative and natural flood control measures as discussed above.

VI. The DPEIR Inadequately Analyzes Hydrology and Water Quality.

O17-27

As discussed above, the DPEIR fails to include an adequate project description. (Section I.) The DPEIR's so-called analysis of the Master Plan Update's hydrological and water quality impacts highlights the necessity of providing an adequate and accurate

project description to allow for a useful assessment of a project's impacts. The DPEIR only includes a very general and perfunctory analysis of any hydrological and water quality impacts, which is inadequate to support a determination these impacts would be less than significant. The DPEIR fails as an informational document in its assessment of hydrological and water quality impacts. (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 515.) The lack of analysis is particularly egregious given the vast size of the LA River; its watershed covers 834 square mile and is home to millions of Los Angeles area residents. The impacts to this important resource and the numerous communities must be fully evaluated.

Due to the DPEIR's lack of an adequate project description, the hydrology and water quality section concludes all activities contemplated under the Master Plan Update will have a less than significant impact on water quality and groundwater, requiring no mitigation measures. (DPEIR Section 3.9.) Instead of providing the necessary analysis of impacts to allow for development of mitigation measures, the DPEIR simply assumes all components will comply with NPDES permits, the MS4 permit and yet to be disclosed BMPs and that this compliance would eliminate the potential for significant adverse impacts. (DPEIR p. 3.9-39 to 3.9-57.) Without a full assessment of the water quality and groundwater impacts, the DPEIR lacks evidentiary support for the claim that compliance with these permits would be possible or that such compliance would mitigate impacts to a less than significant level. Simply deferring to a regulatory scheme instead of analyzing environmental consequences falls "short of [the] duty under CEQA to meaningfully consider the issues raised by the proposed project." (*Californians for Alternatives to Toxics v. Department of Food & Agriculture* (2005) 136 Cal.App.4th 1, 16.) Moreover, the existing and past lack of compliance with the Los Angeles County MS4 permit has been well-documented by Los Angeles Waterkeeper and others. (See, NRDC Report, Omission Accomplished II, Attachment 12.) This existing and past non-compliance must be taken into consideration when evaluating the sufficiency of mitigation for potential impacts. (*Laurel Heights Improvement Assn. V. Regents of University of California* (1988) 47 Cal.3d 376, 420.)

O17-27 cont.

This is also improperly deferred analysis and mitigation, prohibited by CEQA. Deferred mitigation is only allowed if "specific performance criteria" are required at the "time of project approval." (*Endangered Habitats League, supra*, at 793-94; CEQA Guidelines § 15126.4(a)(1)(B); *Sacramento Old City Association v. City Council of Sacramento* (1991) 229 Cal.App.3d 1011, 1029.) The DPEIR fails to establish these required specific performance criteria. Instead, the DPEIR sets indefinite thresholds of significance which it appears to rely upon as performance criteria. The threshold of preventing "substantially alter[ation of] the existing drainage pattern" does not set specific performance criteria with which the actions under the Project would comply.

O17-28

O17-28 cont.

(DPEIR p. 3.9-37.) It is vague and also unenforceable because it was not adopted as a mitigation measure.

O17-29

The DPEIR acknowledges dewatering will be required, but instead of analyzing the potential impacts, just assumes an undefined stormwater pollution prevention plan (SWPPP) will be used that address the impact, then claiming the impact is less than significant, requiring no mitigation. (DPEIR p. 3.9-38.) This improperly compresses the impact analysis and mitigation. The DPEIR must acknowledge the potentially significant impacts and then analyze the ability of mitigation measures to address those impacts. (*Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, 656 ["By compressing the analysis of impacts and mitigation measures into a single issue, the EIR disregards the requirements of CEQA"].)

O17-30

The only mitigation provided in Hydrology and Water Quality section is for potential flooding impacts. The DPEIR finds that several reaches of the LA River (Frames 5 through 9) do not meet existing design standards for flood conveyance capacity and acknowledges that an increase in site runoff from actions under the Master Plan Update would further exacerbate this impact. The mitigation included for this impact is improperly deferred because it relies on deferred drainage studies and then, based on the results of the report, "measures during construction and operation may be required to ensure flood flows are not impeded and to minimize redirected flood flows." (DPEIR p. 3.9-61, emphasis added.) "Impermissible deferral of mitigation occurs when an EIR puts off analysis or orders a report without either setting standards or demonstrating how the impact can be mitigated in the manner described in the EIR." (*Clover Valley Foundation v. City of Rocklin* (2011) 197 Cal.App.4th 200, 236; *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1275; *Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, 280-82.) That is precisely what the DPEIR has done for flooding impacts.

O17-31

The DPEIR fails to acknowledge the fact that changes to the LA River's hydrology will occur due to the changing climate. There is no analysis or required future assessment of limiting the hydrological and water quality impacts of actions under the Master Plan Update in a changing climate or mitigation measures requiring actions ensure climate resilience. This fails to address potential project impacts and is inconsistent with Los Angeles County General Plan Policy S 2.3, which requires the County to "Consider climate change adaptation strategies in flood and inundation hazard." The County should revise the Master Plan Update and the DPEIR to take this vital concern under consideration and to develop a focus for the Plan and mitigation measures to address these impacts. The attached January 2021 LA River: River Management Strategy for the Glendale Narrows Feasibility Study should be taken under

O17-31 cont.

consideration in making these revisions. (Attachment 6.) This Feasibility Study communicates opportunities to enhance access to nature and a healthy natural river while mitigating flood risk by exploring possible new ways to plan for the LA River by incorporating novel and integrated solutions.

O17-32

The DPEIR similarly fails to address the impacts of the Master Plan Update's proposed activities on an "increasing potable water scarcity associated with population growth, drought, climate change, regulatory/legal policy, and protection of endangered species." (Attachment 9, Southern California Coastal Water Research Project's 2021 LA River Flows Project Study.) While the project objectives identify improving water supply reliability and the Hydrology section states that some activities may provide opportunities for reuse of water for groundwater recharge, the DPEIR does not convey the importance of expanded efforts to conserve and reuse wastewater and other discharges. This fails to address whether the Master Plan Update would be consistent with the State Water Resources Control Board recycled water policy, which encourages water reuse while ensuring the protection of existing water rights and beneficial uses. The findings of the Southern California Coastal Water Research Project's 2021 LA River Flows Project Study must be taken into consideration in evaluating the Master Plan Update's impacts and setting priorities for activities under the plan.

VII. The Biological Resources Analysis is Inadequate.

O17-33

As described further in comments submitted by the Center for Biological Diversity, the DPEIR fails to adequately disclose, analyze, and mitigate impacts to the Los Angeles River's biological resources. The DPEIR improperly restricts its analysis to a narrow 1-mile on each side of the River channel, when wildlife impacts may extend beyond the channel and berm areas. The DPEIR neglects to assess wildlife corridors outside of Griffith Park. Importantly, the DPEIR also fails to identify and analyze potentially impacted wildlife species, in part, because most of the data relied upon by the DPEIR is over ten years old. Recent surveys must be incorporated into a revised and recirculated PEIR. Waterkeeper directs the County's attention to its 2020 River Assessment Fieldwork Team report on the Los Angeles River, which contains valuable baseline information about the health of benthic communities and water quality at different sites along the River. (See, Attachment 4.)

VIII. Project Mitigation is Deferred, Vague, and Speculative.

The DPEIR contains very long lists of mitigation measures required to reduce most Project impacts below a level of significance. Mitigation measures must be "fully enforceable through permit conditions, agreements, or other measures." (Pub. Resources Code § 21081.6(b).) "The purpose of these requirements is to ensure that feasible mitigation measures will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded." (*Federation of Hillside & Canyon v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261; *Katzeff v. California Dept. of Forestry and Fire Protection* (2010) 181 Cal.App.4th 601, 612; *Lincoln Place Tenants Assn v. City of Los Angeles* (2005) 130 Cal.App.4th 1491.)

O17-34

However, the DPEIR recognizes that Master Plan Update projects could be implemented by any of the 17 cities along the River if they are not implemented by the County. Thus, the County plans to "encourage" the 17 cities along the Los Angeles River to adopt the PEIR. Unfortunately, if these cities do not adopt the PEIR, and if any of these cities go on to implement projects along the River, there could be adverse environmental impacts that are not disclosed in this DPEIR. CEQA requires that mitigation measures be concrete and enforceable. (Pub. Resources Code § 21081.6(b).) There is no enforceability to the mitigation measures contained in the DPEIR.

Even if actually adopted by implementing agencies, the Project's mitigation is often vague, speculative, deferred, or unenforceable, in violation of CEQA. Examples of vague, speculative, deferred, or unenforceable mitigation include, but are not limited to:

O17-35

- Preparation of the Construction Management Plan (LU-1) is impermissibly deferred.

- Mitigation Measure AES-2, protecting scenic vistas, is vague: "During project design, the implementing agency will minimize visual intrusions from public views of designated scenic vistas by following local jurisdictions' applicable policies and ordinances that protect views of designated scenic vistas by taking into consideration sightlines, scale and massing of structures, and materials used for construction, and other measures as needed." No performance standard is included.

O17-36

- Mitigation Measure AES-3a (lighting) does not contain an enforceable performance standard (lighting shall be designed to minimize light spillage).

O17-36 cont

- Mitigation Measure AES 3b (glare) does not contain an enforceable performance standard.

O17-37

- Mitigation Measure AQ-2. Low VOC components should be required at all times, and not just if emissions exceed applicable standards in the future.

- Mitigation Measure BIO-1 constitutes both deferred analysis and deferred mitigation. Analysis of the impact this measure intends to mitigate must occur now, so the public and decisionmakers may be fully informed. "A mitigation measure cannot be used as a device to avoid disclosing project impacts." (*San Joaquin Raptor Rescue Center v. County of Merced*, *supra*, 149 Cal.App.4th at pp. 663-664.)

- Mitigation Measure BIO-2 is deferred mitigation without specific performance standards.

O17-38

- Mitigation Measure BIO-3d provides for burrowing owl surveys to determine the presence of burrowing owls but requires no action to be taken if owls are located. The mitigation measure would not provide effective mitigation. The DPEIR must evaluate the efficacy of mitigation measures but does not appear to do so here. (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645.)

- Mitigation Measure BIO-3g regarding American Badgers provides for eviction of non-pupping badgers from their dens but not for relocation. It is unclear how this could possibly help the species. Further, CEQA requires that EIRs evaluate any significant impacts caused by proposed mitigation measures. (CEQA Guidelines § 15126.4.)

- Mitigation Measure BIO-5, the weed abatement plan, is deferred. While site-specific details may be appropriate for deferral, general methods and herbicide protocol should be developed now so that responsible agencies may evaluate the effectiveness of the mitigation and any environmental impacts of this mitigation measure.

- Mitigation Measure BIO-7 provides that intentional killing or collection of wildlife "could" result in a stop work order. This language should be made mandatory.

- Mitigation Measure BIO-12 recognizes that best practices for bird and bat-friendly nighttime lighting conflict but does not resolve the conflict.

Additionally, as discussed above, the DPEIR fails to include a defined project description sufficient to enable useful environmental review or the formulation of mitigation measures. The DPEIR must be recirculated after the development of a project ripe for review, along with concrete and useful mitigation measures that address the potentially significant environmental impacts of implementing that ripe project. The DPEIR has also failed to include analysis of defined projects under consideration for the Los Angeles River, and, consequently, lacks mitigation formulated to address the very real and likely environmentally damaging aspects of the 22-acre Los Angeles River Platform Park and the 11-acre Rio Hondo Platform Park.

O17-39

Finally, many of the Project's Design Guidelines are not explicitly mandatory, yet the DPEIR assumes they will be followed. (DPEIR p. 2-16.) Thus, to the extent they are relied upon to mitigate significant environmental impacts or they are relied upon as to conclude the project that will not have environmental impacts in the first instance, these Guidelines fail to reduce relevant impacts below a level of significance. Owing to these deficiencies in mitigation, the County lacks substantial evidence supporting the DPEIR's claims that impacts have been mitigated below a level of significance.

O17-40

IX. The County's CEQA Process Did Not Maximize Public Participation.

The people of Los Angeles County speak 185 different languages at home. (https://la.curbed.com/2015/11/4/9904020/los-angeles-languages.) It is well established the Los Angeles River flows through some of the most diverse communities in Los Angeles County, including many with a high percentage of non-English speakers. For this reason, important notices, such as those concerning voting, are provided in up to 12 languages by the County. Waterkeeper appreciates the County's efforts to include CEQA Notices and Power Point presentations in Spanish. However, neither the DEIR nor its Appendices have been made available to the public in Spanish, or any language other than English.

O17-41

It is well established that an EIR is "a document of accountability." (*Laurel Heights Improvement Assn. v. Regents of the University of California* (1988) 47 Cal.3d 376, 392. It is essential to the functioning of CEQA that the public be informed about and involved in decisions made by their public officials that affect the environment in which they live and raise their children. The CEQA Guidelines, at section 15201, provide: "Public participation is an essential part of the CEQA process. Each public agency should include provisions in its CEQA procedures for wide public involvement. . . ." (*See also* CEQA Guidelines sections 15002(a)(1) ["The basic purposes of CEQA are

to [i]nform decisionmakers and the public about the potential significant environmental effects of proposed actions]; 15003(c) ["The EIR is to inform other governmental agencies and the public generally of the environmental impact of a proposed project[.]")

Analogous state Office of Planning and Research Guidelines recommend that: "All communication … should be done in the major languages spoken in the community. This includes any advertising and written background materials as well as live interpretation at key public events." (OPR, "General Plan Guidelines," p. 32.)

O17-41 cont.

Failure to provide the DPEIR in Spanish has violated this policy, which is central to CEQA and Planning and Zoning Law. The US Census Bureau reports that in Los Angeles County, an estimated 56.6% of households speak a language other than English at home (https://www.census.gov/quickfacts/losangelescountycalifornia; visited 5/5/21), and about 48.6% of the County's population is Hispanic or Latino. Nearly forty percent of Los Angeles County households speak primarily Spanish at home. (https://www.first5la.org/files/CommunityProfileForLACounty.pdf.)

O17-42

Where a public agency does not make documents available in the language spoken by people likely affected by the project, it fails to comply with CEQA's public participation policies, as described above. We request the County recirculate the Draft PEIR in Spanish to enable the necessary public participation. Additionally, the Los Angeles River passes through areas where languages beyond English and Spanish predominate. For this reason, we request that CEQA notices be made available to residents speaking Chinese (Cantonese and Mandarin), as well as the other major languages spoken by river-adjacent communities.

Waterkeeper also notes the lack of outreach to important communities residing along the River. Meetings were held in some River communities, but not in Atwater Village, Boyle Heights, Huntington Park, and Maywood.

O17-43

The Tongva and other Indigenous Peoples were also left largely out of the Master Plan process. Indigenous People have lived in the Los Angeles Basin for thousands of years, and have some of the longest relationships with the River. Their experience, knowledge, and priorities should have been represented on the Steering Committee. One tribal representative, but zero Tongva representatives, was insufficient. The Master Plan process must be repeated to incorporate important information about traditional cultural spaces, ceremonial spaces, and Traditional Ecological Knowledge.

O17-44

Finally, Waterkeeper understands the difficulties presented by the COVID-19 crisis with regard to convening public hearings and meetings. Waterkeeper appreciates

O17-44 cont.

the County's embrace of Zoom and online formats that enabled some participation during a period that otherwise would have recorded zero public participation. However, Waterkeeper notes that Zoom and online meetings resulted in barring access to the CEQA process for the Master Plan Update for community members lacking at-home computer or internet access and/or sufficient technological experience. These barred residents are already those most likely to be adversely impacted by developments in their neighborhoods. Even for community members with the computers and adequate internet access, participation was tricky. For example, during the March 3, 2021 public meeting, it became clear that many members of the public who signed up to speak were unable to connect their audio or video to provide comments. Others may have been able to share their comments, but meeting facilitators could only find participants by the exact names entered into the Eventbrite preregistration. If a community member was using a Zoom account on a device with a name that did not match, if a community member borrowed a device, they were often unable to speak. Thus, =the County's process placed great barriers to public participation for a project that will impact up to 200 square miles of the County, and the entire LA River. Environmental review derives its vitality from public participation. (*Ocean View Estates Homeowners Ass'n, Inc. v. Montecito Water Dist.* (2004) 116 Cal.App.4th 396, 400.)

Conclusion

O17-45

While the DPEIR may be a useful organization of the generalized and differing visions of River stakeholders, it is not a defined "project" for purposes of CEQA, even at the programmatic level. As currently written, the document hinders CEQA's purposes of providing informed decision making and informed public review. Neither the decision makers nor the public know what the Project is meant to achieve or the environmental consequences of project approval. Like the Master Plan itself, the DPEIR must be revised to clarify actual plans for the River and to provide organization *and prioritizat*ion of project objectives that compete with one another. Once the County has settled on an actual plan, the County and its team must perform the studies and analysis needed to adequately disclose, analyze, and mitigate the Project's likely environmental impacts – information that, thus far, has been deferred to future processes. The County must also investigate methods of ensuring the mitigation measures it devises are incorporated by all agencies that may become responsible agencies under CEQA as Master Plan projects are implemented. This information must be included in a revised DPEIR and recirculated for public comment.

Los Angeles Waterkeeper looks forward to continued cooperation with the County and other stakeholders as the Los Angeles River Master Plan Update moves forward. Thank you for the opportunity to comment.

Sincerely,

Michelle Black and Amy Minteer
on behalf of Los Angeles Waterkeeper

Attachments:

1. March 12, 2020 Comments on Draft Master Plan Update
2. August 4, 2020 Notice of Preparation Comments
3. May 16, 2019 Comments on Draft Master Plan Update
4. November 11, 2020 Comments on Draft Master Plan Update
5. River Assessment Fieldwork Team, "Connecting our Los Angeles River Watershed Community Through Bioassessment," 2021.
6. LA River Management Strategies for the Glendale Narrows Feasibility Study, FOLAR, 2021.
7. Rio Hondo Confluence Area Project, Chapter 9, Projects.
8. Rio Hondo Confluence Area Project, Site Design Concept Project Boards.
9. Southern California Coastal Water Research Project's 2021 LA River Flows Project Study.
10. Restoring the Los Angeles River for Ecosystems and People, Dr. Sabrina Drill, Natural Resources Advisor, UC Cooperative Extension, Los Angeles County. Full presentation available at https://www.youtube.com/watch?v=fLThctBIeP8&list=PLLjlfxpbNglaKmmfYanzXN73ovJmNqcsB&index=4 .
11. Frank Gehry's Bold Plan to Upgrade the River Seeks to Atone for Past Injustices, Los Angeles Times, January 11, 2021.
12. Omission Accomplished II: The Lack of Municipal Stormwater Enforcement in the Los Angeles Region, Natural Resources Defense Council, April 2019.

ATTACHMENT 1

















March 12, 2020

Carolina Hernandez, LA County Public Works
Genevieve Osmena, LA County Public Works
Jessica Henson, The Olin Studio
Mark Hanna, Geosyntec Consultants

Via e-mail to: chernandez@dpw.lacounty.gov, gosmena@dpw.lacounty.gov, jhenson@theolinstudio.com, and mhanna@geosyntec.com

Re: LA River Master Plan Update Draft

Dear LA River Master Plan Team,

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 appreciate the opportunity to serve on the Los Angeles River Master Plan Update (LARMPU) Steering Committee and provide guidance on LA County's river revitalization planning. Our organizations have cumulatively advocated for the health of Los Angeles's communities and watersheds for over 100 years, and we represent more than 35,000 members. We are committed to increasing the ecological integrity of our waterways and watersheds to benefit our diverse Angeleno communities.

This plan has many positive aspects, and we appreciate the immense amount of work that the project team put into it. We commend the team's analyses, background research and progress memos, which are fantastic and useful resources to numerous stakeholders working in the LA River Watershed. Appendix Volume I contains a wealth of information, including the planting guidelines, which provide clear recommendations to promote native ecosystem functions. Appendix Volume II provides innovative ways to visualize the LA River that will be useful for community engagement and data-driven justification of projects.

Despite these positive aspects of the plan, we have a range of remaining major concerns. We have voiced these concerns repeatedly throughout the Steering Committee and sub-committee

process, and they remain troubling to us after reviewing the draft plan. We are submitting this letter in addition to our individual comment matrices, as our concerns relate to the plan's broader themes and content. The plan does not currently set us up for achieving climate and community resilience in continuing to treat the River as an engineered structure to be beautified. The plan, its vision, GAMs, and project proposals need to recognize the River as a freshwater ecosystem that provides valuable ecosystem services. We respectfully ask that the County take the time to address the following concerns before releasing the draft plan to the public.

1. **Concerns About Lack of (Socio-Ecological) Vision and Prioritization**

The draft suffers from the lack of clear vision or direction for the River. By its nature, a vision statement must make choices or it winds up trying to be all things to all people and does not provide the 'north star' for what the rest of the plan (goals, actions) then lays out. That is exactly the problem with the 'Reimagined River' vision:

> "The LA River flows through a 51-mile connected public open space that is seamlessly woven together with neighboring communities. It is an integral part of daily life in LA County—a place to enjoy the outdoors and to get across town, a place to appreciate the serene and to bring all people together, a place to celebrate a thriving urban habitat and respect feats of infrastructure, a place to learn from the past and to shape the future"

The vision reads like a list of different (and sometimes competing) goals for the River, many elements of which we could say we achieve today. A vision should be an aspirational declaration of what we see for the River in the future. Compounding this problem is that we have heard from the Master Plan team that the LARMPU was never intended to make such choices, just to lay out various options. What is the purpose of a Master Plan if not to provide a conceptual layout to guide future activities, identify recommendations and priorities for action, and promote transparency among the public and consistency in decision-making as future actions are all guided by this plan and vision?

By not making choices, the current vision sets us up for maintaining the status quo, makes it difficult for us to communicate what this plan is to our partners and community members, and potentially does harm to the River and watershed communities by further perpetuating public confusion about the River. A main aspect of the current vision statement absent from the River today is a thriving River and riparian habitat. We will not be able to 'celebrate' it without prioritizing this in the vision and throughout the overall plan. The vision is also unclear about whether the *stream ecology* is any healthier as a result of this plan.

Respecting feats of infrastructure is the status quo, so we do not see how this is envisioning a new reality. We do not want a vague vision that places 'respecting feats of infrastructure' on equal footing with ecological health. The term 'respect feats of infrastructure' asks us to accept at face value the infrastructure that has provided flood risk management, but that has also caused many harms and environmental injustices that remain unacknowledged in the plan.

The unclear vision statement unfortunately sets the tone for the rest of the plan. The nine goals and their related actions and methods (GAMs) include few to no performance metrics to be able to ascertain if and when the goals have been met. An example of a plan that has clear performance metrics is the County's recently released Sustainability Plan. This plan has targets and indicators to track progress for each strategy in meeting the plan's goals. Further, this plan does not restrict its actions to those led by the County but instead includes actions by partners and stakeholders to create a plan that is ambitious and forward-thinking. We have similar concerns about the lack of clarity about the Kit of Parts. Please see section 4 of this letter for more information about these concerns.

Proposed Steps

- Edit the vision to be clearer about what we are working toward and commit to increasing ecological integrity and treating the River and riparian areas as a freshwater ecosystem. Remove language about respecting infrastructure. Here is an example of what we have in mind:
    - "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."
- Extend the Master Plan Update process at least six months or have a second phase to be able to address Steering Committee concerns.
- Using the County Sustainability Plan as a model, set numeric targets (where possible) and indicators to track progress for each goal and action and develop ambitious forward-thinking goals and actions that are not all meant to be met or led by the County, but some of which rely on partners and stakeholders to implement.

2. Concerns About Equity Prioritization

There are communities along the Los Angeles River who are at the frontline of climate impacts, particularly with regards to health and public safety. These communities, often low-income communities of color, are severely lacking parks and open space, access to the River, and opportunities to have their voices heard during decision-making processes. Inequity runs so deep in this region that one's zip code will determine how long one lives.

Equity metrics should not only be a part of the plan and GAMs, but there should be clear and measurable ways to illustrate how projects will serve to reduce the inequity that LA River watershed residents currently face. The organizations signed on to this letter represent and are allies of environmental justice organizations and hope to see clear equity metrics and the inclusion of underrepresented groups in creating these metrics. Robust community engagement

requirements that enable community members to shape projects and new developments must be included. Such requirements provide residents with the opportunity to express their concerns and priorities and generate project ideas that serve existing communities, without displacing them. As we heard from many of our partners during the Steering Committee process, it is essential that this plan does no harm to community well-being.

The LA River has generated a great deal of interest from market-rate and luxury housing developers, which puts existing communities at risk of being displaced. In order to protect residents, the LARMPU should include provisions that incentivize equitable development, including stand-alone affordable housing projects, neighborhood and pocket parks, and joint development projects that include both greenspace and affordable housing. The LARMPU should include a Displacement Avoidance Strategy like LA County's Measure A Displacement Avoidance Policy. It should also contemplate the viability of a land bank that can protect land for future developments that benefit communities.

Indigenous Peoples have lived in the LA Basin for thousands of years. However, a diversity of indigenous voices has not been included throughout the process, but rather in concentrated and separated outreach efforts that have left few visible fingerprints on the plan and its language. It is unacceptable that there was no Tongva representation on the Steering Committee. The LA County team needs to consult with and include tribes, including those who are not federally recognized, now to ensure that all parts of the plan and its implementation lift up tribal perspectives. It is necessary to prioritize Traditional Ecological Knowledge and tribal cultural and ceremonial spaces along the River, for instance.

The steering committee also does not have any direct engagement from organizations that provide direct houseless organizing or services. The River is a home to over 500 houseless individuals and the steering committee and master plan update process needed to be more inclusive in addressing those residents' concerns, especially if proposed projects will displace many of these existing encampments.

Proposed Steps

- Develop equity metrics, including metrics related to community engagement requirements, with members of the Steering Committee, particularly in the GAMs, to reduce inequity in measurable ways.
- Draft provisions to incentivize equitable development, including joint development projects that include both greenspace and affordable housing.
- Include a Displacement Avoidance Strategy.
- Formally invite Tongva representatives to offer input on the draft plan and to join the implementation committee.
- Formally invite organizations that provide direct houseless organizing or services to offer input on the draft plan and to join the implementation committee.

3. Concerns About Lack of Watershed Approach and Climate Resilience Focus

We have called for a watershed-level approach to River planning from the beginning of our time participating on the Steering Committee. We even heard Mark Pestrella call for watershed planning at one of the first Steering Committee meetings. Thinking about watershed health systemically would enable us to plan with the greatest foresight for climate impacts, ecological health, and community well-being. It would acknowledge that this is a living River that is connected to an 824-square-mile hydrological system and community of people. It is not a mere architectural structure to be designed or a channel to be controlled. It is a watershed and ecosystem to be nurtured and repaired.

The Master Plan states that it is “based on a watershed and community approach...recognizing that these systemic and natural elements cannot be studied in isolation” (Page 22). Yet there needs to be a connection between the watershed-level analyses and the actual vision, goals, and projects of the plan. The plan as it currently is written can claim to include watershed-level analyses, but cannot claim to take a watershed-level approach.

Instead we find a corridor design and beautification strategy with select watershed analyses on the side, which misses a significant opportunity for increasing resilience and systemic long-term planning and creating a plan that is greater than the sum of its parts. A “holistic corridor approach,” as we heard the plan referred to throughout the Steering Committee process, is not good enough for the next 25-50 years, the expected life of this plan.

A key reason for a watershed analysis is to prepare for climate impacts. The first goal listed in the GAMs section is to, “reduce flood risk and improve resiliency.” The current fragmented presentation of project ideas does not prepare us for meeting this goal. We need an analysis of how project ideas fit together to increase climate resilience and reduce flood risk. Ideas for flood risk reduction that LA County Public Works may consider to be non-traditional, including floodplain reclamation and increasing upstream ground permeability to reduce downstream flows, are mostly dismissed in the plan. The Kit of Parts section on “floodplain reclamation” mostly writes this concept off as infeasible, but we have not yet had the opportunity to engage on this complex topic in a meaningful way. Is there a way to promote floodplain reclamation while at the same time preserving existing communities along the River? Recognizing that redlining practices in the 1930’s all but ensured that low-income communities of color only had areas like the floodplain to purchase/develop properties, how do we now support those communities while also utilizing the floodplain for flood protection? We ask that the plan not dismiss these ideas, and instead indicate what would need to happen for those to be possible.

We are also concerned that the tributaries have almost entirely been ignored. Community members reading this plan who live along the Arroyo Seco, Bull Creek, Compton Creek, Rio Hondo, or any of the many additional tributaries in the watershed will come away with the idea that they are not part of this plan. They are not included in the climate, access, housing, or ecological analyses or goals as a result of not living near the mainstem. For a plan that is meant

to be the master guiding document for LA County, this is an inequitable outcome. Meanwhile, some of our soft-bottom stream sections with the highest levels of ecological integrity are along our tributaries, which are being overlooked as places that residents could enjoy now — and even more so with ecological restoration and access improvements. One of the main ways that we could improve access opportunities to residents, especially to our soft-bottom stream sections, would be to improve water quality so that it's safer to interact with our waters. This again requires a watershed approach to address pollution upstream.

Proposed Steps

- Explain what treating the document as "living" means and commit to revising it on a scheduled basis. Recognize that watershed-based planning is necessary and lay out actionable steps to lead us to a truly watershed-level approach in the near future.
- Include the tributaries in analyses, GAMs, and graphics/maps. Include past research conducted about them in other planning efforts. Commit to including them in the next steps with the plan.
- Commit to updating flood risk and floodplain mapping within the next 3-5 years to be able to plan for actual needs. Commit to dynamic modeling that shows how upstream changes in the watershed lead to downstream impacts. Illustrate the meaning of "floodplain" with the new modeling. Include maps of publicly-owned parcels that could be used for floodplain reclamation or infiltration.
- Analyze how the proposed projects in the plan can (or cannot) *cumulatively* meet goals.
- Prioritize restoration and access to our soft-bottom River and tributary sections to connect people with much-needed natural areas now.
- Provide forum for in depth discussion about floodplain reclamation and how publically owned parcels can be utilized.
- Revise the Floodplain Reclamation Kit of Parts section to include outcomes of this discussion and balance pros and cons. Explain what it would take for the Floodplain Reclamation "part" to reduce flood risk while preserving communities along the River.

4. Concerns About Kit of Parts Proposals

The Kit of Parts is presented as the pathway to achieve the goals of the Master Plan, but there is no prioritization or distinction among the six design components in terms of their impacts on goals, possibility to do harm, and appropriateness reach by reach. We are concerned that all six design options are presented as comparable. We believe certain options within the Kit of Parts are more desirable than others, which would be easier to ascertain if we had a clearer and ecologically-focused vision. For example, Trails and Access Gateways require fewer resources than Diversions, but still provide multiple benefits. These distinctions between the six options should be recognized within the plan.

In one of the last Steering Committee sub-committee meetings, there was a robust discussion about prioritization. We understand that there is a need to balance being overly prescriptive while allowing for flexibility and innovation and that there are different opinions about this on the Steering Committee. At the same time, an incredible amount of work has been done so far, and we would like to see this Plan truly become an *actionable road map*, which will require additional work and time. As an attempt to address this issue, the plan includes a “blue box” scoring system for each design option. Although this is a step in the right direction, the process behind the scoring system is unclear. More clarification on this scoring system needs to be provided.

The plan presents the Kit of Parts as standalone options. However, some of the “parts” complement each other and in some cases, one part may make another part possible. For example, if floodplain reclamation is implemented, it may be possible to make channel modifications. Some options, such as the platforms, in fact preclude other “parts,” such as floodplain reclamation and channel modifications. While we understand that the Kit of Parts section doesn’t intend to say the parts can’t be used together, it should explicitly say that some of the parts in some scenarios may be more (or less) effective if implemented together.

Platforms and Crossings

While certain bridges with substantial greening, bikeways, and pedestrian paths could be desirable in locations along the River, creating a healthy and resilient freshwater ecosystem for our communities should be the main priority. We want to ensure that the current plan does not do ecological harm and that it does not preclude future restoration opportunities. Specifically, we have deep concerns over the proposed platform parks and that once built, they will limit future opportunities for true ecological restoration, innovative watershed projects, and bringing people to the River to connect with it and steward it, all while requiring immense public resources. Platform parks cover up the River with additional concrete; they do not celebrate the River or support ecological function. The proposed connectivity corridor section fails to consider these potential negative impacts. The proposed location to cap the River is adjacent to the 710 freeway. Regardless of jurisdiction, we should consider capping the 710 freeway before ever considering capping the river, the former of which could serve as a vista to a resource we are trying to revive, not hide.

Channel Modifications

As we enter a new decade, innovative, nature-based solutions need to be brought to the table to create resilient, sustainable, and inclusive communities. It is clear that concrete removal and creative nature-based solutions could help in flood risk reduction, yet sediment removal and the destruction of mature habitat is the solution offered up to future generations. The proposed channel “rehabilitation” in the Glendale Narrows causes concern. Given recent maintenance activity within this area, it is clear that there is little oversight and trees are being cut down and trimmed in a way they may not recover from. We would like to see explicit language about planting native species in the place of non-native species and ensuring that native vegetation, particularly mature trees, are left alone and proper training and oversight are implemented. We want to ensure that habitat and diversity of native plant species remain intact, and we are

concerned that the “rehabilitation” proposal will not fulfill this vision and will instead threaten one of our river reaches with the highest level of ecological integrity. We would also like to see images in the plan of how “channel modifications” can also mean concrete removal.

Proposed Steps

- Recognize that the Kit of Parts design options are not comparable and interchangeable, establish distinctions, and describe the benefits and drawbacks. Explain the scoring system for the Kit of Parts elements and standardize their presentation. Include more prioritization of the design components and a reach by reach prioritization for how to implement the Kit of Parts. Overlap opportunity areas with appropriate design concepts to produce an actionable roadmap reach by reach.
- Remove the Platform Parks from the proposed design components and the example of Channel Rehabilitation at the Narrows until these have been explored to a greater extent.
- Prioritize and integrate vegetated nature-based solutions across the river corridor and watershed. Utilize innovative nature-based approaches[1] to achieve flood risk reduction rather than the default gray infrastructure/practices as seen around the world, such as in Munich[2], the Netherlands[3], San Antonio[4], and Yonkers[5] . Integrate a diversity of native plant species as a key component of every project type and alternative.
- Offset the additional costs that the region incurs from responding to flood, fire, urban heat island effect, public health issues (mental and physical health), air quality, water quality, and sustainable water supply with nature-based projects to enhance habitat in the river and watershed. As has been stated by East Yard Communities for Environmental Justice - gray infrastructure has functioned to a degree, but has been held harmless for the negative impacts to communities. Any new investments must provide multiple benefits to communities and to municipalities, while considering unintended consequences.
- Require native landscaping specialists that have a deep understanding of ecology in the design, implementation, and maintenance of projects. Nature-based projects provide good green jobs long-term while providing cost savings compared to gray infrastructure.
- Include images and information showing how “channel modification” could also mean concrete removal. Determine how to maximize the ecological integrity at least of all of the vegetated sections of the River and then plan for flood risk from that point, not the other way around.

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[1] https://blog.nature.org/science/2018/02/28/new-study-shows-flood-risks-across-the-u-s-are-underestimated-in-a-big-way/

[2] https://climate-adapt.eea.europa.eu/metadata/case-studies/isar-plan-2013-water-management-plan-and-restoration-of-the-isar-river-munich-germany

[3] https://www.nytimes.com/interactive/2017/06/15/world/europe/climate-change-rotterdam.html?hp&action=click&pgtype=Homepage&clickSource=story-heading&module=photo-spot-region&region=top-news&WT.nav=top-news

[4] https://www.sanantonioriver.org/mission_reach/ecosystem_restoration.php

[5] https://ny.curbed.com/2016/12/15/13963898/yonkers-saw-mill-river-photo-essay

Thank you for reviewing our concerns and our proposals. We look forward to hearing your response to our comments. We plan to schedule a follow-up meeting to discuss these proposals in person.

Sincerely,



Marissa Christiansen
President/CEO
Friends of the Los Angeles River



Shelley Luce
Executive Director
Heal the Bay



Bruce Reznik
Executive Director
Los Angeles Waterkeeper



Shona Ganguly
External Affairs Advisor
The Nature Conservancy



Viviana Franco
Founder & Executive Director
From Lot to Spot



Robin Mark
Los Angeles Program Manager
The Trust for Public Land



Tori Kjer, PLA
Executive Director
Los Angeles Neighborhood Land Trust



Alessandro Negrete
Director of Development and Comms.
East Yard Communities for EJ

Cc:
Speaker Anthony Rendon
Supervisor Hilda Solis
Supervisor Mark Ridley-Thomas
Supervisor Sheila Kuehl
Supervisor Janice Hahn
Supervisor Kathryn Barger
Michael Affeldt, City of Los Angeles, Riverworks
Brian Baldauf, Chief of Watershed Planning, Mountains Recreation and Conservation Authority

ATTACHMENT 2



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

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).

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

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@lawaterkeeper.org

Melissa von Mayrhauser
Watershed Programs Manager
LA Waterkeeper
melissavm@lawaterkeeper.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.

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

ATTACHMENT 3

May 16, 2019

LA River Master Plan Update – Comments on Goals, Actions, Methods (GAMs)

1. Introduction

Thank you for the opportunity to comment on the LARMPU's draft materials. We appreciate that the newer draft of goals, actions, methods are more complete and specific than the initial draft. We applaud the team for including language about floodplain reclamation, ecosystem function, climate change resiliency, local workforce development, affordable housing, and equitable access to the river. At the same time, we have remaining concerns and requests for clarification about the draft materials, which we'll highlight starting with overarching themes and then with more targeted comments on the various GAMs.

2. Overarching Concerns

Lack of Clean Vision and Mission

As LA Waterkeeper has brought up at Steering Committee meetings, the current draft suffers from a lack of a clear, overarching vision and mission for the Los Angeles River that both recognizes former and ongoing planning efforts and sets a unifying tone for moving forward. A vision should be an aspirational declaration of what we see for the River and watershed when we close our eyes and imagine it in the future. The vision is critical to guide the goals and actions as the latter are all in service of achieving the former.

By its nature, a vision statement must make some choices or it winds up trying to be all things to all people, and not providing the 'north star' (or guidepost) for what we are trying to achieve. That is exactly the issue that we see with the GAMs, kit of parts, and how the 'Reimagined River' statement currently reads – the latter contains a lot of the words that the Steering Committee has expressed, but without any choices or clear direction for what we see for the River, which leaves us completely in the dark about where we are heading.

A mission statement, on the other hand, should tell us what the plan does, including the scope and what the County can do to support the process. One of the challenges LAW has witnessed as part of the Steering Committee is confusion about what the LARMPU is or should be (i.e., its scope). While the current draft plan does include a section on the "Role of the County and Coordination," we feel the definition laid out here is too limiting. Below is an example for a more overarching mission for the Plan:

The LA River Master Plan Update will help ensure a Reimagined LA River by:

- Establishing a **long-term vision** for the River that maximizes benefits to the environment and communities

- Identifying goals and actions that will be **undertaken by the County throughout the watershed** to further the mission and achieve the vision for the River
- Identifying those actions throughout the watershed that can be taken by other (non-county) entities to help further the mission and achieve the vision for the LA River, including identifying how **County support** through coordination, funding, model ordinances, etc. can aid these efforts
- Identifying a transparent and inclusive **governance structure** that will ensure the goals of the plan are met and the public is fully engaged in implementing the plan

Scope of Plan

LAW has several concerns with the overall scope of the plan. Most notably, we believe the LARMPU should more explicitly adopt a watershed approach that encompasses the entirety of the River, its tributaries and its watershed. While some improvements have been made in the current draft, the goals and actions still vacillate from the corridor to the watershed, leading to confusion about what this plan is trying to achieve. The idea of a holistic corridor plan is self-contradictory. Since the beginning of this process, we have advocated for watershed planning that would consider the river as part of a hydrological and ecological system – and as part of a broader cultural and community context beyond the corridor itself. We feel that this is the best approach to tackling public health, flood risk, and ecological health concerns, both now and for future generations.

Additionally, we believe governance of the River should be addressed in the LARMPU. The reality is that, regardless of how good the Plan turns out to be, it will be virtually impossible to fully and effectively implement with the current, fractured, governance structure. LAW believes this should be acknowledged and addressed in the plan. Here's an example of a proposed goal: A governance structure is established that fosters holistic management of the entire River and its tributaries while ensuring transparency, oversight & accountability and opportunities for meaningful public engagement.

Lastly, it is generally understood that economic development is one of the County's unstated goals of the plan. Yet, the lack of goals, actions or methods specifically around economic development is conspicuous in absence and leaves room for too wide a range of outcomes that may harm communities and the environment. We would prefer that this unspoken goal be identified formally as part of the Update so the members of the TAC can discuss and debate such activities out in the open and ensure that the plan moves forward with economic development in an equitable way.

Goals

LAW also finds the overall organization of the goals somewhat confusing and not conducive to understanding the Plan or how the various elements fit together. For example, it's unnecessarily difficult to understand how some of the more environmental goals (ecosystem health and water quality) fit together, when the former is Goal 3 and the latter Goal 9. Meanwhile, Goal 3 is given much more detail and thought than Goal 3, and the two do not reference each other even though they are very interconnected. We believe it would make more sense to order the goals in a way that they can flow into each other more easily. Also, while the County has emphasized that the order of the goals does not indicate a prioritization, this is not how it seems when reading them. This might be different if the goals referenced each other to a greater extent. As it is, many of the GAMs contradict each other, or could be strengthened by referencing other GAMs.

Additionally, while we understand that the primary focus at this point is the action and methods, we respectfully offer the following thought. We believe the goals as currently drafted lack the required specificity to guide the overall planning for the LA River, as we see goals as a destination or end result. While goals shouldn't be overly specific/measurable, like the vision they should be clear enough to serve as a guidepost. Is "Support healthy, connected ecosystems" such a destination? Interestingly, some of the sub-goals get closer to having the needed specificity, but these should be pulled out into the actual goals themselves.

Here is an example of the reframing of goals to be 'destinations'.

Current goal 9: Promote healthy, safe, clean water.

Example proposed goal: Water quality within the River and its tributaries achieves all beneficial uses of the River, including protecting wildlife and habitat as well as recreational uses of the River

Additionally, while improvements have definitely been made from the first draft of the GAMs, LAW finds that there is still a lack of emphasis on ecological health as well as addressing climate change throughout the Plan. We are concerned that while this is a river planning document, there is only one or two ecosystem-related goals (depending if you include clean water), and generally the goals and actions related to ecosystem restoration are expressed in weak and vague terms. Several times throughout the document, we read that the primary goal with ecosystems is to connect them. We urge the County to pursue more ambitious goals and actions in terms of the river's ecological integrity. Even in the river's predominantly concretized state, there are ecosystems and they are connected, but that doesn't mean that they have ecological integrity. Healthier ecosystems connect to all of the goals, including equitable access, and should be woven throughout the entire document.

Similarly, climate change (which is having and will continue to have a defining impact on the future of the River and watershed communities) is mentioned fairly fleetingly throughout the document, and even then generally in terms of researching what must be done. Considering the role climate change is having on our planet, our region and the River, it must be more centrally addressed in the LARMPU, integrated throughout the GAMs, and treated with a sense of urgency.

Lastly, we find there is a need for clearer definitions throughout the document. Several of the sections are vague and leave room for a multitude of interpretations. One example is the use of the term "development" in Goal 1. What constitutes development – just a hard structure or also a park? How about a wetland? The types of "development" that we are proposing and/or encouraging are critical to consider given that land use decisions beyond the corridor directly impact and will continue to impact flood risk and river health for generations to come.

3. Specific Thoughts About the GAMs

Goal 1 Comments

1.1.3. Coordinate with Watershed Management Programs […]
We ask for distributed stormwater capture and nature-based solutions to be called out as specific methods for achieving our goals, rather than just under the umbrella of the WMPs/EWMPs.

1.1.4. Manage dry weather flows to discourage the growth of non-native vegetation.
This should reference the findings of the State Water Board – SCCWRP flows study that is being conducted now. We'd like to see the management of dry weather flows framed as a way to meet beneficial uses.

1.2. *Increase capacity of the river in high risk areas and provide flood risk management to at least the 100-year flood event.*

How are you defining a 100-year flood event? Are you considering climate change? Why did you choose the 100-year flood event level specifically?

How will you ensure that the methods proposed are not contradicting goal 3?

1.2.2. *Purchase or otherwise reclaim land along the channel and immediately adjacent floodplain areas.*

Agreed! This floodplain reclamation concept is such an important and complex one that we think that it should be its own action with sub-methods. We ask that you clarify that this is for restoring a floodplain buffer rather than for additional development that would increase flood risk.

1.2.6. *Manage vegetation and remove invasive plants.*

We ask for modeling to demonstrate the extent to which this action is reducing flood risk, indicate that this will be used as a last resort, and discuss develop BMPs. This concept of managing vegetation comes up in many sections. They should all reference each other.

1.3 *Include climate change research in the planning process for new projects along the river.* It's great that you're including this action. We'd also like to see additional methods that would convey the sense of urgency needed to address climate change.

1.4 *Improve and refine emergency preparedness*

Most of these methods seem to be referring to increasing emergency preparedness for river users, but what about people living next to the river?

1.5.4. *Encourage residents and businesses to consider purchasing flood insurance.*

Who would this include? Everyone living and owning a business within a certain proximity of the river? This could also connect to the educational program that you mention.

1.6.4. *Implement dam and levee safety programs […]*

Would this include addressing aging levees and sharing information with the LA community about them?

1.7.2. *Update and improve the LA River hydrology.*

This sentence doesn't make sense. Do you mean hydrology modeling? Another update that needs to happen is soil mapping, so that we can better model infiltration rates.

1.7.5. *Encourage only flood resilient projects in the floodplain.*

Great! But how are you defining "flood-resilient?" And how are you defining the "floodplain?"

Goal 2 Comments

2.1. *Create 51 miles of connected open space.*

This already exists. Is your point that you're increasing access? It'd also be great to say that you're increasing access to connected open space that increases the ecological integrity of the river. We'd like to see more of an up-front focus on multi-benefit, nature-based solutions.

We would like to see methods that entail adopting policies that limit displacement connected to greening.

2.1.1. *Create a park setting along the entire river utilizing this plan's design guidelines.*

This "park setting" should be river-specific and honor the river-dependent habitat that benefits Angelenos.

2.3. *Provide support facilities at regular cadence along the length of the river, on both sides.*

We support bike paths that are shaded by trees. You propose a "continuous greenway of trees" in section 3.3.7. Why not connect this with the bikepath so that cyclists have the benefit of shade?

We also ask for trash cans at a regular cadence. Trash remains a big water quality challenge in the river, compounded by the lack of receptacles.

2.5.2. *Encourage the re-zoning of incompatible land uses adjacent to the river, where feasible.*

What is an "incompatible" land use? We also had this question for 2.5.3.

2.7.1. *Improve safety signage, including what to do in an emergency.*

We'd like to see signage improved in general, including decriminalizing access to the river. We ask that the County develop a unified signage plan so that there are no more mixed messages. We also ask for signs to be multilingual.

Goal 3 Comments

Most of the ecosystems in this section referenced seem to be river-adjacent. We would like to see more methods that focus specifically on the in-stream habitat. This should also include considering removing concrete, daylighting stormdrains, and using bio-objectives.

3.1 *Increase ecosystem function along the river corridor.*

How are you defining "ecosystem function?" Please add some additional methods to this action. An LAR River study about increasing ecological function would also be helpful.

3.2.1. *Develop reach specific plant species guidelines … to create desirable ecosystems.*

We also need a definition for "desirable ecosystems." This is too vague. This is also the case for 3.3.5.

3.3.3. *Promote the creation of linkages between upland and riparian ecosystems.*

What about a linkage with the river ecosystem itself?

3.3.6. *Support, in parallel with regional efforts, a reach specific regime for low flows in the river that contributes to ecological function.*

This also should reference the flows study that's happening now. What do you mean by a "reach specific regime?" Also, how does this relate to the meaning of 3.5.6 regarding supporting "water conservation strategies within the channel?"

3.4 *Encourage cities along the river to adopt sustainability strategies.*

This should include encouraging cities to use multi-benefit, nature-based approaches.

3.5.1 *Train maintenance staff to work with native vegetation.*

Great, but how will this be formalized? This should go beyond native vegetation and also include BMPs for managing vegetation in general, such as not using glyphosate.

3.6 *Use the river corridor as a living laboratory.*

This also relates to connecting students with the river as a living ecological laboratory.

Goal 4 Comments

4.1 *Create welcoming access points and gateways to the LA River Trail to optimize physical access along its length, on both sides.*

This goes along with our comment from 2.7.1 about developing consistent and welcome signage that decriminalizes river access.

Welcoming access points and gateways should not just be for the bike paths, but also for the river itself.

4.2.2. *Require all new pedestrian or road bridges over the river to provide pedestrian and bicycle access to the river trail.*

As we mentioned, access should also be provided to the river, not just to the trails.

Goal 5 Comments

We are excited about the focus on embracing local arts and culture. Promoting the river as a meeting location is a worthwhile goal. Recognizing all of the ways that people have connected

with the river for a long time and highlighting their knowledge would be particularly meaningful.

Goal 6 Comments

We support and recognize the need for affordable housing. We also support multi-dimensional policy efforts to ensure that improvements in ecological health do not lead to community displacement.

We are also worried about action 6.3 "increase units of affordable housing within one mile of the river" and method 6.8.1 "identify sites for permanent housing within 1 mile of the river." Considering Goal 1 and climate change and flooding predictions, we are concerned that building housing next to the river would put people in harm's way, and we urge caution.

Goal 7 Comments

7.1.3. *Prioritize connectivity to the river from schools, cultural centers, and other education facilities.*

Agreed, and it'd be great to learn from schools and organizations that are already connecting their students with the river in many ways.

7.4.1. *Utilize local resources and workforce to design, build, operate, and maintain projects, art, and amenities along the river, where possible.*

Building up our local workforce is a great goal. We'd also like to see job trainings for maintaining distributed, nature-based projects.

Goals 8 & 9 Comments

These goals seem like afterthoughts at the end of the GAMs document. They specifically require a watershed approach to achieve them, which contradicts the statement that we'd heard from the County team that this is a corridor plan only. Why only mention the watershed in some sections when convenient, and then otherwise say that this is a corridor-focused plan? The language of goals 8 and 9 is vague and lacks important detail. We could use some clarifications about their place in the broader plan, and we would welcome the opportunity discuss them at greater length.

Specifically, LAW remains confused about goal 8 (as a separate goal) as part of the Update. We are wondering about the County's thought process in including this goal here and we wonder whether goal 8 should actually be couched in different terms (e.g., 'reduce stressors on the LA

River through stormwater capture') and included in more appropriate sections (for stomwater capture, for example, it should be classified as part of the reducing flood risk goal). Also, goal 9 misses big opportunities to connect to public health, recreation, industrial stormwater, groundwater contamination, construction run-off, trash, "W" implementation, etc.

Kit of Parts

- We are concerned that this seems like a grab bag that is not integrated at all and treats all possibilities as the same. Meanwhile, ecological opportunities and their connections to public health remain overlooked.
- Specific thoughts:
    - We are opposed to the concept of covering the river with a platform. The platform park idea is the only concept presented for a "constrained LA River ROW," which is misleading.
    - The channel modifications category should specifically include concrete removal and stormdrain daylighting.
    - By natural treatment system, do you mean a wetland? What is a "vegetation conversion"? The terminology is very engineering-driven again and doesn't reference many habitats and restoration opportunities that are possible. For instance, trees could be planted along the trails, but this is not mentioned.

Thank you for your consideration of our comments, and we look forward to continuing this conversation.

Sincerely,
Bruce Reznik and Melissa von Mayrhauser

ATTACHMENT 4



November 11, 2020

Dan Lafferty, Deputy Director
(Via email)
LA County Public Works, Water Resources
900 S. Fremont Ave.
Alhambra, CA

Cc: Keith Lillie, Stormwater Planning

Dear Mr. Lafferty,

Thank you for your continued conversations with our coalition of seven steering committee organizations who are committed to an increasingly equitable, ecologically healthy, and climate resilient Los Angeles River. Our organizations represent a diverse set of voices, perspectives, and expertise with community-based work all across the Los Angeles River watershed.

As you know, after serving on the Los Angeles River Master Plan Update (LARMPU) Steering Committee and faithfully attending the steering and subcommittee meetings, providing guidance river revitalization planning, and submitting a thorough comment letter, we remain concerned that our consistent comments around gentrification, ecological function, and clear prioritization and vision have not been adequately addressed. As we discussed in our meeting on November 3rd, our collective view of the LARMPU is a lost opportunity to lay out a clear and compelling vision for the future of the Los Angeles River and adjacent communities. We remain skeptical that the community-based priorities identified during the extensive outreach efforts were adequately reflected in this Plan. This letter sets forth a focused list of priority requests that would go towards solving our top concerns and are necessary for each of us to feel comfortable supporting the LARMPU.

We do recognize that the plan does take the innovative and much-needed step of including an affordable housing chapter, the kind of which has not been seen in another plan of this scope. We applaud the Los Angeles County Flood Control District for its collaborative work towards and ultimate inclusion of this chapter. That said, there are still substantial concerns around the real estate speculation and subsequent displacement that will undoubtedly be triggered by the

publication of this plan. Below is the list of our priority requests and solutions that we believe the LARMPU must address before our organizations support the final plan. To best achieve these solutions together, we would be very enthusiastic about extending the plan's timeline by another eight months.

The final plan must:

1. Meet the classic definition of a master plan by providing a clear vision for and prioritization of projects that is committed to - first and foremost - solving these four issues:
    a. The affordable housing chapter does not have a commitment to implementation. At a minimum, there should be a commitment to collaborating with, providing technical assistance for, educating, and otherwise resourcing local cities as they implement the proposed affordable housing and anti-displacement measures and policies **ahead** of capital project implementation;
    b. Improve climate resilience and flood mitigation for all residents living alongside the River;
    c. Prioritize the enhancement of biodiverse ecosystems - understanding that healthy ecosystems are crucial to climate resilience;
    d. And recharge groundwater where possible.
2. Remove the Platform Park from the plan both as a specific project and as a part of the tool kit. This proposal in particular stands to do particular ecological harm, create real estate speculation, and precludes future opportunities for climate resilience. Nor does it improve flood capacity for climate resilience. More concrete does not help any of these issues or support the goals and methods described in the plan.
3. Integrate past and current plans slated for the entire "soft-bottom" section of the river by authentically representing their desired outcomes derived from thoughtful community processes. The current plan draft is inconsistent with existing plans, such as the City's River Master Plan, the ARBOR Study, and the 100 Acre Vision at G2 Taylor Yards.

We hope the Los Angeles County Flood Control District considers a lengthened timeline to adequately collaborate on these above solutions. We would welcome additional collaboration and discussion around the basis and details of these proposed solutions. Without the inclusion of the items above, our organizations cannot support the Los Angeles River Master Plan Update.

Sincerely,

Marissa Christiansen
President/CEO
Friends of the Los Angeles River

Shelley Luce
Executive Director
Heal the Bay



Bruce Reznik
Executive Director
Los Angeles Waterkeeper



Shona Ganguly
External Affairs Advisor
The Nature Conservancy



Robin Mark
Los Angeles Program Manager
The Trust for Public Land



Alessandro Negrete
Director of Development and Comms.
East Yard Communities for EJ

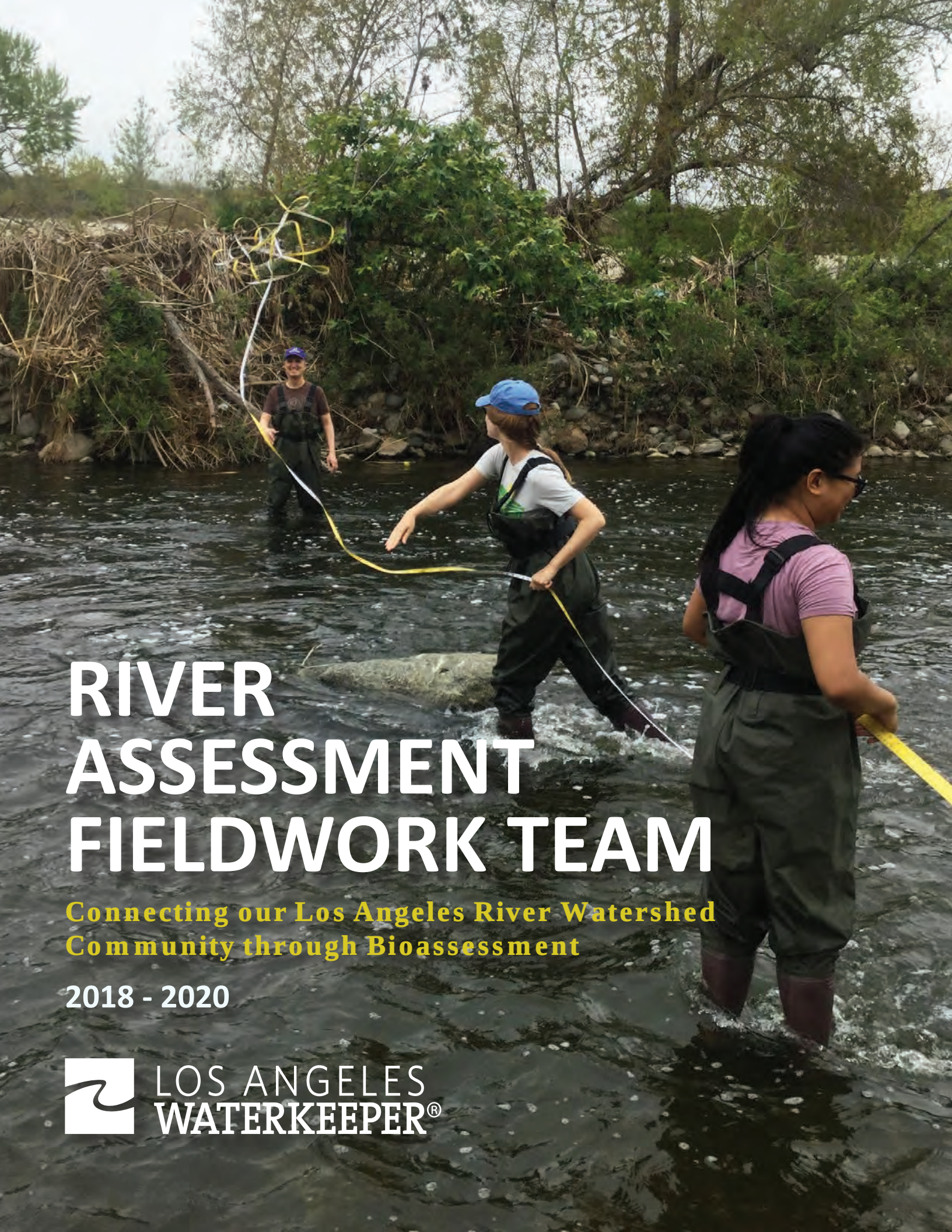


Tori Kjer, PLA
Executive Director
Los Angeles Neighborhood Land Trust



Viviana Franco
Founder & Executive Director
From Lot to Spot

ATTACHMENT 5



RIVER ASSESSMENT FIELDWORK TEAM

Connecting our Los Angeles River Watershed Community through Bioassessment

2018 - 2020

LOS ANGELES WATERKEEPER®

ACKNOWLEDGMENTS

This report acknowledges that the River Assessment Fieldwork Team (RAFT) program occurs in the ancestral homelands and waters of several Indigenous Peoples, including the Gabrielino-Tongva Tribe, the Fernandeño Tataviam Band of Mission Indians, and the Kizh Nation, Gabrieleño Band of Mission Indians. We are grateful to be guests on these lands and in these waters, including in the RAFT program.

The author of this report is Melissa von Mayrhauser, Watershed Programs Manager at LA Waterkeeper.

The designer of this report is Lindsey Jurca.

Thank you to the whole LA Waterkeeper team for your support of the program. Special thanks to Bruce Reznik, Dr. Michael Quill, Mithsy Hernandez, Geraldine Burrola, and Kelly Shannon.

Thank you to former watershed interns Hannah Tropiano, Jessica Tormoen, Maricarmen Hernandez, and Nico Lapointe, as well as former watershed fellow Michelle Lin.

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Thank you to the LA Waterkeeper staff and volunteers who contributed photos for the report.

Most of all, thank you to our team of RAFT volunteers who made all of this possible.

Thank You To Our Generous Funders

THE CAMPBELL FOUNDATION

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The Kenneth T. and Eileen L. NORRIS FOUNDATION

THE DORRANCE FAMILY FOUNDATION

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TABLE OF CONTENTS

Ex e Summary 4
Key Takeaways 6
Recommenda 7
Note from the Author 8
Vocabulary 9
Part 1: Intr 12
Part 2: Program Overview 22
Part 3: Overall Findings 34
Part 4: Sit esults 62
Part 5: Policy Recommenda 84

EXECUTIVE SUMMARY

About Los Angeles Waterkeeper

Founded in 1993, Los Angeles Waterkeeper's mission is to safeguard LA's inland and coastal waters by enforcing laws and empowering communities. We envision the Los Angeles region as an international leader on integrated, sustainable and equitable water management, a region that is water self-sufficient and where all waterways throughout LA County are safe, healthy, and accessible to the public. LA Waterkeeper advocates for the restoration of the LA River watershed to maximize ecological health and community resiliency.

About the River Assessment Fieldwork Team (RAFT)

LA Waterkeeper's River Assessment Fieldwork Team (RAFT) program provides community members with opportunities to learn first-hand about the health of the Los Angeles River watershed through ecological analysis. Together, we collect critical baseline data and gain tools to advocate for a healthier LA River watershed. We started this program in response to ongoing river revitalization efforts that have failed to prioritize the river's ecology and the community's connection with it.

In 2018 and 2019, LA Waterkeeper trained over 100 community members in the California Rapid Bioassessment Protocol to monitor eight sites along the LA River and its tributaries. We studied natural sites (no concrete), soft-bottom sites (concrete levees and a sediment stream bottom), and concrete-lined sites (concrete levees and a concrete stream bottom). RAFT volunteers monitored water quality, habitat quality, and biological integrity. We also recorded observations about our experiences along the river.

We believe these conversations about ecology should be integrated with conversations about equity and climate, rather than being treated as separate topics. Green gentrification, in which revitalization projects lead to harmful impacts like displacement of existing communities, is a legitimate fear without community stabilization efforts, collaborative community participation, and government transparency.

We ask government agencies to encourage and include community science initiatives in their river planning processes, to prioritize environmental education, and to better integrate the voices of community members who already have a relationship with the river. We also ask for agencies to hire freshwater ecologists to lead work on river restoration efforts.

Volunteers monitor BMIs in the Arroyo Seco Con

KEY TAKEAWAYS



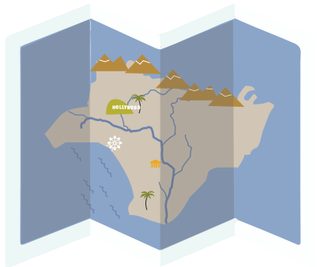
All areas of the LA River need help.

Even the more natural sections we monitored were not in excellent health from an ecological standpoint and most were in a poor ecological condition. This includes our tributaries.



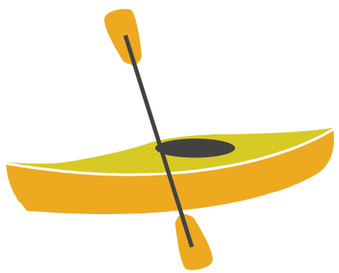
Looks can be deceiving.

Just because a stream section's habitat may look healthy, doesn't mean it is biologically healthy. While the most natural areas were the healthiest, the biological indicators did not significantly differ between soft-bottom sections (which tend to look healthier) and fully concretized areas. However, less concrete means there are more near-term opportunities for meaningful ecological restoration and community access.



We cannot reach a healthy LA River without planning for the watershed as a whole.

What happens upstream affects what happens downstream. River revitalization efforts will only fulfill their promise of a healthier LA River by recognizing these interconnections and expanding beyond the 51-mile mainstem to include the tributaries.



an change a lot even over just a year.

Constant protection, monitoring and vigilance are needed. Community members are an important and under-appreciated source of local river knowledge. Their experiences should drive planning efforts.

RECOMMENDATIONS

PURSUE COMPREHENSIVE PLANNING & GOVERNANCE

- Ensure the entire watershed, including tributaries, is considered in LA River planning efforts and integrated into the LA River Master Plan Update.
- Start a Joint Powers Authority or similar joint management structure to promote coordination between the various agencies and municipalities with LA River oversight.
- Maximize investment in nature-based, multi-benefit stormwater projects in the LA River watershed to reduce flood risk.

UNITE COMMUNITY & ECOLOGY

- Make equitable access to healthy blue space a priority in planning processes, including access to the river and tributaries themselves, not just adjacent areas.
- Include Indigenous communities in all conversations, recognizing the importance of Traditional Ecological Knowledge.
- Design river planning and policy efforts to include community science data, and to encourage environmental education.
- Decriminalize access to the river, including by removing signs that threaten imprisonment and fines. Promote inclusive access with welcoming and multilingual signage.

TREAT THE RIVER AS A RIVER

- Establish biological objectives as regulatory standards for the LA River watershed.
- Treat channelization as an impairment and adopt policies to remove concrete in the river.
- Minimize sediment and vegetation removal in the river and tributaries. Take steps to improve the river ecosystem's resilience, such as by planting and fostering native plant species.
- Hire ecologists, biologists, and hydrologists to lead river planning and implementation.
- Recognize that the river has legal personhood rights as a living entity.
- Fund and implement the ARBOR study restoration projects.

FOSTER CLIMATE RESILIENCY

- Engage frontline communities along the river in planning processes, including related to flood risk.
- Incorporate climate change, equity, and ecology into community stabilization plans that protect the most vulnerable and prevent displacement related to restoration efforts.
- Update flood maps with climate change modeling.
- Consider how an equitable floodplain reclamation program could be executed.
- Limit new development along the river and in the floodplain so that we are not placing people in harm's way.

NOTE FROM THE AUTHOR



This report is both a love letter and a scientific document written for the LA River, our community of volunteers, and the LA River community as a whole. Conducting scientific inquiry is a form of love and respect for our shared environment and for each other in seeking a more just and equitable world, more resilient communities, and a healthier planet.

I write this note during the summer of 2020, a period of unprecedented change. As a global, national, and local community, we are reflecting on the need to address systemic racism, confront inequities in all areas — including in access to healthcare and to a healthy environment — and become a more just society.

The recovery process will be long, and we will need our rivers, streams and oceans every step of the way. This is a key time to remember that our waterways are not mere conveyance structures to move water from A to B, dumping sites to pollute, or destinations to commercialize for a few people's profit. They are living members of our community and necessary spaces for mental health and well-being, and they should feel safe and accessible to every Angeleno.

During the current coronavirus-related shelter in place, I've missed the LA River. I've missed the bright blue dragonflies along Compton Creek, the gently gurgling waters of the Arroyo Seco, the spinning phalarope birds in Long Beach, and the graceful willow trees of the Glendale Narrows. Most of all, I've missed laughing as we wade into these waters, measure the depths and widths, and find insect life that we hadn't expected. And I know that I'm not alone in feeling this way. In visiting our regional waterways, I've seen how important they are to our Angeleno communities as a friend during good times and bad.

At the same time, we have a long way to go with bringing our waterways back to life in socially equitable ways, addressing both ecological and community needs. To do this, we need to be able to access our waterways and understand first-hand how they're part of a larger watershed. In this way, the river and its tributaries teach us that we're all interconnected, too. And I know that the fiercely dedicated and intelligent RAFT community will be fighting for this future.

I hope that in reading this RAFT report, you get a sense for the spirit of the program, the volunteers, and the science, and that you too decide to visit your waterway and fight for all of the life in and surrounding it.

With friendship and gratitude,

Melissa von Mayrhauser

Melissa von Mayrhauser

Watershed Programs Manager
Los Angeles Waterkeeper



VOCABULARY

Bioassessment
This is another way of saying "biological assessment." It means analyzing the organisms living in a waterway to understand its health. Scientists and community scientists measure the number and types of organisms, and then compare those results with pre-established benchmarks of health (State Water Board, 2020). Compared to water quality monitoring, bioassessments provide a more holistic understanding of ecosystem health because the organisms found at a site are a reflection of the cumulative impacts of all of the human influences on the environment.

Benthic Macroinvertebrates (BMIs)
Small but visible animals without backbones that live on the bottom of our waterways. We are usually talking about insects when referring to BMIs, but they can also be worms, mollusks (like snails), and crustaceans (like shrimp) (State Water Board, 2020).

Community Science
The practice of collaborating on scientific fieldwork with community members. We are using this term in place of the term "citizen science," as it is more inclusive of everyone who joins the program (British Science Association, 2020).

Ecosystem
A community of living organisms and the environment (EPA, 2019).

Ecosystem Services
The benefits that people derive from ecosystems, including clean water, flood protection, and cultural connections (EPA, 2019).

Entomology
The scientific study of insects and how they relate to humans, other living organisms, and the environment (Washington State University, 2020).

Food Webs
All of the food chains within an ecosystem, showing how energy and nutrients are transferred as organisms consume each other (National Geographic, 2012).

Organism
Something that is living, such as an animal, plant, or single-celled life form (Lexico, 2020).

Refer
A benchmark that scientists expect when there is minimal human influence on an environment (Rehn et al, 2015).

Ecological Restora
Taking steps to help a degraded ecosystem recover. Often incorrectly used interchangeably with the term "revitalization," which is more socio-economically focused.

Riparian
The land along waterways, which includes stream banks and floodplains (NRCS, 1996).

Taxon (Plural: Taxa)
A term used to classify organisms (for instance: kingdom, phylum, class, order, family, genus, or species) (Lexico, 2020).

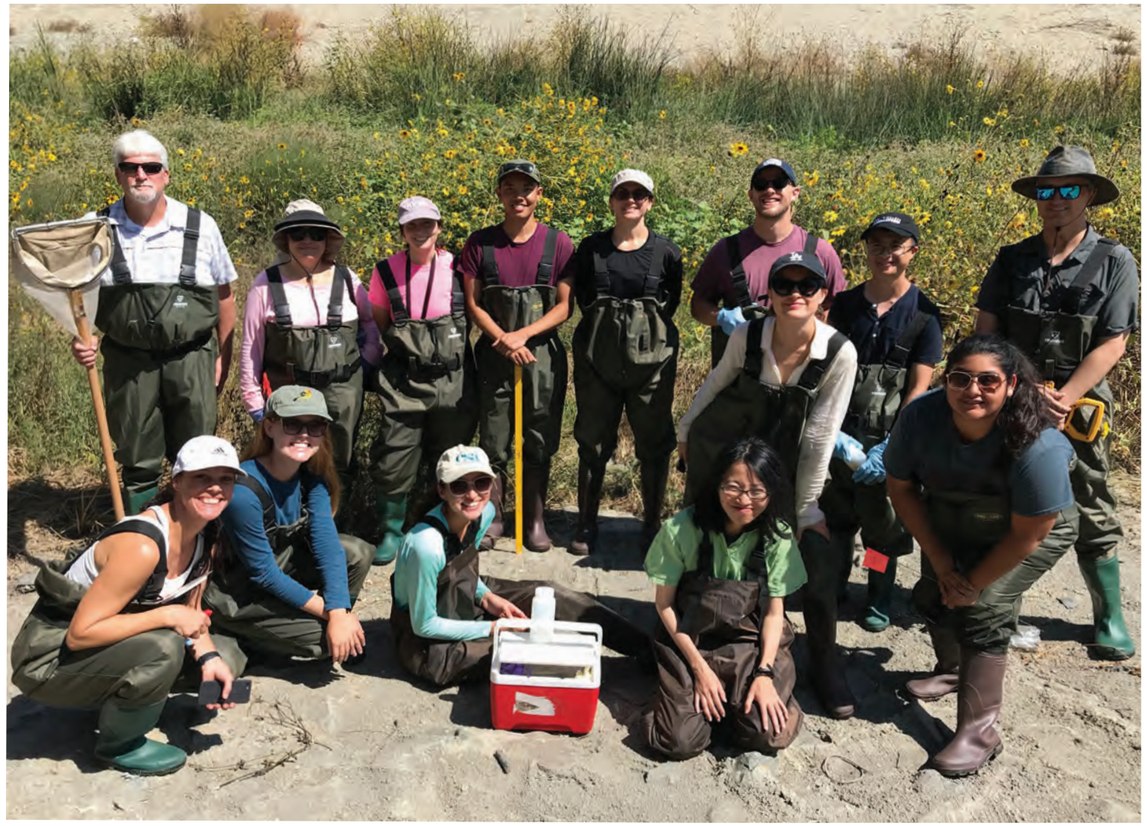
Transect
A line used to measure a study area and understand a related research question (BBC, 2020).

Tributary
A freshwater waterway that flows into another body of water (National Geographic, 2012).

Watershed
An area of land where all of the water that falls on it or flows through it moves to a common outlet point (such as a bay, lake, or ocean) (National Geographic, 2019).

PART 1: INTRODUCTION

Credit: William Durland



Los Angeles Waterkeeper's Mission Statement

Los Angeles Waterkeeper (LAW) was founded in 1993. Our mission is to safeguard LA's inland and coastal waters by enforcing laws and empowering communities. LAW is a member of the California Coastkeeper Alliance and Waterkeeper Alliance, the world's fastest growing environmental movement. Alongside more than 350 fellow Waterkeeper organizations, we advocate for swimmable, drinkable, and fishable waterways worldwide.

About the River Assessment Fieldwork Team (RAFT)

LA Waterkeeper's River Assessment Fieldwork Team (RAFT) program provides community members with opportunities to learn first-hand about the health of the Los Angeles River watershed through ecological analysis. Together, we collect critical baseline data and gain tools to advocate for a healthier LA River watershed. We started this program in response to ongoing river revitalization efforts that have failed to prioritize the river's ecology and the community's connection with it.

Origins of the RAFT Program

Since LAW's formation, we have worked with diverse communities throughout LA County to monitor, protect, and restore our inland and coastal waterways. We have engaged thousands of Angelenos to monitor the health of local waterways, understand sources of pollution, restore kelp forests, and monitor Marine Protected Areas (MPAs). Marine Programs Director Dr. Michael Quill's development and leadership of the MPA Watch Boat-Based Survey Program set the stage for the development of RAFT. Dr. Quill has pioneered work on experiential, hands-on learning in our waters as a way of addressing nature-deficit disorder.

The RAFT program started as part of conversations between Stephen Mejia-Carranza, former Policy and Advocacy Manager from Friends of the LA River (FoLAR) and Melissa von Mayrhauser, Watershed Programs Manager at LAW. We were attending meetings related to the LA River revitalization, and we felt discouraged by the lack of ecological and community input. Stephen had already been working on the LA River for several years, and he recognized the need for connecting community members with hands-on river science.

We felt that in order for people to engage with the revitalization process meaningfully, it was critical to provide opportunities for people to learn about the river first-hand and gain watershed literacy. We also viewed community and environmental health as one and the same and wanted to provide an opportunity to connect the two in the form of a program that takes people not just next to the river — but also into it.

We started a pilot program in 2017 as a joint LA Waterkeeper – FoLAR program. LA Waterkeeper then launched the program independently in 2018 with Stephen's continued support and with a focus on bioassessment. At the point of this report's publication, we have completed bioassessment monitoring for two seasons: 2018 and 2019. Our 2020 monitoring season was canceled due to the coronavirus crisis.





Figure 1: Map of the Los Angeles River watershed

The 51-mile LA River is part of an 834-square-mile watershed ws from the San Gabriel, Santa Susana and Santa Monica Mountains to the San Pedro Bay (Sanchez et al, 2018). The river and its tribut ogether not only doz cultures and c eat meaning to genera of people, including the Tongva, Tataviam, and Kizh Na or whom it is an ancestral river.



Los Angeles River Watershed

Before the river was channelized, it was a meandering stream lined with willows and c onwoods and hos teelhead trout, frogs, and mountain lions (Gumprecht. 2001). Indeed, the river was the reason for the founding of the City of Los Angeles (The River Project, 2020).

Los Angeles is in a Mediterranean climate region with distinct dry and wet seasons. The river thus has a flashy hydrology, going from low flows during the dry season to high flows during the wet season very quickly. Throughout history, this meant that the river at times left its banks and even switched between flowing into the Santa Monica Bay and San Pedro Bay (Gumprecht, 2001).

The river has always flooded, but as people developed permanent structures in the floodplain, the river's naturally variable hydrology became more dangerous to human life. After a series of floods in the early 20th Century, the LA County Flood Control District formed and partnered with the Army Corps of Engineers to concretize the majority of the river (Gumprecht, 2001). While this has provided general flood protection, it also led to many forms of social and ecological harm. Meanwhile, discriminatory redlining practices led to low-income people and communities of color living in the floodplain and near polluting industries because they had no other housing options. With the increased likelihood of more extreme storms and higher flooding risks, these communities are now at the frontlines of climate change-related dangers, yet they are often left out of decision-making processes.

People today experience a river that is largely inaccessible and concretized, although some more natural sections of the river remain. Signs posted at many access points tell residents that entering the river is illegal and will lead to fines or imprisonment. Many Angelenos, especially from low-income communities and communities of color, face the environmental injustice of having less access to healthy green and blue spaces while facing greater burdens from environmental disasters such as flooding.



LA River Revitaliza Processes

Several environmental and community leaders have been leading the charge for several decades to bring the river back to life and reconnect Angelenos with it, including Dorothy Green, Lewis MacAdams, and Melanie Winter, to name a few. Dorothy founded the non-profit Heal the Bay and spearheaded the ahead-of-its-time Unpave LA movement, recognizing the need to deconcretize our communities and rivers. Lewis founded FoLAR and led the charge to reconnect communities to the river. Melanie founded The River Project and has demonstrated that taking a watershed-wide approach to river planning is critical to restoring ecological function, improving Angelenos' quality of life, and becoming a climate resilient region. Their leadership has been pivotal to rethinking the dominant engineering paradigm to river management in LA. Today there are many government-led planning processes that seek to revitalize the LA River and Angelenos' relationship with it. These processes include, but are not limited to, the City of LA's LA River Revitalization Master Plan, the County LA River Master Plan Update, the Lower LA River Revitalization Plan, and the Upper LA River & Tributaries Revitalization Plan.

These plans offer new amenities and designs for river-adjacent areas and sometimes for the river itself, leading to concerns about the relationship between revitalization, gentrification, displacement and growing inequities. Meanwhile, the plans remain fragmented and superficial, with more focus on design than on ecology or equity. None of the plans take a watershed approach, which would involve studying and planning with all of the ecology, hydrology and communities of the watershed in mind. This is particularly troubling given that the best way to prepare for climate change-related impacts like flooding is to take into account watershed health and upstream/downstream connections.

The current and recent planning efforts speak to a desire from many Angelenos to restore their relationship with a healthier river, become more resilient to climate impacts, and create equitable economic opportunities for locals. There is only one LA River, and it is a unique freshwater ecosystem. LAW and our partners believe that we need to move away from treating it as a flood control channel, and fully recognize it once again as a river. We envision river planning that prioritizes both ecological health and social equity, recognizing that the river and its watershed hold many of the keys to climate resiliency.

There is only one LA River, and it is a unique freshwater ecosystem. We need to move away from trea control channel, and fully recognize it once again as a river.

Through working on RAFT, we are trying to bring this vision into reality. It is important that we monitor the LA River and its tributaries in order to understand how they're changing, call for improvements in planning processes, and connect people with our waterways. After all, there's a certain joy that comes from finding life in the most unexpected places — even in a river covered in concrete.

Why Study Benthic Macroinvertebrates with Community Scien ts?

We study benthic macroinvertebrates (BMIs) because they tell us an important story about the health of our streams.

We study benthic macroinvertebrates (BMIs) — animals without backbones that live on the bottom of our waterways — because they tell us an important story about the health of our streams (EPA, 2016). BMIs are primarily insects, but they also include non-insects like mollusks (such as snails), crustaceans (such as shrimp), and aquatic worms. Unlike many other animals, they are relatively stationary and have predictable responses to pollution and other disturbances (EPA, 2016). They are also found in the majority of streams.

The more diverse, e, and abundant our insect popula e, the healthier we can expect our ecosystems to be.

Studying BMIs is a way for us to understand the health of our streams with our fellow community members. BMIs are typically small, but still big enough for us to see with the naked eye. We know that insects are important sources of prey in our ecosystems and food webs. The more diverse, pollution-sensitive, and abundant our insect populations are, the healthier we can expect our ecosystems to be. Some groups that we study, such as caddisflies, stoneflies, and mayflies, require clean, oxygen-rich water and generally disappear from polluted waterways. On the other hand, we are more likely to find tolerant species, such as midges, leeches, and air-breathing snails in polluted waters.

Across the globe, scientists are recognizing a trend that insect populations are collapsing (Hoff, 2018). This is a serious problem because we rely on insects for many ecosystem services, including crop pollination, medicine production, and as a food source to many other species. Insect populations are declining due to factors like habitat loss, water pollution, and climate change. This is happening both on land and in our waterways (Sanchez et al, 2018). For the same reasons that insects are useful in understanding environmental pressures (they stay in one place and have varying degrees of pollution sensitivity), they are also often dying off at rates faster than larger animals.

We need all the help that we can get in documenting the state of our insect populations. In fact, we need our whole community. That is why we train and study insects with our team of volunteers — our community scientists. We purposefully refer to “community science” instead of “citizen science” because we want to use a term that is inclusive of everyone who joins our program.

History of Bioassessment & Importance es

Bioassessments, which analyze the organisms living in a waterway to understand that waterway’s health, have been carried out in Southern California for several decades. The U.S. EPA formalized a “Rapid Bioassessment Protocol” in 1989, and the California Department of Fish and Wildlife produced its own California Stream Bioassessment Procedure (CSBP) in 1996 (Harrington, 2017). Our partner organizations, including the Council for Watershed Health, Heal the Bay, the Southern California Coastal Water Resource Project (SCCWRP), and the Stormwater Monitoring Coalition, have been conducting macroinvertebrate bioassessments in LA County’s waterways for a few decades, which has given us critical information for understanding their biological health. Our intention is to complement their efforts by collecting additional data and providing opportunities for Angelenos to participate directly in this data collection. More information about how our results compare with other organizations’ results can be found in the Overall Findings section.

Notwithstanding this history of bioassessment, the state of California still lacks biological objectives (bio-objectives), which are criteria for determining the biological integrity of our streams. This is despite the fact that the Clean Water Act of 1972 stated the need to “restore and maintain the chemical, physical, and biological integrity of the Nation’s waters” (33 U.S.C. §1251 et seq.). Presently, the majority of freshwater monitoring and policy relates to the chemical state of our waterways. While monitoring water quality is important, focusing solely on water chemistry gives us a limited snapshot of ecosystem health. It is not good enough to have clean water flowing through a highly modified stream channel. Our concretized streams are still a vital part of our watersheds and should be treated as such. We need to protect the biological health of all of our waterways, and an important way to do this is through continuing and improving upon our legacy of bioassessment.

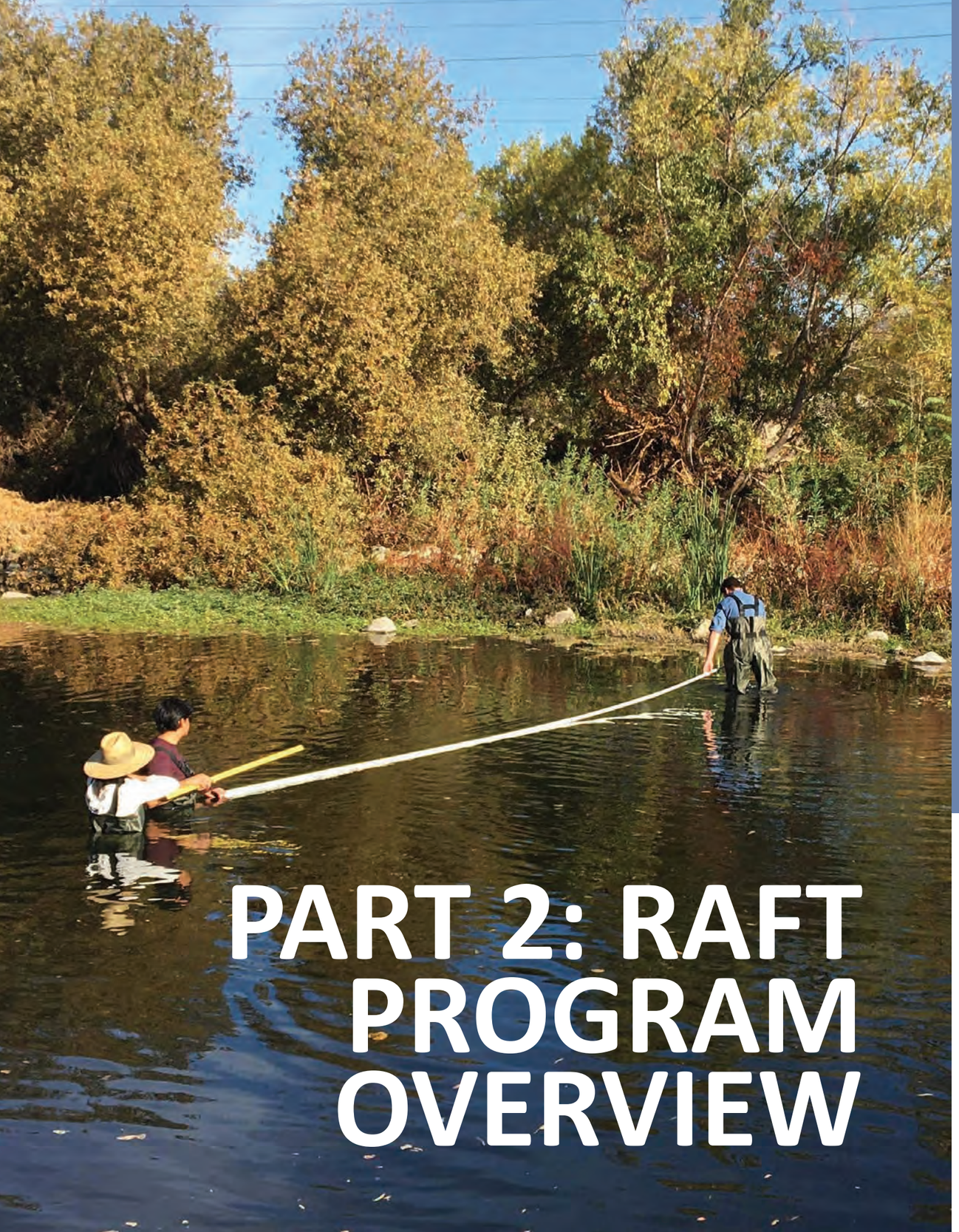
The state of California s s bio- es, which are criteria for determining the biological integrity of our streams.

Report Purpose

This report presents our RAFT program and our data from the 2018 and 2019 monitoring seasons, and shares information that is relevant for ongoing policy efforts around the future of the river.

We Are Seeking To Answer The Following Ques

What do our scien olunteers’ experiences tell us about the ecological integrity of the LA River watershed, and what are the policy implica xperiences for future watershed planning and monitoring?



PART 2: RAFT PROGRAM OVERVIEW

Goals of the RAFT Program

Connect community member o understand the LA River through scien y and increase our shared environmental literacy.

Collect baseline data that tell us about the ecological c er and its tributaries and complement bioassessment e orts by other agencies and non-pr

Advocate for maximizing the ecological integrity of the LA River watershed for the bene c

Each year, RAFT volunteers monitor the ecological integrity of eight segments of the Los Angeles River and its tributaries. This experience and the data collected contribute to our understanding of the river, drive our advocacy, and increase our shared environmental literacy. All volunteers participate in a training session and then meet on Saturday mornings from May-October to implement our methodology. We sample during LA's dry season when flow rates are relatively stable and we do not have the scouring effect of winter storm flows. We emphasize nurturing a core group of trained volunteers, rather than engaging people only once.

Descrip oring Sites

We monitored a range of locations throughout the LA River watershed including tributaries, mainstem-tributary confluence points, and concrete-lined channels. We separated the locations into three categories based on the degree of physical alteration. We chose our targeted locations based on where there was community interest in monitoring, where we could safely access the stream, and/or where there was a connection to a proposed restoration or revitalization project. We also wanted to study a diverse range of freshwater habitats. There are very few sites along the mainstem of the river that could fit into the “natural” category except for some sections of the Sepulveda Basin.



Figure 2: A map of the LA River water es indicated by numbers.

Natural

Sections of the river and tributaries with no concrete bottom or levees.



Big Tujunga Creek
2018 & 2019



Arroyo Seco Upstream
2018 & 2019

omed

Sections of the river and tributaries with a sediment bottom and concrete levees.



Bull Creek, Sepulveda Basin
2018 & 2019



Glendale Narrows
2018 & 2019



Compton Creek Con
2019

Concrete-Lined

Sections of the river and tributaries with a concrete bottom and concrete levees.



Arroyo Seco Con
2018 & 2019



Maywood
2018 & 2019



Rio Hondo Con
2018



Long Beach
2018 & 2019

RAFT Sites Data Table

SITE NAME & COORDINATE	NATURAL	SOFT BOTTOMED	CONCRETE LINED	MAINSTEM	TRIBUTARY
Big Tujunga Creek 34.2959, -118.2831	X				X
Arroyo Seco Upstream 34.2029, -118.1664	X				X
Bull Creek, Sepulveda Basin 34.1787, -118.4975		X			X
Glendale Narrows 34.1015, -118.2423		X		X	
Compton Creek Con 33.8424, -118.2049		X			X
Arroyo Seco Con 34.0479, -118.1349			X		X
Maywood 33.9865, -118.1717			X	X	
Rio Hondo Con 33.9298, -118.1759			X	X	
Long Beach 33.8059, -118.2055			X	X	

Figure 3: Data table of RAFT sites.



Sampling Methodology

Quality Assurance & Trainings

LAW's Watershed Programs Manager, Melissa von Mayrhauser, served as the project manager and quality assurance officer. She developed and led all RAFT trainings after completing the Water Boards Training Academy's College of Bioassessment's California Rapid Bioassessment Protocol (CRBP) courses. All volunteers participated in a half-day training led by von Mayrhauser to learn the bioassessment protocol before joining for RAFT fieldwork days. LAW's training included a class session and hands-on field practice at the river. More than 50% of our volunteers were recurring and thus were able to implement the methodology multiple times at a variety of sites throughout the watershed. LAW staff relied on our Quality Assurance Project Plan (QAPP) and Dr. Jim Harrington for scientific guidance. von Mayrhauser also oversaw all RAFT fieldwork days and the proper calibration of equipment. The Sustainable Land Stewardship International Institute provided taxonomic services for LAW, identifying the insects to the family and genus levels while following their own quality assurance protocols.

California Rapid Bioassessment Protocol (CRBP)

We relied on the CRBP as the foundation of our field methodology. Dr. Harrington, former environmental scientist at the California Department of Fish and Wildlife, developed the CRBP (Harrington, 2017) based on EPA Rapid Bioassessment protocols (Barbour et al, 1999) as a more cost-effective, time-efficient, and accessible version of the SWAMP Bioassessment Protocol (SBP) (Ode et al, 2016). Data from the SBP and CRBP are consistent with national EPA standards, but the protocols are also customized for the state's needs. The CRBP is a useful tool for understanding stream biology and physical habitat health as a complement to the SBP methodology. The CRBP can also help to identify stream segments where a deeper analysis would be beneficial. Dr. Harrington teaches this protocol as part of the CA Department of Fish and Wildlife (CDFW) and State Water Resources Control Board's College of Bioassessment. The CRBP methodology includes measuring stream widths and depths, collecting benthic macroinvertebrates, recording flow habitats, and monitoring the physical habitat. LA Waterkeeper amended some parts of the methodology to suit our programmatic needs. For instance, we only monitored widths and depths at primary transects, rather than also monitoring in between transects (see Figure 5). We also conducted additional water quality monitoring beyond the specifications of the protocol in order to have a more comprehensive picture of water quality within our sites.

Protocol Overview

At each of our field sites, we started at the downstream end of our study area (Figure 6). It was important to start at the most downstream point and then move upstream to avoid disturbing the habitat before we monitored it. We placed an orange cone for transect A, marking our first study location. We monitored water quality at transect A, collected BMIs in sample bottles, recorded flow levels, and measured widths and depths of the stream. Then we measured 15m upstream to our next point, transect B, and repeated this same protocol. We did this until we reached transect K, meaning that we had surveyed 150m of stream habitat. We monitored water quality at transects A, F and K. After we finished monitoring 150m of stream, we completed a physical habitat assessment field form, evaluating qualities such as sediment deposition and vegetative cover. Back at the LAW lab, we drained the BMI samples of water and added ethanol to preserve them until we could send them to the taxonomic analysis lab. See Figure 4 for information about materials needed and Figure 5 for a graphical representation of our methodology.

Materials Needed

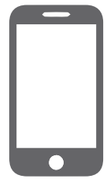


Figure 4: Materials needed for RAFT.

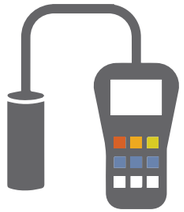
RAFT Methodology



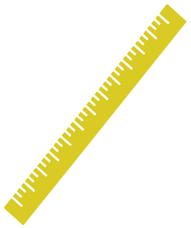
1 Start at the most downstream point. Measure 150 m upstream and put cones at every 15m mark. These are transects A-K.



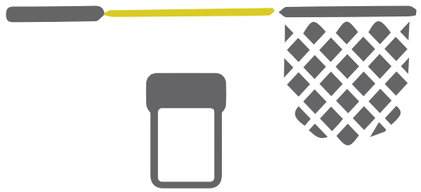
2 Take photos from transects A (looking upstream), F (upstream and downstream) and K (downstream).



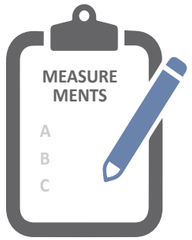
3 Measure water quality at transect A, F and K.



4 Measure widths and depths at each transect.



5 Collect BMIs at each transect.



6 Ensure all measurements have been recorded.



7 Fill out the physical habitat assessment form.



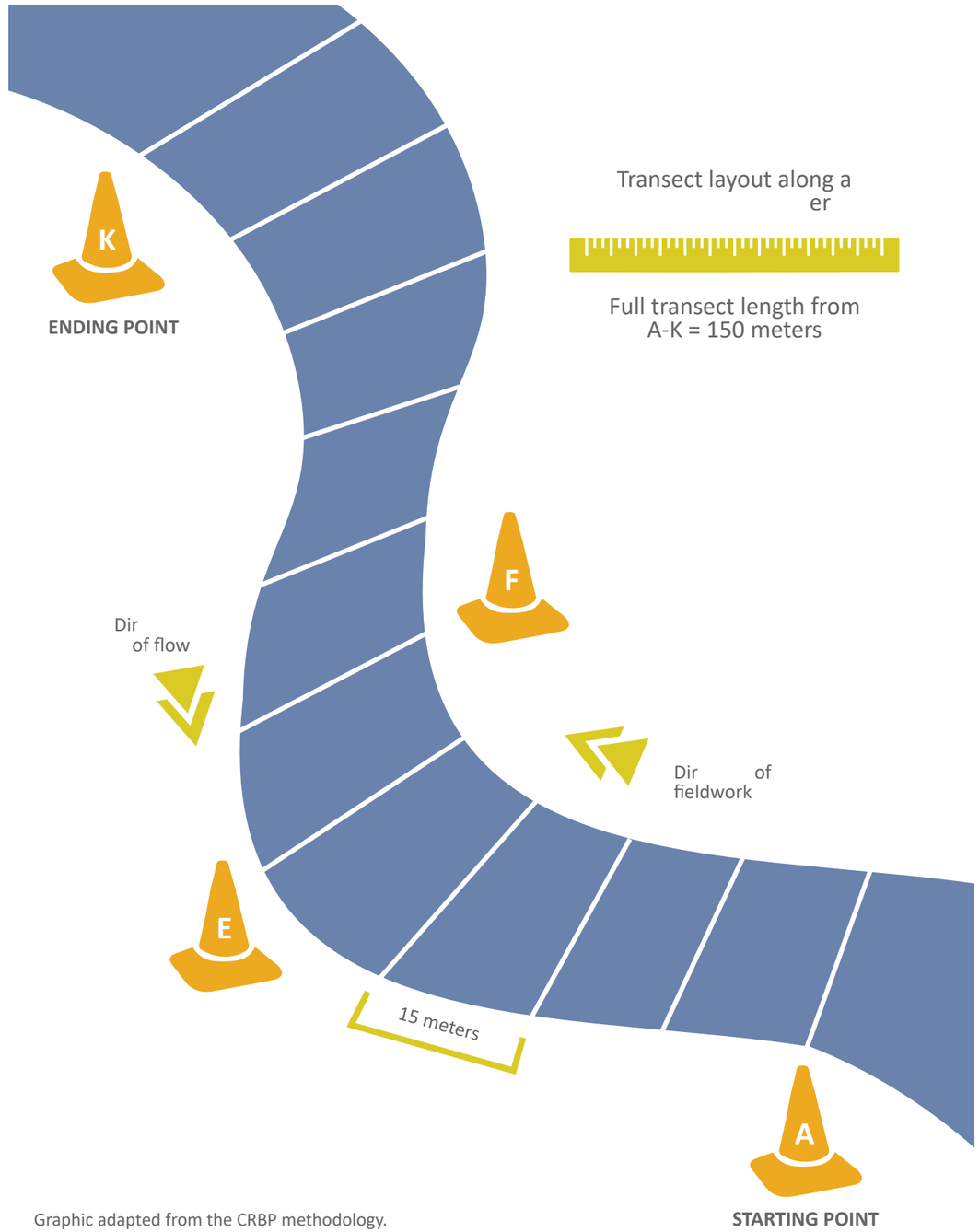
5 Drain water and ethanol into the BMI sample.



6 Drain ethanol and send the BMIs to the lab.

Figure 5: RAFT methodology.

RAFT Transect Layout



Graphic adapted from the CRBP methodology.

Figure 6: RAFT transect layout.

Data Analysis Methods

Biology

We collected BMIs at each site. This bioassessment provided an opportunity to measure stream condition in a more integrated way than just taking water quality readings. We used our BMIs to generate Family Level Index (FLI) scores (Harrington, 2017). The FLI is the most important ecological metric that we consider because it provides us with an overall signal of the health of each stream segment (Harrington, 2017). This score generally ranges from 0-1.0, but can exceed 1 when the site surpasses expectations (Beck and Mazor, 2020). A score of zero indicates a high level of degradation, and a score of 1.0 indicates few or no impacts (all organisms expected at a site are present in the expected proportions). Values lower than 1.0 indicate that some alteration has occurred from a healthy reference site. The FLI is a sister index to the more intensive California Stream Condition Index (CSCI), which has established thresholds for whether streams are meeting management goals (Rehn et al, 2015). Although threshold values for the FLI haven't yet been established, we interpreted our results using CSCI thresholds, as seen below, due to similarities between the two protocols. We also assigned the terms "healthy," "good," "impacted," and "poor" to the various CSCI score categories for ease of interpretation. Further analysis utilizing CSCI scores could offer additional insight into the health of the river.

CSCI Score Key:

>1.00 = Better Conditions than Expected
>.92 - 1.00 = Likely Intact Condition (Healthy)
>.80 to .91 = Possibly Altered Condition (Good)
>.63 to .79 = Very Likely Altered (Impacted)
0 to .62 = Very Likely Altered Condition (Poor)

We can also understand our biological findings by looking at other indicators, such as their taxa richness, % taxa types found, % functional feeding groups, % tolerance values, and abundance. We calculate **abundance** as the total number of organisms in a sample. A low abundance can indicate an ecological disturbance has occurred. The **taxa richness** is the overall number of unique taxa (family groups) found. Higher taxa richness suggests better ecological health. The **taxa evenness** is the distribution of abundance across taxa, calculated by dividing the Shannon's Diversity Index by the natural logarithm of species richness. Evenness scores range from 0 to 1. A score of 0 indicates no evenness and a score of 1 indicates full evenness and higher species diversity. The % **taxa types** are the percentage of non-insects, EPT insects (mayflies, stoneflies, and caddisflies), and other insects out of the total number of organisms in each sample. A greater proportion of EPT insects tends to indicate better stream health while more non-insects tend to indicate worsened stream health. The **% functional feeding groups** gives an indication of food availability. Calculating these percentages involves dividing the number of organisms who share a particular feeding approach by the total number of organisms. Finally, we calculate the % tolerance value by dividing the number of organisms with certain tolerance values by the overall number of organisms. More pollution intolerant species generally indicates a healthier stream habitat.

Water Quality

We conducted water quality monitoring, measuring temperature, pH, dissolved oxygen, turbidity and conductivity. These readings helped us to interpret our FLI scores and understand more about the conditions in the watershed. We particularly focused on temperature and the maximum temperature levels that many BMIs can endure — approximately 20.5°C (Richards et al, 2018). We analyzed results for temperature based on whether they were above or below this threshold.

<20.5°C = Acceptable
>20.5°C = Poor

Physical Habitat (Phab)

RAFT volunteers completed the US EPA's Rapid Bioassessment Protocol, a 10-question Physical Habitat (Phab) assessment, after finishing the rest of the RAFT methodology at each site. The assessment provides a qualitative picture of the stream habitat's health, looking at factors such as stream bank stability, amount of riparian vegetation, and the amount of sediment deposited. The thresholds were based on EPA-determined levels (Barbour et al, 1999). The thresholds were based on EPA-determined levels, and we added the terms "healthy," "good," "impacted," and "poor" to correspond with our other labels. The closer the site was to 200, the higher the quality of habitat.

151-200= Optimal Condition (Healthy)
101-150 = Suboptimal Condition (Good)
51-100 = Marginal Condition (Impacted)
0-50 = Poor Condition (Poor)

Experien

We made observations about our experiences at each site, including challenges of access, recreational uses, and what we would like to see for its future. These experiences of wading into the river inform our hopes for the river's future and are included in this report in the form of quotes.



PART 3: OVERALL FINDINGS

Credit: William Durland

Data Take-Aways

The more natural str e healthiest, but need support.

We cannot assume that more natural sites are ecologically healthy just because they do not have concret oms or levees.

Our upper watershed sites clearly had the best signals of ecological health, although even these sites did not receive Family Level Index (FLI) scores indicating healthy biological communities. The results show that we cannot assume that more natural sites are ecologically healthy just because they do not have concrete bottoms or levees, and they need to be monitored regularly. Restoration interventions in the headwaters of these sub-watersheds would not only benefit these sites, but all downstream sites. Planning processes should recognize that these sites already hold importance to many communities and should consider how more people can access and experience our healthiest sites.

om str e struggling and should not be taken for granted.

The presence of a vegetated habitat does not always translate into healthier biological c improved water quality.

Our soft-bottom sections of the LA River did not score highly with their FLI or Phab scores and often had comparable or worse ecological metrics to concrete-lined stream reaches. We cannot take them for granted as "healthy" just because they do not have a concrete bottom and some vegetation. The presence of a vegetated habitat does not always translate into healthier biological communities or improved water quality, especially because upstream pollution, artificially enhanced flow levels, a lack of floodplain riparian connection, and continued sediment and vegetation removal continue to burden these sites. However, the fact that they have soft bottoms means that there are more opportunities to rehabilitate them currently, and communities already have a relationship with them (or there are opportunities to do so). We need more of a focus on tributaries in planning processes, because many of our soft-bottom stream sections are not along the river mainstem, and we need to rethink our sediment removal practices. We can bring our soft-bottom sites back to health with watershed-level restoration interventions.

Concrete-lined are not dead zones ecologically, but unsurprisingly have the farthest to go.

Rather than turning our backs on our concrete-lined e should consider them as key parts of our strategy for the river and LA's future.

Our concrete-lined sites had poor FLI, physical habitat scores (Phab) and water quality results. They often had an abundance of BMIs — just primarily pollution tolerant ones from a few taxa. These sections should still be treated as part of watershed-wide ecosystem planning for the river. We need planning that prepares for the strategic removal of concrete over time, rethinks sediment removal in these sections, and prioritizes access to the river itself. Rather than turning our backs on our concrete-lined sections, we should consider them as key parts of our strategy for the river and LA's future.

Explora ators

In this section, we will explore overarching results from our biology, chemistry and physical habitat indicators that allow us to delve deeper into the meaning of our findings within a watershed context. In all of our graphs, we move from the upper to the lower LA River watershed to illustrate change as it relates to moving downstream from the headwaters toward the estuary. We monitored all of our sites in 2018 and 2019 except for the Rio Hondo Confluence (only 2018) and Compton Creek Confluence (only 2019).

Data Snapshot

RAFT Site	FLI Score	Abundance	Taxa Richness	Taxa Evenness	Phab Score	Water Temp
Big Tujunga Creek	.81 (2018) .79 (2019)	240 (2018) 190 (2019)	22 (2018) 25 (2019)	.649 (2018) .698 (2019)	159 (2018) 112 (2019)	17.7 C (2018) 17.2 C (2019)
Arroyo Seco Upstream	.74 (2018) .74 (2019)	594 (2018) 580 (2019)	21 (2018) 22 (2019)	.318 (2018) .407 (2019)	136 (2018) 154 (2019)	14.6 C (2018) 16.5 C (2019)
Bull Creek, Sepulveda Basin	.49 (2018) .31 (2019)	310 (2018) 622 (2019)	13 (2018) 9 (2019)	.422 (2018) .264 (2019)	113 (2018) 105 (2019)	25.7 C (2018) 24.1 C (2019)
Glendale Narrows	.46 (2018) .48 (2019)	322 (2018) 607 (2019)	10 (2018) 12 (2019)	.638 (2018) .625 (2019)	121 (2018) 113 (2019)	22.3 C (2018) 18.1 (2019)
Arroyo Seco Con	.54 (2018) .50 (2019)	486 (2018) 242 (2019)	13 (2018) 12 (2019)	.691 (2018) .612 (2019)	72 (2018) 57 (2019)	24.2 C (2018) 16.6 C (2019)
Maywood	.29 (2018) .52 (2019)	624 (2018) 605 (2019)	7 (2018) 13 (2019)	.42 (2018) .261 (2019)	81 (2018) 46 (2019)	29.4 C (2018) 22.7 C (2019)
Rio Hondo Con (only sampled in 2018)	.44 (2018)	504 (2018)	11 (2018)	.391 (2018)	57 (2018)	32.4 C (2018)
Compton Creek Con (only sampled in 2019)	.26 (2019)	23 (2019)	6 (2019)	.78 (2019)	104 (2019)	21 C (2019)
Long Beach	.31 (2018) .42 (2019)	635 (2018) 609 (2019)	7 (2018) 11 (2019)	.345 (2018) .347 (2019)	43 (2018) 106 (2019)	20.3 C (2018) 23.4 C (2019)

NATURAL | SOFT BOTTOMED | CONCRETE LINED

Figure 7: A data snapshot of results across the RAFT sites.

Biology Findings

Family Level Index

Highest FLI 2018:
Big Tujunga Creek

Highest FLI 2019:
Big Tujunga Creek

Lowest FLI 2018:
Maywood

Lowest FLI 2019:
Compton Creek
Con

Only one of our sites received an FLI score above 0.79 indicating good ecological condition — Big Tujunga Creek, and only in 2018. More than 75% of our sites were in the poor category. In general, we found that as we moved from the upper to the lower watershed, the FLI scores decreased (Figure 8). The upper watershed natural field sites clearly were the healthiest, although they were still primarily in the "impacted" category. However, all of our soft-bottom sections and concretized sections had scores that indicated a high level of degradation. In some cases, the soft-bottom field sites scored lower than concrete-lined sites. The largest changes in FLI scores that we observed between 2018 and 2019 were a reduction in the score at Bull Creek, Sepulveda Basin and an improvement in the score in Maywood, although these scores remained within the "poor" category.

We evaluated our FLI scores by comparing them with the following CSCI thresholds:

HEALTHY	GOOD	IMPACTED	POOR
.92 - 1.00	.79 - .92	.63 - .79	0 - .63
BMI Likely Intact	BMI Possibly Altered	BMI Likely Altered	BMI Very Likely Altered

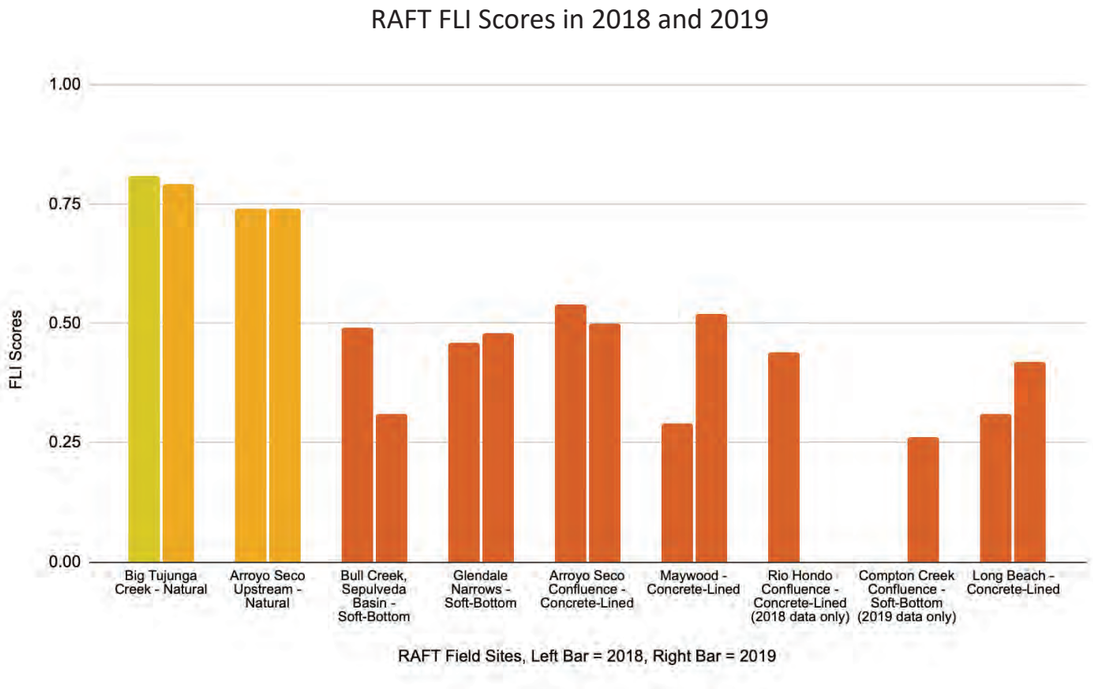


Figure 8: RAFT FLI scores from 2018 and 2019.



Abundance

Highest Abundance 2018:
Long Beach

Highest Abundance 2019:
Bull Creek, Sepulveda Basin

Lowest Abundance 2018:
Big Tujunga Creek

Lowest Abundance 2019:
Compton Creek Con

Abundance tells us about the number of organisms that we found in our samples. Since we use the same sampling protocol at each site, the quantity of organisms in our sample offers another way of understanding stream health. The FLI protocol recommends a sample size of 500 individuals (Harrington, 2017). We frequently did not find this quantity of BMIs in our samples (Figure 9). SCCWRP recommends a sample size of at least 250 organisms for conducting a standardized SWAMP bioassessment (Beck and Mazor, 2020). We collected fewer than 250 organisms in Big Tujunga Creek in both 2018 and 2019 and at the Arroyo Seco Confluence in 2019. At the Compton Creek Confluence in 2019 we only found 23 organisms. FLI values should be interpreted cautiously with a low abundance of organisms, particularly in the case of Compton Creek. While we found high abundances at several of our sites, including concrete-lined channel sections, these were often low-quality samples in other ways, such as lacking in diversity. In the future, it would be worthwhile to compare our abundances with those from other monitoring efforts and study whether low abundances could be the result of aquatic disturbances or the timing of our sampling efforts. Especially in the case of Compton Creek, it would be helpful to explore whether the low abundance is the result of industrial pollution run-off. For a fuller discussion of why we might have found low abundances, please see the "Reflections on Our Experiences" section.

RAFT BMI Abundances in 2018 and 2019

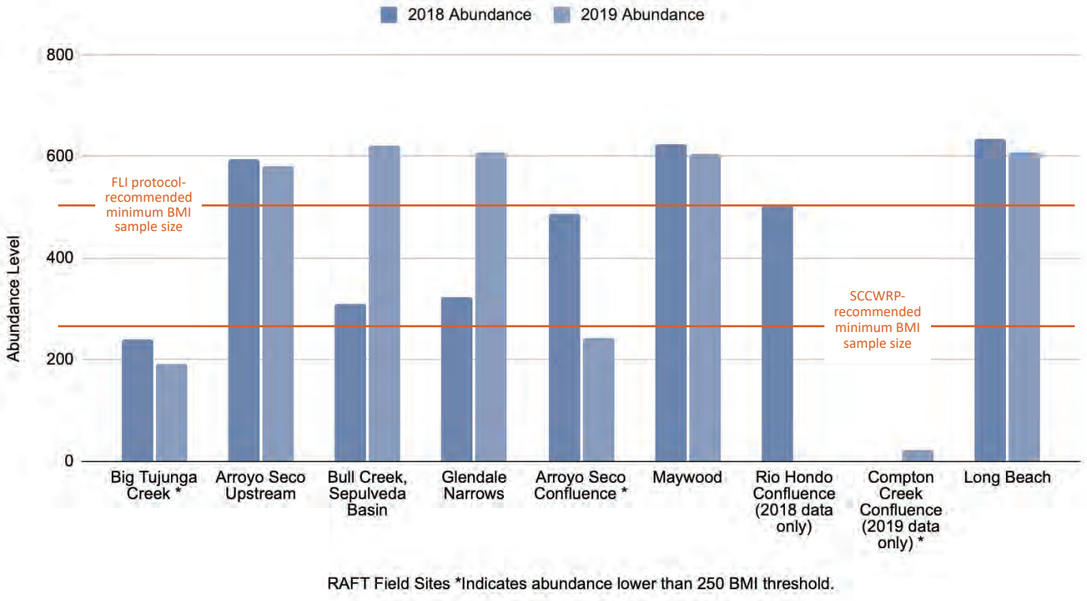


Figure 9: Abundance of BMIs found at RAFT sites in 2018 and 2019.



Taxa Richness

This indicator is an important signal about the diversity of BMIs found in our sampling results. Higher richness often correlates with greater stream health. Richness often decreases as aquatic disturbances (such as pollution) increase, which is what we generally observed across our sites (Figure 10). We observed the highest taxa richness furthest up in the watershed at the natural sites. Richness scores were lower at our soft-bottom and concrete-lined sites. We found slightly higher taxonomic richness in 2019 than in 2018 at over 70% of our sites that we monitored both years. The Compton Creek Confluence stood out as a site with the lowest taxa richness. Even though it's a soft-bottom site, it scored worse than our concrete-lined sites.

Highest Richness 2018:
Big Tujunga Creek

Highest Richness 2019:
Big Tujunga Creek

Lowest Richness 2018:
Maywood

Lowest Richness 2019:
Compton Creek Con

RAFT Taxa Richness in 2018 and 2019

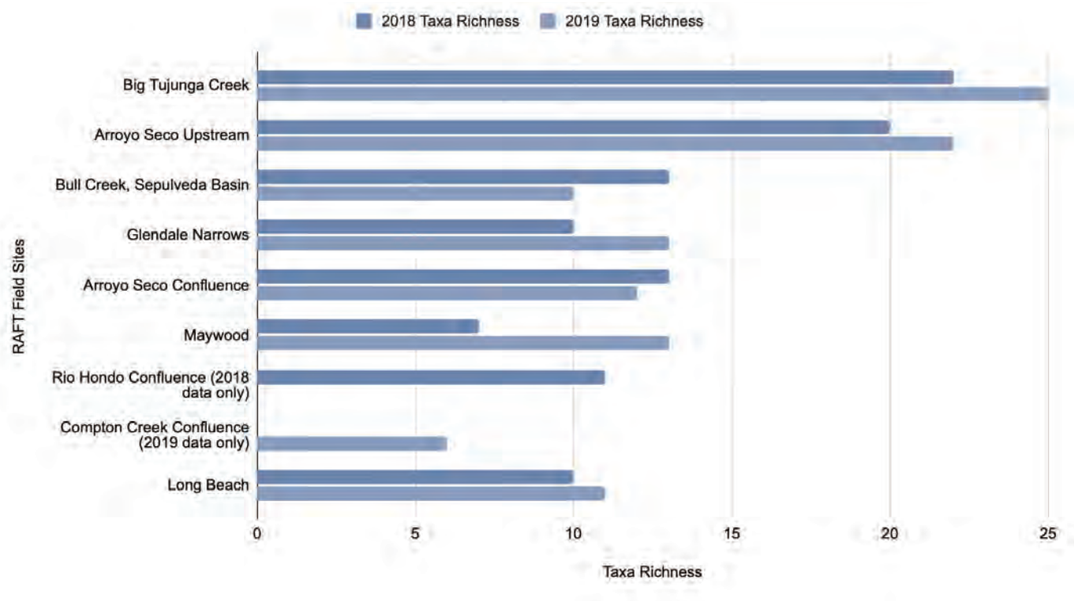


Figure 10: RAFT taxa richness in 2018 and 2019.



Taxa Evenness

Highest Evenness 2018:
Arroyo Seco Con

Highest Evenness 2019:
Compton Creek Con

Lowest Evenness 2018:
Arroyo Seco Upstream

Lowest Evenness 2019:
Maywood

This indicator tells us about how evenly abundances of taxa are distributed in a sample. Evenness scores closest to 1 indicate the highest balance of taxa across the sample. A low evenness indicates that one or a few taxa are dominating a sample. More than 50% of our samples had evenness levels lower than 0.5, indicating that a few taxa dominate many of our samples from the upper to the lower watershed (Figure 11). Figure 15 includes a list of the most abundant BMIs from our samples. Two samples can have the same taxa richness, but a different taxa evenness. For instance, Bull Creek, Sepulveda Basin and the Arroyo Seco Confluence had the same taxa richness scores in 2018, but the Arroyo Seco Confluence's taxa evenness was higher, indicating greater overall biodiversity.

RAFT Taxa Evenness in 2018 and 2019

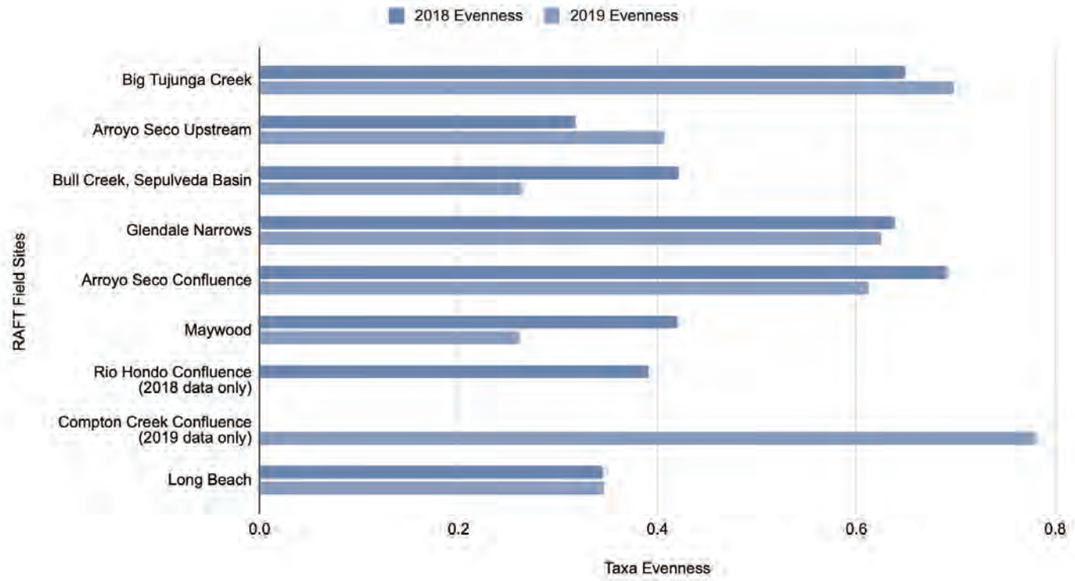


Figure 11: RAFT taxa evenness in 2018 and 2019.

Percent Non-Insect, EPT Insects and Other Insects Found

This indicator tells us about the percentage of our sample made up of non-insects, such as water mites, snails, and leeches, EPT insect taxa (referring to taxa from the orders Ephemeroptera - mayflies, Plecoptera - stoneflies and Trichoptera - caddisflies), and other insects. Higher percentages of non-insect taxa often indicate a higher level of aquatic disturbance because these non-insect species are generally more pollution tolerant. In contrast, a higher percentage of EPT insects indicates higher stream health because EPT taxa are less pollution tolerant than other BMIs overall. In Figure 12, we would like to see less yellow (non-insects) and more green (EPT taxa). High overall insect percentages (green and blue together in Figure 12) are a positive sign, but EPT taxa in particular are a strong indicator of stream health compared to overall insect populations because they are known for being pollution intolerant.

The sites with the most positive indicators (low non-insect levels, high EPT taxa levels) were in the headwaters (Big Tujunga Creek and Arroyo Seco Upstream). The soft-bottom and concrete-lined sites received lower scores overall. In fact, in both 2018 and 2019, the sites with the highest levels of non-insect taxa were both soft-bottom sections in the middle of the watershed: Glendale Narrows and Bull Creek, Sepulveda Basin. Thus, our soft-bottom sections often scored even lower than our concrete-lined sections with this indicator. In 2019, the lowest % EPT taxa were also in soft-bottom sections (Compton Creek and Bull Creek, Sepulveda Basin).

NON INSECT TAXA

Highest % 2018:
Glendale Narrows

Highest % 2019:
Bull Creek, Sepulveda Basin

Lowest % 2018:
Arroyo Seco Upstream

Lowest % 2019:
Arroyo Seco Upstream

EPT TAXA

Highest % 2018:
Big Tujunga Creek

Highest % 2019:
Big Tujunga Creek

Lowest % 2018:
Maywood and Long Beach

Lowest % 2019:
Compton Creek Con
Bull Creek, Sepulveda Basin

RAFT Taxonomic Breakdown

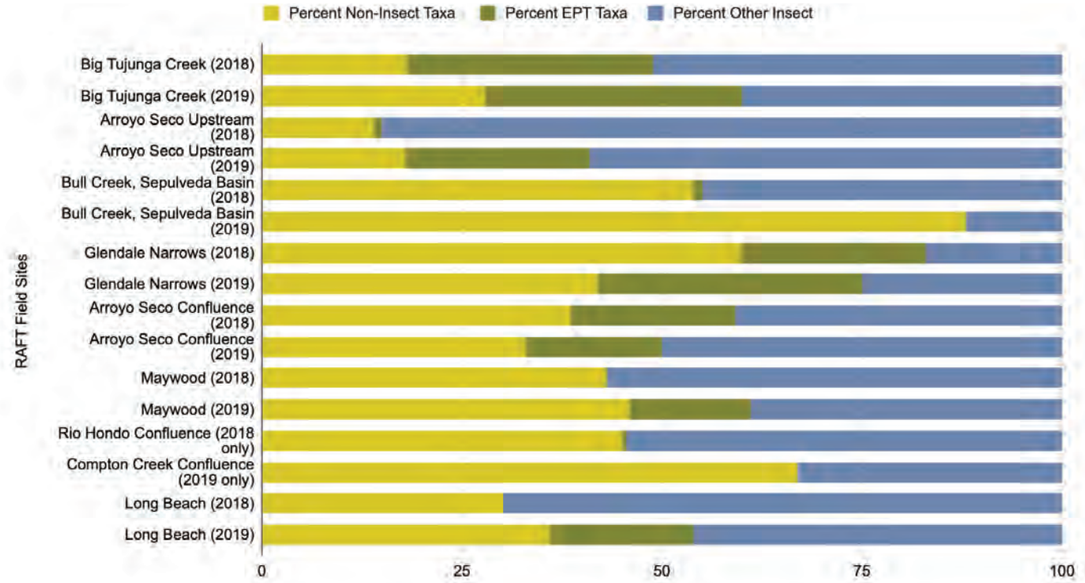


Figure 12: RAFT taxonomic breakdown in 2018 and 2019.

Tolerance Values

Highest % of high tolerance taxa in 2018: Maywood

Highest % of high tolerance taxa in 2019: Bull Creek, Sepulveda Basin

Highest % of low tolerance taxa in 2018: Big Tujunga Creek

Highest % of low tolerance taxa in 2019: Big Tujunga Creek

This indicator tells us about BMI communities' tolerance to pollution. Each BMI family has a tolerance value (t-value) that tells us about its pollution tolerance. A healthy stream would likely have a high percentage of BMIs with a low tolerance to pollution. In 2018 and 2019, we did not find many BMIs with low tolerances to pollution (green in Figure 13) except for a few in Big Tujunga Creek and in the Arroyo Seco upstream sites. We found zero low tolerance BMIs at any of our sites other than in the headwaters. Most of the BMIs that we sampled were in the medium tolerance category (yellow in Figure 13), although 50% or more of the individual organisms found had high tolerance values (orange in Figure 13) in Maywood in 2018 and at the Sepulveda Basin, Arroyo Seco Confluence, and Compton Creek Confluence sites in 2019. With more watershed-wide restoration interventions, we might begin to see more BMIs with low tolerance values.

HIGH TOLERANCE T-VALUE 8-10

MEDIUM TOLERANCE T-VALUE 3-7

LOW TOLERANCE T-VALUE 0-2

RAFT % BMI Tolerance in 2018 and 2019

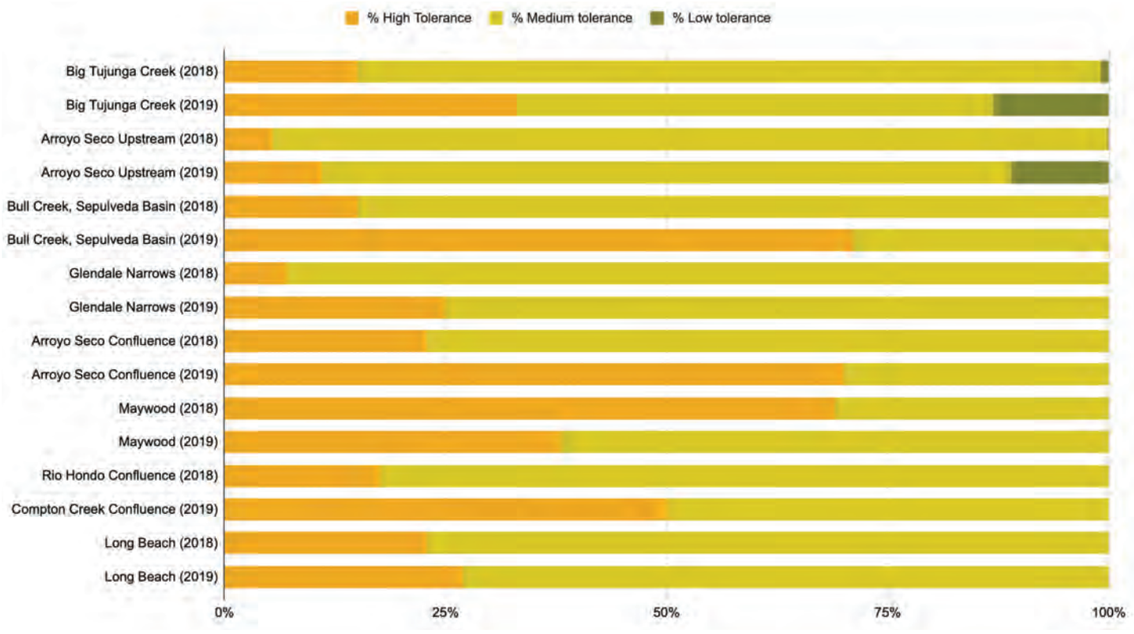


Figure 13: RAFT % tolerance values in 2018 and 2019.

eeding Groups

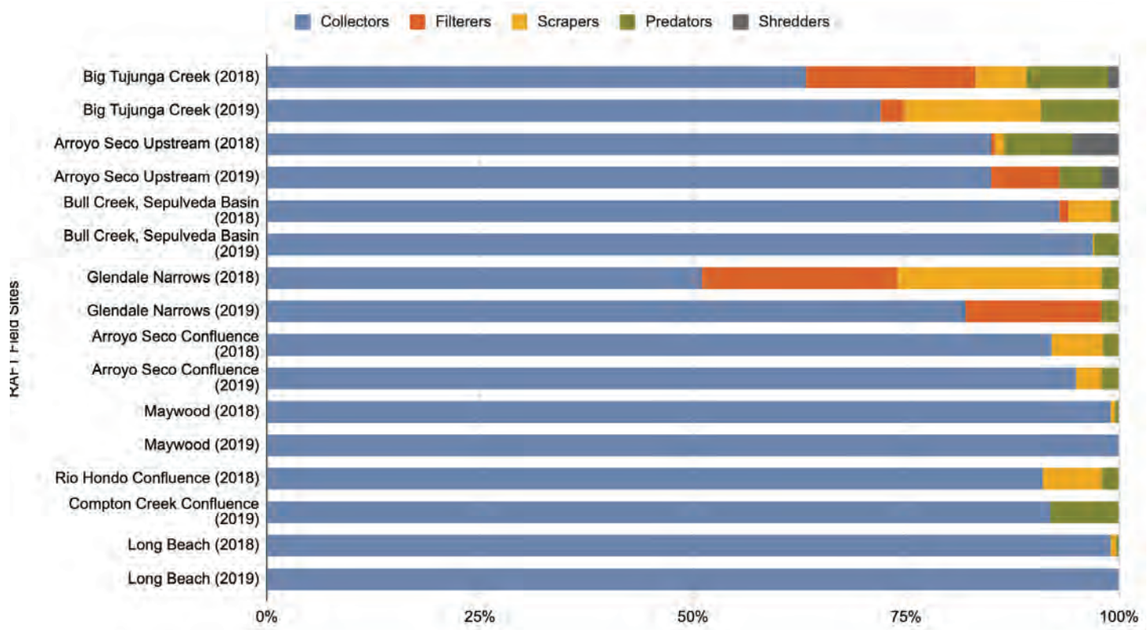
At each site, we looked at how the BMIs eat because that tells us about the flow of food resources that are available at each site (Harrington and Born, 2017).

- Collectors gather smaller organic matter from sediments.
- Filterers eat smaller organic matter suspended in water.
- Predators eat other organisms.
- Scrapers eat algae from logs and rocks.
- Shredders eat larger organic matter, such as leaves and twigs.

In all of our locations, we found a predominance of collectors, representing 50% or more of BMIs found at all sites in 2018 and 2019, from the top to the bottom of the watershed and in natural, soft-bottom and concrete-lined sites (Figure 14). With the exception of the Glendale Narrows, our soft-bottom and concrete-lined field sites had low feeding group diversity, and collectors represented over 90% of these samples in both 2018 and 2019. This lack of diversity in functional feeding groups indicates a lack of availability of a range of types of food.

According to the River Continuum Concept, in natural stream conditions, there is usually a gradient of dominant functional feeding groups (Vannote et al, 1980). Generally, we would expect to see a majority of shredders in headwater streams where there is larger organic material available to eat (Harrington and Born, 2017). We found only a few shredders at our upstream sites in 2018 and 2019. The predominance of collectors throughout our sites indicates that fine organic matter is the most available food source for BMIs in the watershed.

eeding Groups in 2018 and 2019



Figur eeding groups in 2018 and 2019.

10 Most Commonly Found BMIs

1. Chironomidae (Midges)
2. Ostracoda (Seed Shrimp)
3. Oligochaeta (Aquatic Worms)
4. Stratiomyidae (Soldier Flies)
5. Baetidae (Mayflies)
6. Hydropsychidae (Caddisflies)
7. Pyralidae (Aquatic Moths)
8. Amphipoda (Scuds)
9. Leptohyphidae (Mayflies)
10. Gastropoda (Snails)



1. Chironomidae (Midges)



2. Ostracoda (Seed Shrimp)



3. Oligochaeta (Aquatic Worms)



4. Stratiomyidae (Soldier Flies)



5. Baetidae (Mayflies)



6. Hydropsychidae (Caddisflies)



7. Pyralidae (Aquatic Moths)



8. Amphipoda (Scuds)



9. Leptohyphidae (Mayflies)



10. Gastropoda (Snails)

Figure 15: 10 most commonly found BMIs at RAFT sites in 2018 and 2019.
Images Courtesy of MacroInvertebrates.org, DFW's BMI Digital Reference & Yale Peabody Museum of Natural History



Water Quality Findings

Our water quality results showed the pressures that aquatic species face in the LA River. These readings are not just signals from each of our sites, but also expressions of LA River watershed health. BMIs are sensitive to changes in water quality to varying degrees, and often BMIs cannot feed, reproduce, or survive outside of certain ranges of temperature, pH, and dissolved oxygen. As seen in the previous section on tolerance values, we primarily found BMIs with moderate and high tolerances to pollution and other aquatic disturbances.

Water Temperature

Highest Temp in 2018:
Rio Hondo Con

Highest Temp in 2019:
Bull Creek, Sepulveda Basin

Lowest Temp in 2018:
Arroyo Seco Upstream

Lowest Temp in 2019:
Arroyo Seco Upstream

The temperatures that we found at our sites in the LA River generally surpassed maximum temperature levels that many BMIs can endure — approximately 20.5°C (Richards et al, 2018) — indicating thermal pollution (Figure 16). It is important to note that water temperature can be dependent on factors such as air temperature, time of day, and time of year. For that reason, a graph of air temperature on fieldwork days is also included below for reference (Figure 17). Regardless of air temperature impacts, however, the water temperatures that we recorded exceeded the maximum thresholds that many BMIs can withstand. The only sites that consistently had a temperature below that threshold were in the headwaters. Water temperatures may be higher at downstream sites where there is warm stormwater run-off, less vegetative cover, wastewater treatment effluent inputs, and a warming effect from concrete. Our findings were largely consistent with the 2017 study, "A longitudinal temperature profile of the Los Angeles River from June through October 2016" (Mongolo et al, 2017). This study found the lowest temperature levels in the upper watershed natural tributaries, and it demonstrated that temperatures are too high to support native fish populations in both the soft-bottom and concrete-lined sections of the river mainstem.

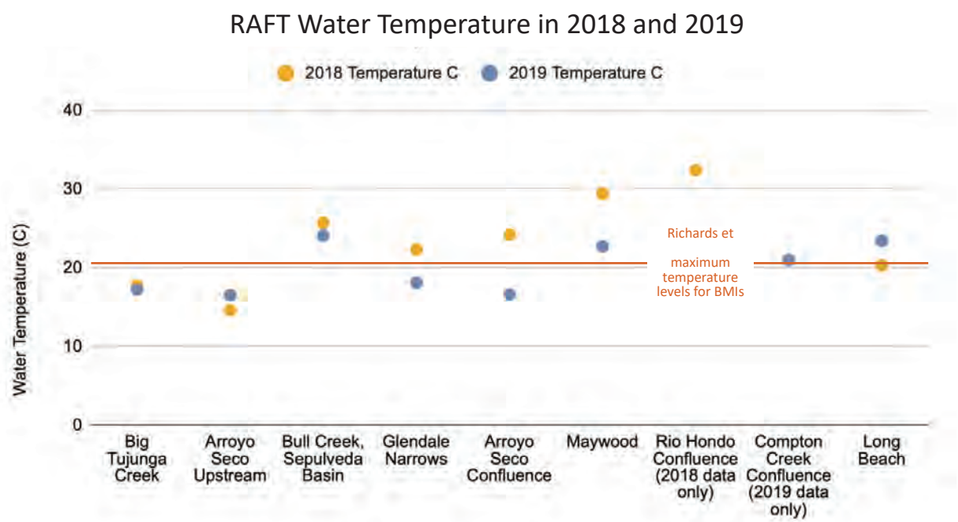


Figure 16: RAFT water temperature in 2018 and 2019.



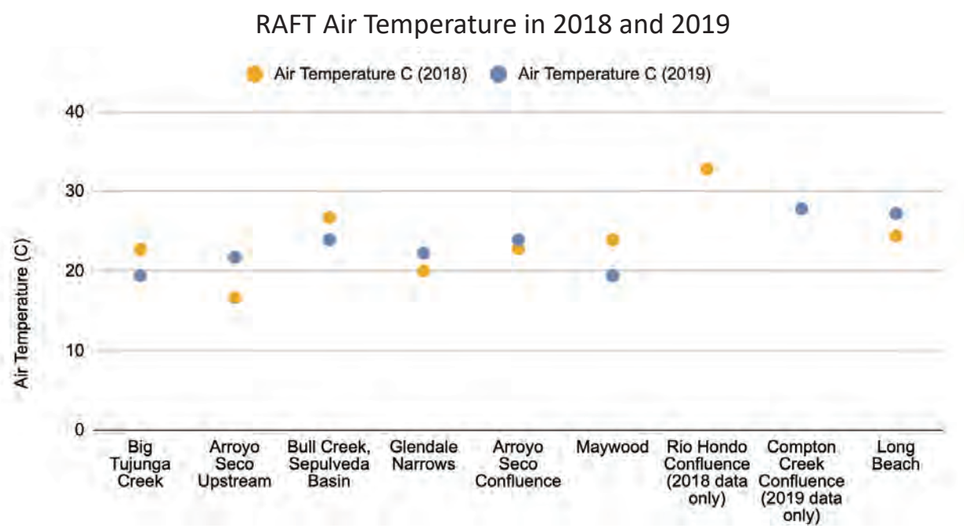


Figure 17: RAFT air temperature in 2018 and 2019 (Weather Underground, 2020).



pH

Highest pH in 2018:
Rio Hondo Con

Highest pH in 2019:
Maywood

Lowest pH in 2018:
Bull Creek, Sepulveda Basin

Lowest pH in 2019:
Long Beach

The pH of water tells us how acidic or basic it is. The Los Angeles Regional Water Control Board's standard for pH in inland streams is between 6.5 and 8.5 (California Water Boards, 2019). Our sites' pH readings were generally within this range between 8 and 8.5, although we noted higher readings in some of our middle and lower watershed sites: Glendale Narrows in 2019 (8.7), Maywood in 2018 and 2019 (9.2 and 8.8), the Rio Hondo Confluence in 2018 (9.5), and Long Beach in 2018 (8.6) (Figure 18). These higher pH readings could negatively impact the BMI communities that are able to live in the river.

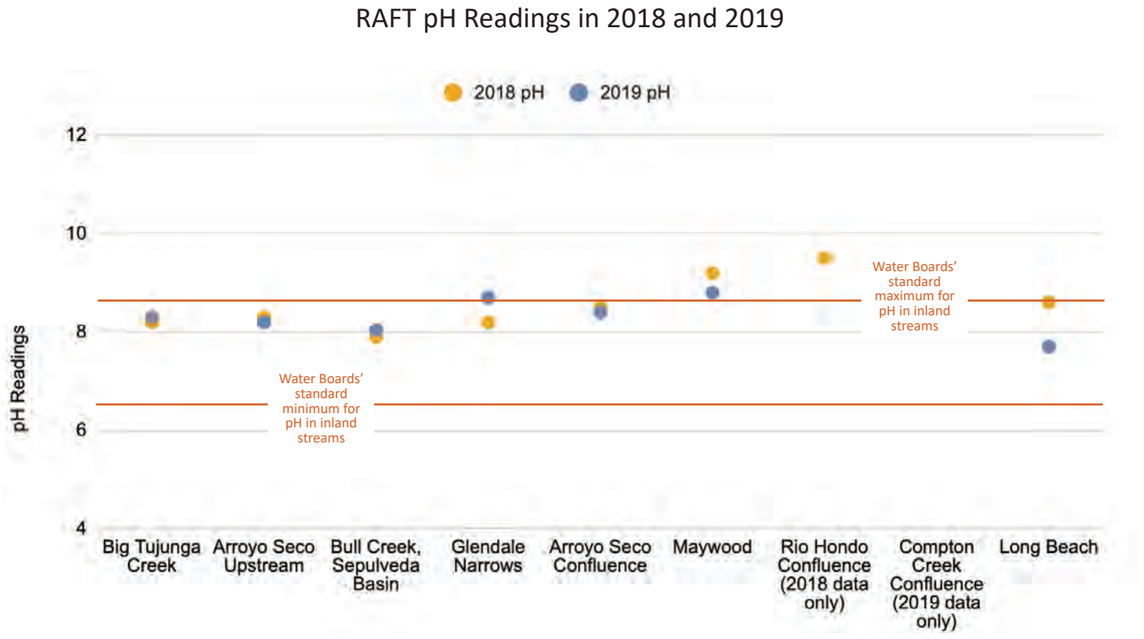


Figure 18: RAFT pH readings in 2018 and 2019.

Dissolved Oxygen

Dissolved oxygen (DO) is necessary for aquatic life to be able to survive, just like humans need oxygen to breathe. The LA Basin Plan states that mean annual dissolved oxygen concentration should be higher than 7 parts per million (ppm) and every single DO reading should be higher than 5ppm (California Water Boards, 2019). Some of our readings were at the lower end of this range, such as Big Tujunga Creek in 2019 (6ppm) and Big Tujunga Creek in 2018 (7ppm), but generally the DO readings surpassed this requirement, especially in faster-moving, concrete-lined river sections, such as in Maywood, the Rio Hondo Confluence, and Long Beach (Figure 19). One site was well below the necessary dissolved oxygen threshold: Compton Creek Confluence in 2019. Our reading there was 1.8 ppm. This low amount of oxygen would make it difficult for BMIs to live in this stream reach, which matched our findings at this site. Further studies would be helpful to understand why dissolved oxygen levels are so low in this tributary.

Highest DO in 2018:
Rio Hondo Con

Highest DO in 2019:
Maywood

Lowest DO in 2018:
Bull Creek, Sepulveda Basin

Lowest DO in 2019:
Compton Creek Con

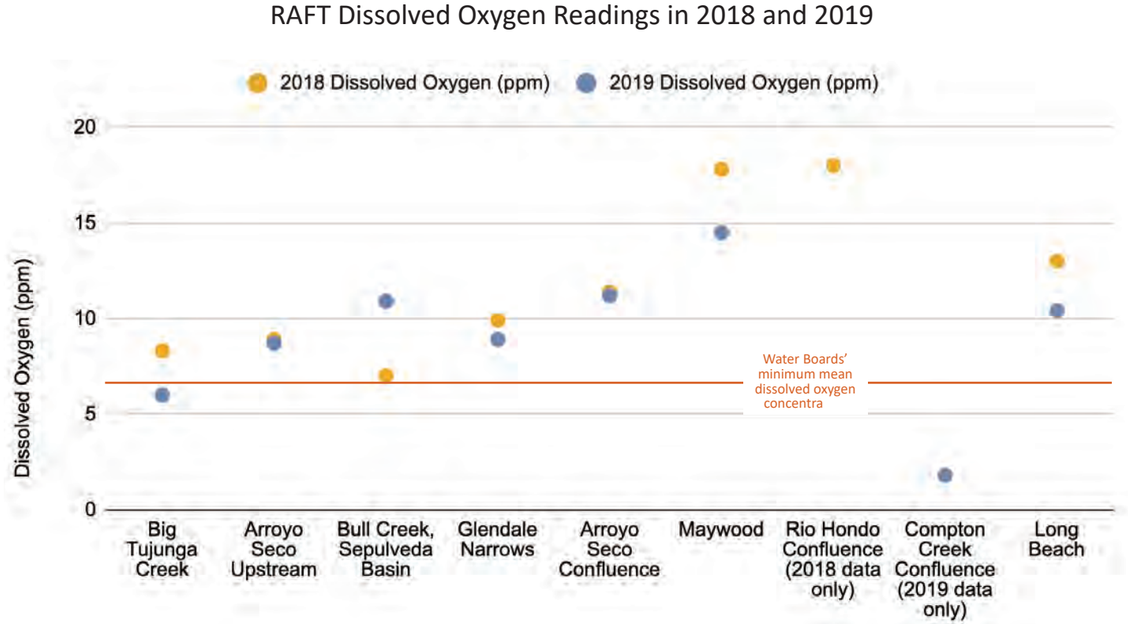
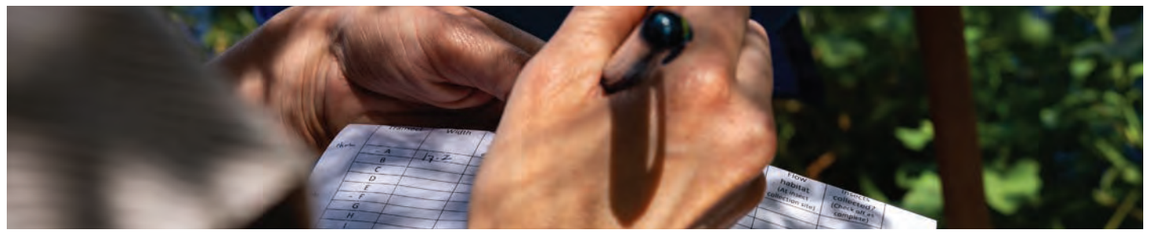


Figure 19: RAFT dissolved oxygen readings in 2018 and 2019.



Physical Habitat Findings

Physical Habitat (Phab) Scores

Phab assessment scores provide a qualita e picture of the stream habitat's health. As we made our way down the watershed from higher to lower la scores generally decreased.

Phab assessment scores provide a qualitative picture of the stream habitat's health. As we made our way down the watershed from higher to lower latitudes, the FLI scores generally decreased, with the lowest scores recorded in concrete-lined sections (Figure 20). Comparing our Phab scores with the FLI scores allows us to get a sense of how the biological community health compares to our evaluation of the physical habitat. These were not always aligned. For instance, we recorded a lower physical habitat quality score at Maywood in 2019 than in 2020, but our FLI score for the site improved. Our group also found the methodology frustrating at times since it did not always reflect the nuances of urban and Mediterranean climate stream ecologies, which at times led us to giving an artificially high Phab score at our sites. For a discussion of our concerns with the EPA's Phab methodology, please see the Reflections section.

HEALTHY	GOOD	IMPACTED	POOR
151-200	101-150	51-100	0-50
Op	Subop	Marginal	Poor

RAFT Phab Scores in 2018 and 2019

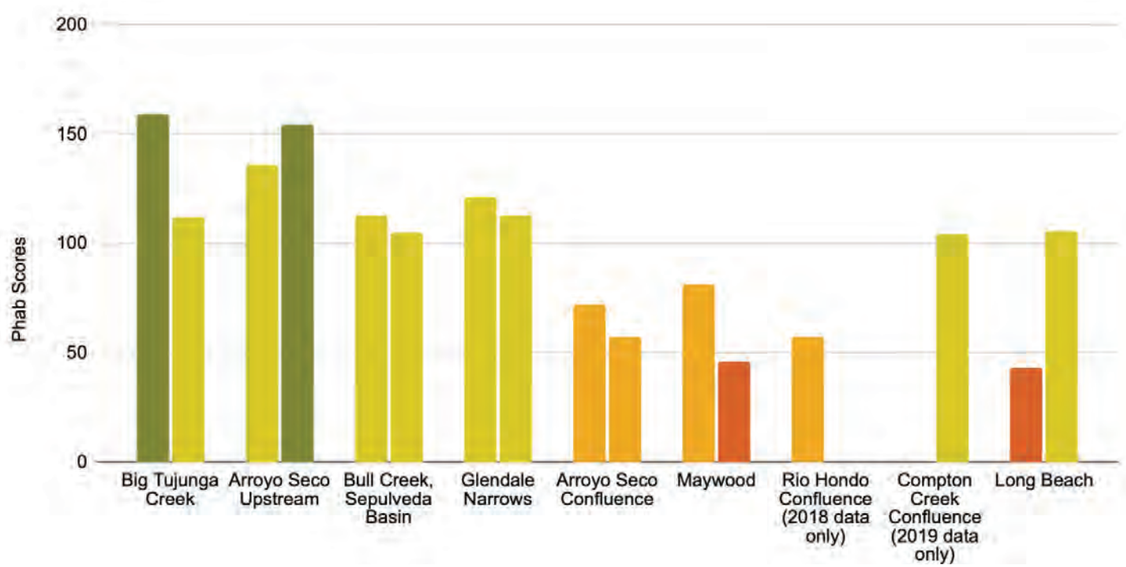
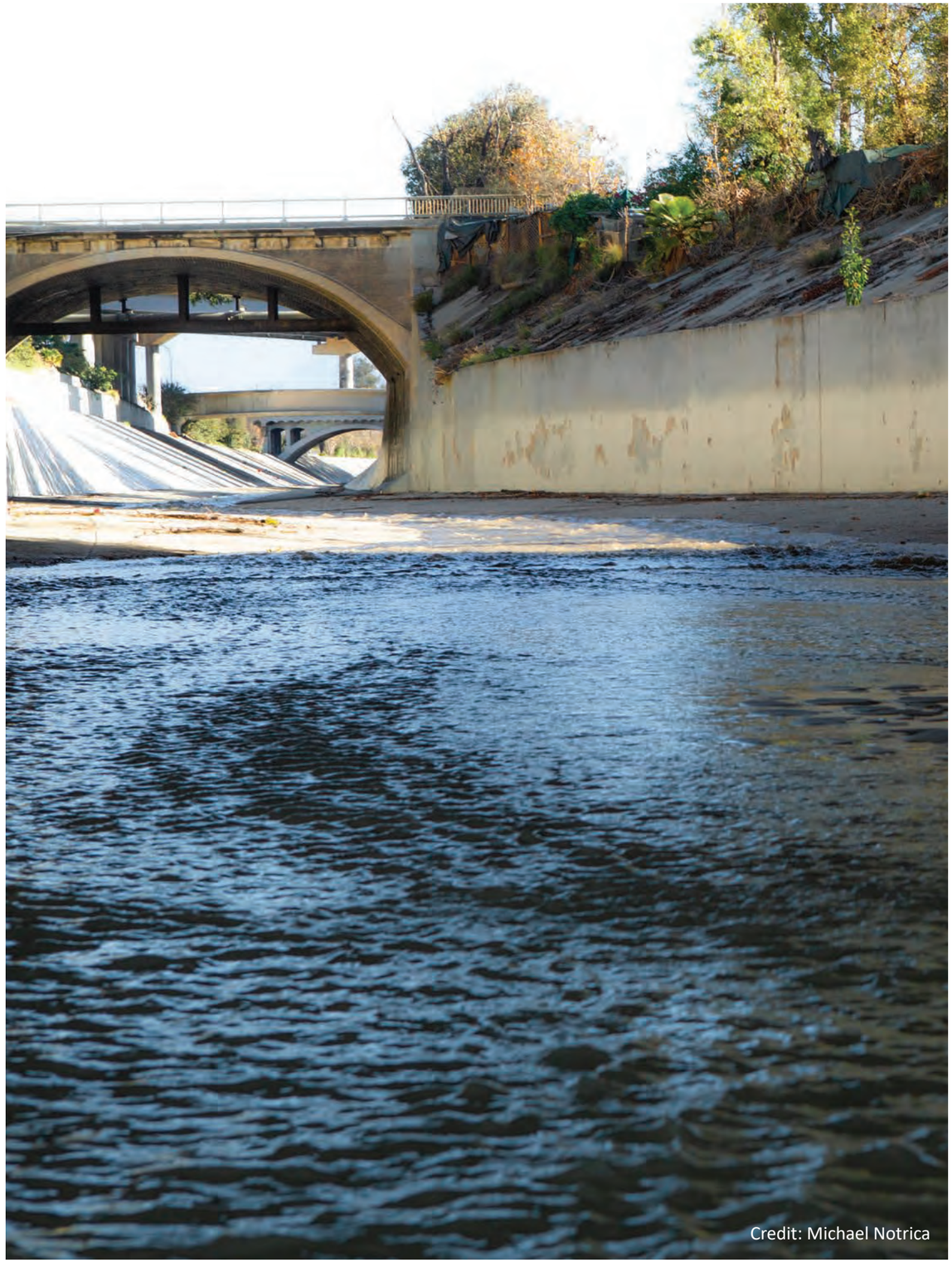


Figure 20: RAFT Phab Scores in 2018 and 2019.



Credit: Michael Notrica



Comparison with Other Data

The Stormwater Monitoring Coalition and Council for Watershed Health also monitor biological and water quality indicators in the LA River watershed. A statewide CSCI map shows data points from 1999 to 2015 (SWRCB, 2018). The LA River Watershed Monitoring Program, led by the Council for Watershed Health, has CSCI data from 2009 through present (CWH, 2020). This report compares RAFT's FLI results with other CSCI results, with the understanding that these are comparable but not equivalent indices. The CSCI is the most rigorous index to use to understand and regulate stream integrity. Still, the FLI can be used as a tool to understand where more monitoring and restoration interventions are needed.

Site	RAFT FLI Result	SMC CSCI Result	CWH CSCI Result	Comparison of Result
Big Tujunga Creek	**.81** (2018) **.79** (2019)	**.80** (2011) Overlapping site	**1.02** (2009) Overlapping site	This site received a high CSCI score in 2009, which decreased a erwards. Monitoring is needed to understand the reason for this decrease and to consider restora
Arroyo Seco Upstream	**.74** (2018) **.74** (2019)	**.61** (2010) Comparable nearby upstream site	**.83** (2011) Comparable nearby downstream site	Results have varied but have indicated borderline good ecological c stream restora ould be bene
Bull Creek, Sepulveda Basin	**.49** (2018) **.31** (2019)		**.50** (2016) Comparable nearby upstream site	The data from CWH also demonstrate tha om eek is struggling.
Glendale Narrows	**.46** (2018) **.48** (2019)		**.70** (2015) **.59** (2018) Comparable nearby upstream site	The data from CWH also show that the Glendale Narrows is struggling.
Arroyo Seco Con	**.54** (2018) **.50** (2019)	**.72** (2011) Overlapping site		This site received a higher CSCI score in 2011 perhaps bene from the improved biological c served upstream in the same year, but s wing that the site is degraded.
Maywood	**.29** (2018) **.52** (2019)	**.32** (2008) Comparable nearby upstream site	**.61** (2013) Comparable nearby downstream site	The CSCI scores also show that the stream aded.
Rio Hondo Con	**.44** (2018)	**.32** (2008) Comparable nearby upstream site		The CSCI scores also show that the stream aded.
Compton Creek Con	**.26** (2018)	**.43** (2010) Comparable nearby downstream site		The CSCI scores also show that the stream aded.
Long Beach	**.31** (2018) **.42** (2019)	**.35** (2010) Comparable nearby upstream site	**.47** (2019) Comparable nearby upstream site	The CSCI scores also show that this site is highly degraded.

Figure 21: Comparison with other LA River bioassessment data.

Re

Access to the River

The act of accessing and wading into the LA River was important to our program but was not always easy to do. Before each RAFT fieldwork day, our team conducted thorough reconnaissance at sites to consider questions of safety and ease of access. There were several sites that we decided not to monitor. An upstream, soft-bottom section of the Rio Hondo tributary, for instance, smelled rancid to the point that we decided it was an unsafe environment for our volunteers. An upstream Compton Creek site was too deep for us to wade into safely. Many sections of the river mainstem in the San Fernando Valley are in a box channel with few access points. For all of these reasons and because we wanted to prioritize sites that held importance to our community, we did not randomize our sampling locations.

There are many challenges to accessing the LA River, including physical impediments, logis al impediments and environmental impediments.

There are many challenges to accessing the LA River, and not just for volunteer programming. These challenges include physical impediments (fences, walls, threatening signs, and steep concrete levees), logistical impediments (lack of access to restroom facilities, poor proximity to public transportation, and few parking options), and environmental impediments (water quality concerns, fast-moving flow due to concretization, and areas too deep for wading). Communities may experience these access challenges differently based on their relationships with law enforcement, degree of physical ease such as with scaling concrete levees, or cultural connections with the river, such as Indigenous communities that have been denied access that would allow them to carry out Traditional Ecological Practices. Indeed, varying communities may define feeling “safe” in the river in different ways. It’s important that we confront through planning processes the spectrum of understanding of what the best, safest and most inclusive access would mean and consider the current underlying inequities in access. Building bridges above the river can be helpful, but this alone is not enough. People should feel safe accessing the river itself.

Access was stolen well before the LA River was encased in concrete in the early- to mid-20th Century, but channeliza cemented this power dynamic.

It is important to acknowledge that people have been “accessing” the river for a long time and have continued to do so despite the obstacles. The LA River is an ancestral river of the Tongva, Tataviam, and Kizh Nations. Access was stolen well before the LA River was encased in concrete in the early- to mid-20th Century, but channelization cemented this power dynamic. With these power structures in mind, we must ask for whom we are revitalizing the river, and to what extent current processes of increasing access are seeking to confront and heal the environmental injustices perpetrated previously.









Volunteer Engagement

We focused on building a core group of volunteers who would return many times and become familiar with the training and methodology, rather than trying to engage as many people as possible.

We strove for inclusive volunteer engagement, holding trainings and fieldwork days on Saturday mornings when volunteers were generally most available, inviting partner organizations and their members to join, and reaching out widely on social media for new participants to join before each of our trainings. We focused on building a core group of volunteers who would return many times and become familiar with the training and methodology, rather than trying to engage as many people as possible. The program tended to attract younger folks, especially college and graduate students and early career professionals who were already working in or interested in switching to the environmental field. Many of our RAFT volunteers used the training and fieldwork experience to bolster their resumes, and so the program has functioned informally as an ecological training program as well. Our volunteer base also included retirees, teachers, and new moms. Still, one of our goals moving forward is to be even more purposeful and inclusive with our outreach, bringing in a wider range of individuals.

Sediment Removal

Another challenge that we faced was monitoring the LA River around the same t agencies were removing vegeta sediment and applying herbicides.

Another challenge that we faced was monitoring the LA River around the same time that agencies were removing vegetation and sediment and applying herbicides. The County of Los Angeles and the Army Corps of Engineers perform maintenance on the river each year prior to the rainy season. Without information about the schedule of maintenance posted online, however, we did not know when this removal would occur. We planned to monitor at the Compton Creek Confluence in 2018, but a few days before our RAFT field day, we observed the scraping of sediment and vegetation there. We were in the midst of sampling in Long Beach in 2018 when bulldozers prepared to start removing sediment and vegetation alongside us.

We need to have a broader public conversa the dredging of sediment and vegeta waterways.

The public needs to be able to access information about when agencies will be removing sediment. Even more importantly, we need to have a broader public conversation about the dredging of sediment and vegetation in our waterways. There are trade-offs that we need to consider. Maintenance actions for flood risk prevention purposes devastate the few soft-bottom (and concrete-lined) vegetated ecosystems that we have. The burden of proof should be on the agencies to demonstrate that these steps are necessary in all sections, that they are performing any critical maintenance in the most sensitive way possible, and cease these practices otherwise.

Protocol Changes and Considera

We made a few changes to the original California Rapid Bioassessment Protocol (CRBP) to meet the needs of our volunteer program.

We made a few changes to the original California Rapid Bioassessment Protocol (CRBP) to meet the needs of our volunteer program. The CRBP calls for midway transects between each of our 11 transects, which we found too time-consuming and not rewarding enough for our team to include in our protocol. We also added in water quality monitoring since this is important for LAW's overall work. We found the EPA Rapid Bioassessment Physical Habitat assessment to be of limited usefulness in our Southern California urban stream environments. While it provided a general picture of habitat health, this qualitative assessment seems to be designed for more natural streams in more temperate environments.

For instance, the protocol asks about the bank stability of our fieldwork sites. Streams encased in a concrete channel are very stable with little evidence of erosion, but this is not a sign of ecological health. Also, how should a volunteer team define a stream "bank" when there are concrete levees? Does this include the sediment built up within a concrete-lined channel? Or is it the levees themselves? The protocol also asks about channel flow status. An optimal stream would have flows that reach both banks, which does not factor in Mediterranean streams with intermittent or ephemeral flow regimes. We would recommend the revision of the Rapid Bioassessment Physical Habitat assessment with California urban streams in mind.





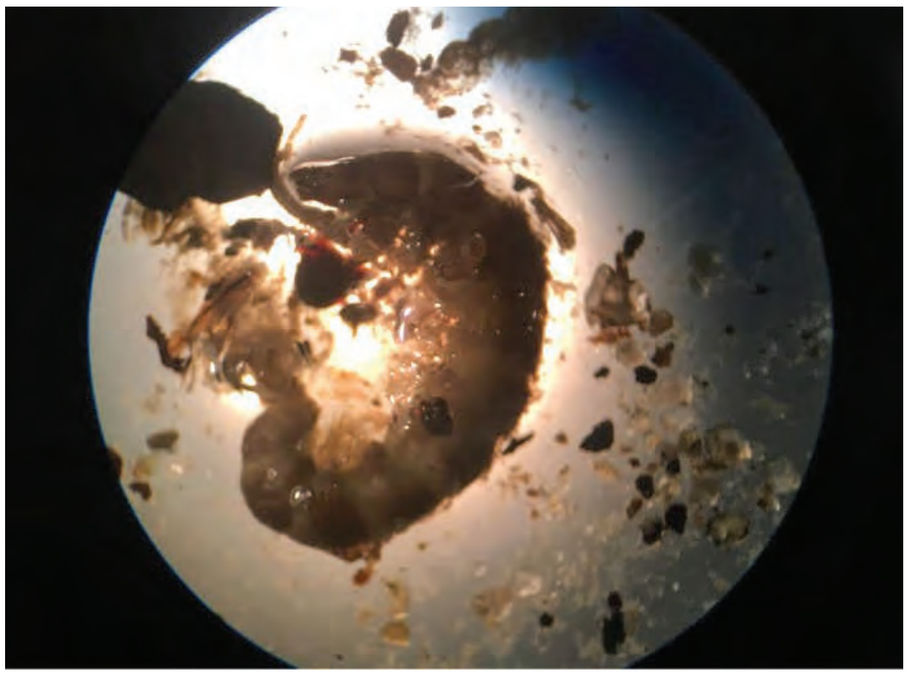


Macroinvertebrate Abundance, Timing, and Analysis

For the use of the FLI, it is best to analyze a BMI sample with at least 500 individuals (Harrington, 2017). We did not find this quantity of BMIs at many of our sites. This may have occurred due to sampling error (such as the loss of BMIs during sampling), the timing of our sampling, or a lack of abundance due to an ecological disturbance. In the future, we plan to compare our sampling results with other field crews who collected samples in similar areas and pursue intercalibration collaborations with them.

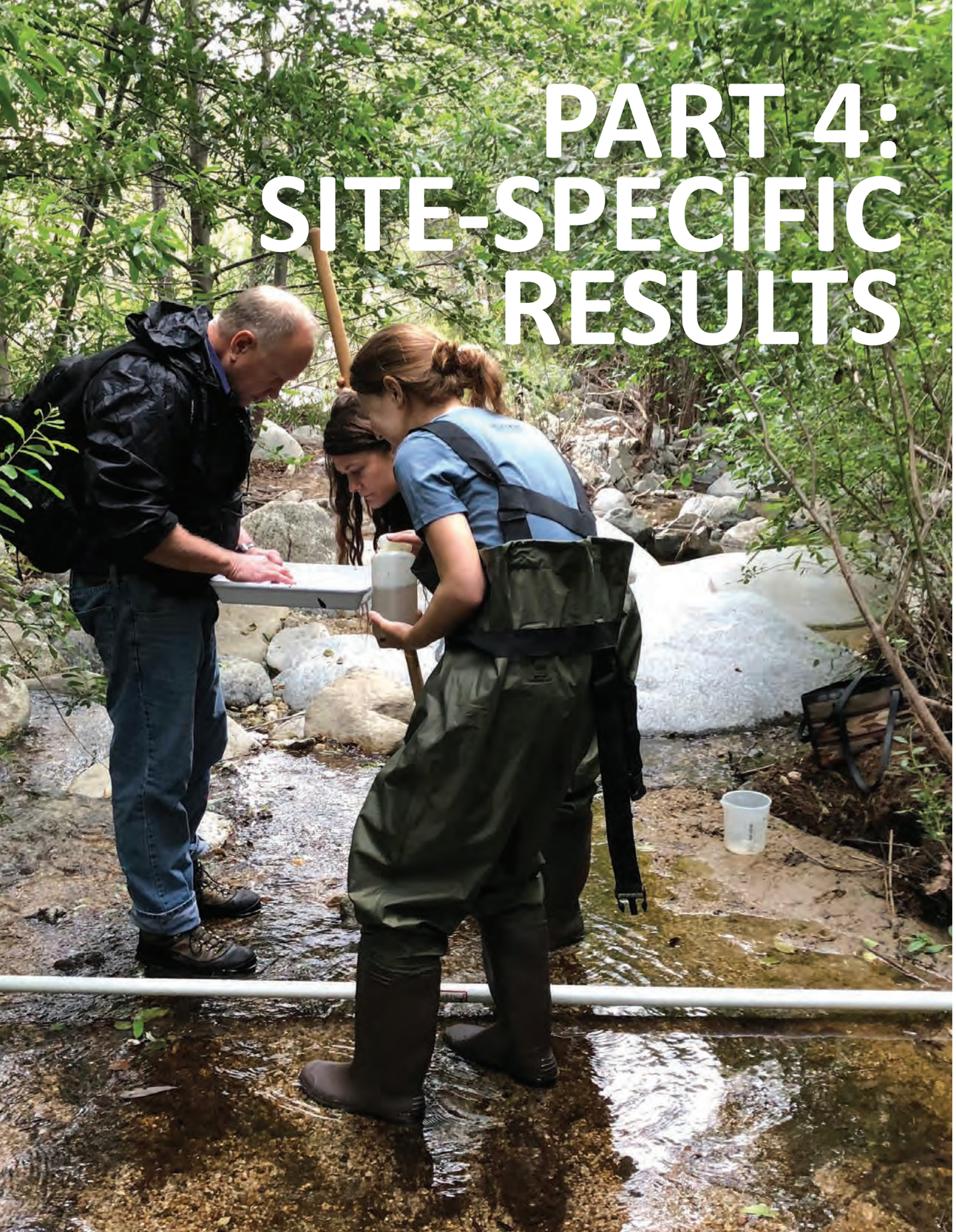
As a volunteer program that only does sampling approximately every other Saturday, it would be challenging and limiting for us to stay within the standardized sampling index period for Southern California (May-July 15th) (Ode et al, 2016). Instead, we tried to remain within the general index period for California of May-September (the timeframe for sampling that the state has identified as appropriate), although some of our sampling extended into October. We evaluated the trade-offs and decided that it was worthwhile to have more volunteer engagements during the general California index period rather than limiting our program to just a few months. We only sampled BMIs during the dry season, consistent with index protocol (Ode et al, 2016).

We opted for sending our samples to a lab at Chico State University affiliated with the Sustainable Land Stewardship International Institute rather than doing the full taxonomic analysis ourselves, which would have required an advanced level of training to identify our samples. We preferred to devote the majority of our time to the fieldwork activities while entrusting a certified lab to analyze our BMI results. We did hold a BMI analysis workshop in 2018 to try out this analysis.





Credit: William Durland



PART 4: SITE-SPECIFIC RESULTS

SITE NAME & COORDINATE	NATURAL	SOFT BOTTOMED	CONCRETE LINED	MAINSTEM	TRIBUTARY	FLI 2018	FLI 2019
Big Tujunga Creek	X				X	.81	.79
Arroyo Seco Upstream	X				X	.74	.74
Bull Creek, Sepulveda Basin		X			X	.49	.31
Glendale Narrows		X		X		.46	.48
Compton Creek Con		X			X	--	.26
Arroyo Seco Con			X		X	.54	.50
Maywood			X	X		.29	.52
Rio Hondo Con			X	X		.44	--
Long Beach			X	X		.31	.42

Figure 22: Overview of sit esults

We have organized our site-specific results into three categories based on the degree of physical alteration. Natural sites have no concrete levees or concrete bottom. Soft-bottom sites have no concrete levees and a sediment stream bottom. Concrete-lined sites have concrete levees and a concrete stream bottom.

Note: Rio Hondo Confluence was only monitored in 2018. Compton Creek was only monitored in 2019.

Big Tujunga Creek | Natural Tributary

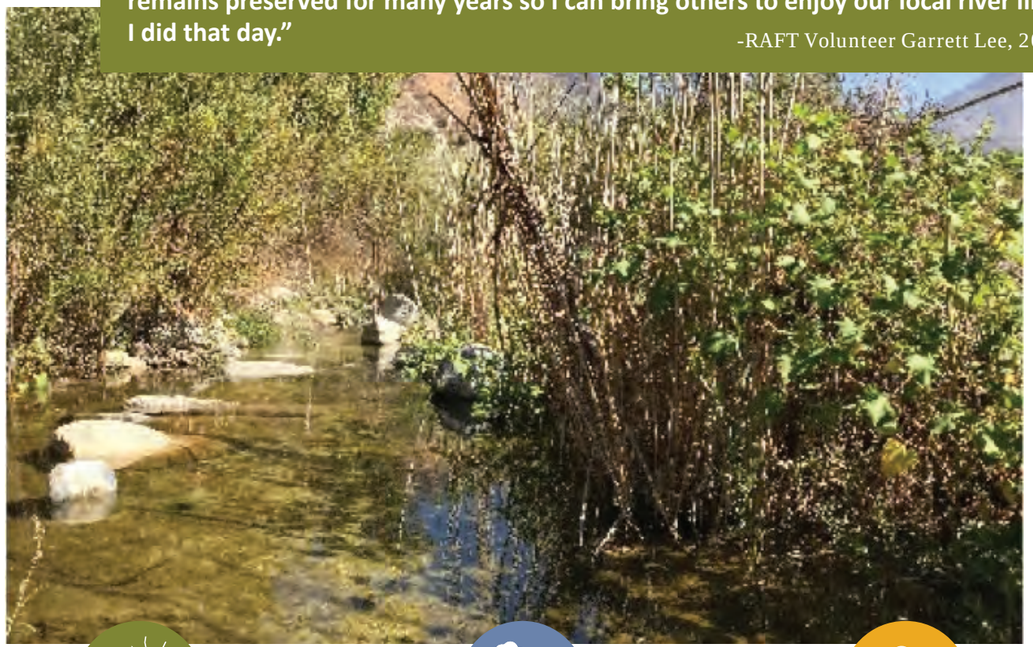
34.2959 ° | -118.2831 °

Dates Surveyed: August 25, 2018 and October 28, 2019

Recrea served: Trash clean-ups, e

"This gorgeous site showed me how healthy the other parts of the river could be. I found this site to be rich with a variety of life under the surface of the water, which is an ex e balanced ecosystem and healthy water. I hope this site remains preserved for many years so I can bring others to enjoy our local river like I did that day."

-RAFT Volunteer Garrett Lee, 2018



FLI Score

2018	2019
.81	.79

HEALTHY .92 - 1.00 | GOOD .79 - .92 | IMPACTED .63 - .79 | POOR 0 - .63

Phab Score

2018	2019
159	112

HEALTHY 151-200 | GOOD 101-150 | IMPACTED 51-100 | POOR 0 - 50

Water Temperature

2018	2019
17.7°c	17.2°c

ACCEPTABLE <20.5 ° C | POOR >20.5 ° C

Taxa Richness

2018	2019
22	25

Taxa Evenness

2018	2019
0.649	0.698

Abundance

2018	2019
240	190

Takeaways

2018

This site had the highest FLI, Phab and taxa richness scores and among the highest taxa evenness, while its abundance was the lowest. Among the RAFT sites, this one was closest to a reference model thanks to its high habitat and water quality. There was little obvious negative human impact other than a few constructed dams.

2019

When we returned in 2019, we found that trash had been dumped along this site. New invasive species, such as arundo donax, grew along the banks. The site's Phab score decreased. The site still received the highest scores out of our RAFT sites for FLI and taxa richness but had an even lower abundance of BMIs. It is important to note that even though many ecological indicators were highest at this site, this does not mean that the site is healthy.

Policy Recommenda

We need more of a policy focus on tributary health, including in the headwaters. Even seemingly healthy tributaries have room for ecological improvement, and restoration interventions here could have more immediate positive impacts than in more impaired areas.

There's a need for annual monitoring of headwater sites, including understanding low BMI abundances and high levels of trash and invasive species.

Related Policy E orts

There is not currently a planning process to restore the Big Tujunga Creek headwaters, but we hope that the next phase of the Upper LA River and Tributaries (SMMC, 2020) planning effort will incorporate all of Big Tujunga Creek. The River Project's Tujunga-Pacoima Watershed Plan is a great policy roadmap (The River Project, 2008).

Arroyo Seco Upstream | Natural Tributary

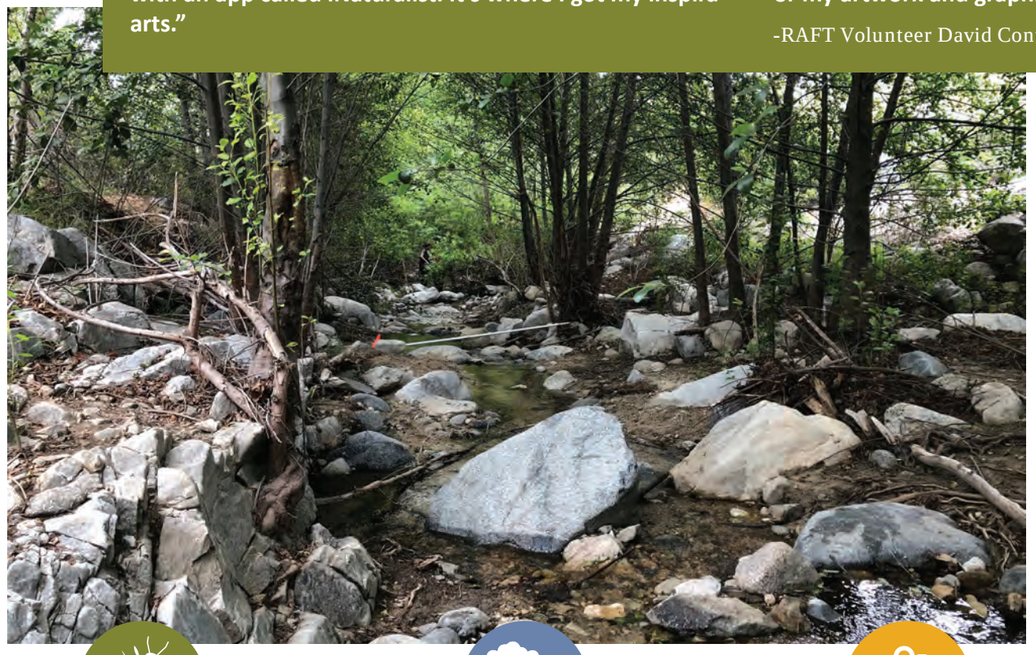
34.2029 ° | -118.1664 °

Dates Surveyed: May 19, 2018 and June 8, 2019

Recrea served: Dog walking, frog watching, hiking, horseback riding

"My day with LA Waterkeeper was a spectacular experience. Arroyo Seco was something erent than the other places we visited. It's more natural, peaceful, and it's a fantas landmark to be away from the city. My personal favorite was iden ying animals and plants with an app called iNaturalist. It's where I got my inspira or my artwork and graphic arts."

-RAFT Volunteer David Contreras



FLI Score

2018	2019
.74	.74

HEALTHY .92 - 1.00 | GOOD .79 - .92 | IMPACTED .63 - .79 | POOR 0 - .63

Phab Score

2018	2019
134	154

HEALTHY 151-200 | GOOD 101-150 | IMPACTED 51-100 | POOR 0 - 50

Water Temperature

2018	2019
14.6°c	16.5°c

ACCEPTABLE <20.5 ° C | POOR >20.5 ° C

Taxa Richness

2018	2019
20	22

Taxa Evenness

2018	2019
0.318	0.407

Abundance

2018	2019
594	580

Takeaways

2018

This site had the second-highest FLI scores, although these were in the "impacted" category. It had a relatively high taxa richness but low taxa evenness due to the dominance of the Chironomidae (midge) taxon. Its BMI abundance levels were higher than in the fellow headwater stream RAFT site, Big Tujunga Creek.

2019

This site's FLI score was consistent, even as its taxa richness and evenness levels and Phab score increased. This site's BMI community benefited from our lowest temperature readings and predominance of riffle flow habitats (oxygen-rich, shallow, and fast flows), although the section had low bank stability and high sediment deposition.

Policy Recommenda

Even seemingly healthy tributaries need restoration. We need a policy focus on tributary health, including in the headwaters (not just in our urbanized areas). And we need to monitor tributaries from year to year.

We would like to see an Arroyo Seco sub-watershed-wide restoration plan.

Related Policy E orts

There is not currently a planning process to restore the Arroyo Seco headwaters, but we hope that the next phase of the Upper LA River and Tributaries planning effort will incorporate all of the Arroyo Seco. We are awaiting the release of the US Army Corps of Engineers' Arroyo Seco Ecosystem Study (Arroyo Seco Foundation, 2018). The Arroyo Seco Foundation and Pasadena Audubon Society also won a lawsuit in 2020 regarding LA County's sediment removal downstream of our RAFT site at the Devil's Gate Dam, leading to improved sediment removal practices.

Bull Creek, Sepulveda Basin | om Tributary

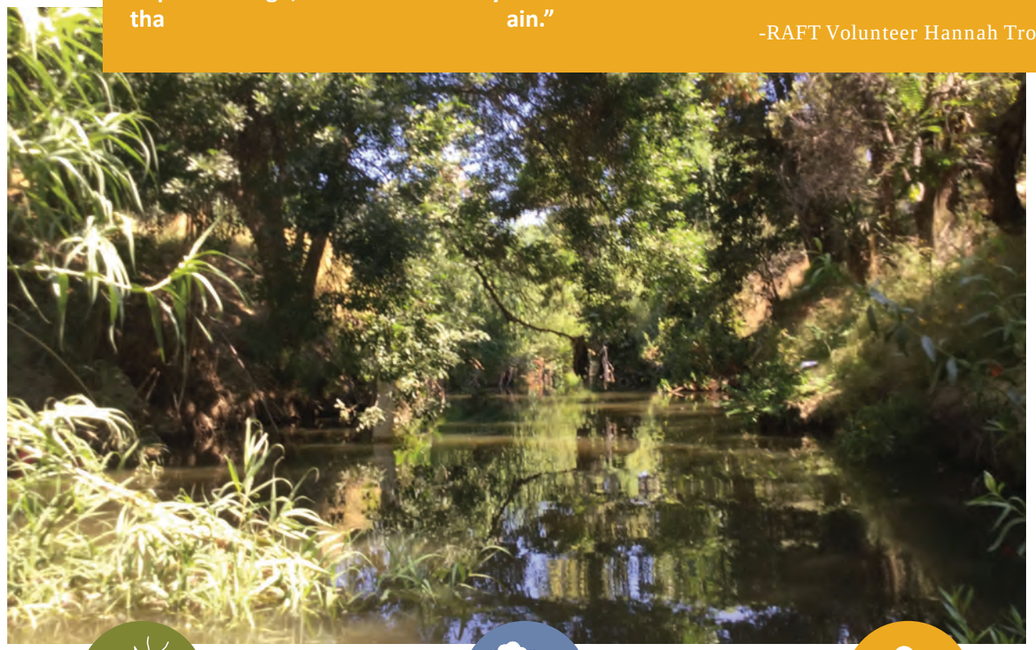
34.1787 ° | -118.4975 °

Dates Surveyed: June 9, 2018 and July 20, 2019

Recrea served: Fishing

“Working around the Sepulveda Basin was an eye-opener for me. While this site holds so much poten or what the river could become, the quality of the water itself and the ecosystem are far below what the standard of ‘healthy’ should be for our waterways. I am hopeful though, that with advocacy eda Basin and all tha ain.”

-RAFT Volunteer Hannah Tropiano



FLI Score

2018	2019
.49	.31

HEALTHY .92 - 1.00 | GOOD .79 - .92 | IMPACTED .63 - .79 | POOR 0 - .63

Phab Score

2018	2019
113	105

HEALTHY 151-200 | GOOD 101-150 | IMPACTED 51-100 | POOR 0 - 50

Water Temperature

2018	2019
25.7° c	24.1° c

ACCEPTABLE <20.5 ° C | POOR >20.5 ° C

Taxa Richness

2018	2019
13	10

Taxa Evenness

2018	2019
0.422	0.264

Abundance

2018	2019
310	622

Takeaways

2018

This site had a low FLI score for what we might expect from a soft-bottom stream section, with an FLI score in the poor category alongside concrete-lined channel reaches. The taxa evenness levels were low with more than 69% of the sample made up of the Chironomidae taxon (midges). The overall BMI abundance was low. We found low dissolved oxygen and high water temperature readings and several floating dead fish.

2019

There was a decrease in our FLI and Phab scores. While the BMI abundance increased, the taxa richness and evenness declined; we found an even greater proportion of midges. The majority of the sample that we collected was made up of non-insects, including Oligochaeta (aquatic worms) and Turbellaria (flatworms), and the majority of them were highly tolerant to pollution. The flow was deeper and slower at this site.

Policy Recommenda

We need more of a focus on tributary health. Even seemingly healthy tributaries are struggling. Unlike the headwaters sites, this tributary is downstream of many urban land uses that should be investigated to understand its poor health.

This site is downstream from a previous Army Corps of Engineers restoration effort (CEQA, 2005) that seems to have failed. A closer look needs to be taken at how we define “restoration” for soft-bottom sites.

This site is in the middle of the Sepulveda Basin, but compared to the nearby popular Balboa Lake, it is largely out of site and out of mind. This soft-bottom river site could be a great community amenity.

Related Policy E orts

Bull Creek was largely overlooked in the recent Upper LA River and Tributaries plan (SMMC, 2020).

Glendale Narrows | om Mainstem

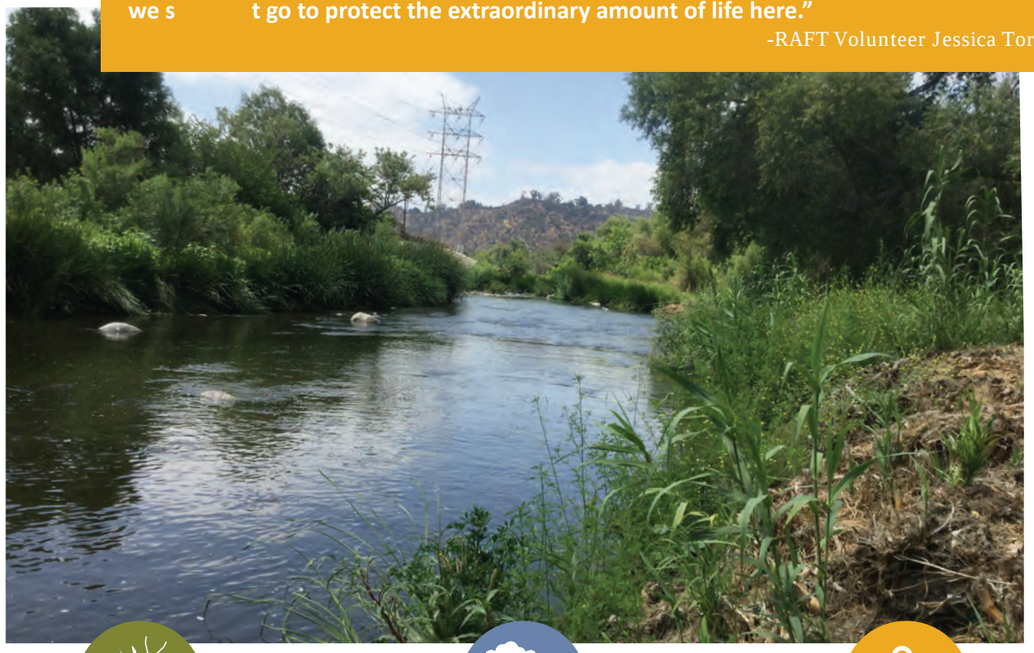
34.1015 ° | -118.2423 °

Dates Surveyed: June 30, 2018 and October 19, 2019

Recrea served: Bicycling, birdwatching, kayaking, strolling

"The Glendale Narrows is one of my favorit er is full of ca ails and the awe-inspiring Arroyo Willows. The fauna is astounding - from the skinny -necked s o the massive great blue herons and snowy egre in the Glendale Narrows is calming e to my soul. It reminds me how far we s t go to protect the extraordinary amount of life here."

-RAFT Volunteer Jessica Tormoen



FLI Score

2018	2019
.46	.48

HEALTHY .92 - 1.00 | GOOD .79 - .92 | IMPACTED .63 - .79 | POOR 0 - .63

Phab Score

2018	2019
121	113

HEALTHY 151-200 | GOOD 101-150 | IMPACTED 51-100 | POOR 0 - 50

Water Temperature

2018	2019
22.3° c	18.1° c

ACCEPTABLE <20.5 ° C | POOR >20.5 ° C

Taxa Richness

2018	2019
10	13

Taxa Evenness

2018	2019
0.638	0.625

Abundance

2018	2019
322	607

Takeaways

2018

Despite this site's more idyllic habitat features than our fully concrete-lined sites, its scores were not ideal. Its FLI scores were poor and comparable to concrete-lined sites' scores. Its good Phab scores did not translate into high taxa richness or abundance. Its taxa evenness levels were some of the highest among our sites, however, thanks to high numbers of Pyralidae (aquatic moths), Hydropsychidae (caddisflies) and Pelecypoda (freshwater molluscs).

2019

There was a slight increase in taxa richness and fewer non-insects, although the FLI remained in the "poor" category and the Phab decreased. The abundance of BMIs increased, primarily due to an increase in Chironomidae (midges).

Policy Recommenda

This river site has been the inspiration for many of the LA River revitalization efforts, but even though it may appear to be healthier than other sites, its biological communities are struggling. Revitalization efforts should prioritize improving its habitat and water quality through watershed-level interventions.

The Army Corps of Engineers removes sediment and plants in this section of the river, a practice which needs to be thoroughly reconsidered. A watershed-level look at how current high flow rates perpetuate invasive species is needed, rather than removing invasive species each year only for them to grow back. Native species should not be harmed.

Related Policy E orts

This site is part of the LA River Revitalization Master Plan (City of LA, 2007), the ARBOR Study (US Army Corps of Engineers, 2013) and plans for the Taylor Yard Riverfront Park (City of LA Bureau of Engineering, 2020). It is also part of the LA River Master Plan Update (County of LA, 2020).

Compton Creek Con | om Tributary

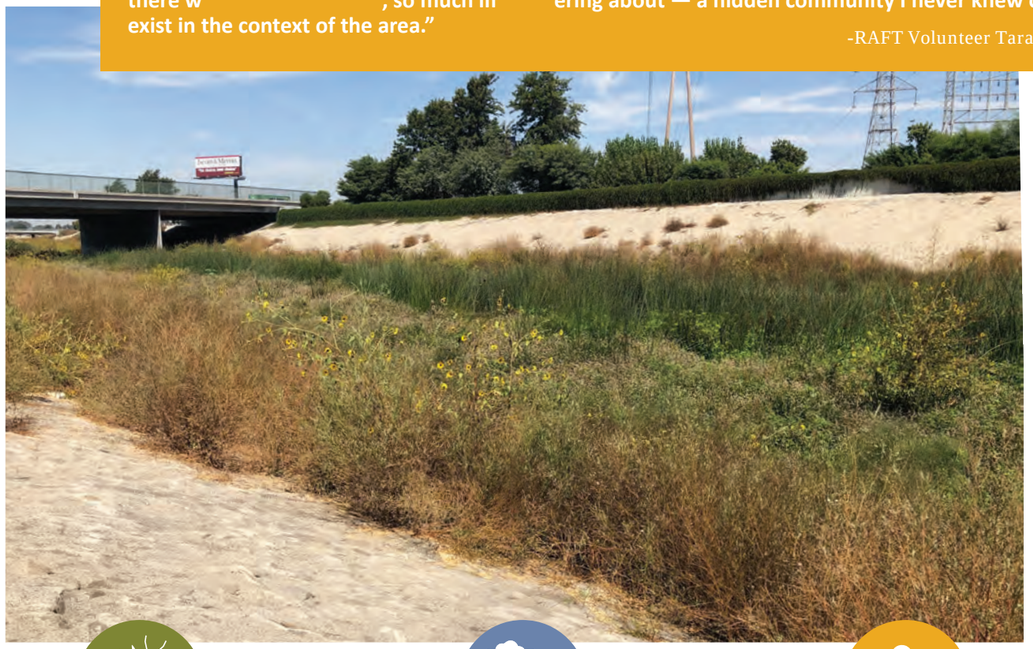
33.8428 ° | -118.2049 °

Date Surveyed: September 14, 2019

Recrea served: None, this ar o access

"I had never really seen Compton Creek before, although I passed by it almost daily. The area is industrial, so my expecta or the health and beauty of the water here were very low. As we got closer, we came across a disgus eenish-yellow goo. Once immersed in the vegeta turned out to be a wonderful secret, the tra om the road above no longer existed. I discovered there w , so much lif ering about — a hidden community I never knew could exist in the context of the area."

-RAFT Volunteer Tara Huhn



FLI Score

2019

.26

HEALTHY	GOOD	IMPACTED	POOR
.92 - 1.00	.79 - .92	.63 - .79	0 - .63

Phab Score

2019

104

HEALTHY	GOOD	IMPACTED	POOR
151-200	101-150	51-100	0 - 50

Water Temperature

2019

21° c

ACCEPTABLE	POOR
<20.5 ° C	>20.5 ° C

Taxa Richness

2019

6

Taxa Evenness

2019

0.78

Abundance

2019

23

Takeaways

2019

This site had our lowest FLI score in 2019 despite the fact that this is a soft-bottom section with more vegetated habitat than many of our other sites. It had the lowest taxa richness but the highest taxa evenness. These findings should be interpreted cautiously, however, given that we found such a low abundance of organisms. This low abundance may be partially due to poor water quality that we found, including high water temperatures and low dissolved oxygen readings. The BMIs that we found all had medium and high tolerance levels and primarily included Oligochaeta (aquatic worms), Cambaridae (crayfish), and Hyalellidae (crustaceans).

Policy Recommenda

Prioritize tributaries in planning efforts. Conduct additional monitoring in Compton Creek to confirm whether our results were an anomaly or part of a pattern. We would especially like to see a study of the Compton Creek sub-watershed and the impacts of industrial run-off on the creek.

Reduce sediment and vegetation removal practices. We did not monitor this site in 2018 because a few days before we planned to monitor here, we noticed that LA County Flood Control District contractors were scraping sediment. This practice can have devastating impacts on the ecosystem. Monitoring BMI communities before and after these practices could better demonstrate the impacts.

Improve access to the creek in collaboration with the community. Especially the soft-bottom sections of the creek could offer green and blue space to the community if people could reach it more easily.

Related Policy E orts

The Lower LA River Revitalization Plan (Rivers and Mountains Conservancy, 2018) relates to the nearby mainstem, but it largely ignores the tributary of Compton Creek.

Arroyo Seco Con | Concrete-Lined Tributary

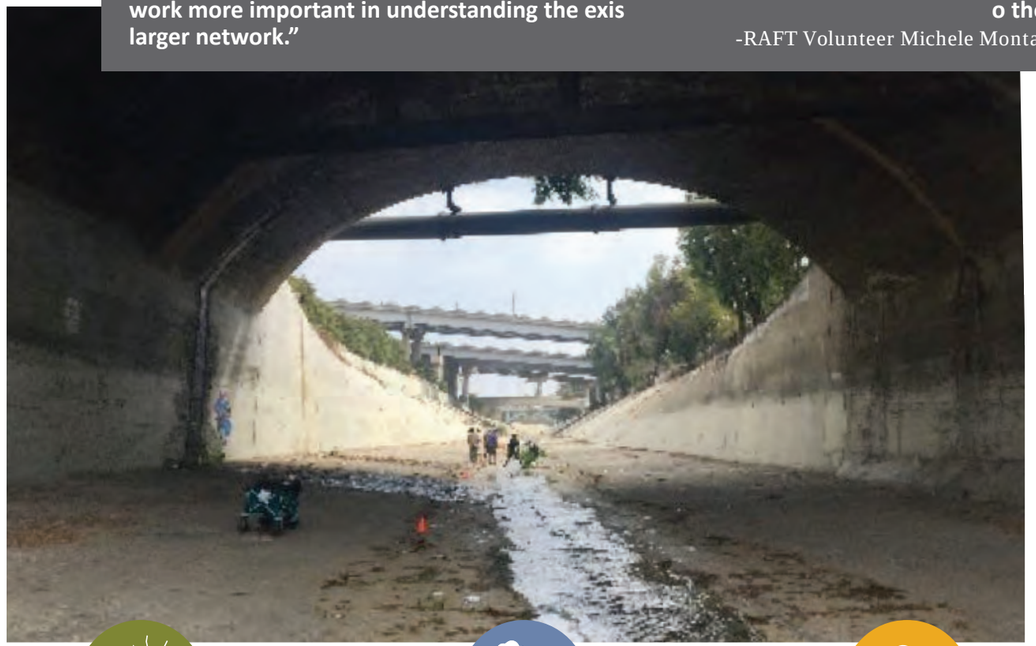
34.0479 ° | -118.1349 °

Dates Surveyed: August 25, 2018 and October 5, 2019

Recrea served: Bicycling nearby, this site lacks easy public access

"The Arroyo Seco Con ers so much possibility. We witnessed the impact of urban infrastructure on the natural syst sthand. I saw onions growing out of the cracks in the concrete, a variety of bir verhead, signs of life you wouldn't expect to see normally, and its adjacency to Los Angeles River ecosystem restora ojects makes our work more important in understanding the exis o the larger network."

-RAFT Volunteer Michele Montano



FLI Score

2018	2019
.54	.50

HEALTHY .92 - 1.00 | GOOD .79 - .92 | IMPACTED .63 - .79 | POOR 0 - .63

Phab Score

2018	2019
72	57

HEALTHY 151-200 | GOOD 101-150 | IMPACTED 51-100 | POOR 0 - 50

Water Temperature

2018	2019
24.2° c	16.6° c

ACCEPTABLE <20.5 ° C | POOR >20.5 ° C

Taxa Richness

2018	2019
13	12

Taxa Evenness

2018	2019
0.691	0.612

Abundance

2018	2019
486	242

Takeaways

2018

This site had the highest FLI and taxa richness and evenness scores among the concrete-lined channel sections, although the FLI score was still in the "poor" category. These scores may be due to this site being downstream of ecologically rich areas in the Arroyo Seco headwaters. It's possible many of the less pollution tolerant species that we found flowed into our sample rather than living at this site. For instance, we found Baetidae (mayflies) during both our upstream and confluence RAFT days.

2019

The FLI and Phab scores decreased slightly, and we found lower taxa diversity, more BMIs with higher tolerance values, and a lower BMI abundance. Part of this shift may be due to sampling this site later in the season and due to lower flows.

Policy Recommenda

Given this site's promising BMI community and central location in the watershed, it should be prioritized for ecological restoration and community access.

As mentioned previously in our Arroyo Seco upstream section, we would like to see an Arroyo Seco sub-watershed-wide restoration plan.

Related Policy E orts

This site is included in the LA River Revitalization Master Plan (City of LA, 2007) and the ARBOR study (US Army Corps of Engineers, 2013), which reference the confluence as a potential site for restoration.

Maywood | Concrete-Lined Mainstem

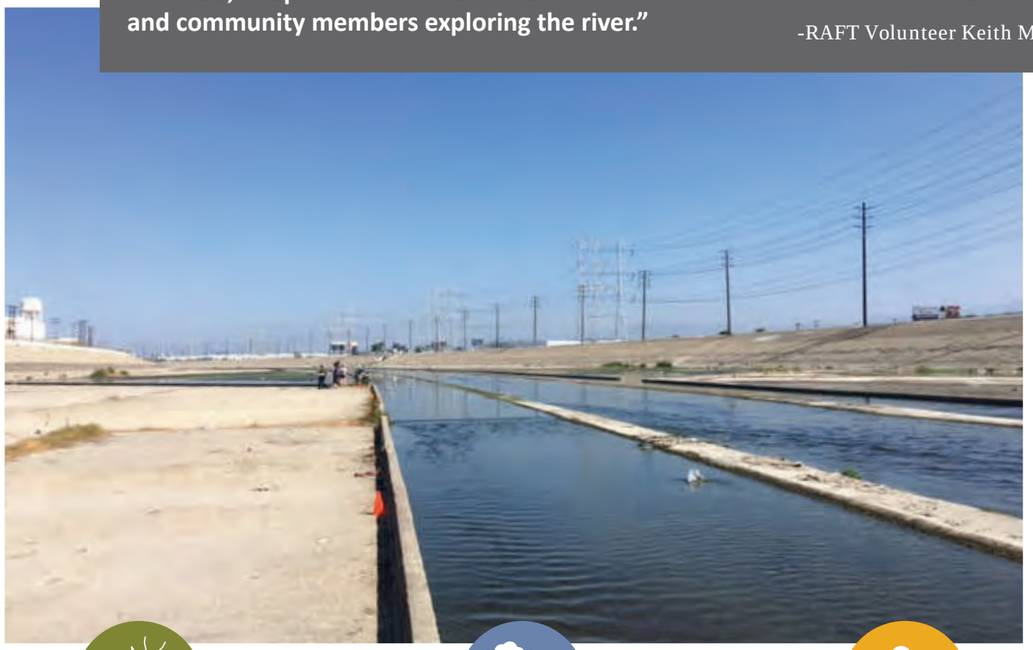
33.9865 ° | -118.1717 °

Dates Surveyed: July 14, 2018 and July 6, 2019

Recrea served: Bicycling, bird watching, dog walking and walking

"It's concrete, trash, and algae. You are going to want to wear gloves when you touch the water. And few things are more promising than seeing birds and dragon er in Maywood. Working with RAFT in Maywood's concrete channels, I hope we all decide in the future we want t oad or two, and community members exploring the river."

-RAFT Volunteer Keith Mataya



FLI Score

2018	2019
.29	.52

HEALTHY .92 - 1.00 | GOOD .79 - .92 | IMPACTED .63 - .79 | POOR 0 - .63

Phab Score

2018	2019
81	46

HEALTHY 151-200 | GOOD 101-150 | IMPACTED 51-100 | POOR 0 - 50

Water Temperature

2018	2019
29.4° c	22.7° c

ACCEPTABLE <20.5 ° C | POOR >20.5 ° C

Taxa Richness

2018	2019
7	13

Taxa Evenness

2018	2019
0.42	0.261

Abundance

2018	2019
624	605

Takeaways

2018

This site received the lowest FLI score of any of our sites, but had the highest abundance of BMIs. Pollution-tolerant Ostracoda (seed shrimp) and Chironomidae (midges) dominated the sample, contributing to low taxa evenness. High water temperatures and pH readings may have contributed to conditions that were inhospitable to many BMI taxa.

2019

Our FLI score increased within the "poor" category. We found higher taxa richness, fewer non-insect taxa and BMIs with lower pollution tolerance. The flow was shallower and slower, perhaps scouring BMI populations less and encouraging the growth of algae. At the same time, the taxa evenness decreased further due to an even greater proportion of midges.

Policy Recommenda

Increase access opportunities. This site is already an important access point alongside the river in South LA thanks to Maywood Riverfront Park. There are many more possibilities for connecting people with the river itself. LA Waterkeeper found this site conducive to environmental education for high schoolers.

Study the algae communities. The channel structure, divided into multiple segments, spreads out the river flow, giving rise to algal growth and attracting a community of wading birds. Studying the relationship between algal and BMI health here would be helpful.

Consider strategic removal of concrete and the diversion of flood water overflow into the 710 freeway (necessitating temporary closure) rather than into nearby communities. Also study upstream impacts of industrial pollution so as to protect human life.

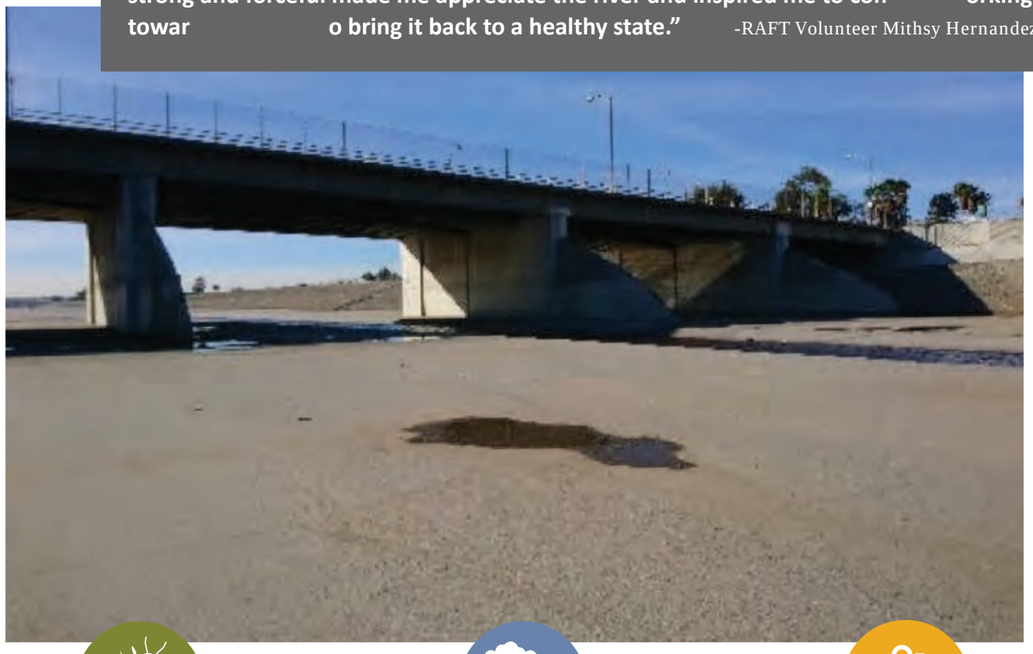
Related Policy E orts

Amenities adjacent to this site are included in the Lower LA River Revitalization Plan (Rivers and Mountains Conservancy, 2018), although the river itself is overlooked.

Rio Hondo Con | Concrete-Lined Mainstem

33.9298 ° | -118.1759 °
Date Surveyed: August 8, 2018
Recrea served: Bicycling

"Being in the Rio Hondo Con eminded me that although cert y look vas erent, it is all part of the same system. We are responsible for taking care of the river in its en ety. Although our river has been severely mistreat t it ran strong and forceful made me appreciate the river and inspired me to con orking towar o bring it back to a healthy state." -RAFT Volunteer Mithsy Hernandez



FLI Score

2019

.44

HEALTHY .92 - 1.00 | GOOD .79 - .92 | IMPACTED .63 - .79 | POOR 0 - .63

Phab Score

2019

57

HEALTHY 151-200 | GOOD 101-150 | IMPACTED 51-100 | POOR 0 - 50

Water Temperature

2019

32.4° c

ACCEPTABLE <20.5 ° C | POOR >20.5 ° C

Taxa Richness

2018
11

Taxa Evenness

2018
0.391

Abundance

2018
504

Takeaways

2018

This site had poor FLI and Phab scores and low taxa richness and evenness. This site is devoid of vegetation except for the occasional algae and had our highest temperature readings. Flows through the central channel have a scouring effect on BMI communities. This site had a high abundance of Chironomidae (midges).

Policy Recommenda

This site is just downstream of the confluence point of the LA River and Rio Hondo Confluence. It's a natural coming together point, for people and water. While community spaces are being planned above and adjacent to the river, connections to the river itself should not be overlooked.

The current concrete configuration makes the water flow quickly through a central channel. This has a scouring effect on the channel's biology and makes accessing this water a safety concern even during the dry season. This channel configuration needs to be addressed in bringing people to the river.

Consider strategic removal of concrete and the diversion of flood water overflow into the 710 freeway (necessitating temporary closure) rather than into nearby communities. Also study upstream impacts of industrial pollution.

Related Policy E orts

Amenities adjacent to and above this site are included in the Lower LA River Revitalization Plan (Rivers and Mountains Conservancy, 2018) and the LA River Master Plan Update (County of LA, 2020). This includes plans to cover the river with a concrete cap (LA County Public Works, 2020), further cementing the river in place and separating the community from it.

Long Beach | Concrete-Lined Mainstem

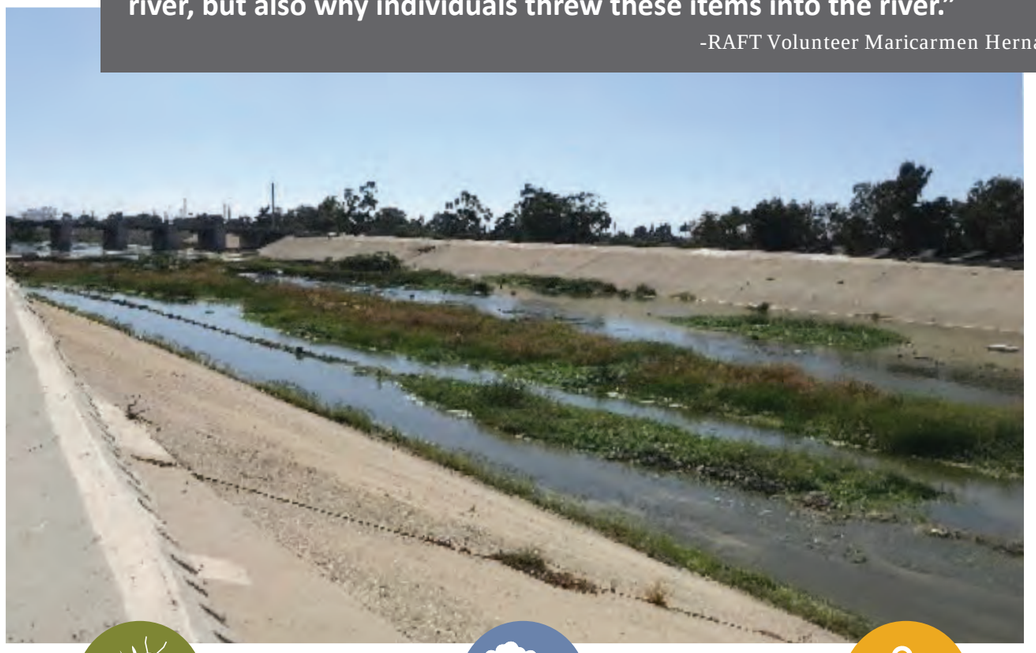
33.8058 ° | -118.2055 °

Dates Surveyed: October 17, 2018 and August 24, 2019

Recrea served: Bicycling, bird watching wnstream, photography

"I was shocked at the things we found inside the river, which included a sof e parts, clothing, and lots of other garbage. Going to this site sparked my interest not only about how these items ended up inside the river, but also why individuals threw these items into the river."

-RAFT Volunteer Maricarmen Hernandez



FLI Score

2018	2019
.31	.42

HEALTHY .92 - 1.00 | GOOD .79 - .92 | IMPACTED .63 - .79 | POOR 0 - .63

Phab Score

2018	2019
43	106

HEALTHY 151-200 | GOOD 101-150 | IMPACTED 51-100 | POOR 0 - 50

Water Temperature

2018	2019
20.3° c	23.4° c

ACCEPTABLE <20.5 ° C | POOR >20.5 ° C

Taxa Richness

2018	2019
10	11

Taxa Evenness

2018	2019
0.345	0.347

Abundance

2018	2019
635	609

Takeaways

2018

This site had low FLI and Phab scores, low taxa richness and evenness, and a predominance of Chironomidae (midges) and Ostracoda (seed shrimp). This lower watershed concrete-lined site captures sediment, which leads to the growth of some vegetation. When we surveyed this site in 2018, LA County-contracted bulldozers were beginning to remove vegetation and sediment, which may have contributed to our lower scores.

2019

We returned to the site to monitor prior to the annual vegetation removal. The FLI and Phab scores improved slightly even as the taxa richness, evenness, and abundance levels largely remained consistent. The experience of monitoring this site was entirely different, however, as we were experiencing an array of plant and birdlife within a concretized river stretch.

Policy Recommenda

Recognize this section's ecological value and possibility for future improvements with concrete removal. Concrete blocks in this section of the river hold sediment and water back, ironically allowing for some vegetation to grow and encouraging bird life (although there would be much more if concrete were removed). This site benefits from its proximity to the river's soft-bottom estuary that starts just downstream.

Rethink sediment removal practices not just in soft-bottom sections, but also in concrete-lined sections like this one, recognizing their ecological value and importance to the community.

This site especially would benefit from watershed-level restoration interventions since it is the recipient of everything going on upstream. This site especially struggles with trash pollution.

Related Policy E orts

The Lower LA River Revitalization Plan discusses potential plans for a site just downstream of this RAFT site in the estuary with a focus on boardwalks, trails, and crossings (Rivers and Mountains Conservancy, 2018).

ts from RAFT Volunteers

> Plans for river improvements are in process, but good policy depends on a foundation of good data. For me, RAFT is an opportunity to help shape the future of the river. As a volunteer I play only a small part in this effort, but along with other volunteers and organizations such as LA Waterkeeper, I think that the data we collect is essential for good policy. I hope that by providing our data we show that the river can and should be restored to a more natural waterway, where urban dwellers can truly experience nature, not just a large public space."
>
> **Steve Gustafson**

> It was amazing to walk down this stretch of the river [Sepulveda Basin] and really understand how so much life still depends on this water system. While the quality of the water I was wading in wasn't the best, it didn't seem to stop the surrounding riparian vegetation and abundance of small terrestrial mammals, insects, spiders, and birds from staying resilient and thriving. To go from doing water quality monitoring at the fully concretized site of Maywood during the last RAFT outing, to coming here and seeing first-hand just how many different ecosystems outside of the water the LA River still supports, made me reflect even more about how urban river restoration isn't just about creating human access but is also about allowing our native plant and animal systems to come back and create their own niches along the riverbanks as well."
>
> **Hannah Tropiano**

> Although our river has been severely mistreated, noticing that it ran strong and forceful made me appreciate the river and inspired me to continue working towards solutions to bring it back to a healthy state. I would like for our leaders to look at this area [Rio Hondo] and invest in making this section and other similar areas a place where community and ecology can thrive. I am not a fan of placing a tree or two and calling the problem fixed, so my hope for the future is to have the ecology of the river and the livelihood of its neighboring community flourish side-by-side."
>
> **Mithsy Hernandez**



PART 5: POLICY RECOMMENDATIONS & CONCLUSIONS

Policy Recommenda

Overview

PURSUE COMPREHENSIVE PLANNING & GOVERNANCE

- Ensure the entire watershed, including tributaries, is considered in LA River planning efforts and integrated into the LA River Master Plan Update.
- Start a Joint Powers Authority or similar joint management structure to promote coordination between the various agencies and municipalities with LA River oversight.
- Maximize investment in nature-based, multi-benefit stormwater projects in the LA River watershed to reduce flood risk.

UNITE COMMUNITY & ECOLOGY

- Make equitable access to healthy blue space a priority in planning processes, including access to the river and tributaries themselves, not just adjacent areas.
- Include Indigenous communities in all conversations, recognizing the importance of Traditional Ecological Knowledge.
- Design river planning and policy efforts to include community science data, and to encourage environmental education.
- Decriminalize access to the river, including by removing signs that threaten imprisonment and fines. Promote inclusive access with welcoming and multilingual signage.

TREAT THE RIVER AS A RIVER

- Establish biological objectives as regulatory standards for the LA River watershed.
- Treat channelization as an impairment and adopt policies to remove concrete in the river.
- Minimize sediment and vegetation removal in the river and tributaries. Take steps to improve the river ecosystem's resilience, such as by planting and fostering native plant species.
- Hire ecologists, biologists, and hydrologists to lead river planning and implementation.
- Recognize that the river has legal personhood rights as a living entity.
- Fund and implement the ARBOR study restoration projects.

FOSTER CLIMATE RESILIENCY

- Engage frontline communities along the river in planning processes, including related to flood risk.
- Incorporate climate change, equity, and ecology into community stabilization plans that protect the most vulnerable and prevent displacement related to restoration efforts.
- Update flood maps with climate change modeling.
- Consider how an equitable floodplain reclamation program could be executed.
- Limit new development along the river and in the floodplain so that we are not placing people in harm's way.



"Paddle the LA River 2012" by U.S. Army Corps of Engineers

Pursue Comprehensive Planning and Governance

Freshwater ecological research has demonstrated that restoration projects that primarily focus on making changes to habitats in streams (such as by designing meanders or installing boulders) have usually not led to the intended consequence of increasing stream ecological function (Palmer et al, 2010). Research instead points to the need for watershed-level changes that address the root causes of stream degradation (Roni et al, 2011). We cannot expect that efforts to add superficial elements to the river (i.e. planter boxes, terraced vegetation, etc.) will increase ecological structure or function or that they will help us increase climate resiliency.

The majority of our RAFT sites did not receive high FLI scores, which speaks to an interconnected system that is struggling.

The majority of our RAFT sites did not receive high FLI scores, which speaks to an interconnected system that is struggling. Even when there was more habitat value at our soft-bottom sites, this did not necessarily translate into improved biological communities. The burdens that these sites face from upstream pollution, artificially high flows, lack of connection to floodplain, ongoing sediment removal and other pressures continue to prevent a return of ecological integrity. Taking a watershed approach would mean thinking about how the low ecological scores of most of our sites are symptomatic of larger challenges.

Another example of this is we noticed that the majority of our sites had water temperatures that surpassed levels beyond which many benthic macroinvertebrates (BMIs) can survive, reproduce and grow. We cannot address this thermal pollution only by making superficial changes; we need to cool the watershed as a whole through adding canopy cover, removing concrete, and reducing urban run-off.

The majority of river planning in Los Angeles has been fragmented and focused on river-adjacent development.

The majority of river planning in Los Angeles has been fragmented and focused on river-adjacent development. Our findings and experiences show clearly that business-as-usual river revitalization efforts are not going to get us to a healthier LA River. We only have one LA River and watershed, and it is key to our region's health and climate resiliency.

Recommenda

- Ensure the entire watershed, including tributaries, is considered in LA River planning efforts.
- Government agencies pursuing any revitalization efforts should establish a joint powers authority to bring decisions about the river under a unified and collaborative decision-making body with community participation. This JPA can more easily pursue watershed-level planning efforts for the LA River watershed with metrics and definitions that address systemic needs. Just saying a planning process is considering the concept of a watershed is not enough.
- Agencies and cities should develop sub-watershed plans for LA River tributaries to address specific needs, such as industrial run-off in Compton Creek.
- The County of LA's Master Plan Update needs to connect the varying planning efforts that have already been completed to see where there may be contradictions, overlapping efforts, or the need for more systemic thinking.
- Maximize investment in nature-based, multi-benefit stormwater projects in the LA River watershed to reduce flood risk. A model example of how more holistic action can be taken through community participation can be found in the Water LA report.



Credit: William Durland

Treat the River as a River

The Clean Water Act states that its purpose is to restore and maintain the "chemical, physical, and biological integrity" of the United States' waters (33 U.S.C. §1251 et seq.). Yet California and most other states have not yet established any enforcement measures of the biological integrity of waterways. Ohio and North Carolina have led the way in establishing stream biocriteria (EPA, 2018). Instead, California relies on chemical indicators of water quality, which provide helpful but limited information about the integrity of stream ecosystems. Clean water flowing down a concrete-lined channel is not good enough.

More than 75% of our sites were in the poor stream health category. These sites are not maintaining biological integrity as mandated by the Clean Water Act.

As we observed in the RAFT program, the LA River watershed is struggling. None of our sites received FLI scores indicating a healthy stream condition. More than 75% of our sites were in the poor stream health category. These sites are not maintaining biological integrity as mandated by the Clean Water Act. Without regulatory oversight, these sites will remain out of compliance for years to come, depriving current and future generations of healthy waterways.

Establishing biological objectives (bio-objectives) is a necessary step to take in protecting the LA River and all of our waterways.

Establishing biological objectives (bio-objectives) is a necessary step to take in protecting the LA River and all of our waterways. We support government agencies establishing enforceable bio-objectives using the California Stream Condition Index (CSCI) as the foundational tool. The CSCI is the more intensive sister tool of the FLI that allows for comparison of stream health across the state of California. FLI results can also serve to flag sites that are not meeting regulatory criteria.

Recommenda

- The Los Angeles Regional Water Quality Control Board should evaluate existing data and establish bio-objectives for LA's waterways.
- The State Water Resources Control Board should establish statewide standards for bio-objectives. This process was started, stalled, merged with nutrient work, and is proceeding slowly. We would like this process to move forward swiftly.
- Include reaches of the LA River with CSCI scores below 0.79 as impaired for Benthic Community Effects on the 303(d) list.
- Treat channelization as an impairment and adopt policies to remove concrete in the river.
- Minimize sediment and vegetation removal in the river and tributaries. Take steps to improve the river ecosystem's resiliency, such as by planting and fostering native plant species.
- Hire ecologists, biologists, and hydrologists to lead river planning and implementation.
- Recognize that the river has legal personhood rights as a living entity.
- Fund and implement the ARBOR study restoration projects.



Credit: MIchael Notrica

Unite Community & Ecology

Many people in LA County lack access to their waterways, which is unacceptable.

As we made our way down the LA River watershed and farther away from the headwaters, we generally found lower stream health. Many people in LA County lack access to their waterways, which is unacceptable, especially given that the California Constitution establishes this access as residents' right (CA Constitution, 1976). Healthy waterways provide many ecosystem services, including improved recreational opportunities, cleaner air and water, protection from the urban heat island effect, educational opportunities, flood risk mitigation, and cultural amenities. There are a lot of worthwhile conversations happening about the need for greater access to green space, as indicated by the LA County Parks Assessment (County of LA, 2016). There is also a need for greater access to blue space, meaning access to our waterways.

Access to the river means access to clean water and a healthy ecosystem in a way that feels safe and open for everyone.

To be clear, we do not equate access to the LA River with access to structures along or near the river, such as bike paths and bridges. Nor do we think that covering the river with a concrete cap is increasing equitable access to the river. There are plans to cover parts of the LA River at the Rio Hondo Confluence as part of the LA County Master Plan Update and the Lower LA River Revitalization Plan implementation process (LA County Public Works, 2020). Access to the river means access to clean water and a healthy ecosystem in a way that feels safe and open for everyone. Current access challenges include steep concrete levees, threatening and confusing messaging about river access, and polluted water that poses a public health risk. It is not enough to encourage people to recreate in our waterways. We need to clean up the water as well so that it is safe. We should ask the question of how to maximize the ecological potential of all segments of our waterways through caring for our watershed, while making it easier for communities to visit our waterways.

There was tremendous excitement among RAFT volunteers to learn more about the river first-hand and to gain new scientific skills to use in schoolwork and careers. In fact, many of our RAFT volunteers have used their training in environmental studies and as a resumé builder for new careers. The LA River is also a living laboratory for elementary, middle, and high school students to learn about freshwater ecology. Community science programs have an important role to play as this form of career training and as a connector between people and policy. This is the next generation of river stewards and scientists, and we need to listen to their voices.

Tr cological Knowledge and environmental science should be at the forefront of planning e orts that revolve around a freshwater ecosystem or else the river will con o be ignored.

The LA region also has many ecologists, biologists, hydrologists, and Indigenous people with Traditional Ecological Knowledge who have largely been left out of river planning efforts. Engineers and landscape architects have generally led river planning efforts in LA. Traditional Ecological Knowledge and environmental science should be at the forefront of planning efforts that revolve around a freshwater ecosystem or else the river will continue to be ignored.

Recommenda

- Make equitable access to healthy blue space a priority in planning processes, including access to the river and tributaries themselves, not just adjacent areas.
- Prioritize the inclusion of Indigenous communities in all conversations, including about access and the prioritization of Traditional Ecological Knowledge and spaces.
- Design river planning and policy efforts to include community science data, and to encourage environmental education and related experiential learning at the river and tributaries themselves.
- Decriminalize access to the river, including by removing signs that threaten imprisonment and fines. Promote inclusive access with welcoming and multilingual signage.
- Expand the understanding of river-created ecosystem services to include mental health benefits, educational opportunities and cultural amenities.
- Recognize that access to a healthy LA River is only possible through watershed-level planning.



Credit: Lindsey Jurca

Foster Climate Resiliency

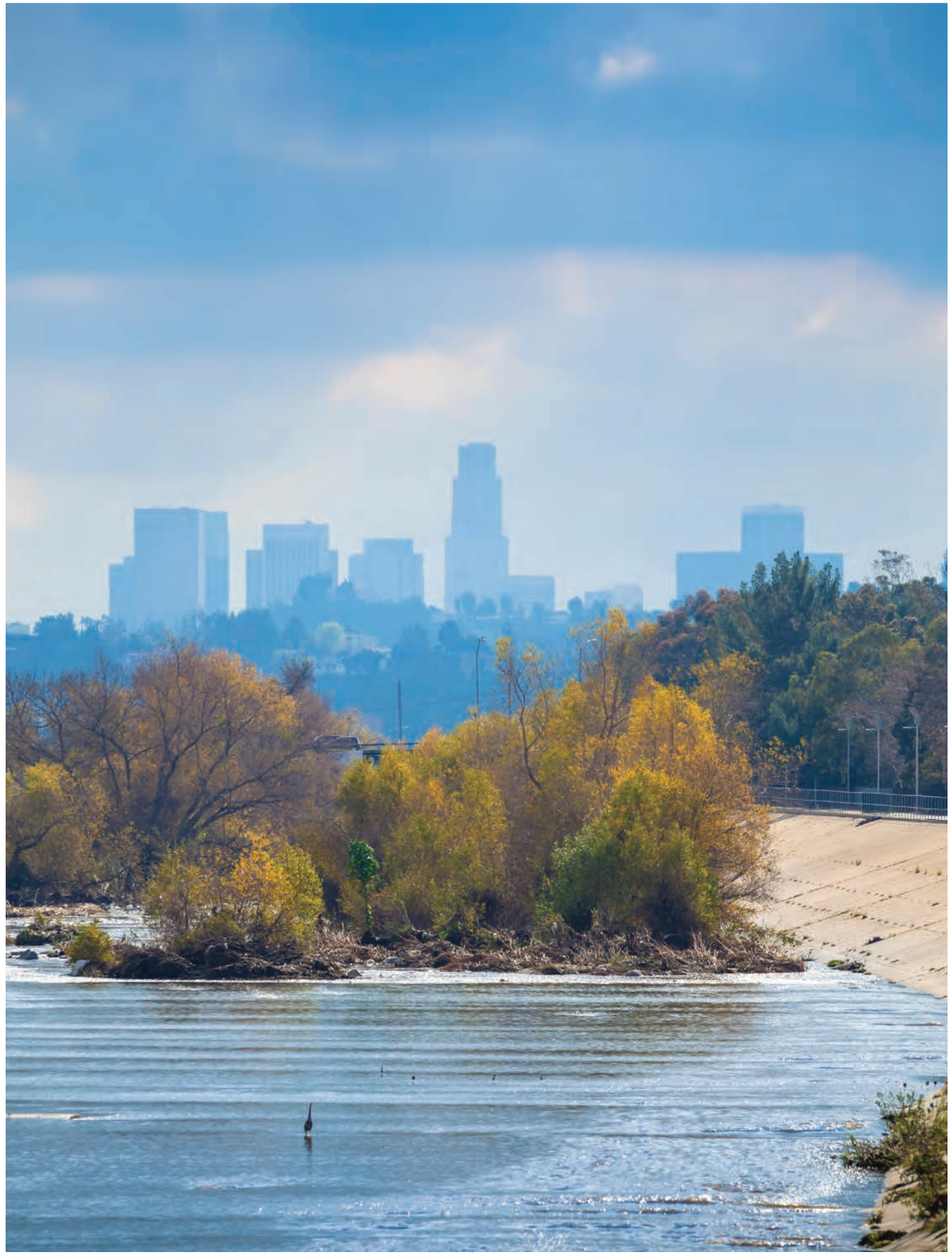
E orts to restore our waterways should be carried out in c in-depth community coordina stabiliza orts so that current c an enjoy healthier environments without fear of displacement and with the promise of economic bene for local residents.

We acknowledge the phenomenon of green gentrification in which restoration or revitalization projects lead to high rates of displacement and related social harm when the community is not consulted, collaborated with, or factored into the equation. Efforts to restore our waterways and watersheds should be carried out in conjunction with in-depth community coordination and stabilization efforts so that current communities can enjoy healthier environments without fear of displacement and with the promise of economic benefit for local residents. It's important to ask who restoration or revitalization efforts will benefit — and who they might harm — and proceed cautiously with that in mind.

We also think that any revitalization effort should recognize historical context, including the reasons why some communities live in vulnerable floodplain areas, including due to discriminatory and racist redlining practices. These are communities who are on the front lines of climate impacts, including heightened flood risks. We also recognize that a lot of development is happening now along the river that will put people in harm's way due to floods, and is often not created for or with the community. We need river planning that is driven by considering equity, ecology, and climate as interwoven concerns.

Recommenda

- Engage frontline communities along the river in planning processes, including related to flood risk.
- Recognize that climate, equity, and ecology are intersecting priorities and should be part of the same conversations.
- Incorporate climate change, equity, and ecology into community stabilization plans that protect the most vulnerable and prevent displacement related to restoration efforts.
- Update floodplain and flood risk maps to include climate change modeling projections and make these accessible to community members.
- Tie together upper and lower LA River planning processes, recognizing that what happens upstream will affect the health and well-being of communities downstream.
- Recognize that communities living along tributaries are impacted by these plans. They are also part of the LA River community and should not be ignored.
- Consider how an equitable floodplain reclamation program could be executed.
- Limit new development along the river and in the floodplain so that we are not placing people in harm's way.



Conclusions & Next Steps

The LA River is a living waterway and Angelenos in the RAFT program and beyond believe that it's worthy of protection. These are not new ideas, but current policy processes continue to fail in recognizing them.

Too much of the LA River revitaliza ocess has ignored the river, watershed, and surrounding c es, or worse, used the symbol of the river to spur harmful developments that keep power frastructure in place. The focus of many current revitaliza orts on developmen a o a healthy LA River or resilient watershed for the bene e genera

Through RAFT, we have found meaning in monitoring the river first-hand, understanding its baseline health, and gaining tools and data to advocate for better policies. RAFT makes us understand that everyone should have access to healthy waterways, and helps us imagine a more resilient future for our communities.

At the time of writing this report in 2020, RAFT is on hold due to the coronavirus crisis, but it is our hope that we can continue with this project in future years. In our 2019 season, we started to integrate the biodiversity app iNaturalist, which anyone can use to identify plant and animal species. We also began to collaborate with the CALeDNA project, which collects and analyzes environmental DNA to get a fuller picture of the biodiversity of California ecosystems (UC CALeDNA, 2020). We are also planning to generate CSCI scores with our data in our advocacy for the establishment of bio-objectives. We would like to scale up these parts of the program while continuing to collect critical baseline data to understand how the ecological health of the river is changing over time.

As different revitalization efforts move forward, we need informed community scientists like our RAFT volunteers to monitor how well these projects are actually addressing watershed and ecological health. At the core of these efforts, we recognize that we are a part of the river, and the river is a part of us.

esources

Check out the websites of many of our partner organizations who are doing fantastic work on and around the river.

Arroyo Seco Founda – arroyoseco.org
or a Be er Environment – cbecal.org
East Yar or Environmental Jus – eycej.org
Friends of the LA River – folar.org
From Lot to Spot – fromlottospot.org
Heal the Bay – healthebay.org
LA Neighborhood Land Trust – lanlt.org
Pac – pacoimabeautiful.org
Sacred Places Ins e – sacredplacesinstitute.org
The Nature Conservancy – tnc.org
The River Project – theriverproject.org
Trust for Public Land – tpl.org
UC CaleDNA – ucedna.comW



List of Figures

Figure 1: Map of the LA River watershed 16
Figure 2: Map of the RAFT field sites 24
Figure 3: Data table of RAFT sites 26
Figure 4: Materials needed for RAFT 29
Figure 5: RAFT methodology 30
Figure 6: RAFT transect layout 31
Figure 7: A data snapshot of results across the RAFT sites 37
Figure 8: RAFT FLI scores from 2018 and 2019 38
Figure 9: Abundance of BMIs found at RAFT sites in 2018 and 2019 40
Figure 10: RAFT taxa richness in 2018 and 2019 41
Figure 11: RAFT taxa evenness in 2018 and 2019 42
Figure 12: RAFT taxonomic breakdown in 2018 and 2019 43
Figure 13: RAFT % tolerance values in 2018 and 2019 44
Figure 14: RAFT functional feeding groups in 2018 and 2019 45
Figure 15: 10 most commonly found BMIs at RAFT sites in 2018 and 2019 46
Figure 16: RAFT water temperature in 2018 and 2019 48
Figure 17: Air temperature at RAFT sites in 2018 and 2019 49
Figure 18: RAFT pH readings in 2018 and 2019 50
Figure 19: RAFT dissolved oxygen readings in 2018 and 2019 51
Figure 20: RAFT Phab Scores in 2018 and 2019 52
Figure 21: Comparison with other LA River bioassessment data 55
Figure 22: Overview of site-specific FLI results 63

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ATTACHMENT 6

LA River

River Management Strategies for The Glendale Narrows

Feasibility Study

January 2021

FRIENDS OF THE LA RIVER

Consultants:

Sherwood Design Engineers
2301 E 7th St suite a-238
Los Angeles, CA 90023

Studio MLA
251 South Mission Road
Los Angeles, CA 90033

The Water Institute of the Gulf
1110 River Road S, Suite 200
Baton Rouge, LA 70802

Grant funding provided by:

Santa Monica Mountains Conservancy (SMMC)

LA River

River Management Strategies for The Glendale Narrows

Feasibility Study

January 2021



Figure 1: Project Context Map with LA River highlighted

Table Of Contents

I. **INTRODUCTION** 4

II. **SECTION 1 LA RIVER HYDROLOGY** 8
Past and Present

III. **SECTION 2 EXPLORING LOCAL SOLUTIONS** 22
Channel Widening, Bypass Systems and Point Source Diversion

IV. **SECTION 3 GOING REGIONAL** 28
Opportunity Sites for Detention and Infiltration

V. **SECTION 4 MULTI-BENEFICIAL & RESILIENT RIVER** 34
Channel widening, Bypass systems and Point source diversion

Introduction

The Glendale Narrows stretch of river features natural springs that support stands of willows, sycamores, and cottonwoods. The many trails and paths along the river are heavily used for hiking, riding, and bird watching.

Los Angeles has an opportunity to restore a section of wild urban river to pursue multi-benefit management solutions. Proposed strategies for this stretch of river leverage local and regional approaches to improve flood risk, and model a progressive water infrastructure response to a changing climate.

This report begins to explore an actionable portfolio of solutions that can support a climate-responsive region and community that values the river as an asset, with the 2016 Arbor Study as a starting point.

The goal of this study is to better understand existing LA River channel capacity and flood risks in the Glendale Narrows. This study analyzes a variety of strategies at multiple scales, and characterizes a combination of solutions that optimize the river and community as a climate adaptive and resilient ecological system connected to place.



Figure 2: The LA River along the Glendale Narrows



Figure 3: Riparian Planting Along the LA River



Figure 4: Small Rapids in the LA River



Figure 5: LA River Kayaker

Goals

In response to proposed plans and projects that potentially disrupt major opportunities for habitat restoration, public access, climate resilience and improved flood protection in the surrounding communities, FoLAR is making an effort to understand and communicate associated engineering constraints and opportunities.

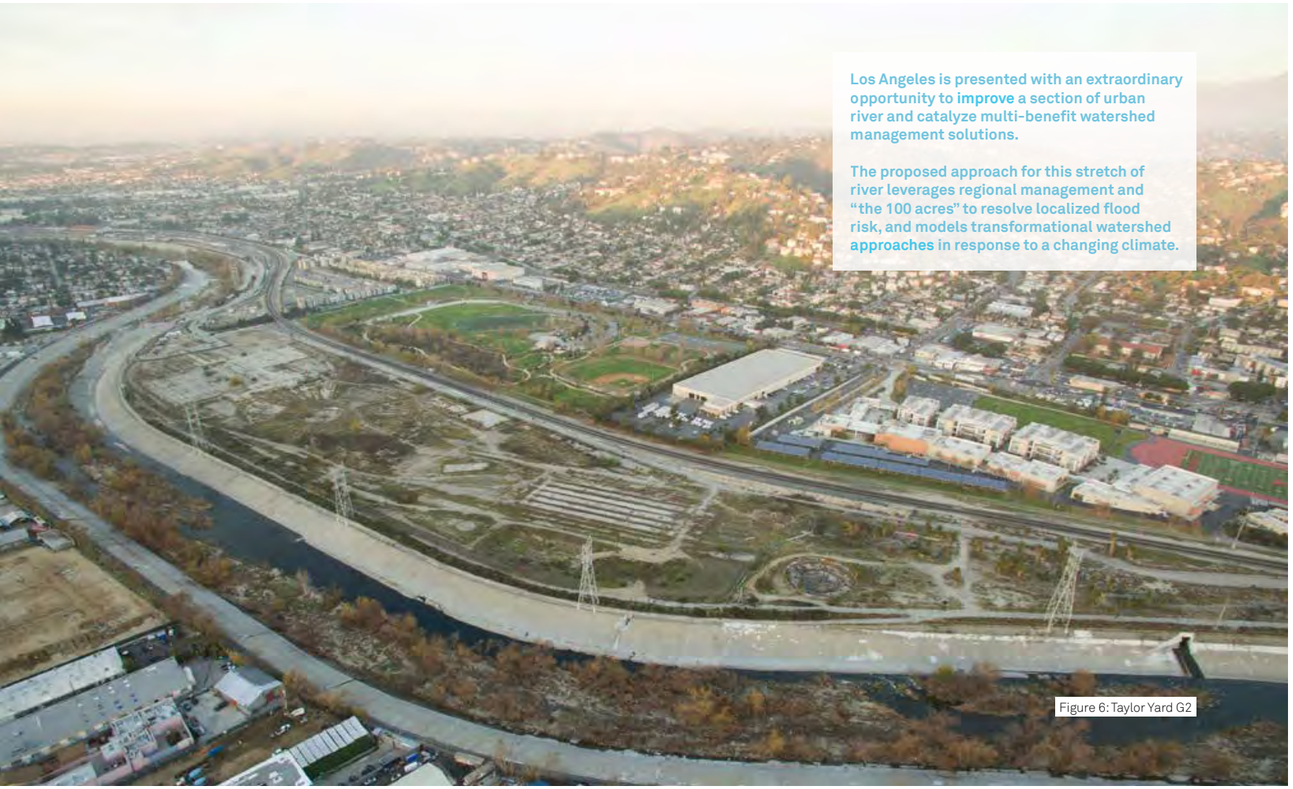
Consistent with our mission, this work aspires to find viable solutions for a stable and naturalized mid-river that provides flood mitigation while enhancing community benefits and ecosystem services for the Glendale Narrows.

No current plan for this section of the river includes a substantive improvement to flood control for this community, and several new plans threaten to undermine access to nature and a healthy natural river, citing flood control. The intent of this study is to explore and communicate opportunities to enhance these important benefits while mitigating flood risk.

This is a feasibility study exploring possible new ways to plan for the river by incorporating novel and integrated solutions, and should not be viewed as a designed proposal.

Exploring a tangible portfolio of solutions to support a river friendly community, this study intends to:

- Review and understand LA River flood risk and channel capacity in the Glendale Narrows,
- Evaluate strategies to resolve the 100-yr flood event while expanding upon ecosystem benefits of the river and enhancing equity / public access,
- Propose a community based kit of solutions for localized flood response and calculate their potential impact for future implementation in the urban-river ecosystem, and
- Envision a watershed and civic infrastructure to improve flood risk management and prepare for climate change in a way that is resilient, adaptive, and regenerative.

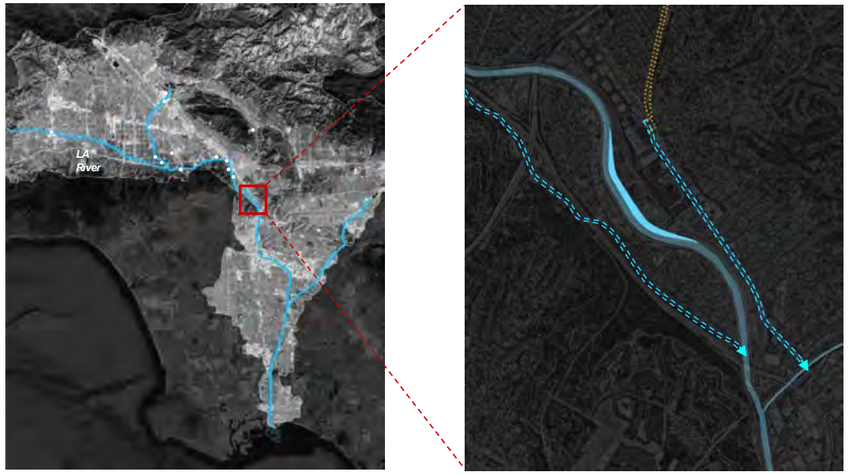


Los Angeles is presented with an extraordinary opportunity to **improve** a section of urban river and catalyze multi-benefit watershed management solutions.

The proposed approach for this stretch of river leverages regional management and "the 100 acres" to resolve localized flood risk, and models transformational watershed **approaches** in response to a changing climate.

Figure 6: Taylor Yard G2

A Study To Enable Ecology, Public Access, And Flood Protection



REGIONAL MANAGEMENT
Reducing In-Channel Flows

LOCAL ENHANCEMENT
Capturing Localized Stormwater + Ecological Flood Response

This study seeks to simultaneously repair ecological process and function, improve public access to the river, and increase community scale protection from flood risk. To do so this study looked beyond the channel and immediately impacted neighborhoods, to assess a regional watershed context. While localized engineering approaches are often feasible, associated impacts to ecology, public access, neighborhood fabric, and social equity can be stressed beyond capacity when flood control is the only lens.

For the purpose of this effort, when local stressors that drive multi-benefit outcomes toward diminishing returns were identified, regional strategies were evaluated to provide a more holistic outcome.

This approach allows for calibration of local vs regional efforts to optimize multi-benefit uses of the Los Angeles River in both Atwater Village and Elysian Valley.



Figure 7: View of the Los Angeles River at Taylor Yards, looking downstream

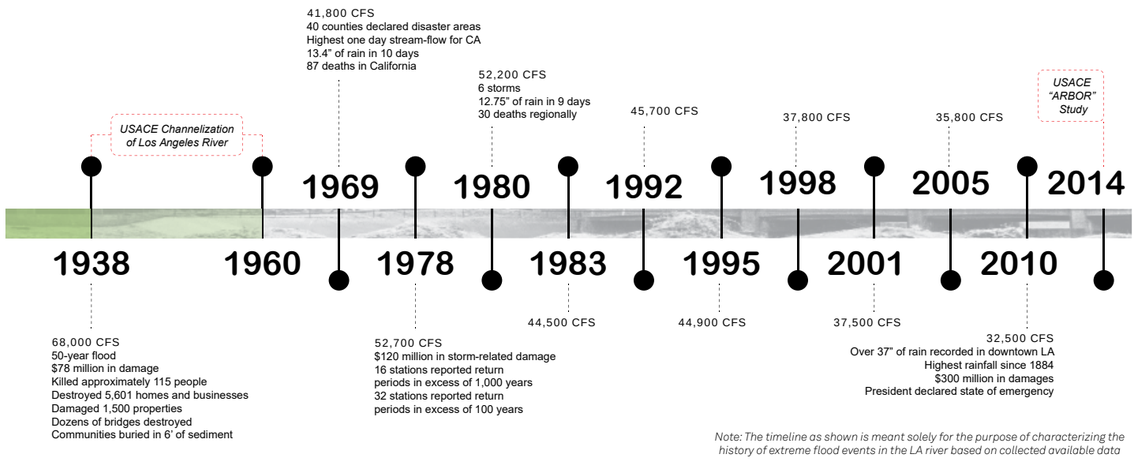
01

LA River Hydrology

Past and Present

Extreme Flood Events Timeline

Channelization of the LA River began in 1938. Data from recorded flood volumes are consistent with predicted flooding in the source USACE models, lending calibration to the modeling process.



Note: The timeline as shown is meant solely for the purpose of characterizing the history of extreme flood events in the LA river based on collected available data

Current Flood Risk In Elysian Valley

100-Year Event (USACE - 2016)



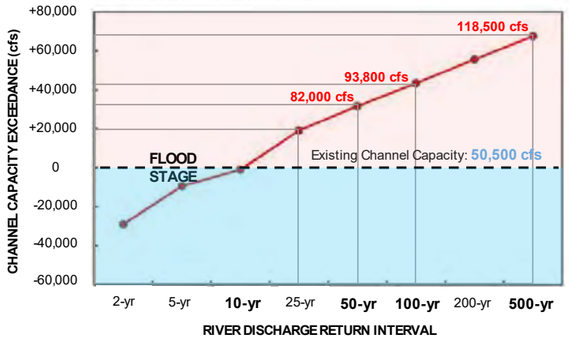
500-Year Event (USACE - 2016)



USACE flood models show extensive flooding during the 100-year flood event (1%), both in Atwater Village and Elysian Valley, with potential risk factors in the area as low as an expected 10-year flood event (10%). Cypress Park on the east bank is approximately 12' higher in elevation than Elysian Valley on the west bank, and outside the flood zone. These communities have built up adjacent to the river, leaving little room to move. Taylor Yard is a complex legacy rail facility, with infrastructure and environmental challenges and constraints. Sediment and vegetation in the channel itself have reduced the capacity of the reach to convey high volumes. Runoff from both sides of the Elysian Valley contribute significantly to the risk of flooding, exacerbating peak flows as they reach outfalls into the channel. The prospect of large flood walls, armoring of the channel, widening of the channel, and potential disruption of local neighborhoods are among the challenges that must be faced in this stretch of river.

LA River Channel Capacity and Exceedance

STORM EVENT - RIVER HYDROLOGY



UNCAPTURED STORMWATER:

10-Year Storm*	= Total 50,500 CFS	=	0 cfs Exceeds Channel
50-Year Storm*	= Total 82,000 CFS	=	31,500 cfs Exceeds Channel
100-Year Storm	= Total 93,800 CFS	=	43,300 cfs Exceeds Channel
500-Year Storm	= Total 118,000 CFS	=	67,500 cfs Exceeds Channel

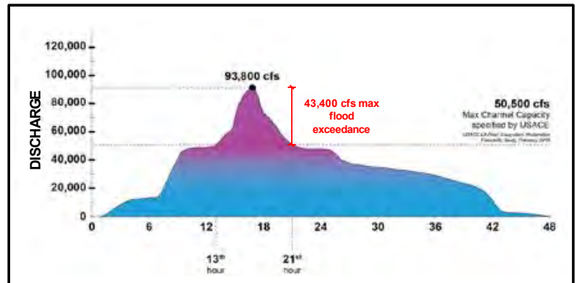
**Official data is from an 11-year storm that was measured to be 50,500 cfs. City report also shows at Station 57, the design flow for a 57-year storm is 83,700 cfs.*

Initial work was done to identify, establish and understand current challenges and existing conditions. Using available HEC-RAS and published data, the team was able to characterize the magnitude of the flood volume and duration of actual and modeled flood events.

Results suggest that the existing channel capacity is quickly overwhelmed by flood intervals as low as the 10-year event (10% risk of flooding in a given year).

This is consistent with previous studies, and suggests the potential necessity for highly invasive engineering strategies to either reduce flow within the channel, or substantially increase conveyance capacity of the channel.

100-YEAR STORM EVENT



Volume Exceeding Max Channel Capacity During 100 Year Event:

Hour 13 = +3,400 CFS
Hour 14 = +9,900 CFS
Hour 15 = +30,000 CFS
Hour 16 = +43,300 CFS
Hour 17 = +34,800 CFS
Hour 18 = +20,600 CFS
Hour 19 = +14,700 CFS
Hour 20 = +3,900 CFS
Hour 21 = +400 CFS

100 Year Flood Event Volume
4.33 Billion Gallons
(13,300 Acre-Feet)

The approach taken first addressed flooding locally, then assessed the impact to local communities and the optimization of multi-benefit and stakeholder values. This process included sensitivity to impacts on local neighborhoods, public access to the river, and integrity of ecological process and function.

Using flood volume and duration data informs local capacity for conveyance and the bulk storage volumes needed to augment flood response.

It becomes quickly clear that localized flooding cannot be resolved easily solely within the channel, nor within local neighborhoods. Excess flood volumes are substantial, and exceed channel and floodplain capacity significantly during peak flows.

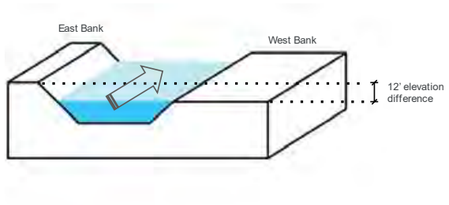
Working iteratively, the team used flood volume and duration data to understand the deficit in local capacity and consider the magnitude and significance of the potential for larger scale interventions at the regional scale.

LA River Channel - Existing Conditions

Additional Capacity Needed for 50-year Flood: **31,500 cfs**

Additional Capacity Needed for 100-year Flood: **43,300 cfs**

Additional Capacity Needed for 500-year Flood: **67,500cfs**



Existing Channel Capacity: **50,500 cfs**
(excluding sedimentation/ vegetation volume)

Channel Cross-Section Area: ~7000 sq ft

Velocity: ~7.2 ft/s

**values used for calculation of design solutions*



The team first evaluated the status of the river channel, including route, capacity, bank heights, sediment, vegetation, and other factors. The adjacent Taylor Yard site presents significant opportunity for flexibility, and also major challenges with regard to existing power and rail infrastructure and soil quality. The existing channel geometry allows for a maximum conveyance volume of 50,500 cfs, which can be exceeded when storms are larger than the 10-year event.

The 100-year/1% risk brings volumes that exceed channel capacity by as much as 43,300 cfs. To account for climate change uncertainty and conform to protocols applied by other modeling efforts in the watershed, the 500 year/ 0.2% event was also calculated.

Space and budget constraints limit the ability to simply widen or deepen the channel itself; levee enhancements, large bypass structures, and additional concrete armoring of the channel can be prohibitively expensive and begin to compromise other benefits including ecology, public access, and social equity concerns.

Local and regional constraints and opportunities were evaluated for social, environmental, and financial viability as well as technical feasibility. Based on these values, strategies were prioritized and weighted without consideration of property boundaries, jurisdiction, or political constraints.

Modeled strategies were assembled to develop scenarios using a suite of approaches and scales in concert. Evaluating responses to ecological, social, and economic implications, the team determined suitability for multiple factors including but not limited to flood mitigation capacity, potential cost and complexity of construction, environmental impact, and potential to disrupt local neighborhoods and associated gentrification and economic stability.

Unmanaged or unanticipated sediment deposition has been identified as an issue that can reduce total channel volumes, undermining the ability to convey flood waters during large storm events.

While native vegetation and ecosystem vitality are essential for a resilient Los Angeles River, managing vegetation composition and density is important to reduce resistance (Manning's co-efficient) that can slow the flow of water and cause height to rise in a precarious fashion.

To address this variable, an approach to channel management was optimized in the model to reflect multi-stakeholder values and priorities. Native vegetation is maintained at approximately ambient densities, factoring in proposed removal of invasive species and assuming on going maintenance to this effect.

Sediment management is approximated to reflect retention of a minimum and variable quantity of sediment consistent with supporting a healthy riparian ecosystem typology. It is assumed for modeling purposes that seasonal management of total sediment would occur as needed to maintain flood conveyance, within the parameters of supporting native riparian vegetation for habitat.

It is believed that this approach provides optimization of flood conveyance, within the described parameters of a multi-benefit management approach.

The following pages describe the results of strategy and scenario evaluation, using HEC-RAS flood modeling norms to evaluate results. An iterative process produced outputs that were limited as further described herein.

These charts provide information regarding source data, location, contribution to flood response, and additional considerations affecting decision making. Cost was an input, though not treated as a stand alone limiting factor; when other impacts were also present, cost was more closely considered.

Ultimately 8 different scenarios were modeled, ranging from local interventions only to approaches that attempt to solve flooding upstream only. A variety of intermediate scenarios attempt to optimize for strategies at both local and regional scales.

As noted, some scenarios do not successfully resolve 100 year flood risk; the most ambitious multi-scalar scenario nearly achieves the aspirational flood resilience goal of the 500 year event, or 0.2% likelihood of a flood occurring in Elysian Valley.

Strategies

STRATEGIES			PROJECT EXTENT	PROS AND CONS			OPPORTUNITIES	CONSTRAINTS
STRATEGY	REFERRED REPORT	VOLUME CAPTURED		ECOLOGY	SOCIAL	ECONOMIC		
Hansen Dam Discharge (Into Quarry)	Hansen Dam Basin Master Plan, USACE (September 2011)	-15,200 cfs	Quarry A = 134 acres Quarry B = 145 acres	(+) Expand Ecological Zone Around Quarry Edge	(+) Potential Recreation Opportunities	$$$$	Able to detain peak discharge from Hansen Dam for 16-20 hours, capturing the peak of a large storm event	Cost of acquisition and implementation of diversion/pump infrastructure to harness quarry(s) as reservoirs
Regional Infiltration	USBR LA Basin Study, Appendix B (September 2014) EPA Green Infrastructure Technical Assistance Program (2012) One Water LA 2040 Plan, Volume 3 (April 2018)	-2,656 cfs	36 Miles of River Channel	(+) Expand Riparian Ecology Into Adjacent Floodable Parcels	(+) Increase Recreation Opportunities (-) Park Closures For Construction	$$ (+) Phased Work	Recognizing public parcels immediately adjacent to the river channel to serve as capture, dentition and potential sites of infiltration based upon local soil permeability. Watershed-level approach to mitigating flood risk along the length of the river	Requires coordination at a regional scale, public parcels would need earthwork to create berms (24"-36") along floodable perimeter to enhance detention capacity and protect surrounding vulnerable buildings/ infrastructure
Taylor Yard Outfall Intercept To Arroyo Seco	LA Bureau of Engineering Taylor Yard G2 River Park Project, Proposition O, Page 16 (January 2019)	-7,100 cfs	1.75 Miles	(+) Opportunity To Upgrade Surface Stormwater BMP/ LID Infrastructure (-) Likely Would Require Removal Of Existing Street Trees	(+) Businesses Won't Get Affected During Construction	$$$	Diverting existing outfall pipes (Eagle Rock and Project 480) to downstream Arroyo Seco wash along N. San Fernando Rd to mitigate flood risk in the Elysian Valley area, less invasive construction within the streetscape to install piping	Would require a portion of N. San Fernando Rd to be closed to traffic during construction, but would not disrupt traffic across all lanes and adjacent businesses would be able to remain accessible to the public
190' Channel Widening	USACE LA River Revitalization Master Plan "ARBOR Study" (September 2015) (different dimensions) LA River Ecosystem Restoration Project (April 2016)	-27,400 cfs	25 Acres along 1 Mile	(+) Expand River / Riparian Ecological Systems	(+) Promote River Access	$$ (-) Excavate Toxic Soil	In-channel modification to excavate soils from Taylor Train Yard (G2) to create an additional 190' width to allow for larger flow volumes during peak storm events	Removal of soil would generate traffic as earth moving vehicles would shuttle to and from the project site
Riverside Drive - River Bypass	LA River Ecosystem Restoration Feasibility Study, Appendix A (August 2013) (non street specific)	-13,150 cfs	2.9 Miles	(+) Opportunity To Upgrade Surface Stormwater Bmp/ Lid Infrastructure (-) Likely Would Require Removal Of Existing Street Trees	(+) Opportunity For Pedestrian Oriented Projects (-) Construction May Partially Disrupt Vehicle Circulation	$$$	Divert a portion of the river flow from upstream and have it travel via bypass culvert beneath Riverside Dr - would divert a substantial volume during peak storm events	Construction of the bypass culvert would occupy the entire width of the roadway and has the potential to be somewhat disruptive to business activity and roadway access for the surrounding neighborhood(s)

Scenarios

CHANNEL CAPACITY (Elysian Valley) = 50,500 cfs		
STORM EVENT TOTAL FLOW - ARBOR		CHANNEL EXCEEDANCE - ARBOR
100-Year (0.01)	93,800 cfs	43,300 cfs
500-Year (0.002)	118,500 cfs	67,500 cfs

	STRATEGIES		ALT 1	ALT 2	ALT 3	ALT 4	ALT 5	ALT 6	ALT 7	ALT 8
LOCAL	*190' Channel Widening*	-27,400 cfs	X	X	X	X		X	X	X
LOCAL	*Taylor Yard Outfall Intercept to Arroyo Seco*	-7,100 cfs	X			X			X	X
LOCAL	*Riverside Dr - River Bypass Culvert (90' x 25')*	-13,150 cfs	X	X						X
REGIONAL	*Hansen Dam Discharge (Into Quarry)*	-15,200 cfs			X	X	X	X	X	X
REGIONAL	*Regional Capture & Infiltration*	-2,656 cfs					X	X	X	X
TOTAL FLOW MITIGATED			**-47,650 cfs**	**-40,550 cfs**	**-42,600 cfs**	**-49,700 cfs**	**-17,856 cfs**	**-45,256 cfs**	**-52,356 cfs**	**-65,506 cfs**
% CAPTURED OF THE 100-YEAR			110%	94%	93%	115%	41%	104%	121%	151%
% CAPTURED OF THE 500-YEAR			71%	60%	63%	74%	26%	67%	78%	97%

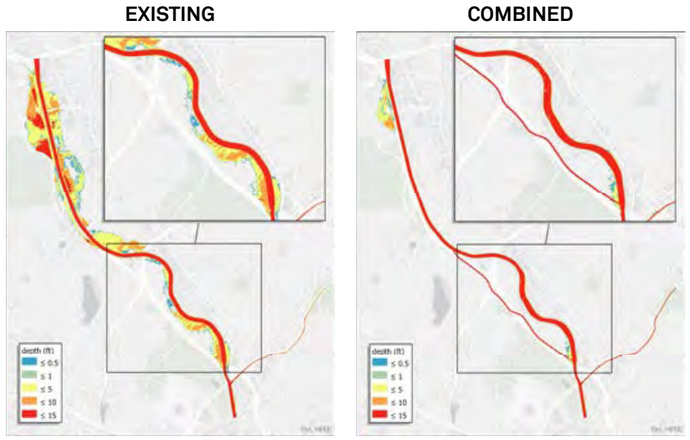
NEIGHBORHOOD RESPONSE: 100-Year Storm Event

Alternative 1 Modeled

REGIONAL CAPTURE
+
190' CHANNEL WIDENING
+
STORM OUTFALL DIVERSION
+
RIVERSIDE BYPASS CULVERT
+
36" ATWATER FLOOD BARRIER

The combination of strategies modeled shows that the 100-year event can be managed while enhancing ecology, public access, and other benefits of a naturalized river typology.

Applying regional strategies to manage flood risk upstream can reduce the cost and impact of local interventions.



The local and regional strategies discussed in this report were modeled to evaluate their flood mitigation capacity, individually and in combination, to see whether flooding could be reduced during a 100-year storm event in the Atwater Village and Elysian Valley communities. USACE data was used to inform the modeling and simulation of the baseline conditions were incorporated so that the results are comparable with previous efforts.

Modeling an optimized combined strategy to meet multi-benefit stakeholder concerns shows that there are solutions to resolve flooding within the context of public access and ecological integrity, without major disruption to sensitive neighborhoods and associated social concerns.

The optimized solution modeled for the purpose of demonstrating the efficacy of such an approach includes several interventions working in tandem, toward the common goals outlined.

While no individual strategy was able to fully mitigate the risk of flooding to both the Atwater Village and Elysian Valley neighborhoods, a combination of strategies demonstrated that there is aggregate capacity to capture and convey higher volumes.

CHANNEL WIDENING:
Increasing the local channel width by 190 feet, excavating portions of Taylor Yard along the eastern edge of the river, increased flow capacity within the immediate channel; the greatest reduction of height is 3.6 feet near the upstream extent of where the widening occurs.

OUTFALL INTERCEPT:
The diversion of Mt Washington's storm outfall flows (7,100 cfs), redirected to the Arroyo Seco Tributary, results in a decrease in river height ranging from 0.3' to 1 foot along this extent of the LA River channel, downstream from the current outfall at Taylor Yard.

BYPASS CULVERT:
Diversion of river flows using a bypass culvert along Riverside Drive increased local flow capacity and was able to reduce the depth of the river by as much as 2 feet near the upstream end of the affected reach.

FLOOD BARRIER:
The implementation of a 36" tall flood barrier along the eastern embankment of the Atwater Village community, where modeling has shown that it is vulnerable to flood, was successful in eliminating all flood risk to the neighborhood in the model.

REGIONAL CAPTURE:
A combination of regional detention and infiltration, removing a total of 17,850 cfs (19%) from peak channel flows, resulted in the greatest reduction in flood extents and depths. Flow reduction results in decreased depths along the LA River centerline ranging from 1' to 4.5' in height.



Figure 8: Taylor Yard

02

Exploring Local Solutions

Channel Widening, Bypass Systems and Point Source Diversion

Channel Widening & Bypass Systems

Many options were considered, including but not limited to modification of main channel size and route, bypass sizing and routes, off-channel stormwater management, increased channel depth, fortification of levees, re-grading, and urban intervention. Considering constraints and opportunities, it was determined that a combination of widening and management of sediment and vegetation optimizes at approximately 190' of additional width, after which benefits are nominal.

Widening and sediment management in the study area would considerably reduce flood risk locally; however these alone are not sufficient to alleviate the 100-year flood event. To further resolve local flooding, diversion and bypass systems were considered within the affected neighborhoods. A number of options were evaluated, and the most effective were studied further.

Ultimately a west side bypass culvert along Riverside Drive was coupled with a stormwater outfall diversion along North San Fernando Road; the latter ideally as part of a more comprehensive green infrastructure upgrade. The following pages provide additional information regarding the potential size and placement of such features, as well as the specific modeling results.



Outfalls in Local Neighborhood

The model identified a significant volume of stormwater originating from Mount Washington, due to impervious surfaces and numerous legacy springs that have been piped to the stormwater system. These flows discharge via a network of outfall pipes to the LA River. Two of these outfalls (Eagle Rock Drain and Project 480) have substantial peak discharge rates totaling 7,100 cfs, exacerbating flood risk in Elysian Valley. In an effort to redirect these flows, a diversion is explored. The two outfalls are diverted south to the Arroyo Seco Tributary, immediately upstream of it's confluence with the LA River. This tributary and confluence infrastructure has been upgraded to accommodate large storm events, and as modeled can convey the addition of the diverted outflow.

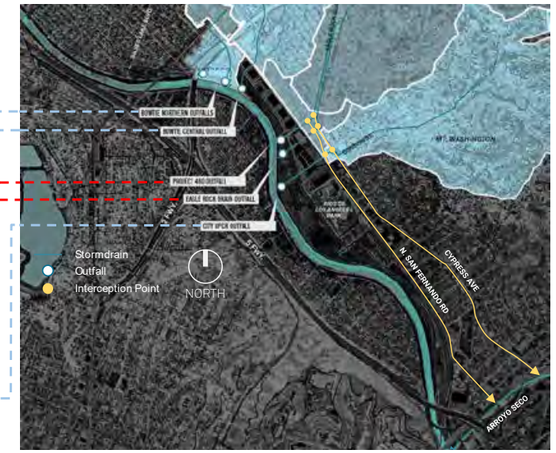
Bowtie Northern Outfalls
Pipe: 66" diam.
Discharge: 13 CFS
High Pollution (ap. 3x CTR limits)
+348.4' Inv. On site

Bowtie Central Outfall
Pipe: 11' x 11'
Discharge: 310 CFS
+351.5' Inv. On site

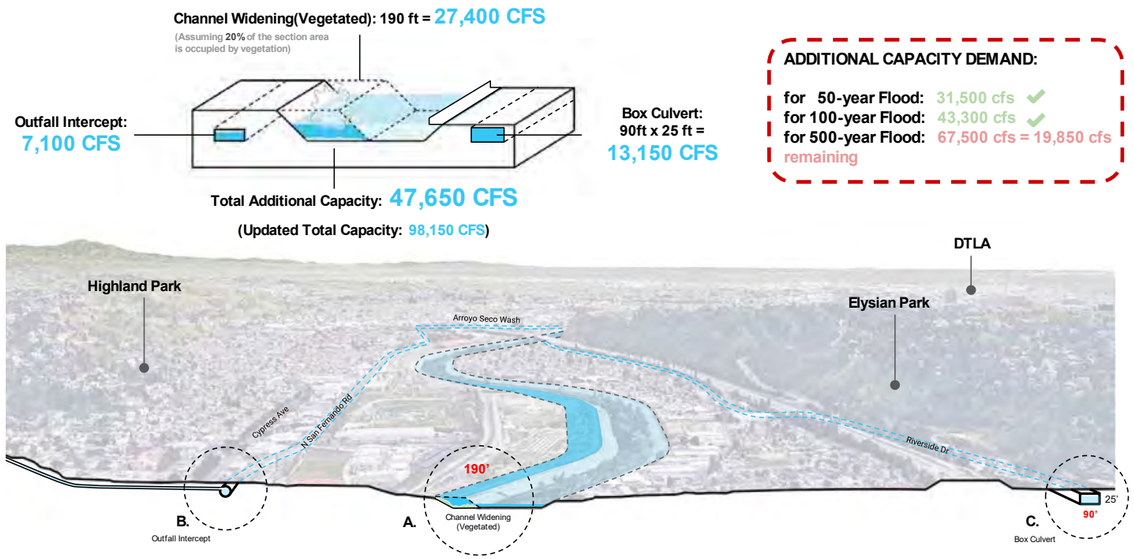
Project 480 Outfall
Pipe: 10' x 12'
Discharge: 2,550 CFS

Eagle Rock Drain Outfall
Pipe: 10' x 10'
Discharge: 4,550 CFS

City UPCR Outfall
Pipe: 78" diameter
Discharge: 130 CFS



Channel Widening + Box Culvert + Outfall Interception To Meet 100-year Flood



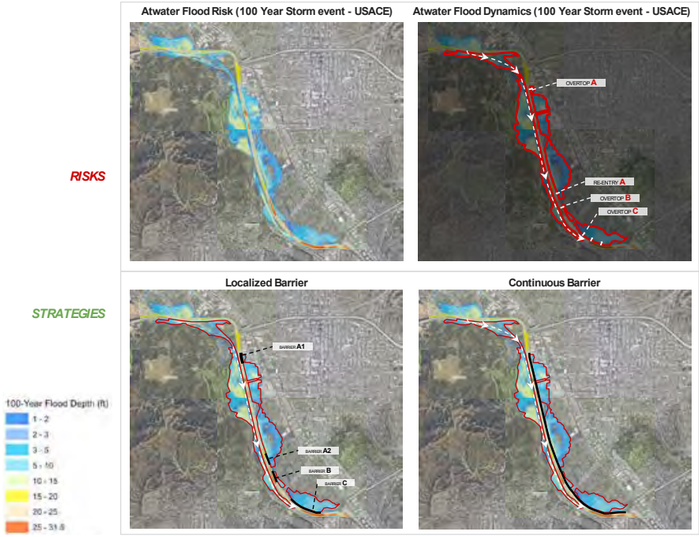
Elysian Valley to Atwater Village

Flood Risk and Barriers

Modeling of strategies at multiple scales in Elysian Valley determined that three solutions working together locally - a stormwater outfall intercept underneath North San Fernando Ave, channel widening of the River by 190 feet, and a bypass culvert under Riverside Drive - would provide an effective set of strategies to alleviate 100-year flood risk in the immediate neighborhoods. This is achieved by simultaneously increasing capacity and reducing peak floodwater conveyed through the channel.

It was hoped that relieving flow constraints and associated flooding in Elysian Valley would have a beneficial effect in Atwater Village as well. However, this adjacent area upstream did not show flood reduction in response to the model. Before investigating larger scale interventions, further work was done to understand the flood risk locally.

Preliminary model results suggested that a linear barrier as low as 36" may prevent 100-yr flood events for all of Atwater Village, and that targeting key breach locations could greatly reduce the linear distance of modeled flood control structures.



Strategy Evaluation - Hydrology Modeling for 100-YR Flood Event





The basis of design referenced findings described by the USACE in 2016, via river flood modeling. That work identified the need to establish a flood barrier along the eastern embankment adjacent to the Atwater Village community. This was accomplished in anticipation of projected El Niño storm events.

Never intended as a permanent long-term solution, temporary barriers were installed at that time, which have been incrementally removed since; some remnant segments remain in place.

This study found that removing the remaining segments and replacing them with smaller and more targeted, attractive, durable, design-integrated permanent features can nearly eliminate 100-year flood risk in the Atwater Village neighborhood.

Atwater Eastern Embankment

A multi-beneficial Flood Barrier (~36")

While conversations to improve the recreational and aesthetic experience of the river in this region are underway, there appear not to be plans for mitigating flood risk. The North Atwater East Bank Riverway Project, which transforms 2.2 miles of access road into a multi-use accessible riverway trail, does not seem to address flooding.

Study models suggest that a 36" flood wall along the River could significantly mitigate flooding in the neighborhood. This could be done in a variety of ways, ranging from seat walls to grading or other landscape structures.

The proposed construction timeline for this project (April 2021 to February 2022) may allow opportunity to integrate more proactive tactics addressing flood management.

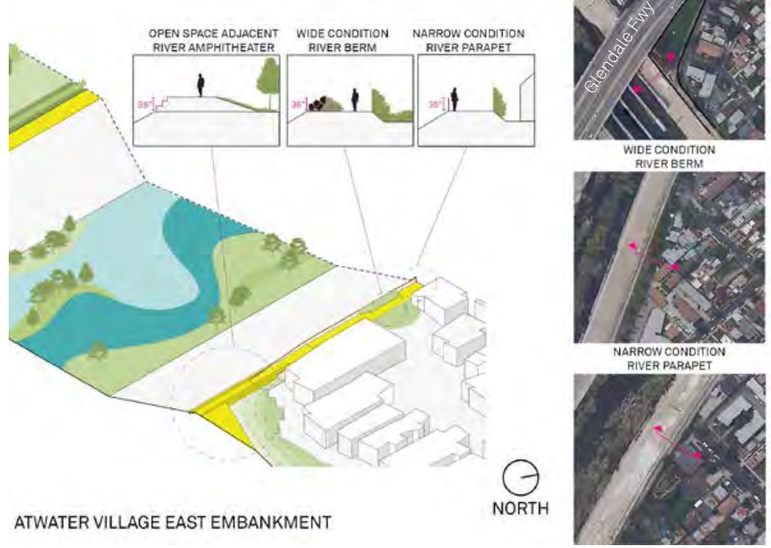




Figure 11: Taylor Yard in 1947

03

Going Regional

Opportunity Sites for Detention and Infiltration

The Los Angeles River Watershed

Bringing the concept of regional management to the Los Angeles River Watershed, a set of larger strategies can begin to mitigate flood concerns throughout the watershed in a more holistic way.

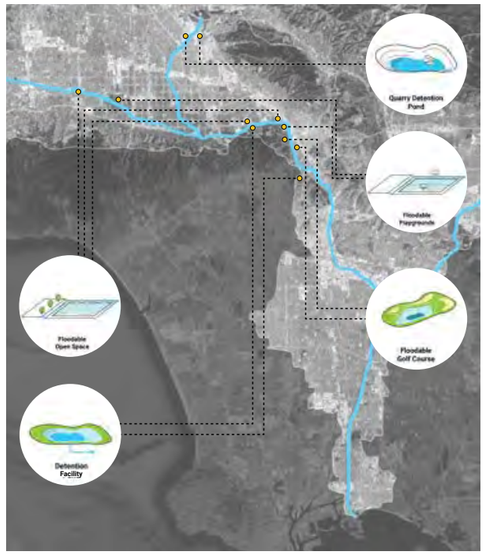
For example, an approach that would offset the need to pursue outfall intercepts from Mount Washington, over the 13 hour modeled flood event, would require approximately 7,628 acre feet of storage volume. Distributing a 4' depth across approximately 1900 acres of floodable open space would eliminate the need for downstream infrastructure improvements.

Appropriate candidate sites might include properly modified parking lots, parks, golf courses, select streets, and other open spaces that can be identified as "suitable for flooding without posing risk to building and infrastructure damage."

Property ownership, jurisdiction, cost, and liability are just a few of the challenges to a coordinated approach to regional off-channel flood control. However the benefits extend beyond flood control, and this study acknowledges the value of a holistic watershed strategy leveraging existing open space, an integrated approach to urban design, and a smart river technology approach.

To understand the river system at a regional watershed scale, the team evaluated upstream flow dynamics impacting Elysian Valley. Assessing flow data from dam release and tributary stream gauges informed modeling of flood dynamics during major storm events.

Analysis of land use, elevation, soils, and other inputs produced a simple, preliminary map of regional opportunities for potential receiving grounds capable of contributing to regional detention and retention. Further investigation was done to identify and prioritize infiltration and recharge opportunities where soils may have capacity to absorb excess water and replenish groundwater and/or low summer river flow. Such sites present opportunities for alleviating downstream flooding, while augmenting ecology and public access opportunities. The following pages provide additional information and insight into this process of exploring peak flood reduction.



Regional Strategies

Achieving the volumes necessary for reduction of peak flood volume in the Elysian Valley is a challenging endeavor. In addition to complex jurisdictional, financial, and property ownership dynamics, the existing fabric of the Los Angeles basin is highly urbanized and the operations and management of regional infrastructure are difficult to coordinate. Modification of elevations, flow paths, and land use dynamics is complex, as are associated stakeholder relationships. Three strategies can help to overcome these hurdles.

LARGE SCALE STORAGE

The most obvious approach to reducing peak flood volume is impoundment; this approach is well illustrated by existing dams in the major tributaries. Additional large parcels do exist, which can make significant contributions. These include abandoned quarries, parks, golf courses, and legacy infrastructure such as Silver Lake.

RIPARIAN URBANISM

Managing watershed flood dynamics requires an integrated approach that includes modification of city fabric in targeted locations. Achieving long term flood resilience requires a broader, and at times more granular approach. Making land use decisions to inundate public and private lands, even for very short durations and frequencies, requires education, transparency, and consensus.

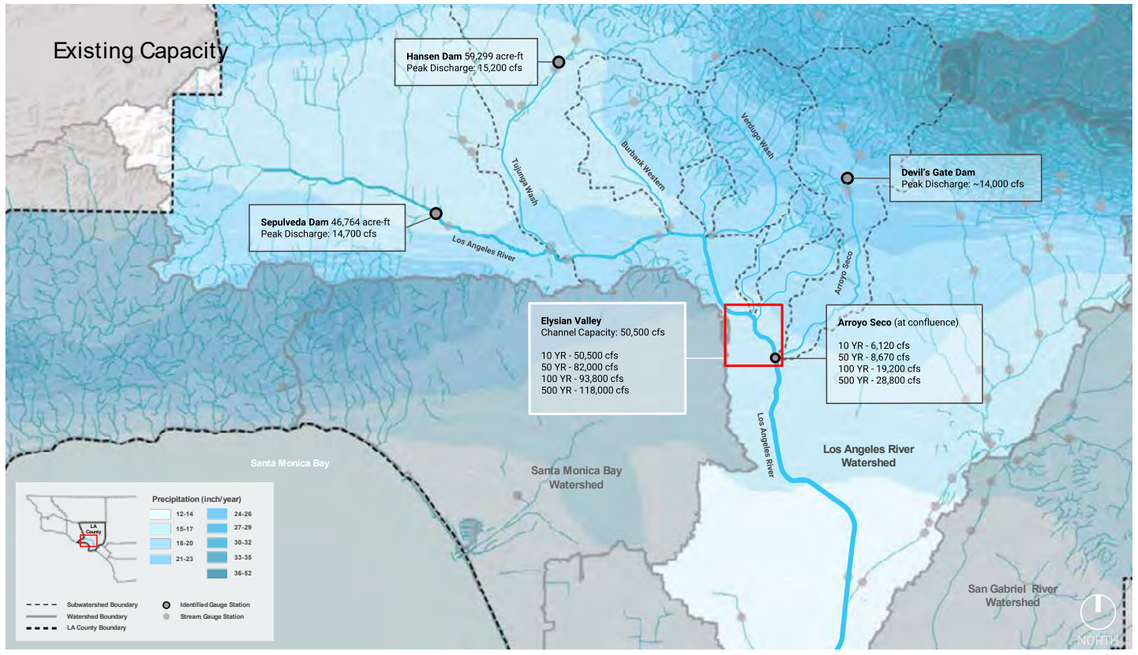
SMART RIVER

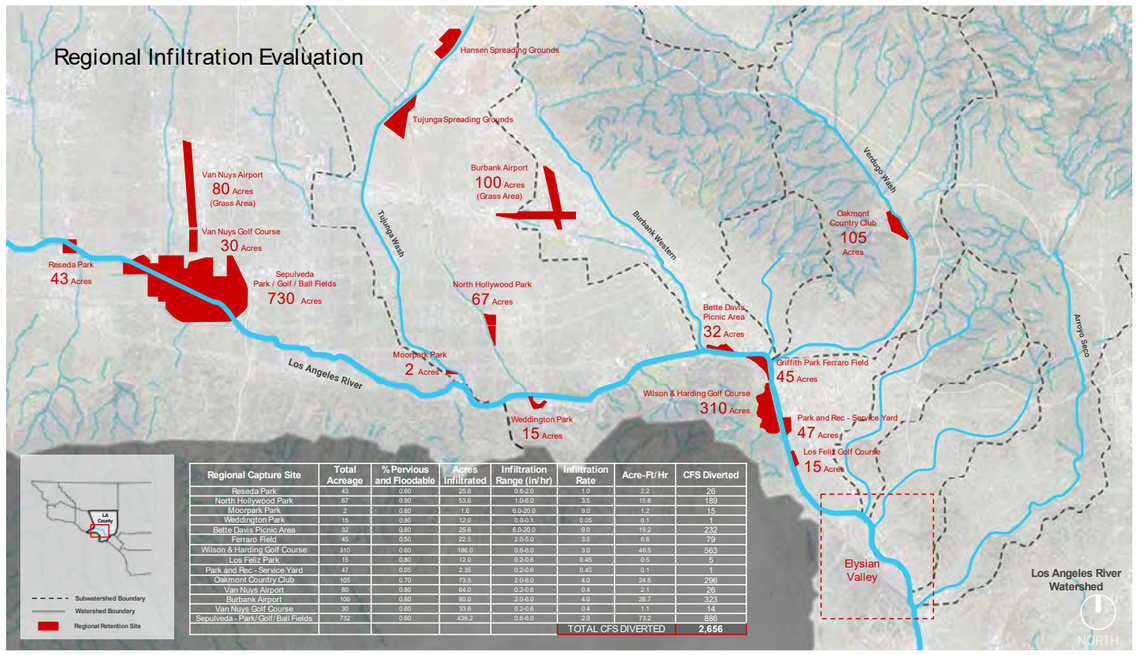
Regional strategies to reduce flooding during precise time periods associated with peak flood events are difficult to operate with precision. Available data must be accurate in real time, and infrastructure needs to operate with reliability in a timely fashion as well. Conventionally, such components of flood management are manually operated, with often inconsistent information available during emergency situations. These dynamics make it difficult to achieve optimum efficiency, relying instead upon redundancy and judgment to protect low lying areas.

A systematic and integrated application of emerging smart technology offers unique data collection, risk assessment, and infrastructure management opportunities not previously available. The ability to deploy dynamic flood storage assets in response to real time monitoring information, combined with channel flow curves from previous events enables higher precision, accuracy, and efficiency of watershed scale flood control assets.

Innovative technology integration provides an approach to watershed scale flood management that very likely enables a vegetated, ecologically intact, publicly accessible natural river to convey a managed flood event without failure.

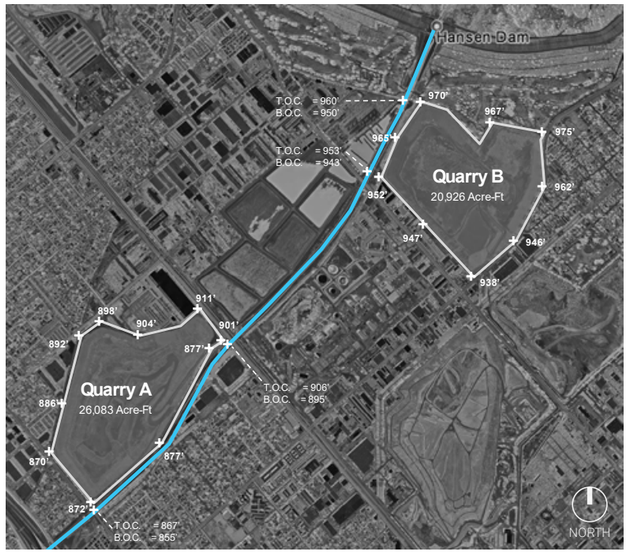






Regional Capture Site	Total Acreage	% Pervious and Floodable	Acres Infiltrated	Infiltration Range (in/hr)	Infiltration Rate	Acre-Ft/ Hr	CFS Diverted
Reseda Park	43	0.60	25.8	0-6.0	1.0	2.2	26
North Hollywood Park	67	0.80	53.6	1.0-6.0	3.5	15.6	189
Moorpark Park	2	0.80	1.6	6.0-20.0	9.0	1.2	15
Weddington Park	15	0.80	12.0	2.0-20.0	0.05	0.1	1
Bette Davis Picnic Area	32	0.80	25.6	6.0-20.0	9.0	19.2	232
Ferraro Field	45	0.50	22.5	2.0-5.0	3.5	6.6	79
Wilson & Harding Golf Course	310	0.60	186.0	0.6-6.0	3.0	46.5	563
Los Feliz Park	15	0.80	12.0	0.2-0.6	0.45	0.6	5
Park and Rec - Service Yard	47	0.05	2.35	0.2-0.6	0.45	0.1	1
Oakmont Country Club	105	0.70	73.5	2.0-6.0	4.0	24.5	296
Van Nuys Airport	80	0.80	64.0	0.2-0.6	0.4	2.1	26
Burbank Airport	100	0.80	80.0	2.0-6.0	4.0	26.7	323
Van Nuys Golf Course	30	0.60	33.6	0.2-0.6	0.4	1.1	14
Sepulveda - Park/ Golf/ Ball Fields	732	0.60	439.2	0.6-6.0	2.0	73.2	886
					TOTAL CFS DIVERTED		2,656

Regional Strategies - Menu Of Options
Hansen Dam and Downstream Quarries - Capture & Detention



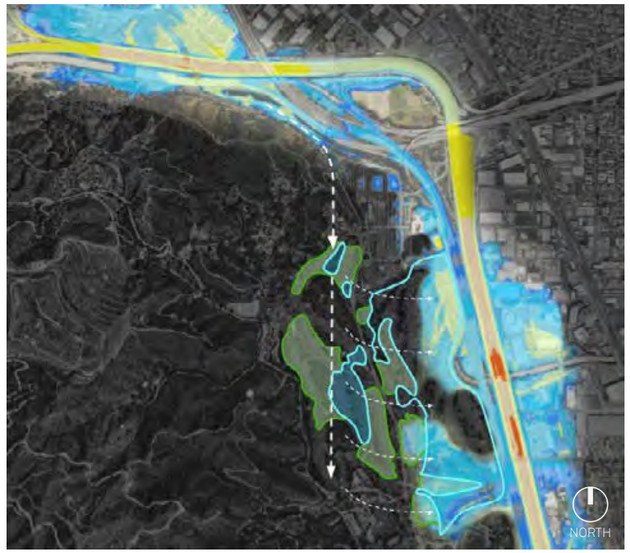
A few sites were evaluated in greater detail, to validate assumptions and provide relative certainty for site metrics. If optimally managed, existing quarries downstream of Hansen Dam have the potential to eliminate Tujunga Wash peak flood contribution to the main stem of the LA River. Both quarry volumes were determined to be large enough to capture the entirety of the Hansen Dam peak discharge during a large storm event, removing a significant flow volume from Tujunga Wash for critical periods of time.

Hansen Dam
Peak Discharge = 15,200 cfs
1 Hr Peak Discharge = 1,256 acre-ft

QUARRY A:
Average Bottom Elevation = 676 ft
Average Top Rim Elevation = 870 ft
Average Depth = 194 ft
Acres (S/A) = 134.45
Stormwater Capture Potential = 26,083 Acre-Ft
Could capture 20 hours of peak discharge

QUARRY B:
Average Bottom Elevation = 794 ft
Average Top Rim Elevation = 938 ft
Average Depth = 144 ft
Acres (S/A) = 145.32
Stormwater Capture Potential = 20,926 Acre-Ft
Could capture 16 hours of peak discharge

Regional Strategies - Menu Of Options
Wilson And Harding Golf Course - Retention & Detention



A potential floodable open space adjacent to the Elysian Valley study area, the Wilson and Harding Golf Course presents another important scale for potential capture and storage of significant stormwater volumes. Accounting for areas inundated by the modeled 100-year flood event, evaluating the grading potential of the site, and understanding elevation constraints that would require routing of stormwater from further upstream, this area was identified as a candidate for prolonged detention, sized consistently with precedent golf course applications, designed not to disrupt play.

TOTAL FLOOD RETENTION CAPACITY = 9,144,944 sq ft

5,762,920 sq ft
Flooding without grading & time restrictions

3,382,024 sq ft
Flooding with grade restrictions & 7 days maximum submerged in water.

100-Year Flood Depth (ft)
- 1 - 2
- 2 - 3
- 3 - 5
- 5 - 10
- 10 - 15
- 15 - 20
- 20 - 25
- 25 - 31.6



Figure 12: The Los Angeles River at Taylor Yard G2

04

A Multi-Beneficial & Resilient River

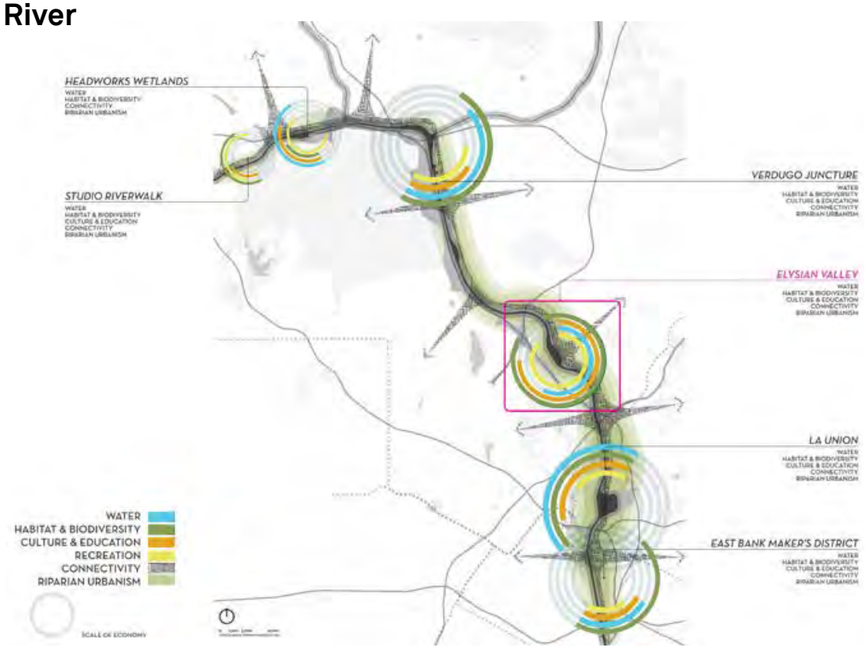
A Multi-scale Strategic Approach For A Riparian City

A Multi-Beneficial River

Looking at multi-benefit solutions in concert provides a structure for co-optimization of outcomes often evaluated as competitive goals. This approach supports a mosaic of urban culture, ecology, public access, education, connectivity, biodiversity, and true resilience. Reliability on a set of complex systems working at multiple scales to manage flooding suggests the need for effective infrastructure management.

This ideally includes monitoring stations along the LA River to track real time flows. Infrastructure automation can use this data to prepare for large storm events with increasing precision and reliability over time.

There is an opportunity to build on existing water management technology to create an integrated system of controls to manage flows throughout the year, optimizing infrastructure performance and informing management processes.



Smart River



Summary

The Los Angeles River provides significant benefits for regional social, ecological, and infrastructure needs. It also presents significant risk, primarily in the form of flooding. Balancing often competing priorities within engineering constraints is a complex and dynamic process. Modeling a variety of strategies and scenarios at multiple scales allows for optimization of multi-benefit solutions, both locally and through a watershed lens.

The public benefits of a natural river flowing through the region are sufficient motivation for many Angelenos to value and enhance the character and ecological integrity of the riparian corridor. Public access, open space, and recreation are a consistent theme, as are ecology and habitat. There is also significant potential for an optimized river corridor to enhance urban resilience in response to consistent concerns over air quality, water quality, and urban heat.

It is clear that these benefits need to be weighed against flood risk, and the necessary conveyance capacity to protect life and property. Unknown changes in climate, precipitation, and associated flood risk are evolving challenges.

At the neighborhood scale, there are constrained flood risk areas that are difficult to resolve. The west bank can be up to 12' lower than the east bank, and Atwater Village was recently determined to be at higher risk than previously understood. Legacy rail and power infrastructure, combined with residential and commercial development, make major upgrades expensive and difficult. Sediment and vegetation have impacted channel conveyance capacity, and even an armored channel is insufficient to meet peak flood stages. Large barriers and levee improvements restrict public access and are imposing structures that impact adjacent neighborhood character and public access.

This study found that there are feasible engineering solutions within Elysian Valley and Atwater Village to resolve local flooding without significant compromise to the bold visions for ecological restoration. These strategies are expensive and of varying intensity and impact to existing communities. Those that compromised the social, ecological, and infrastructure goals of the study were omitted. The extent of compromise for each is a subject of ongoing stakeholder discussion and negotiation that will determine a course of action.

There is a point at which the impacts of hyper-local flood management strategies begin to degrade other priorities. Understanding where these inflection points occur allows for calibration of regional efforts necessary to optimize social and environmental opportunity in addition to flooding. Maximizing local efforts while leveraging upstream opportunities can provide increased resilience, and a framework for achieving a coordinated watershed management approach.

Significant additional upstream flood attenuation capacity exists throughout the watershed, notably in the Sepulveda Basin area, and both Tujunga and Verdugo Washes. Large facilites including out of use quarries, parks, and recreation facilities including golf present opportunity to scale quickly.

Analysis of generalized regional solutions, using individual sites as test pilot areas, the team was able to model aggregated outputs to characterize future flow scenarios. This provided the ability to accurately evaluate multi-scale feasibility for infrastructure improvements in Elysian Valley and optimize in response to various regional inputs. This approach elucidates the manner in which upstream flood retention systems can reduce the magnitude of neighborhood effort necessary. Balancing the scale and magnitude of each allows for iteration and optimization at both scales.

The Los Angeles River flows at the nexus of public safety, public health, and environmental potential. It is this nexus that will either strengthen LA's climate resilience or will become its most vulnerable and highly impacted infrastructure. The primary statement of this study is that a holistic off-channel and in-channel approach shows that flood control is not in conflict with ecological restoration. There are interventions that meet both needs and provide the surrounding communities - and entire region - the flood mitigation they need, as well as the environmental repair and holistic climate resilience they deserve.







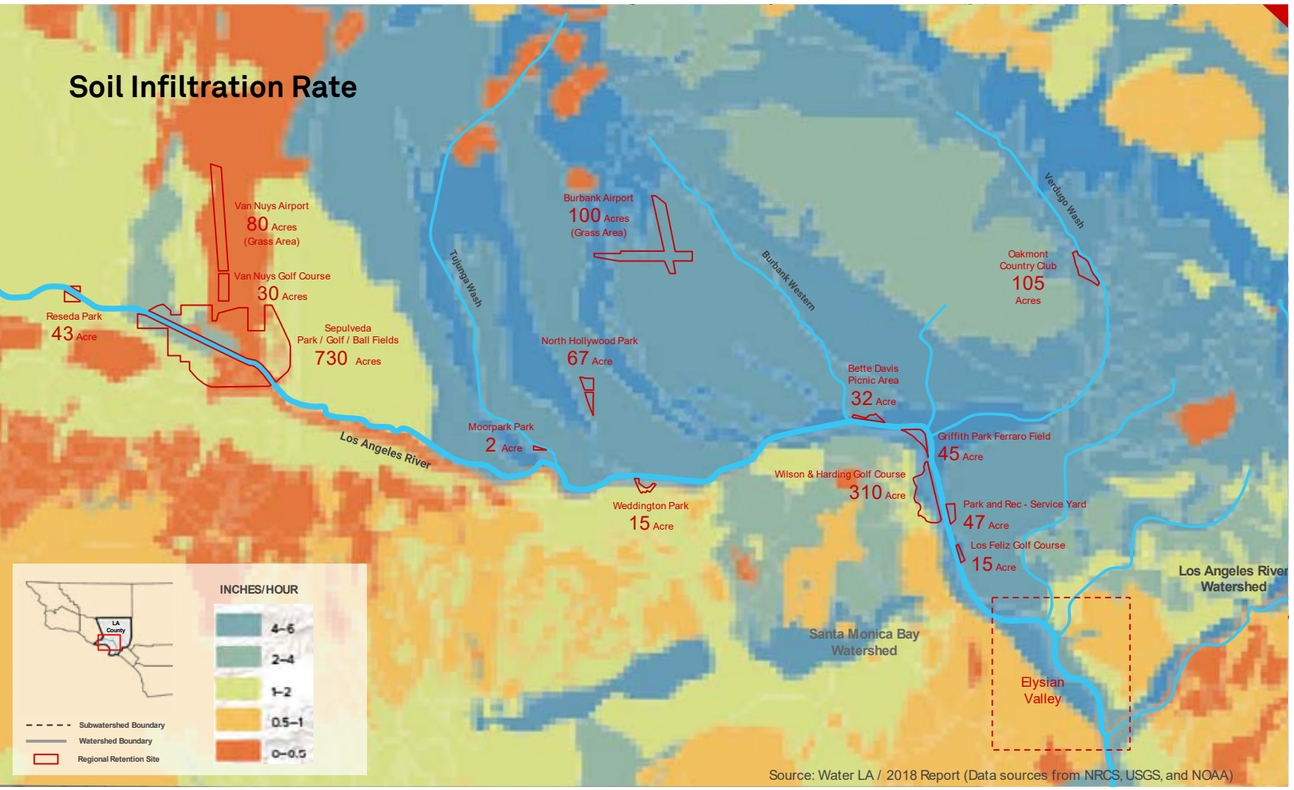
Figure 13: The LA River provides opportunities for recreation, open space and habitat in addition to having a flood control function.



Figure 14: The Los Angeles River at Taylor Yard G2

05

APPENDIX



Source: Water LA / 2018 Report (Data sources from NRCS, USGS, and NOAA)

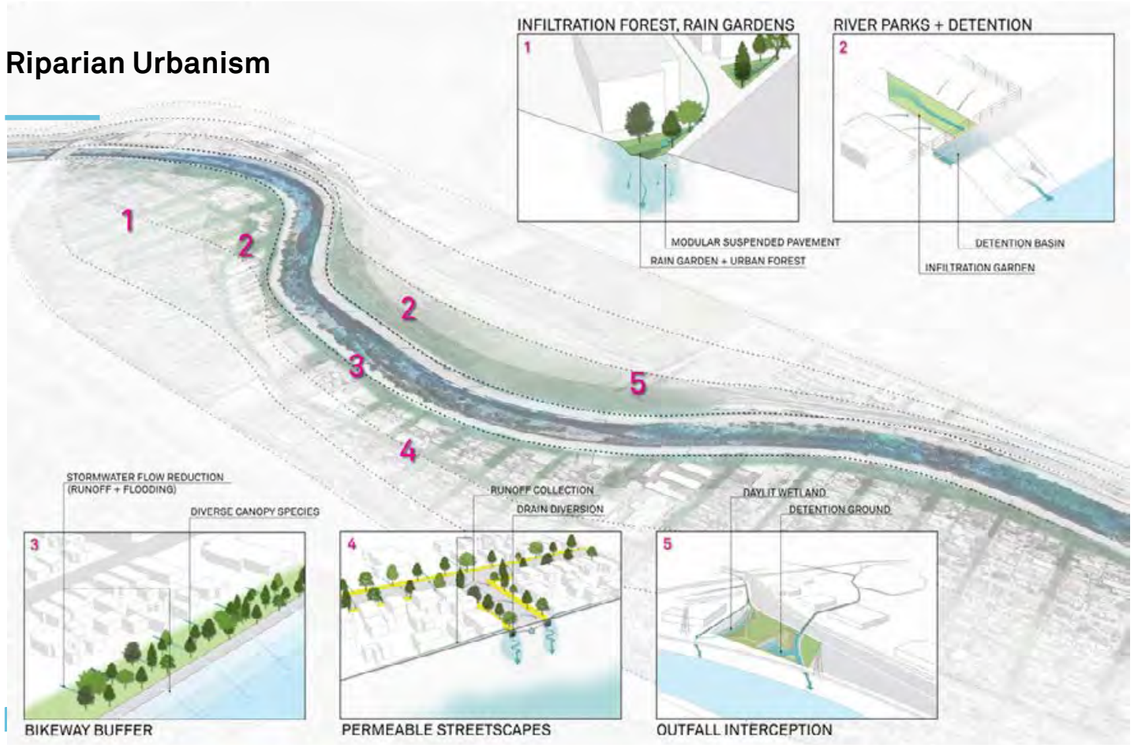
Silver Lake Reservoir Evaluation

Elevation and Subcatchment



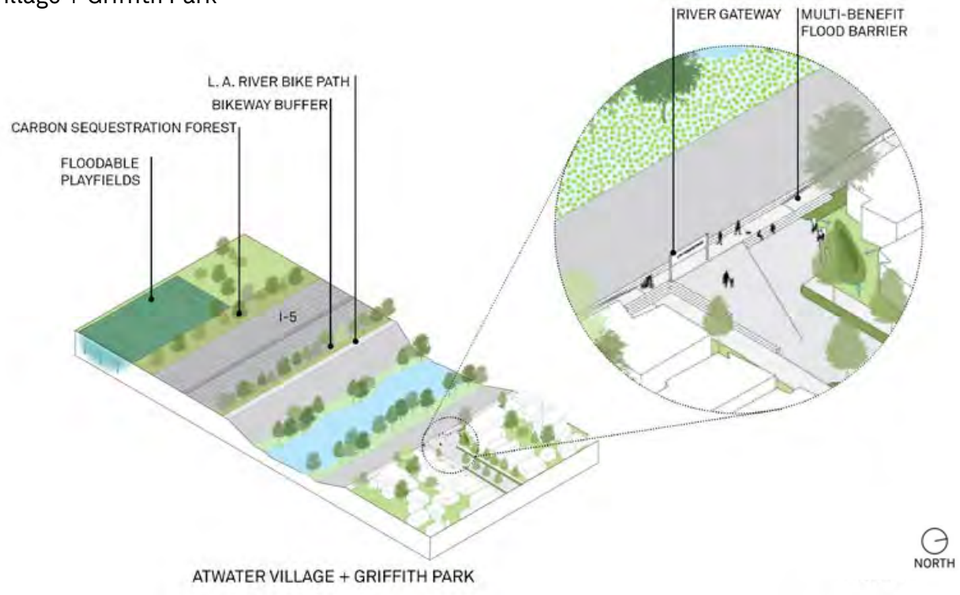


Riparian Urbanism



Physical Interventions

Atwater Village + Griffith Park



North Atwater East Bank Riverway - Project



The North Atwater East Bank Riverway Project will transform 2.2 miles of existing asphalt maintenance road into a clearly marked, multi-use, accessible riverway.

Phase 1: Los Feliz Blvd to State Route 132, 2.2 Miles
- Estimated construction budget is $1.43 million
- Funded by CA Urban Greening Grant thanks to support from the community

Phase 2: Colorado Blvd Undercrossing
- Estimated construction budget is $4 million
- Not yet funded, City is currently exploring funding options.

While conversations to improve the recreational and aesthetic experience of the river in this region are underway, there appears to be no plan to mitigate flood risk. The North Atwater East Bank Riverway Project, which transforms 2.2 miles of access road into a multi-use accessible riverway trail, does not address flooding. Early models suggest that a 36" flood wall along the River and the northern boundary of Atwater Village could significantly mitigate flooding in the neighborhood. The proposed construction timeline for this project (April 2021 to February 2022) may yet allow opportunity to integrate more proactive tactics addressing flood management.

Activity	Timeline
Planning & Design Phase	January 2020 - October 2020
Bid & Award Phase	November 2020 - March 2021
Construction Phase	April 2021 - February 2022

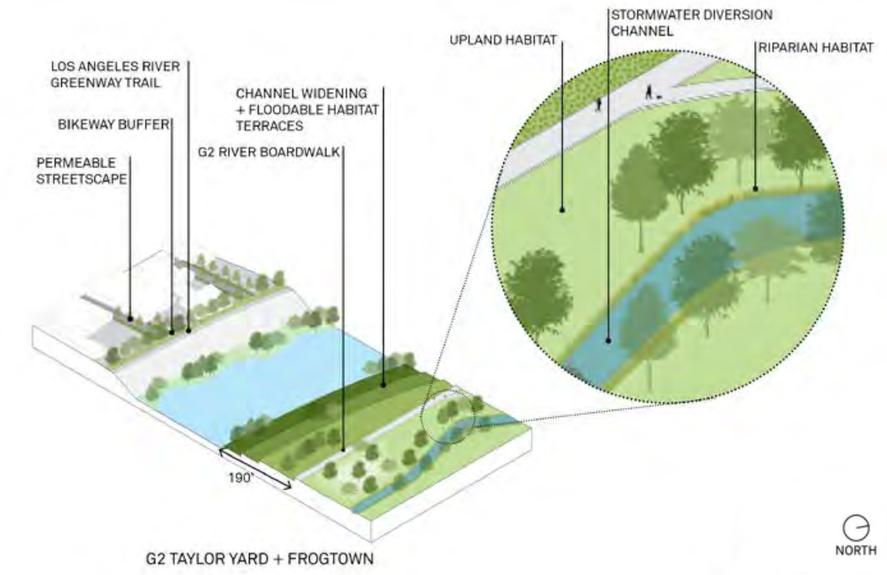


Figure 9: 134 to Colorado Blvd

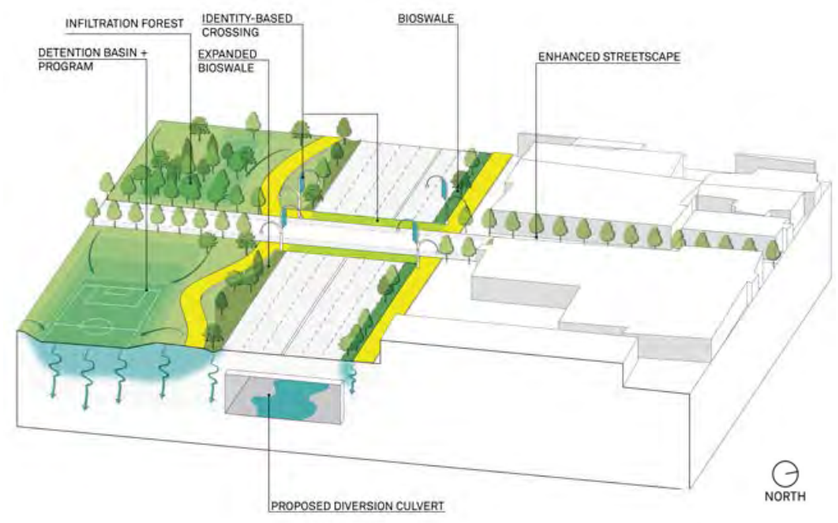


Figure 10: Site Photo

Physical Interventions



Physical Interventions - Riverside Drive

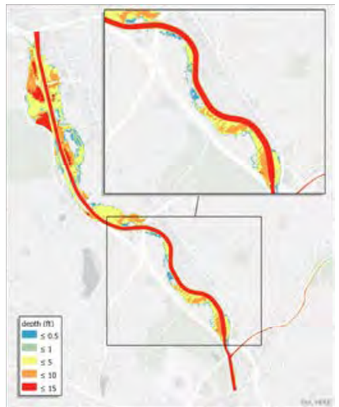


STRATEGY MODELING

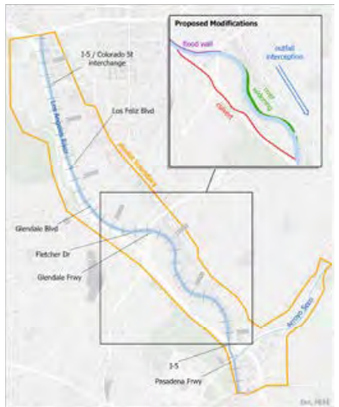
HEC-RAS Results

100-Year Storm Event
Strategies & Stationing

EXISTING



STRATEGIES & STATIONING

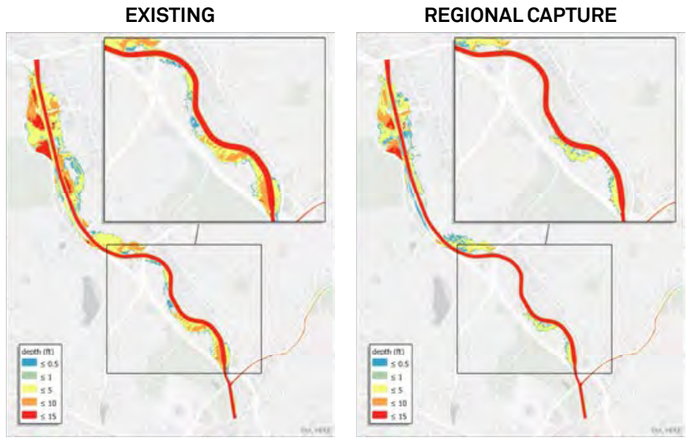


Model domain with Los Angeles River channel stationing and roadway crossings identified. Inset: Proposed flood mitigation strategies in the Taylor Yard reach of the Los Angeles River. Not pictured: Regional flood mitigation strategy that would reduce Los Angeles River flows through the model domain.

INDIVIDUAL STRATEGIES

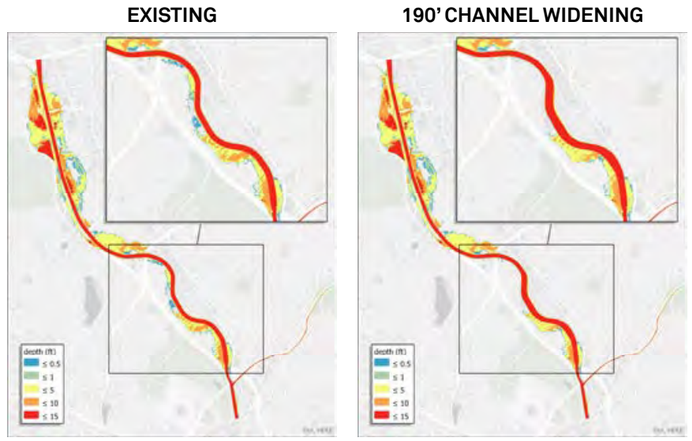
100-Year Storm Event
Regional Capture

The regional strategy flood detention strategy scenario, which reduces the 100-year Los Angeles River flow by 17,850 cfs (~19%), result in the greatest reduction in flood extents and depths along most of the study reach. Flow reduction results in decreased depths along the Los Angeles River centerline ranging from 1 to 4.5 feet. Impacts are generally greatest at the downstream end of the reach and decreased with distance upstream.



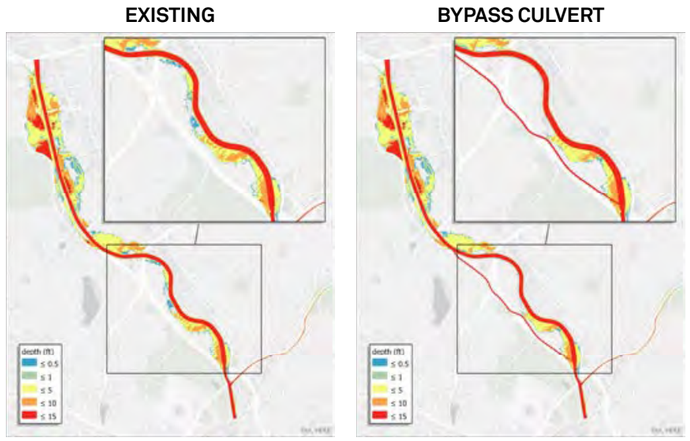
100-Year Storm Event
190' Channel Widening

The channel widening scenario, which broadens the Los Angeles River Taylor Yard reach by approximately 190 feet, locally increases flow capacity and lowers depths. Impacts extend from Los Angeles River station 7300, ~3150 feet upstream of I-5, to station 20000, ~1850 feet upstream of Fletcher Drive. The greatest depth reduction of ~3.6 feet occurs at station 14500, near the upstream end of the widened reach.



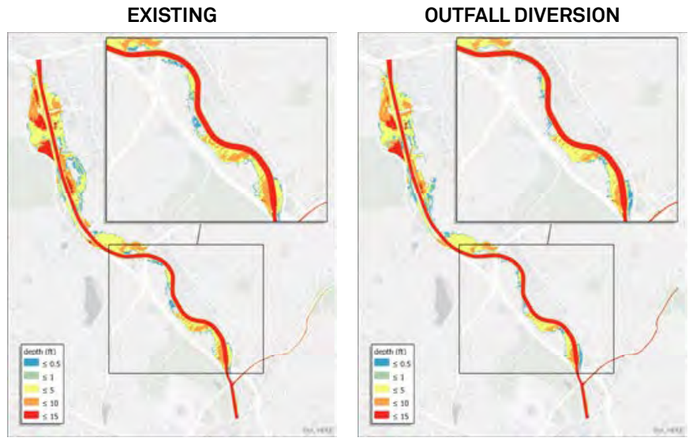
100-Year Storm Event
Bypass Culvert

The bypass culvert scenario, which involves construction of a 90-foot-wide culvert along the Los Angeles River west bank through the Taylor Yard reach, locally increases flow capacity and lowers depths. Because the culvert begins further upstream than the channel widening strategy, its impact also extends further upstream. Generally, changes in depth up to 2 feet occur near the upstream end of the affected reach and decrease with distance downstream.



100-Year Storm Event
Outfall Diversion

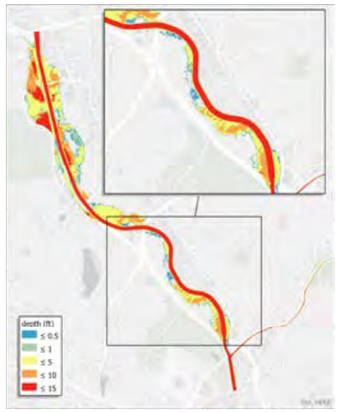
The outfall diversion scenario, which involves redirecting 7100 cfs of storm sewer contributions from the Los Angeles River Taylor Yard reach to Arroyo Seco, results just under a 1-foot decrease in depth along most of the simulated Los Angeles River segment.



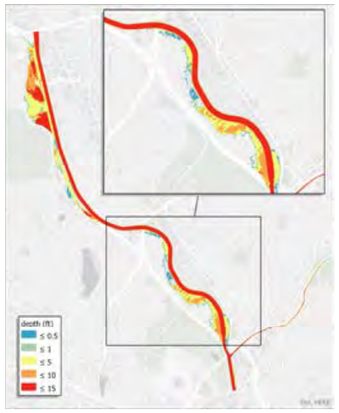
Disclaimer: It should be noted that due to model limitations, the effect of the diversion is likely exaggerated in the upper reach. Because flow can only be introduced at the boundaries of the model domain, the change in flow is modeled at the upstream end of the Los Angeles River.

100-Year Storm Event
Atwater Flood Barrier

EXISTING



ATWATER FLOOD BARRIER



The flood barrier scenario, which involves construction of a flood barrier along the Los Angeles River left bank to protect Atwater Village, increases centerline water surface elevations up to 1.4 feet upstream of Fletcher Drive.

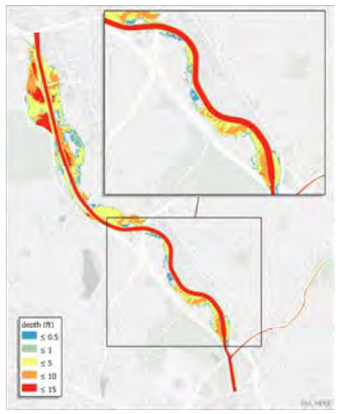
COMBINED STRATEGIES

100-Year Storm Event
Combined

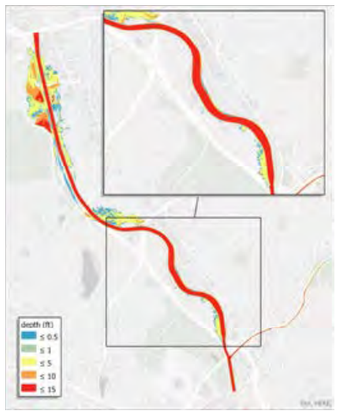
REGIONAL CAPTURE
+
190' CHANNEL WIDENING

Between from Los Angeles River station 7300, ~3150 feet upstream of I-5, and station 20000, ~1850 feet upstream of Fletcher Drive, depths are further decreased by the expanded channel capacity through the Taylor Yard reach. The greatest depth reduction of ~5.9 feet occurs at station 14500, near the upstream end of the widened reach.

EXISTING



COMBINED

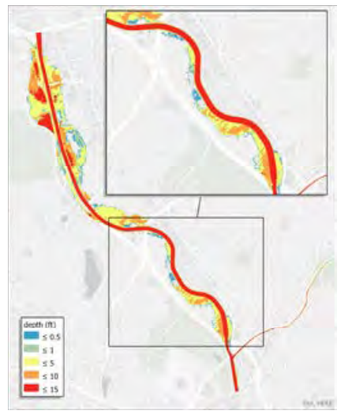


100-Year Storm Event
Combined

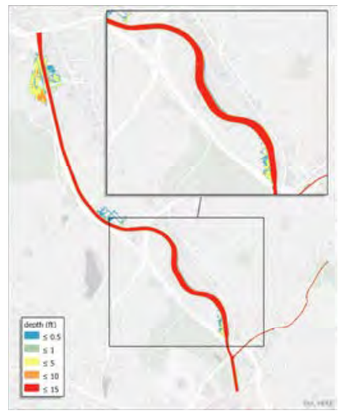
REGIONAL CAPTURE
+
190' CHANNEL WIDENING
+
OUTFALL DIVERSION

Diversion of the left bank stormwater outfalls from the Los Angeles River to Arroyo Seco added to regional flood detention and Los Angeles River widening further reduces flood depths along the Los Angeles River upstream of I-5. The greatest depth reduction of ~6.8 feet occurs at station 14500, near the upstream end of the widened channel reach.

EXISTING



COMBINED

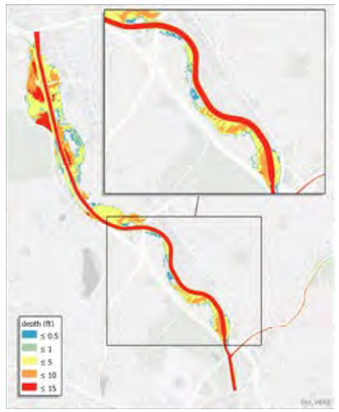


100-Year Storm Event
Combined

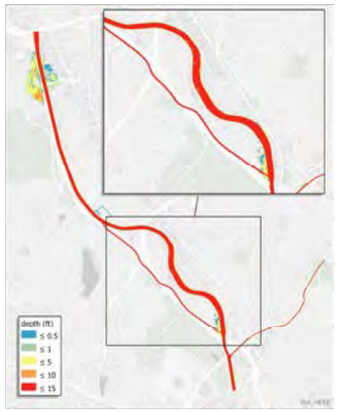
REGIONAL CAPTURE
+
190' CHANNEL WIDENING
+
OUTFALL DIVERSION
+
BYPASS CULVERT

Further depth reduction occurs from Los Angeles River station 6600, ~2450 feet upstream of I-5, to station 24000, ~1650 feet upstream of Glendale Boulevard. The greatest depth reduction of ~8.2 feet occurs at station 14500, near the upstream end of the widened channel reach.

EXISTING



COMBINED

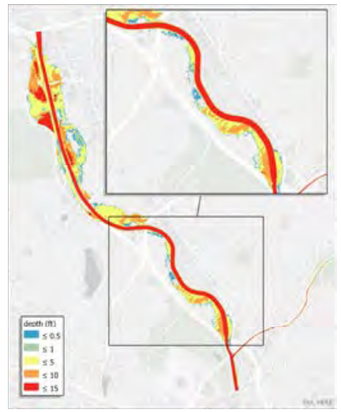


100-Year Storm Event
Combined

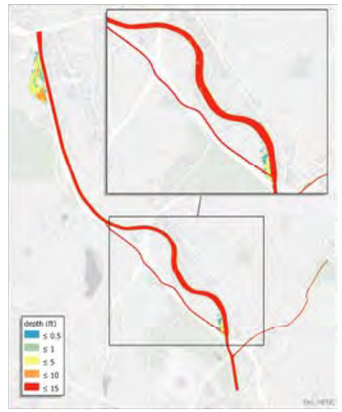
REGIONAL CAPTURE
+
190' CHANNEL WIDENING
+
OUTFALL DIVERSION
+
BYPASS CULVERT
+
ATWATER FLOOD BARRIER

The simulated water surface is up to ~2.1 feet above adjacent ground in areas where Atwater Village would otherwise be affected. It should be noted that due to model limitations, the effect of the diversion is likely exaggerated in the upper reach.

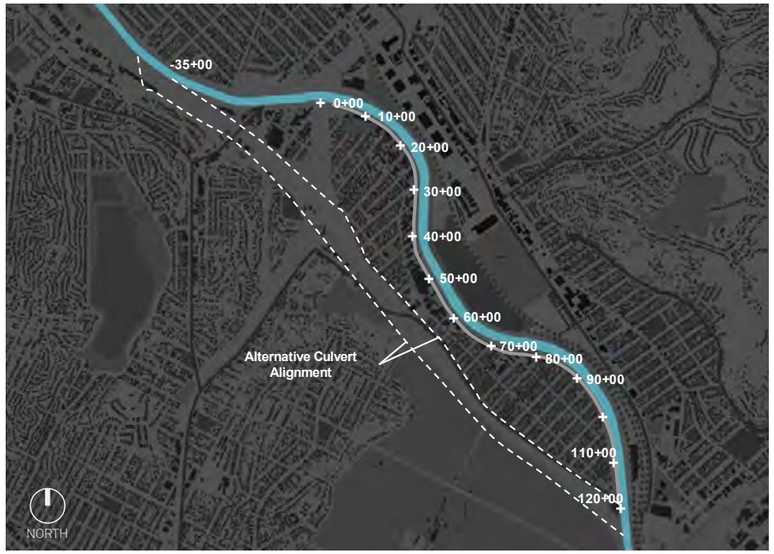
EXISTING



COMBINED



Bypass Culverts - Alternative Concept



Several iterations of bypass culverts were evaluated for the Elysian Valley study area. Of these culverts, parallel culverts along I-5 and a bypass culvert under North San Fernando Avenue needs to be studied further and it requires a deeper evaluation related to community benefits. However, it was deemed unviable as the construction of a culvert along a main road such as North San Fernando Ave would be disruptive to local traffic and economy. Parallel culverts along I-5 would not only be highly disruptive, but due to its placement in a hillside would result in a highly complex and expensive construction process.



Figure 15: The Los Angeles River at Taylor Yard G2

06

REFERENCES

List Of Figures

Page1:
Figure 1: Project Context Map
Image Credit: Sherwood Design Engineers

Page 6:
Figure 2: The Los Angeles River along the Elysian Narrows.
Figure 3: Riparian Planting Along the Los Angeles River
Figure 4: Small Rapids in the Los Angeles River
Figure 5: Los Angeles River Kayaker
Image Credit: https://folar.org/

Page 8:
Figure 6: Taylor Yard G2
Image Credit: Drone Photo by Studio-MLA

Page 10:
Figure 7: The Los Angeles River at Taylor Yard G2
Image Credit: Drone Photo by Studio-MLA

Page 22:
Figure 8: Taylor Yard
Image Credit: LENS-KCET Environmental Storylines

Page 29:
Figure 9: 134 to Colorado Blvd
Figure 10: Site Photo
Image Credit: North Atwater East Bank Riverway Community Meeting, July 15, 2020

Page 30:
Figure 11: Taylor Yard in 1947
Image Credit: Photo by The River Project

Page 38:
Figure 12: The Los Angeles River at Taylor Yard G2
Image Credit: Los Angeles Board of Public Works

Page 42:
Figure 13: People Are Interacting with the River
Image Credit: Photo by Studio-MLA

Page 44:
Figure 14: The Los Angeles River at Taylor Yard G2
Image Credit: Shutterstock

Page 67:
Figure 15: The Los Angeles River at Taylor Yard G2
Image Credit: Drone Photo by Studio-MLA

DATA SOURCE

Page 10:
Source: "History of the Los Angeles River" - Los Angeles Department of Public Works
Source: Atwater Village Neighborhood Council - Flood Information Workshop, May 2019

Page 11:
Source: Los Angeles River Ecosystem Restoration Integrated Feasibility Report, September 2015, US Army Corps of Engineers

Page12:
Image Credit: Sherwood Design Engineers

Page 14:
Source: Los Angeles County Public Works

Page15:
Source: Hansen Dam Basin Master Plan, USACE (September 2011)
Source: USBR LA Basin Study, Appendix B (September 2014)
Source: EPA Green Infrastructure Technical Assistance Program (2012)
Source: One Water LA 2040 Plan, Volume 3 (April 2018)
Source: LA Bureau of Engineering Taylor Yard G2 River Park Project, Proposition O, Page 16 (January 2019)
Source: USACE LA River Revitalization Master Plan "ARBOR Study" (September 2015)
Source: LA River Ecosystem Restoration Project (April 2016)
Source: LA River Ecosystem Restoration Feasibility Study, Appendix A (August 2013)
Source: LA River Ecosystem Restoration Feasibility Study, Appendix A (August 2013)
Source: LA River Ecosystem Restoration Feasibility Study, Appendix A (August 2013)

Page 16:
Source: Hansen Dam Basin Master Plan, USACE (September 2011)
Source: USBR LA Basin Study, Appendix B (September 2014)
Source: EPA Green Infrastructure Technical Assistance Program (2012)
Source: One Water LA 2040 Plan, Volume 3 (April 2018)
Source: LA Bureau of Engineering Taylor Yard G2 River Park Project, Proposition O, Page 16 (January 2019)
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Source: LA River Ecosystem Restoration Feasibility Study, Appendix A (August 2013)
Source: LA River Ecosystem Restoration Feasibility Study, Appendix A

Page17:
Data Source: Sherwood Design Engineers

Page 22:
Graphic Credit: Sherwood Design Engineers

Page 23:
Graphic Credit: Sherwood Design Engineers

Page 24:
Graphic Credit: Sherwood Design Engineers

Page 25:
Graphic Credit: Sherwood Design Engineers
Source: Atwater Village Neighborhood Council - Flood Information Workshop, May 2019

Page 28:
Graphic Credit: Sherwood Design Engineers

Page 29:
Graphic Credit: Studio MLA + Sherwood Design Engineers
Source: Taylor Yard G2 River Park Project Proposition O Conceptual Design Report - The Bureau of Engineering City of Los Angeles (2019)

Page 30:
Graphic Credit: Sherwood Design Engineers
Page 31:
Graphic Credit: The Water Institute of the Gulf (TWIG)
Graphic Credit: Sherwood Design Engineers

Page 31:
Source: Los Angeles River FY16 Flood Risk Management Update - US Army Corps of Engineers

Page 33:
Source: North Atwater East Bank Riverway Community Meeting, July 15, 2020

Page 36:
Source: Studio MLA

Page 37:
Graphic Credit: Sherwood Design Engineers

Appendix Page (42-63):
Source: The Water Institute of the Gulf
Graphic Credit:
Sherwood Design Engineers
Studio MLA

ATTACHMENT 7

09 / PROJECTS

SITE DESIGN CONCEPT
PROJECTS
SOUTHERN AVENUE CONNECTOR
LA RIVER PLATFORM PARK
RIO HONDO PLATFORM PARK
SOUTH GARFIELD TRANSMISSION RIGHT-OF-WAY PARK
NORTH IMPERIAL TRANSMISSION RIGHT-OF-WAY PARK
SOUTH IMPERIAL TRANSMISSION RIGHT-OF-WAY PARK
CONFLUENCE POINT PARK
BLUE PARK
WATER EDUCATION CENTER
IMPERIAL WETLANDS
SELA BRIDGE PARK
LYNWOOD CONNECTOR

PROJECTS

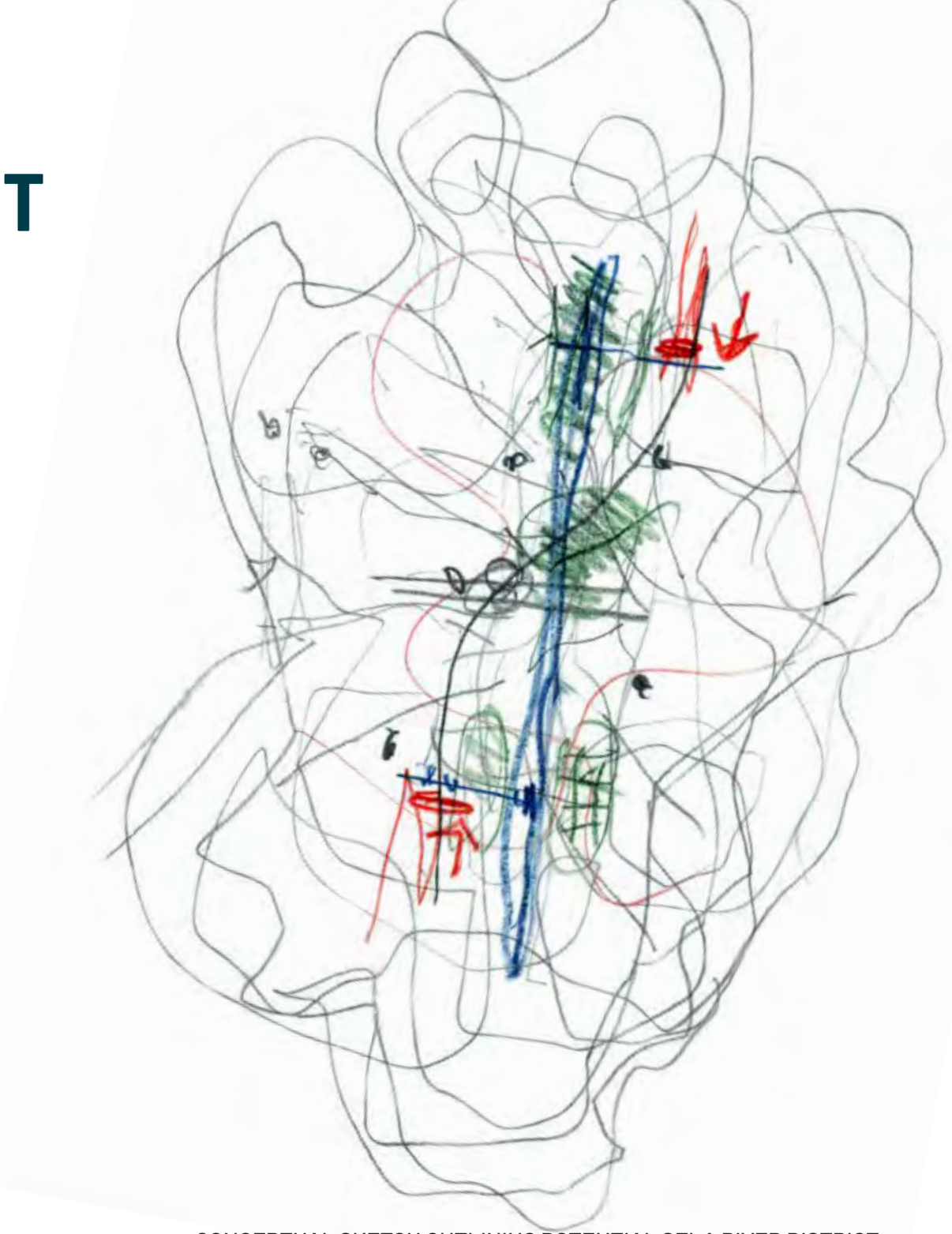
SITE DESIGN CONCEPT

12 OPPORTUNITY AREAS

The 12 Rio Hondo Confluence Area projects would establish an unprecedented system of open space, parks, and amenities along the LA River in Southeast LA. As shown in the sketch to the right, pedestrian and bicycle bridges at the north and south extents of the district will cross the I-710 freeway, proudly announcing the area and the broader LA River corridor. These gateways will bring residents to the river's banks while connecting communities across the very infrastructures that once divided them. More broadly, the projects between the gateway connectors will construct a substantive network of connected parks and trails to form a regional asset for communities that flank the area. The projects work in concert with one another and relate to other ongoing projects, namely the Urban Orchard, Parque Dos Rios, Metro West Santa Ana Branch and the future SELA Cultural Center. In an area that is a largely barren and industrial landscape, the Rio Hondo Confluence Area projects will propel diverse occupations of the river and its adjacent lands, enliven the community with thoughtful, multi-benefit improvements, and form a singular identity of public space, connectivity, and access, along the river and across it.

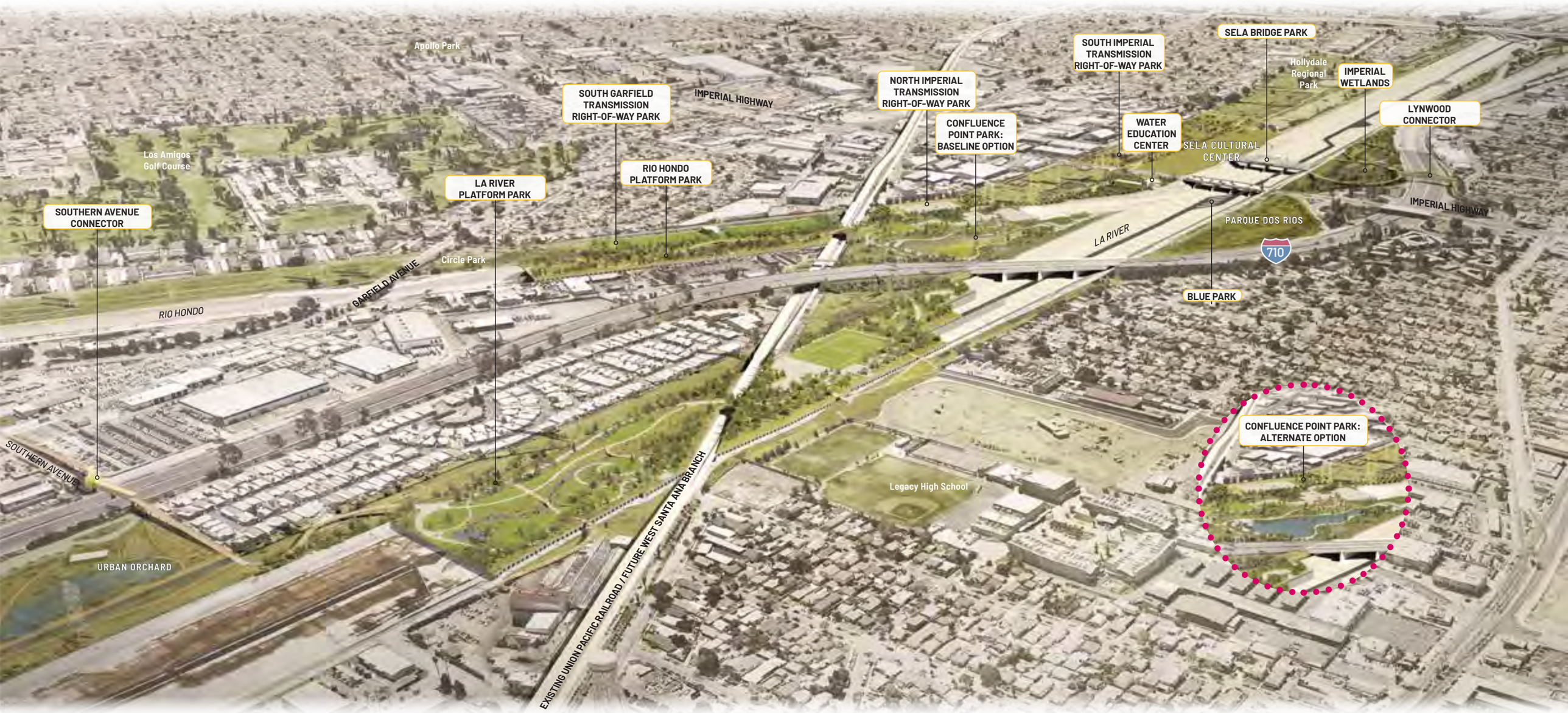
Twelve distinct projects are contained within this report. Each can be undertaken as a single project or joined with neighboring projects to create a connective open space network.

Projects include low flow modifications for habitat improvement and educational opportunities, wetlands for habitat and water quality improvement, bridges for improved connectivity, multi-benefit parks and trails, and platform parks (large-scale bridge parks) to create new open space, and foster connectivity, ecosystem function, and cultural resources while respecting critical needs, such as flood risk reduction.



CONCEPTUAL SKETCH OUTLINING POTENTIAL SELA RIVER DISTRICT

PROJECTS


Apollo Park
SOUTH GARFIELD TRANSMISSION RIGHT-OF-WAY PARK
IMPERIAL HIGHWAY
NORTH IMPERIAL TRANSMISSION RIGHT-OF-WAY PARK
SOUTH IMPERIAL TRANSMISSION RIGHT-OF-WAY PARK
SELA BRIDGE PARK
Hollydale Regional Park
IMPERIAL WETLANDS
LYNWOOD CONNECTOR
Los Amigos Golf Course
RIO HONDO PLATFORM PARK
CONFLUENCE POINT PARK: BASELINE OPTION
WATER EDUCATION CENTER
SELA CULTURAL CENTER
LA RIVER PLATFORM PARK
SOUTHERN AVENUE CONNECTOR
Circle Park
GARFIELD AVENUE
RIO HONDO
LA RIVER
PARQUE DOS RIOS
710
IMPERIAL HIGHWAY
BLUE PARK
CONFLUENCE POINT PARK: ALTERNATE OPTION
SOUTHERN AVENUE
URBAN ORCHARD
Legacy High School
EXISTING UNION PACIFIC RAILROAD / FUTURE WEST SANTA ANA BRANCH

PROJECTS

SITE DESIGN CONCEPT

SOUTH GATE

DOWNEY

LYNWOOD

RHCAP Project Opportunity Area

RHCAP In-Channel Opportunity Area

Gateways

SELA River Projects Corridor

Future West Santa Ana Branch

Approach Via I-710

1500'

N

PROJECTS

12 OPPORTUNITY AREAS

SOUTHERN AVENUE CONNECTOR

LA RIVER PLATFORM PARK

DOWNEY

RIO HONDO PLATFORM PARK

SOUTH GARFIELD TRANSMISSION RIGHT-OF-WAY PARK

NORTH IMPERIAL TRANSMISSION RIGHT-OF-WAY PARK

SOUTH GATE

BLUE PARK

WATER EDUCATION CENTER

IMPERIAL WETLANDS

SELA BRIDGE PARK

LYNWOOD CONNECTOR

SOUTH IMPERIAL TRANSMISSION RIGHT-OF-WAY PARK

CONFLUENCE POINT PARK

LYNWOOD

1500'

N

PROJECTS

SITE DESIGN CONCEPT

The Rio Hondo Confluence Area Project (RHCAP) Concept plan illustrates twelve distinct projects and a connective open space network that can integrate with other projects underway in this area. In total, the various projects of the Site Design Concept could provide approximately 120 acres of new park space with community desired programming and amenities. The following section outlines each project along with the challenges and opportunities that are associated with each typology and site location. Specifics regarding concept design strategies, as well as relevant hydraulic and structural engineering considerations, are described for each project.



12 PROJECTS

SOUTHERN AVENUE CONNECTOR

LA RIVER PLATFORM PARK

RIO HONDO PLATFORM PARK

SOUTH GARFIELD TRANSMISSION RIGHT-OF-WAY PARK

NORTH IMPERIAL TRANSMISSION RIGHT-OF-WAY PARK

SOUTH IMPERIAL TRANSMISSION RIGHT-OF-WAY PARK

CONFLUENCE POINT PARK

BLUE PARK

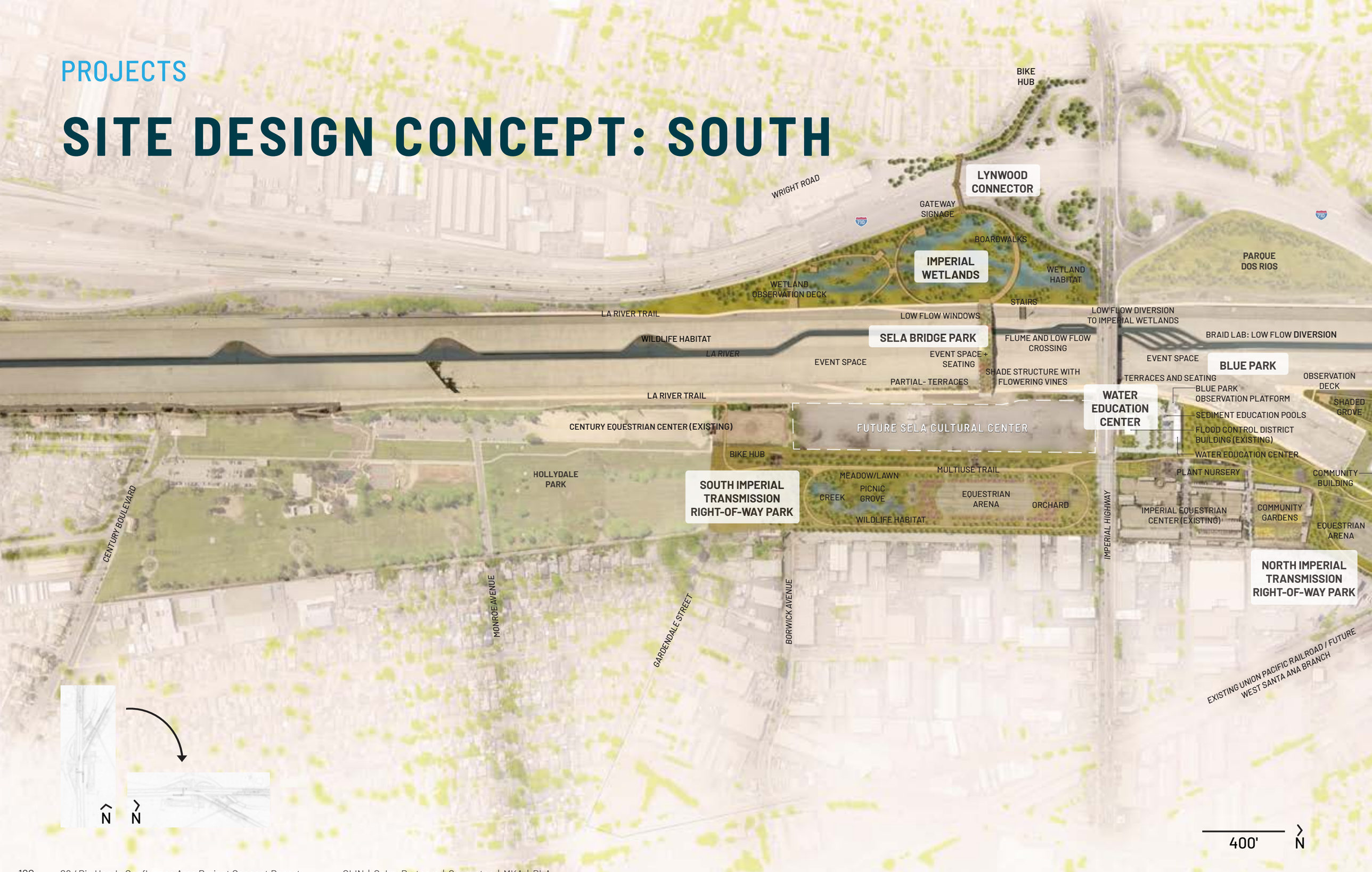
WATER EDUCATION CENTER

IMPERIAL WETLANDS

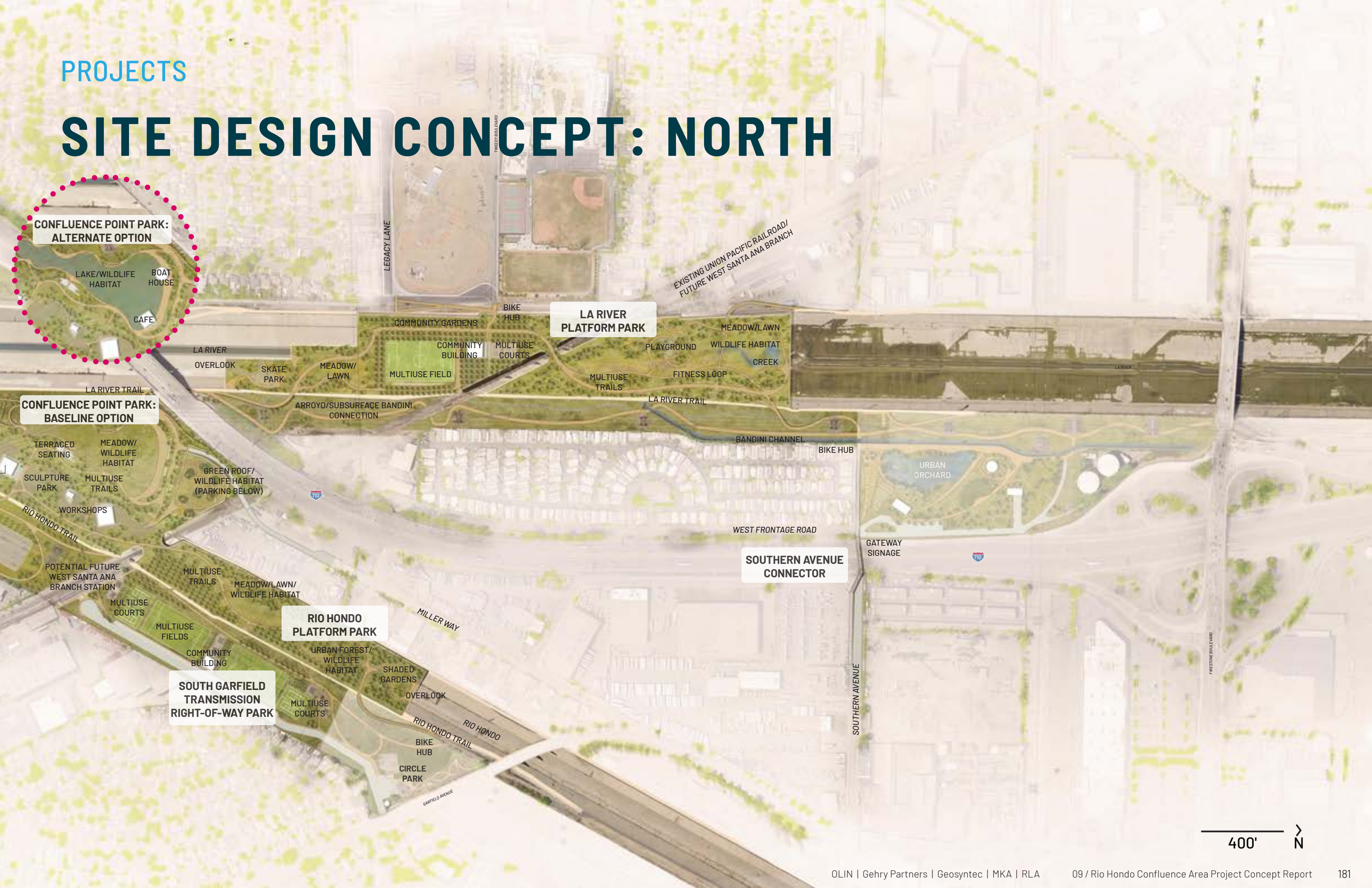
SELA BRIDGE PARK

LYNWOOD CONNECTOR

SITE DESIGN CONCEPT: SOUTH



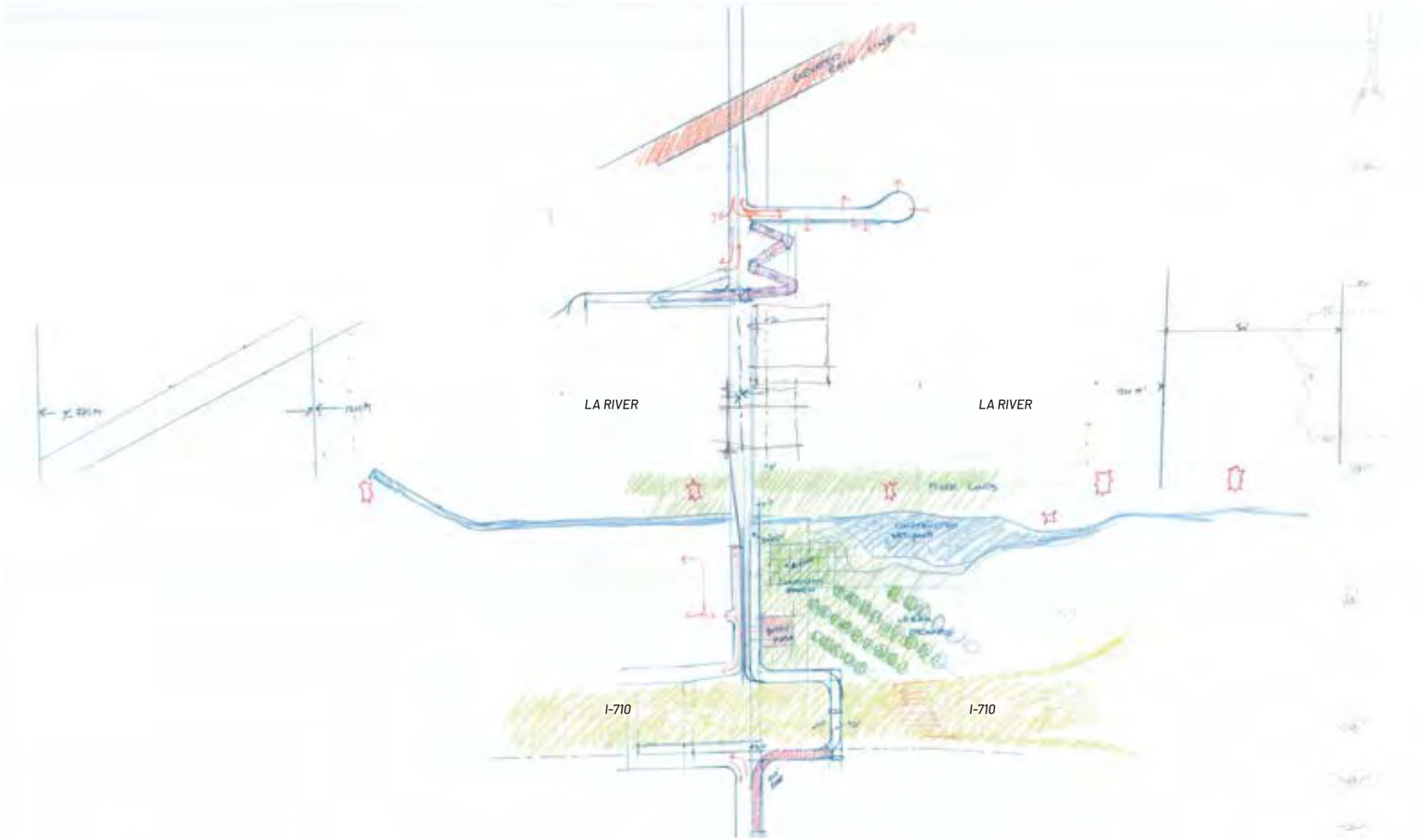
SITE DESIGN CONCEPT: NORTH



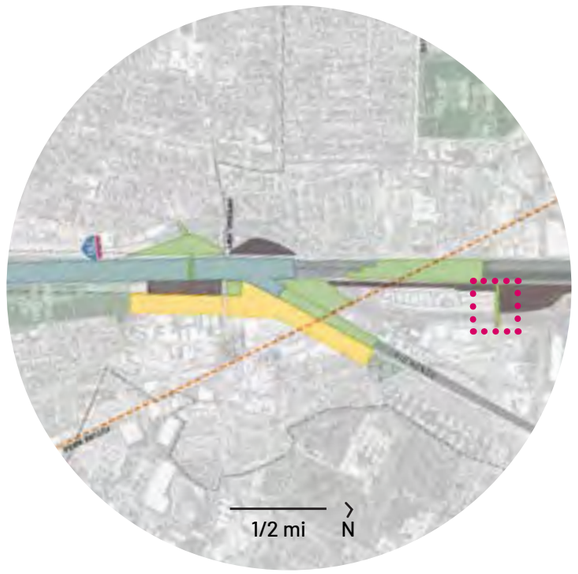
SOUTHERN AVENUE CONNECTOR

SITE INTRODUCTION

The Southern Avenue Connector will serve as a connection for pedestrians and bicyclists, across the I-710, from the neighborhoods east of the LA River to the Urban Orchard Project, LA River Trail, platform parks, and a rich network of community spaces. The Connector begins on grade on Southern Avenue, east of Frontage Road, and provides access for those travelling from Garfield Avenue and east of the Rio Hondo. The Connector is elevated above the I-710, where there is currently no pedestrian crossing above or below the freeway. The Connector provides access to the Urban Orchard Project, the extended multiuse trail network along the LA River, and also provides access to the LA River Platform Park at its northern end.



KEY PLAN


1/2 mi
N


LA RIVER PLATFORM PARK
MEADOW/LAWN
WILDLIFE HABITAT
CREEK
MULTIUSE TRAILS
LA RIVER TRAIL
MULTIUSE TRAILS
BANDINI CHANNEL
BIKE HUB
URBAN ORCHARD
WEST FRONTAGE ROAD
GATEWAY SIGNAGE
710
SOUTHERN AVENUE
100'
N

SOUTHERN AVENUE CONNECTOR

CHALLENGES

- The Southern Avenue Connector will need to be coordinated with the LA River Platform Park.

- Further pedestrian access to the Connector east of the LA River and Rio Hondo to the residential neighborhoods of South Gate and Downey will need to be coordinated through wayfinding and improved sidewalk access through the industrial and commercial parcels between Frontage Road and Garfield Ave



LA RIVER EAST BANK LOOKING NORTH TOWARDS SOUTHERN AVE

Source: OLIN

SOUTHERN AVENUE CONNECTOR

STRUCTURE

The Southern Avenue Connector crosses an overall 200 foot span above the I-710 with an intermediate support at the highway median, and an additional 95 foot span to cross the intersection of Southern Ave and Frontage Rd E. Supported on steel framed elevated structures at the ends for access and concrete pile caps and columns at the center highway median, the spans crossing I-710 and roadway intersection consist of box truss bridges. Intermediate steel framing supporting a composite concrete slab will make up the walkway structure supported by the lower horizontal truss to limit the height required for pedestrians and cyclists to climb. Access ramps to bring pedestrians from grade up to bridge elevations to be steel framed. Secondary framing at bridge pivot point to support signage or art installation for gateway design.

DESIGN

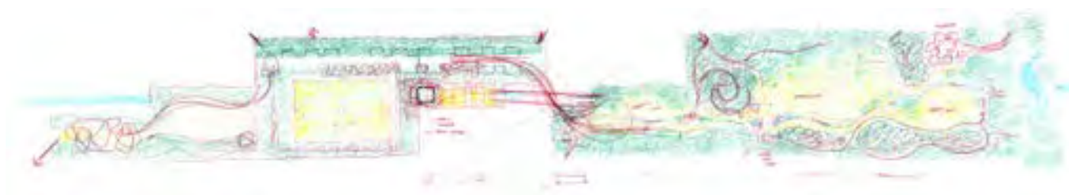
The Southern Avenue Connector provides access across the I-710 from the neighborhoods north and east of the LA River. Like the Lynwood Connector to the south, the Southern Avenue Connector will serve as a visual gateway, announcing the arrival into the Rio Hondo Confluence Area. Considerations for pedestrian and cycling connectivity and wayfinding will provide much-needed accessible linkage to existing and planned trails from communities east of the LA River and the I-710. As the northern gateway to Rio Hondo Confluence Area projects, the Connector will offer a safe and convenient way for pedestrians and cyclists to bridge over existing challenges presented by channel and transportation infrastructure, as well as industrial land use.

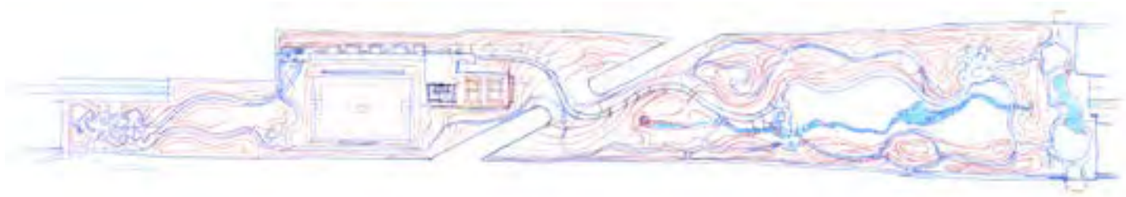
LA RIVER PLATFORM PARK

SITE INTRODUCTION

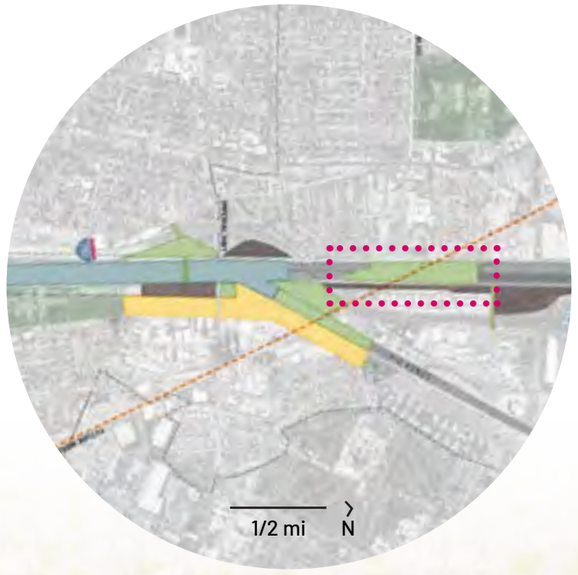
The LA River Platform Park is situated over an approximately 3,200-foot stretch of the LA River. The platform park site is bounded to the north by the LA River channel jurisdiction line between the LACFCD and the USACE. A separate project could potentially extend the platform park north of that line in the future, creating the Southern Avenue Bridge Park. This continuation of the platform would allow for a connection of communities on the east and west of the LA River, in alignment with Southern Avenue. To the south, the platform park boundary is offset a minimum of 300' feet from the nearest platform wall, and staggered away from the residential neighborhoods directly to the west. The eastern and western edges of the platform park are defined by the location of the flood channel parapet walls, or the inner edge of the levee when no parapet walls are present.







KEY PLAN





CONFLUENCE POINT PARK: BASELINE OPTION

LA RIVER PLATFORM PARK

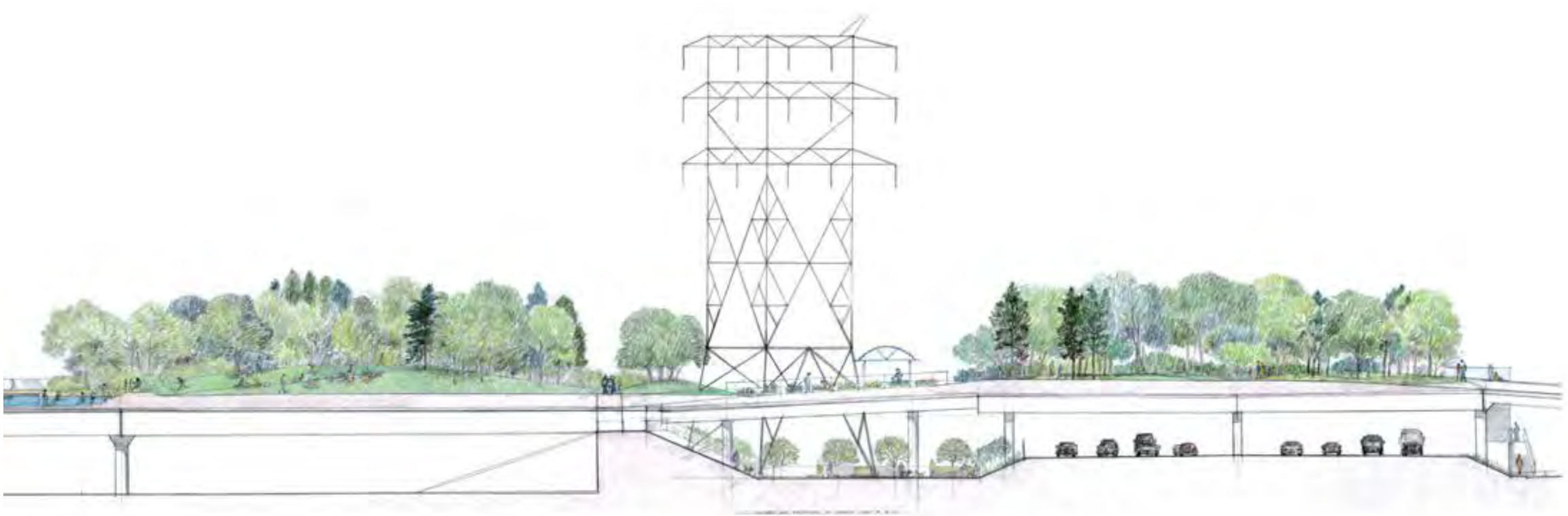
CHALLENGES

A major challenge of the LA River Platform Park is the coordination of the existing UPRR and future Metro WSAB line, which will have significant implications on the hydraulics, structure, and pedestrian access. The design of the platform park must allow for easy visitor access over this rail corridor in order to maintain continuity across the park experience. The Design Team has developed two distinct options for how the platform park will coordinate with these rail crossings. Option A, assumes full replacement of the UPRR bridge and Metro WSAB addition. Option B, assumes the Metro WSAB crossing will be an extension of the existing UPRR bridge crossing. Furthermore, as the platform park will need to be positioned above the LA River channel and the surrounding grade, the western and eastern edges of the platform park will need to be designed in such a way as to achieve an acceptable visual impact for the surrounding residential neighborhoods. The design will need to find ways to create convenient access and connectivity to and from the platform park, as well as between the northern and southern portions of the platform park.



CONCEPTUAL SECTION

LA RIVER

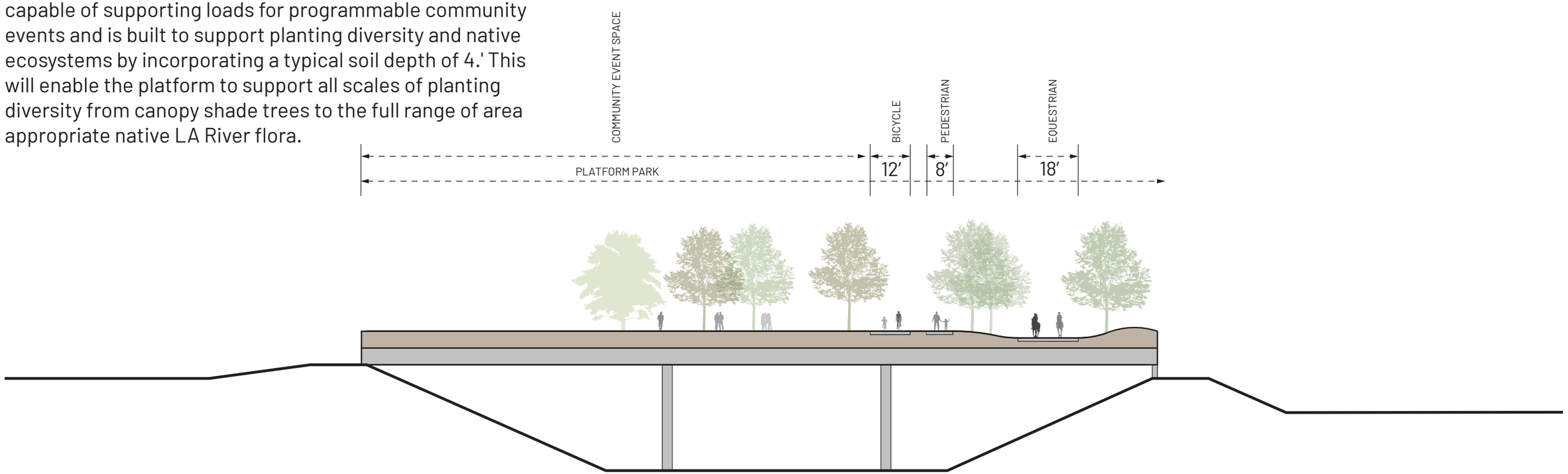


710 FREEWAY

LA RIVER PLATFORM PARK

PLATFORM STRATEGIES

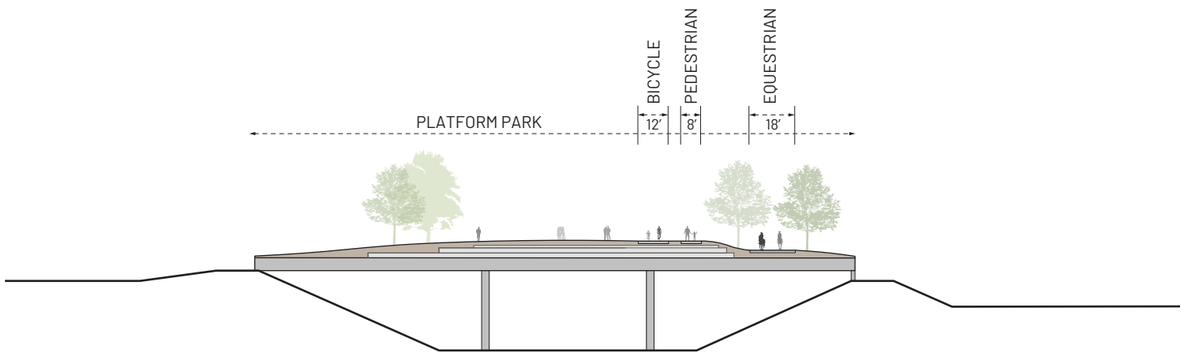
The baseline condition provides a park dimensional width from 200 to 450' wide in cross-section. The dimension provides ample room for trail separations between pedestrians, cyclists, and equestrians and for natural and recreational open spaces. The design of the structure is capable of supporting loads for programmable community events and is built to support planting diversity and native ecosystems by incorporating a typical soil depth of 4.' This will enable the platform to support all scales of planting diversity from canopy shade trees to the full range of area appropriate native LA River flora.



BASELINE CONDITION

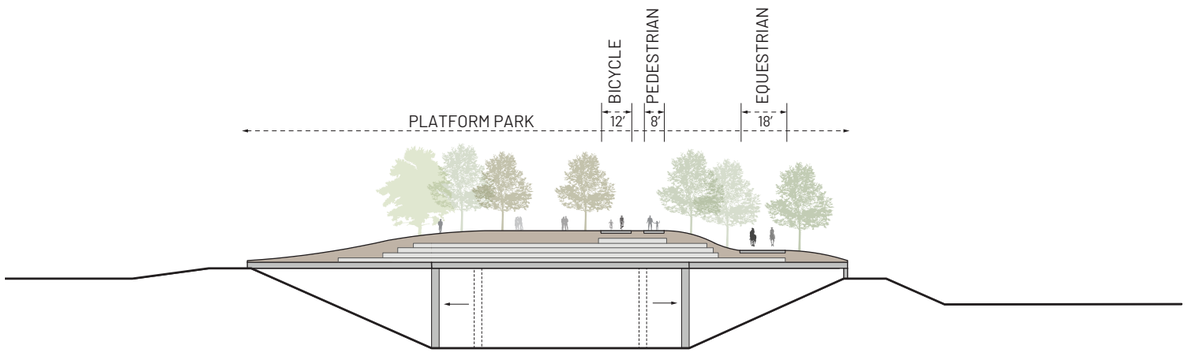
Level platform with maximum soil depth of 4' throughout.

LA RIVER PLATFORM PARK



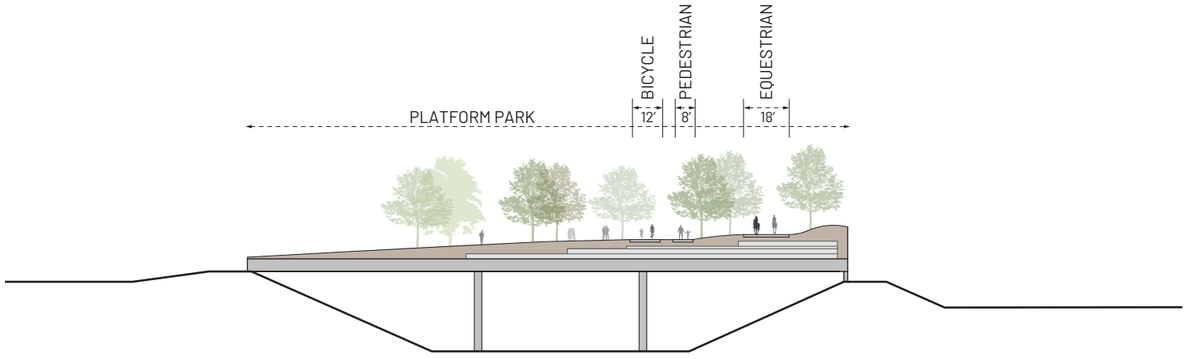
TAPERED EDGES

Slope the outer edges of the landscape downward, decreasing the height of platform and amount of soil used.



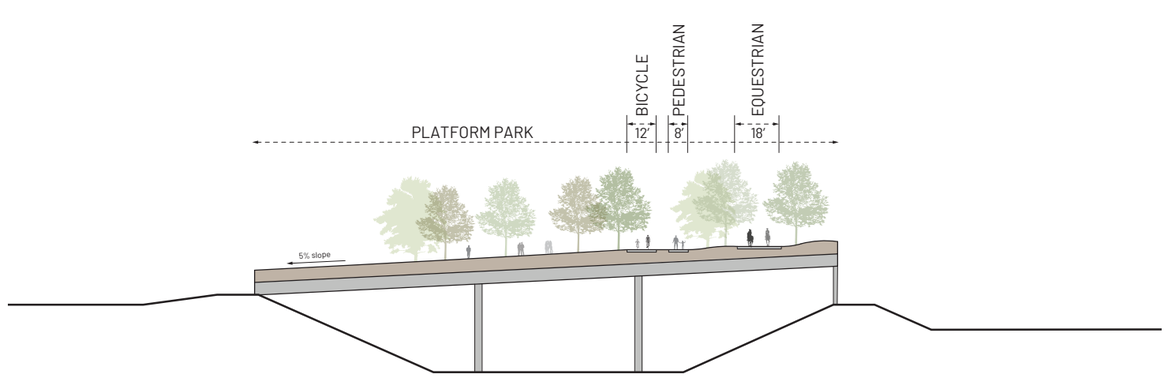
TAPERED STRUCTURE

Slope the outer edges of the platform downward by increasing height at the center of the structure and moving support walls outward.



TILTED LANDSCAPE

Keep structure level, and increase the height of one side of the landscape, sloping the platform in one direction.



TILTED STRUCTURE

Increase the height of one side of structure, sloping the entire platform in one direction.

LA RIVER PLATFORM PARK

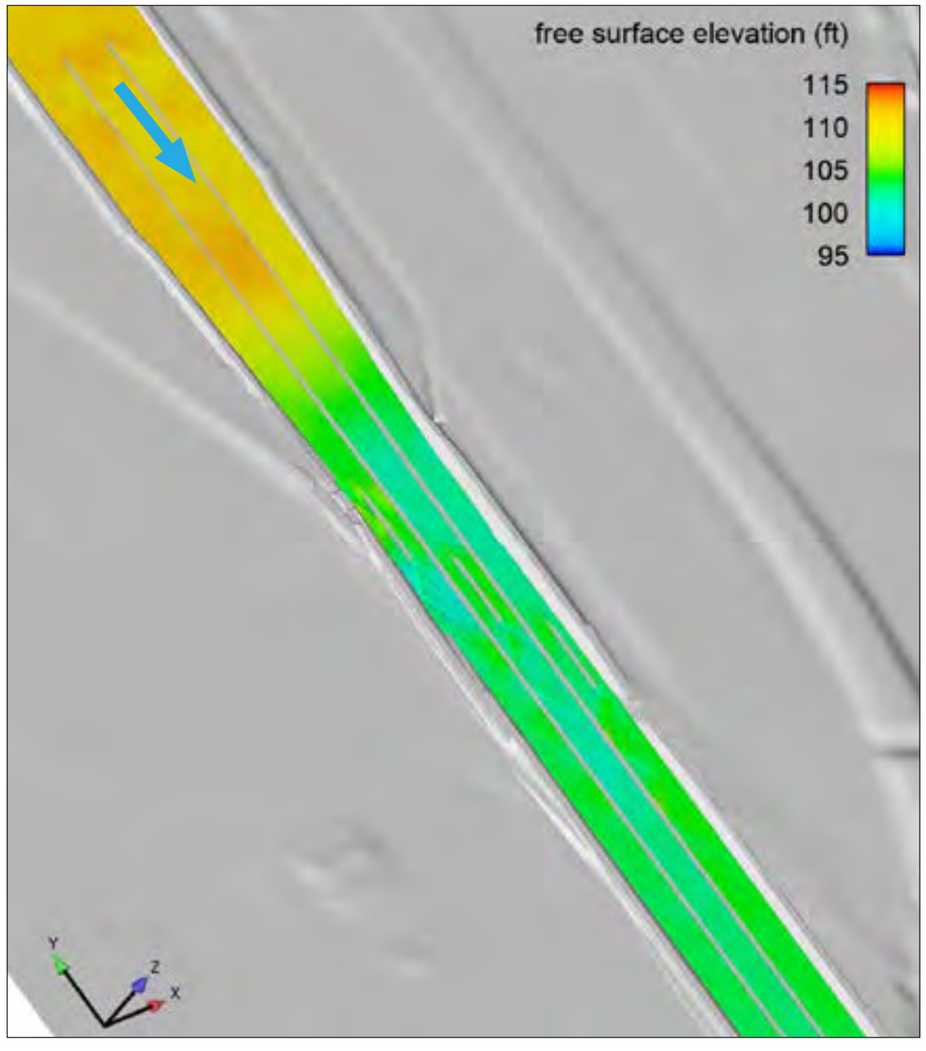
HYDRAULICS

Feasibility and conceptual design of project elements summarized below are based upon 3D hydraulic modeling analyses. An emphasis was placed on minimizing impacts to the design water surface elevation, and coordination with USACE will be required during future design phases.

OPTION A: Rebuilding the UPRR bridge will enable the existing rail crossing and the Metro WSAB to be raised above the design flow event and built with the platform, thereby minimizing hydraulic impacts. This would enable a continuous platform and relatively equally spaced support walls.

- Flow patterns from an initialization model without bridges were used to optimize the wall positions to equalize water surface elevations across the bays.
- Additional piers to support the WSAB Crossing were included in the model.
- The support walls may have to be locally thickened (i.e., greater than ~3') to support the rail load, and this has not yet been assessed hydraulically.

Modeled free surface elevation for LAR Platform Park support walls for the LAR design peak flow conditions (~0.2% event). Model results indicate flows are contained within the channel and below the platform deck.



Platform Model: Free Surface Elevation

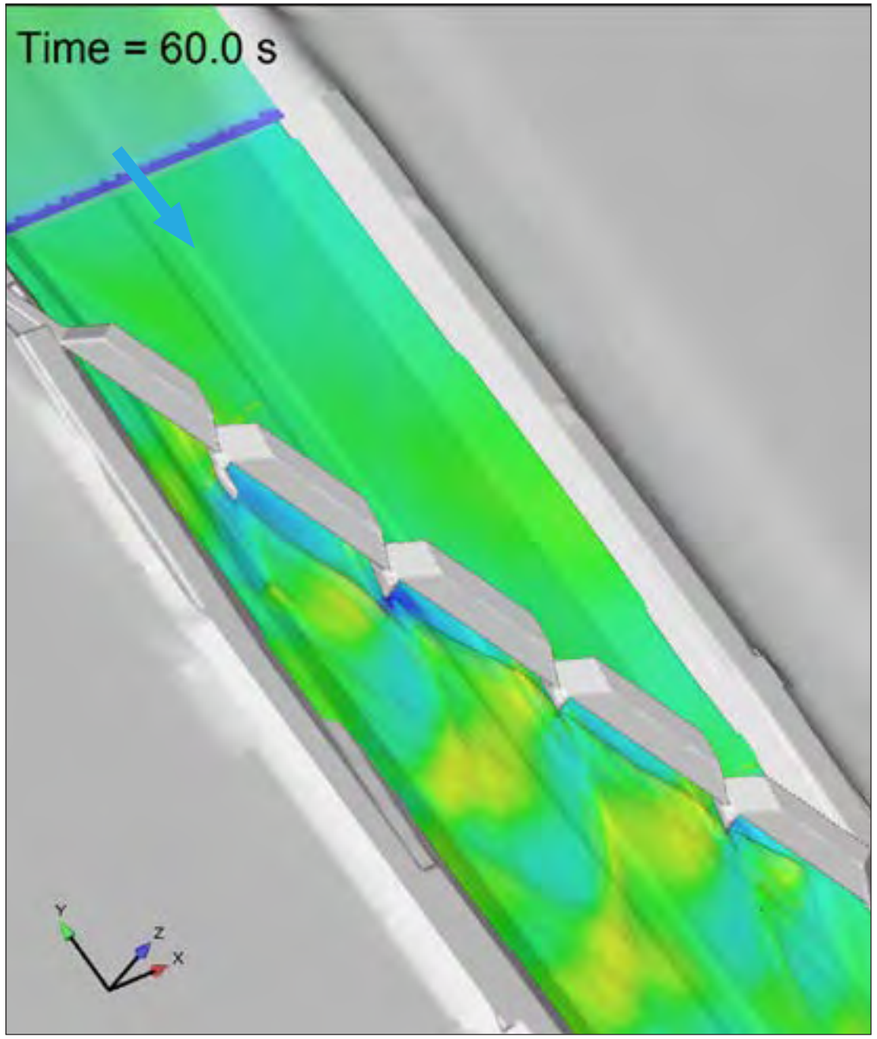
PROJECTS

LA RIVER PLATFORM PARK

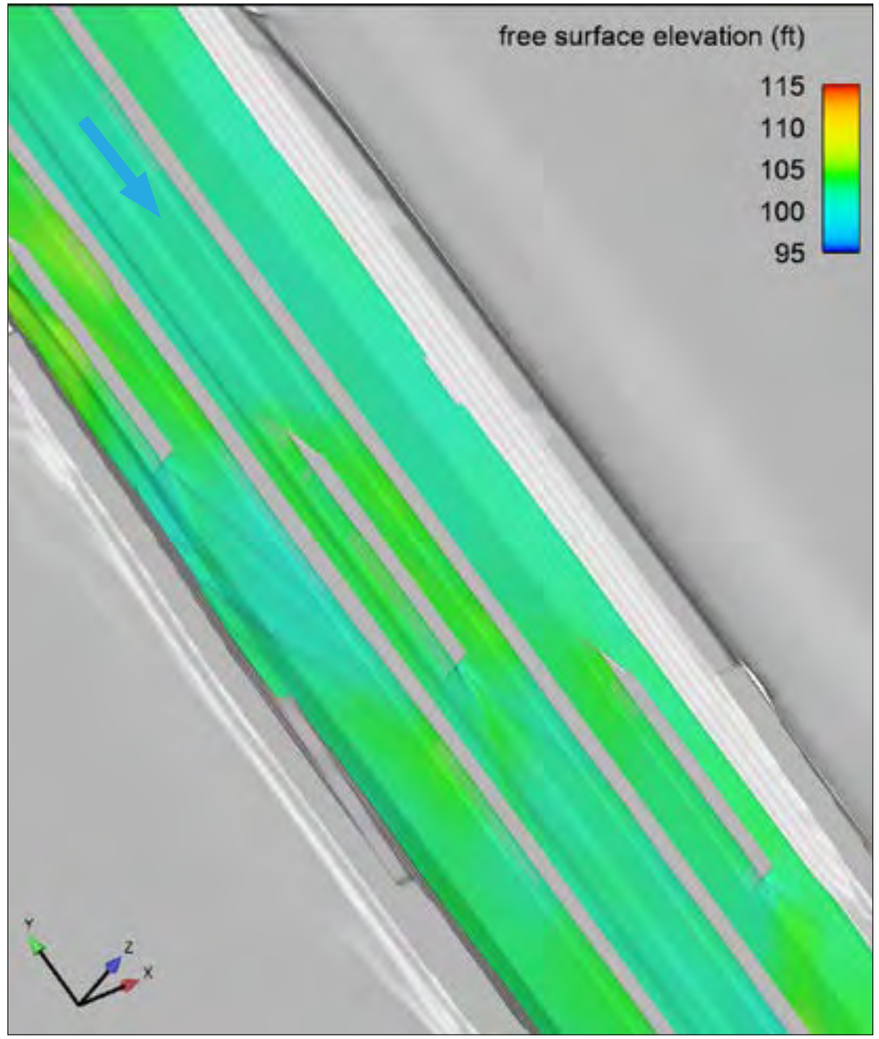
HYDRAULICS

Option A provides the opportunity to improve the hydraulics through removal and rebuilding the UPRR/ WSAB Crossing.

Modeled free surface elevation for baseline (left) and LAR Platform Park support walls (right) for the LA River design peak flow conditions (~0.2% event). Model results indicate similar free surface elevations for both conditions with the flow being contained in the channel. The position of the platform walls were designed and optimized to achieve relatively equal free surface elevations within each of the three bays.



Baseline Model: Free Surface Elevation



Platform Model: Free Surface Elevation

LA RIVER PLATFORM PARK

HYDRAULICS

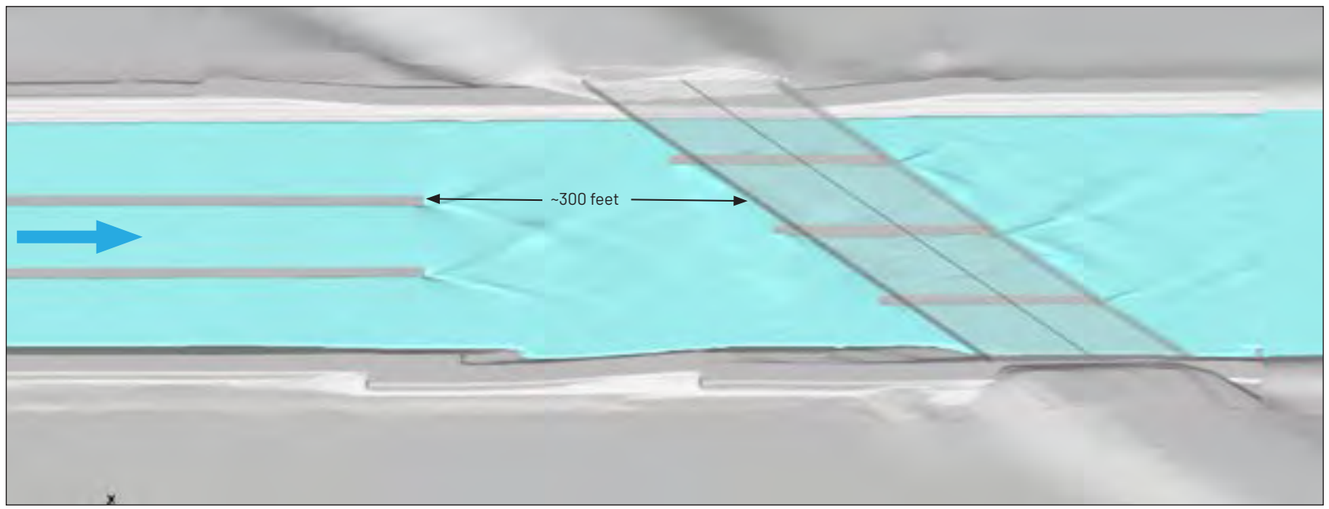
KEY FINDINGS

- Upstream of the UPRR bridge, the existing channel contracts and is steeper. Within this "chute" the support walls will need to contract to match the channel contraction (i.e., so flow areas within the three bays get narrower at approximately the same rate).

- The downstream end of the platform will terminate a safe distance away from the I-710 freeway bridge to reduce impacts to the flow upstream of the existing bridge. Computational Fluid Dynamics (CFD) modeling indicated that about 300 feet between the I-710 bridge deck and the nearest platform support wall is sufficient distance.

- The existing UPRR bridge deck sits within the floodway below the elevation of the parapet walls and USACE noted it would be impacted during high flow flood events. This provides a substantial hydraulic constraint. Ideally, this bridge will be re-built as the additional Metro WSAB lines are added (Option A), but it is possible that the existing bridge will be retained (Option B).

- The channel side slopes may require modification from grouted stone to smooth concrete throughout the platform extent to offset the slight reduction in capacity caused by the support walls. This smoothing was included in the CFD model.



Platform Model: Free Surface Rendering

LA RIVER PLATFORM PARK

HYDRAULICS

OPTION B: If the UPRR bridge remains in place, the hydraulics become more complex. This option was not modeled using CFD in this phase, but CFD modeling should be done if this option is evaluated in future phases. The following interim hydraulic considerations are provided:

- It will likely be necessary to hydraulically merge the platform support walls to the existing two central bridge piers (while maintaining a seismic gap for structural purposes). This will require gradual transition from ~3' wall thickness to the ~9.5' pier thickness.

- The bridge piers are not perfectly aligned with the channel, and this results in a slight 'kink' as the support walls pass under the UPRR bridge. This may be able to be mitigated by aligning the walls with the centroid of the bridge piers (rather than the center of the ends of the piers), but this would require additional thickening of the walls around the piers that would cause additional constriction of the flow.

- The two outer bridge piers will have hydraulic impacts on flow in the outer channels that may have to be mitigated (e.g., by increasing the center spacing of the walls upstream to force more water into the central bay).

- Gaps between select platform girders above the parapet wall will need to be left open near the UPRR bridge in order to allow for intermittent wave runup and prevent pressurization of the platform during the design storm event.

PROJECTS

LA RIVER PLATFORM PARK

STRUCTURE



Source: OLIN

LA RIVER PLATFORM PARK

STRUCTURE

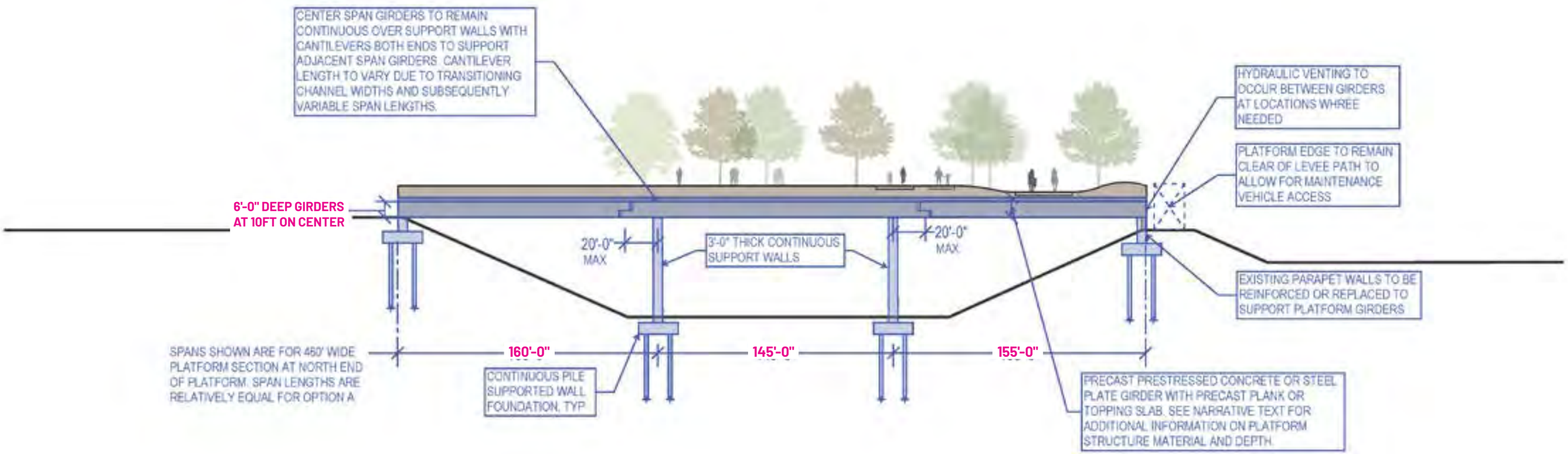
Conceptual design for the structure of the LA River Platform Park is summarized below.

KEY FINDINGS

- Throughout the concept design phase, various structural systems to support the platform park have been considered. These systems include the following:
    - › Precast pre-stressed concrete Deck Bulb Tee girders with top flange of girder forming slab, connected with a topping slab
    - › Precast pre-stressed concrete I-shaped girders supporting precast plank slab
    - › Built up steel plate girders supporting precast plank slab
- Selection of the structural framing system depends on future studies on the cost effectiveness and constructibility of each one, but the approximate girder depths studied for this report applies to all three systems. Note that in addition to the girder depth, a precast plank slab would account for ~8"-12" of added structural depth and the topping slab would account for 4" of added structural depth.
- Long-span girders to be supported by two continuous walls within the channel and reinforced parapet walls along the levee at each side of the channel.
- For three-span conditions, center span may remain continuous over wall supports and extend up to 20 feet past support as cantilevers. Exterior spans to be supported at end of cantilevers with bearing splice connections. This alternative to three simply-supported spans reduces support complexities, results in more efficient girder design, and may allow for more repetition in girder lengths as support walls.

LA RIVER PLATFORM PARK

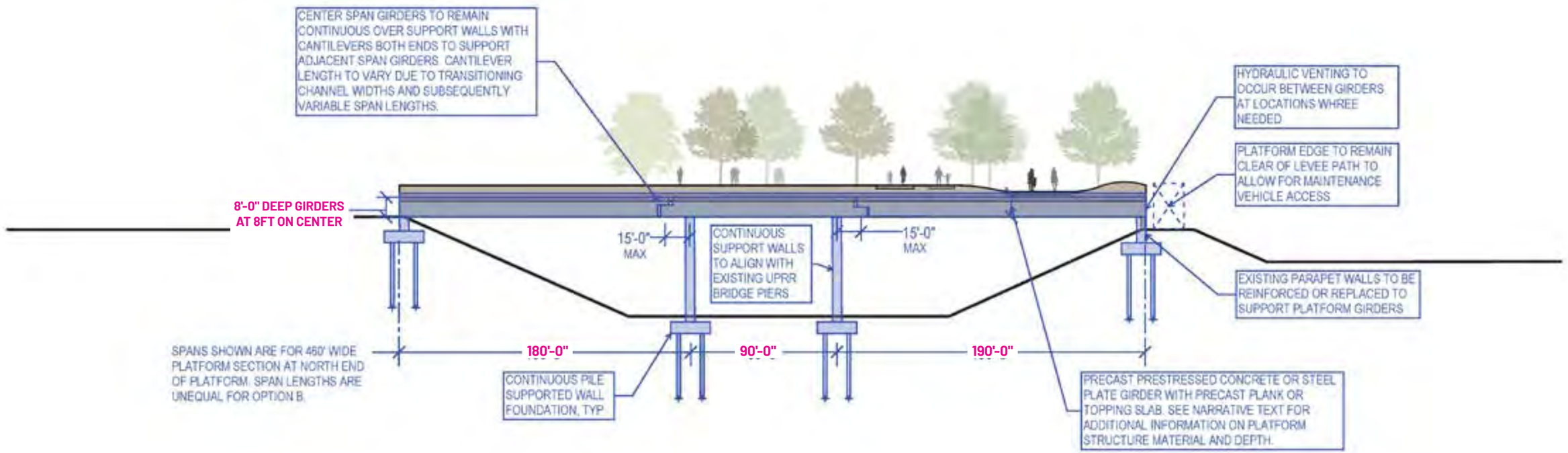
STRUCTURE



OPTION A: FULL UPRR REPLACEMENT

LA RIVER PLATFORM PARK

STRUCTURE



OPTION B: EXISTING UPRR TO REMAIN

LA RIVER PLATFORM PARK

STRUCTURE

- OPTION A: For the primary condition where the existing UPRR bridge is to be removed with new lines for the UPRR and Metro WSAB to be constructed on the new platform, the structure of the platform would also need to consider the following:

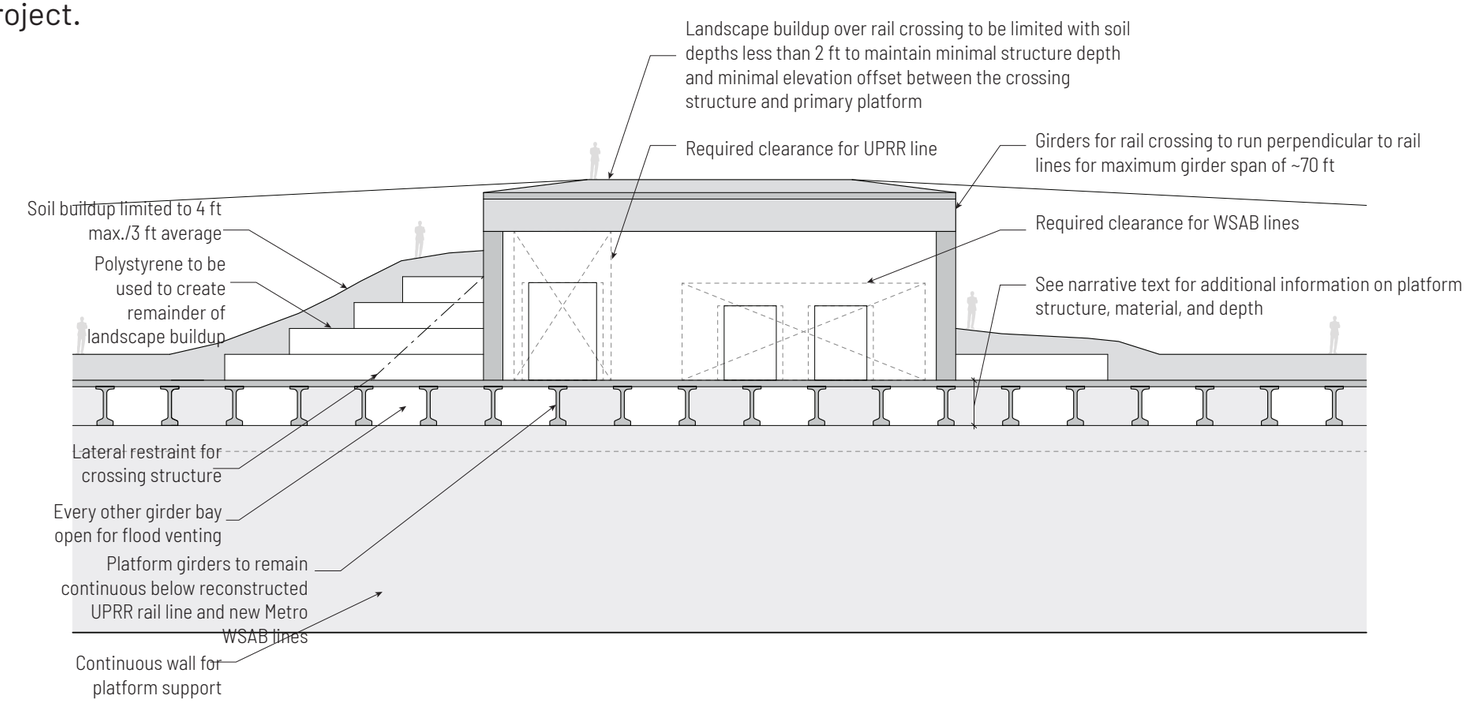
  - With the existing UPRR bridge to be replaced, the two platform support walls can be more equally spaced to create efficient hydraulic flows and more equal platform girder spans. With girder spans within the range of 110 feet to 160 feet, girder depths are anticipated to be approximately 6 feet with girder spacing at 10 feet on center.

  - Design parameters for required platform behavior at the UPRR and Metro WSAB crossings is currently undefined. Depending on strength, deflection, and vibration requirements for rail line support structures, there is potentially the need for thickened walls or additional piers below the new rail lines.

  - Elevated pedestrian crossing to run perpendicular to rail lines to limit structural span. Landscaping at crossing to be minimal to limit structural depth of pedestrian crossing.

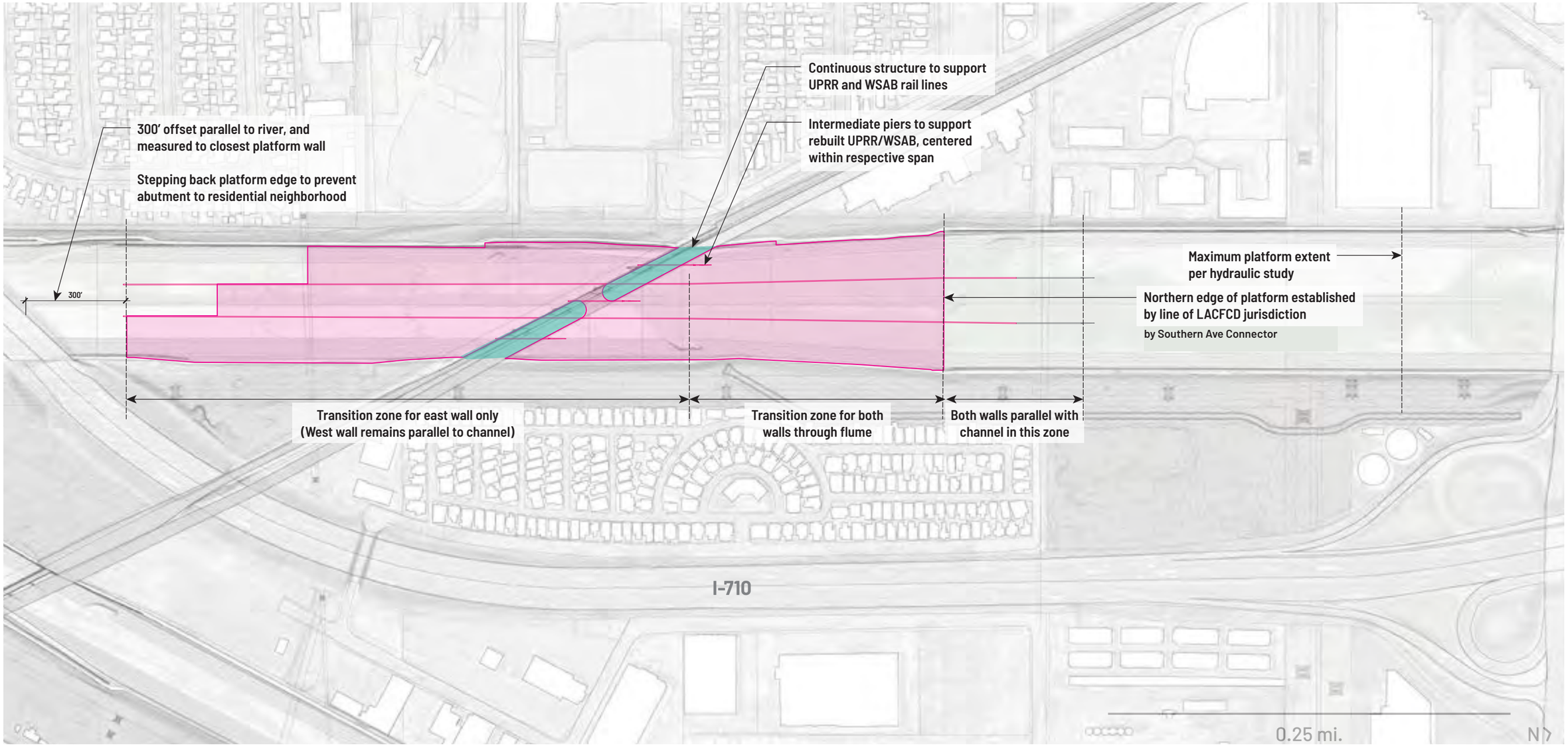
ADDITIONAL CONSIDERATIONS

- One of the primary factors influencing the extent of the platform park as well as structural framing requirements is the platform interface with the existing UPRR bridge and bridges for future Metro WSAB lines. As an alternative, Option B below notes considerations to take into account in order to work around the rail lines in situ versus removing and replacing the lines as part of the platform project.



LA RIVER PLATFORM PARK

OPTION A: FULL UPRR REPLACEMENT



LA RIVER PLATFORM PARK

STRUCTURE

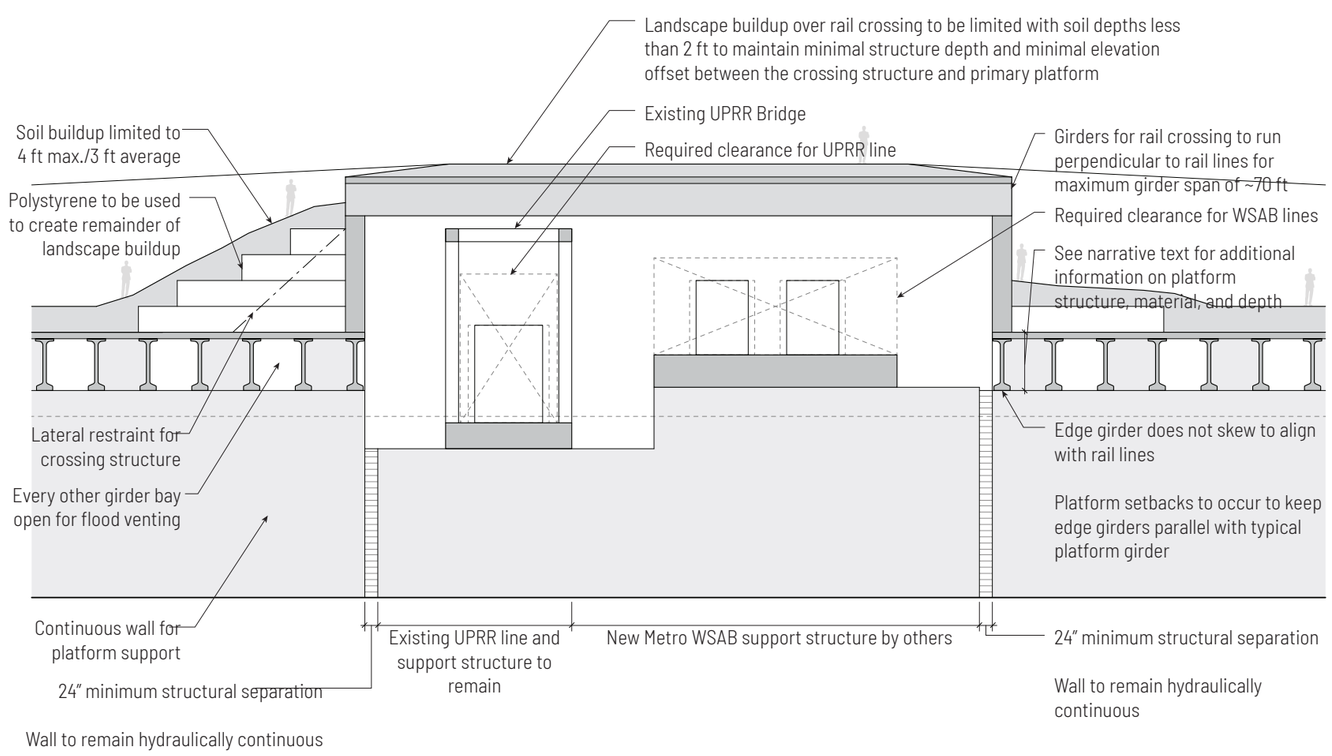
- OPTION B: For the condition where the existing UPRR bridge is to remain, the structure of the platform would need to consider the following:

    - Due to hydraulic concerns, the configuration of the two platform support walls within the channel must be hydraulically continuous with the two inner piers of the existing UPRR crossing. This would necessitate large spans of up to 185 feet for portions of the platform. To support landscape loads over spans of that length, girder depth is anticipated to be approximately 8 feet with girder spacing at 8 feet on center.

    - Where the platform crosses the existing UPRR bridge and future Metro WSAB bridge, the platform is cut at a steep diagonal angle. For an efficient structural system, the platform stops short of the existing UPRR bridge on either side.

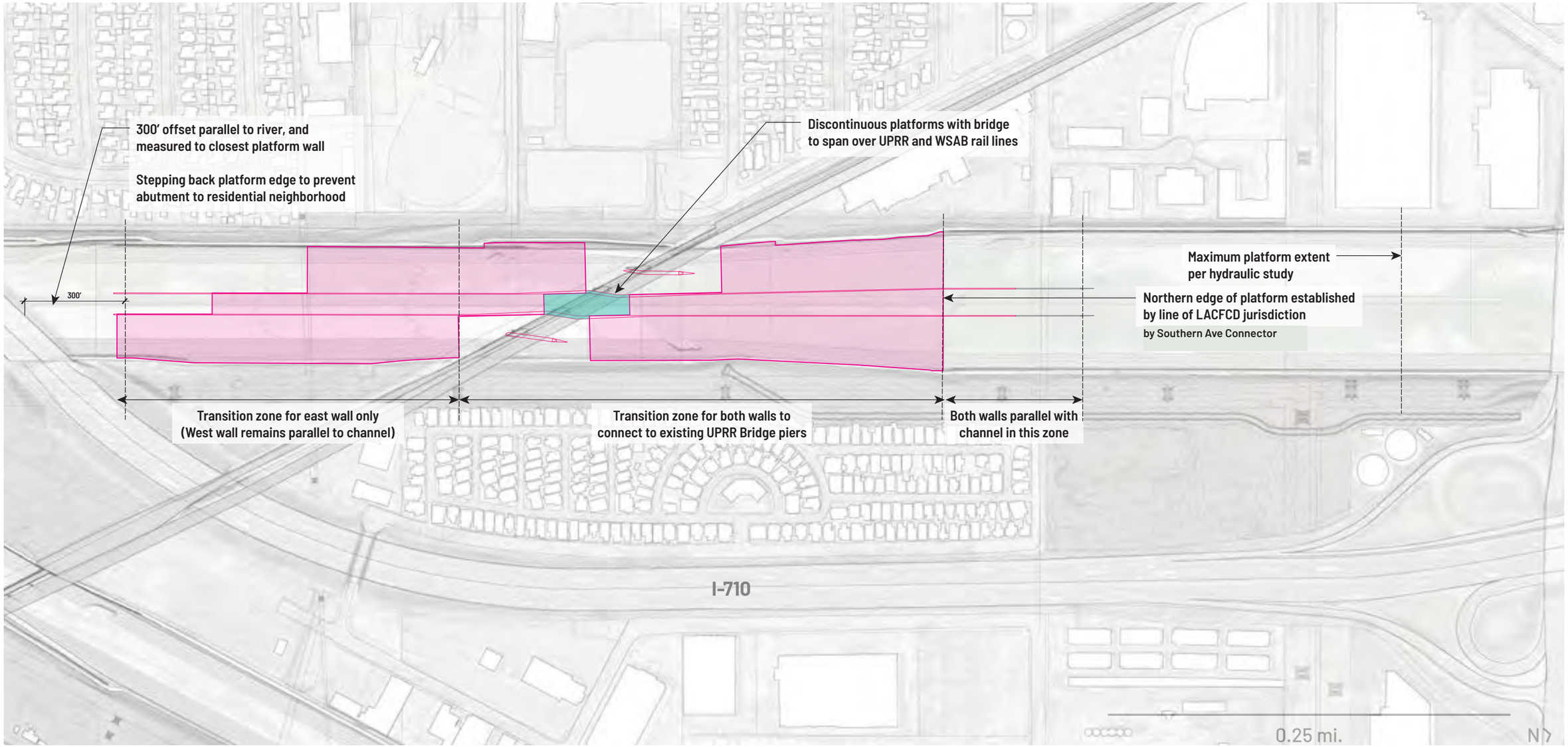
    - Structural separations must be taken into account between existing infrastructure and the platform park. There must be a structural separation of ~24 inches between the UPRR/ Metro WSAB bridge piers and the platform walls; there must be a ~24 inches structural separation between the outer edge of the existing crossings and the platform park structure.

    - Pedestrian bridge to be provided to span the 75 foot to 150 foot horizontal and 27 feet vertical gap between platforms over the existing UPRR and new Metro WSAB bridges. Due to the geometric constraints of the diagonal crossing, a light framed pedestrian bridge over the UPRR/Metro WSAB lines rather than a precast concrete system capping the crossing is preferred.



LA RIVER PLATFORM PARK

OPTION B: EXISTING UPRR TO REMAIN



PROJECTS

LA RIVER PLATFORM PARK

DESIGN

The LA River Platform Park creates approximately 20.5 acres of new opportunities for recreation at the LA River. As the largest piece of the Rio Hondo Confluence Area Project, the LA River Platform Park serves as a destination for communities on both sides of the river, as well as a means of fostering an unprecedented degree of connectivity across the river. Visitors can access the park from the north from neighboring South Gate Park, the Urban Orchard Project, the Southern Avenue Connector, or nearby transit stops along Atlantic Ave and Firestone Blvd. At the southern end, the park leads visitors to the Confluence Point Park and out towards the constellation of other projects in the Rio Hondo Confluence Area. Atop the platform park, visitors encounter a wide array of programming, including active recreation such as sports fields and playgrounds, passive recreation such as planted groves and nature trails, water features such as rills and ponds, and shade structures for cultural activities and social gatherings. Towards the center of the platform, a high vantage point gives visitors the opportunity to enjoy sweeping views of the LA River, South Gate, and neighboring communities.



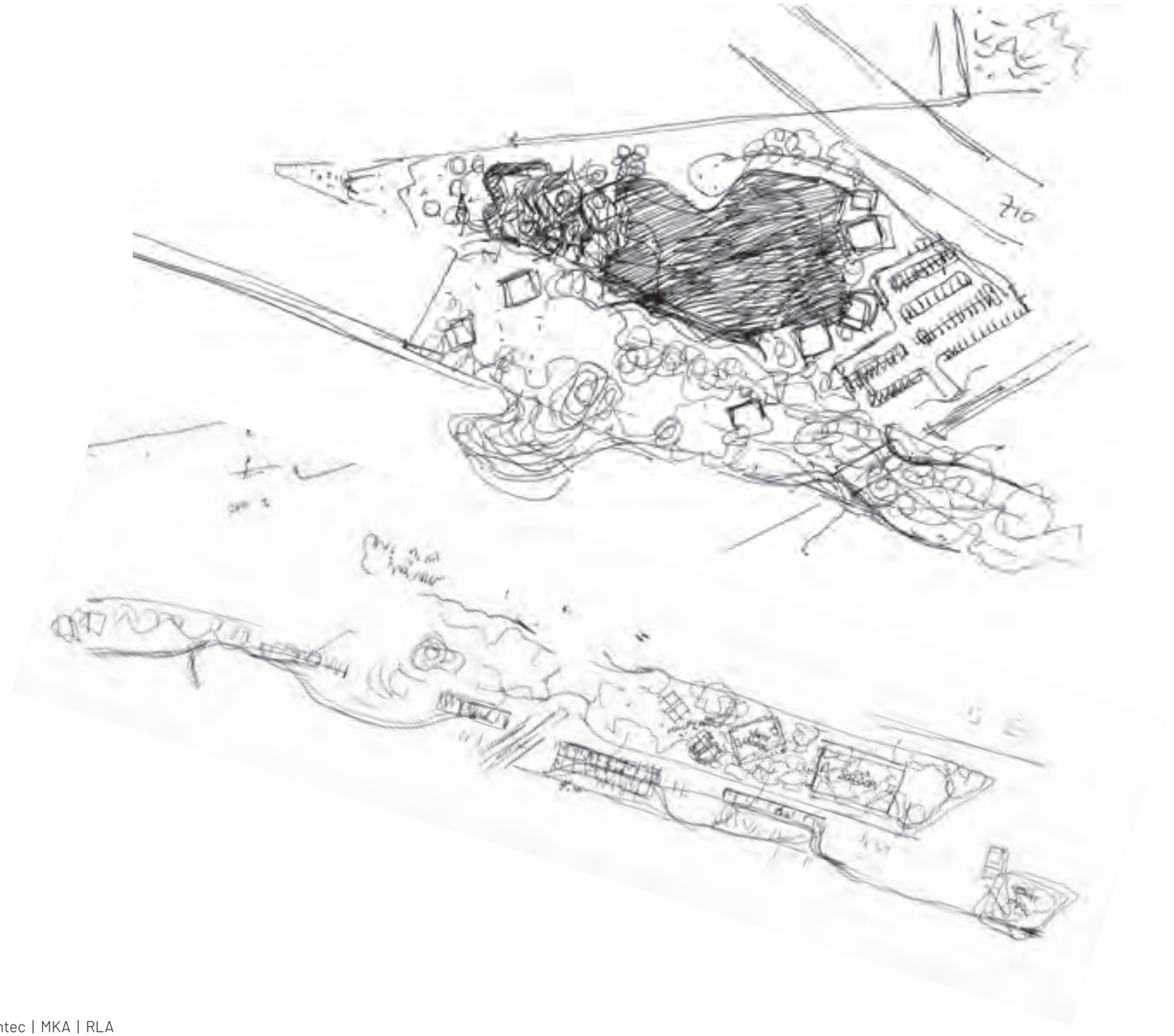
PROJECTS



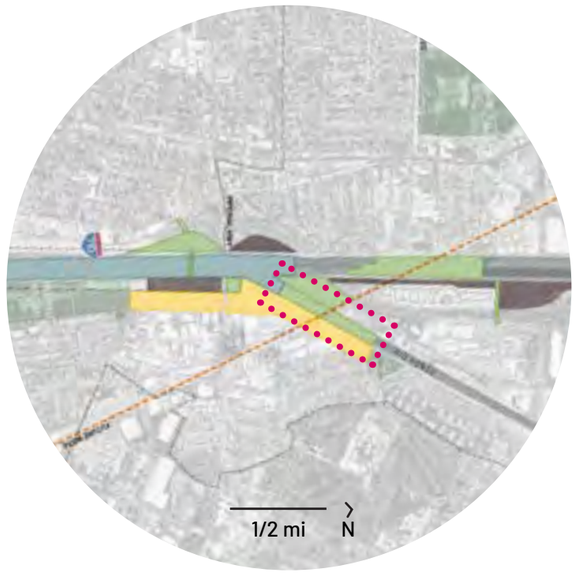
RIO HONDO PLATFORM PARK

SITE INTRODUCTION

The Rio Hondo Platform Park is situated over an approximately 2,400-foot stretch over the Rio Hondo. The platform park site is bounded to the north by a 500-foot offset south from Garfield Avenue parallel to the channel, and bounded to the south by a 500-foot offset north from the LA River / Rio Hondo confluence point, measured from top of levee. The eastern and western edges of the platform park are bounded by the extents of the flood channel. To the east, this is defined by the existing parapet walls; to the west, this is defined by the inner edge of the levee.



KEY PLAN


1/2 mi
N


CONFLUENCE POINT PARK:
BASELINE OPTION
OVERLOOK
COMMUNITY BUILDING
SCULPTURE PARK
WORKSHOPS
RIO HONDO TRAIL
ARROYO/SUBSURFACE BANDINI CONNECTION
710
NORTH IMPERIAL TRANSMISSION RIGHT-OF-WAY PARK
MULTIUSE TRAILS
POTENTIAL FUTURE WEST SANTA ANA BRANCH (WSAB) STATION
MEADOW/LAWN/ WILDLIFE HABITAT
MILLER WAY
EXISTING UNION PACIFIC RAILROAD / FUTURE WEST SANTA ANA BRANCH
URBAN FOREST/ WILDLIFE HABITAT
SHADED GARDENS
OVERLOOK
SOUTH GARFIELD TRANSMISSION RIGHT-OF-WAY PARK
BIKE HUB
200'
N

RIO HONDO PLATFORM PARK

CHALLENGES

A major challenge of the Rio Hondo Platform Park is the coordination of the existing UPRR and future Metro WSAB line, which will have significant implications on the hydraulics, structure, and pedestrian access. The Design team has developed two distinct options for how the platform park will coordinate with these rail crossings. Option A, assumes full replacement of the UPRR bridge and Metro WSAB addition. Option B, assumes the Metro WSAB crossing will be an extension of the existing UPRR bridge crossing.

DESIGN

The Rio Hondo Platform Park creates approximately 12 acres of new opportunities for recreation at the Rio Hondo. Situated immediately adjacent to the Rio Hondo Station along the Metro WSAB, the Rio Hondo Platform Park represents an important gateway to the Rio Hondo Confluence Area Project from the greater LA region. Upon arriving at the WSAB Rio Hondo station, visitors will be drawn up to the platform destination, where they can enjoy sweeping views of the surrounding lands and other confluence area projects, while enjoying a host of new programming such as an urban forest, planted groves, and an extensive outdoor sculpture park. From the Rio Hondo Platform Park, visitors can easily access the adjacent future Confluence Point Park to the west, and the future South Garfield and North Imperial Transmission Right-of-Way Parks to the east.



IN CHANNEL AT CONFLUENCE LOOKING NORTH TOWARDS RIO HONDO

Source: OLIN

RIO HONDO PLATFORM PARK

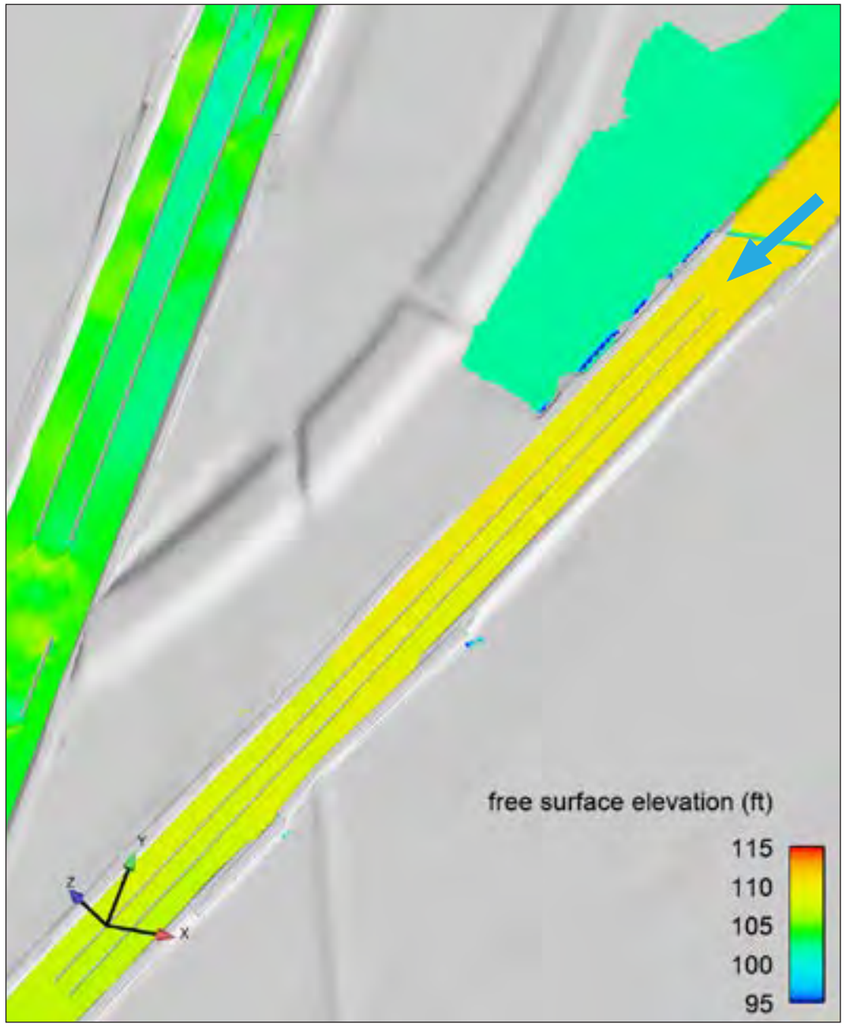
HYDRAULICS

Feasibility and conceptual design of project elements summarized below are based upon 3D hydraulic modeling analyses. An emphasis was placed on minimizing impacts to the design water surface elevation, and coordination with USACE will be required during future design phases. Channel overtopping occurred in the baseline model and the addition of the platform walls did not induce additional overtopping.

Rebuilding the UPRR bridge (Option A) will enable the existing rail crossing and the Metro WSAB to be raised above the design flow event and built into the platform, thereby minimizing hydraulic impacts. This would enable a continuous platform and relatively equally spaced support walls.

The support walls may have to be locally thickened (i.e., greater than ~3') to support the rail load. This was included in the hydraulic model.

Modeled free surface elevation for baseline Rio Hondo Platform Park support walls for the Rio Hondo design event peak flow conditions (~0.2% event). The position of the platform walls were aligned with the existing UPRR bridge piers. Overtopping upstream of the platform walls is similar to the baseline condition.



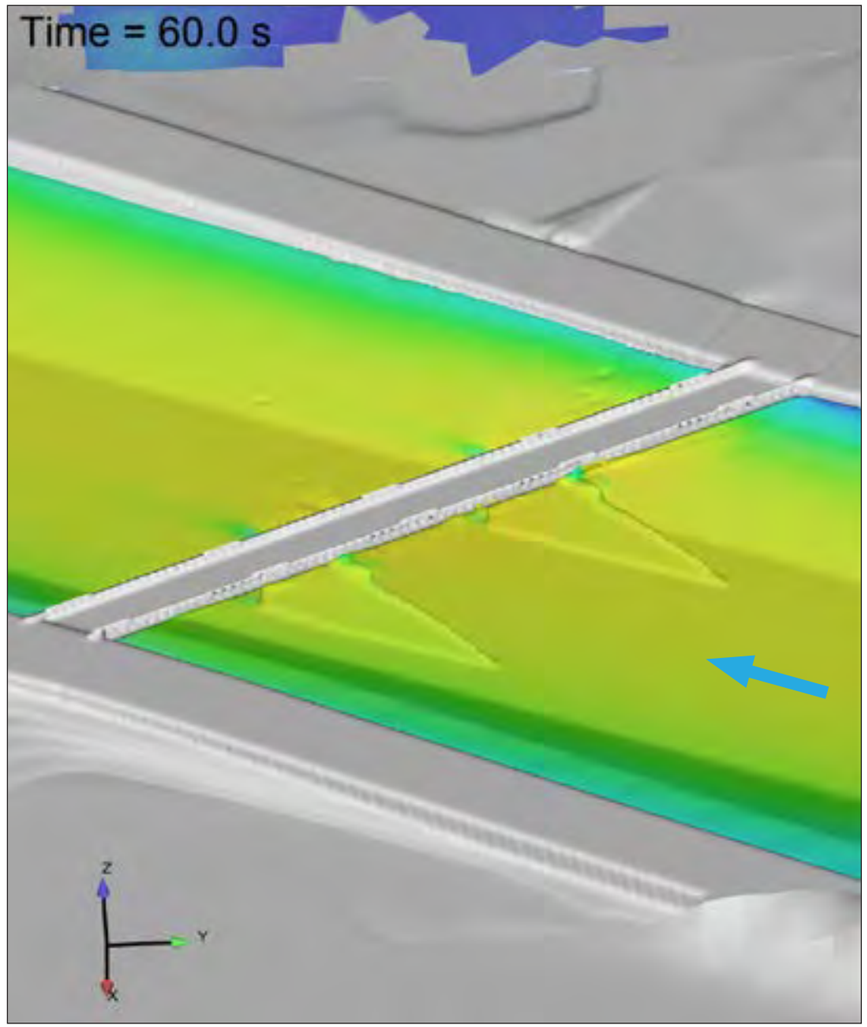
Platform Model: Free Surface Elevation

RIO HONDO PLATFORM PARK

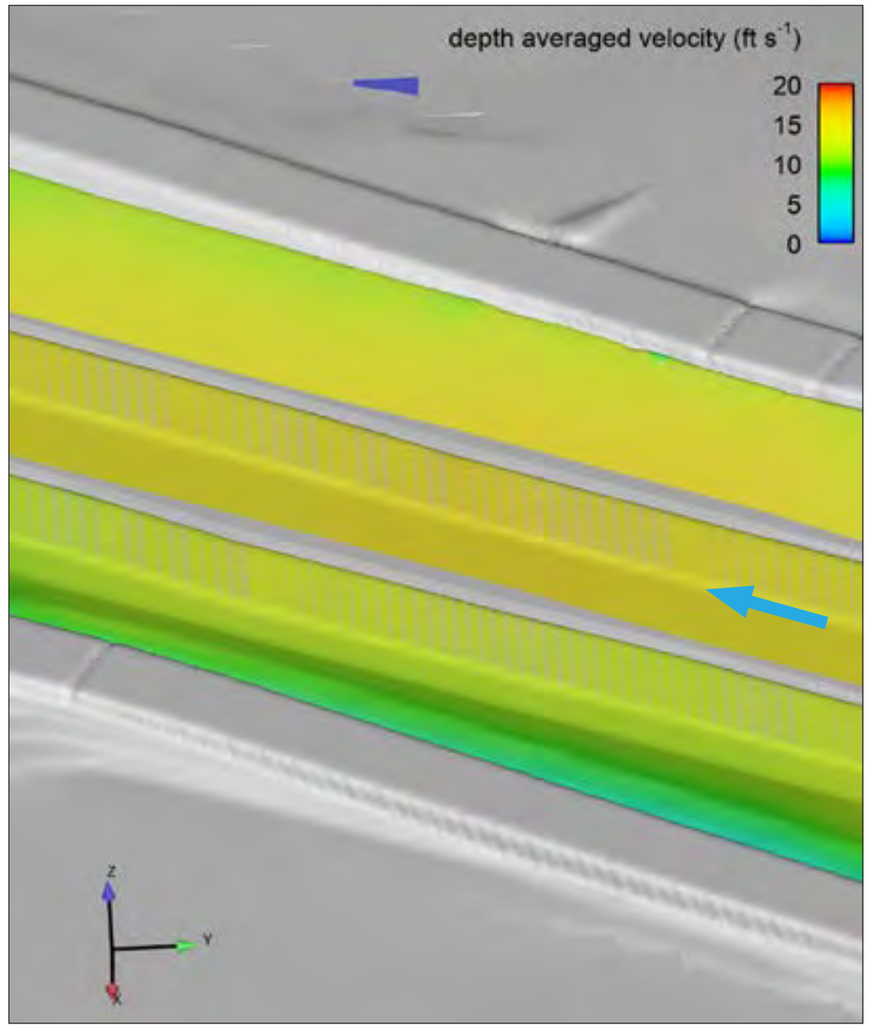
HYDRAULICS

Rebuilding the UPRR/ WSAB Crossing provides the opportunity to improve the hydraulics through removal and rebuilding the UPRR/WSAB Crossing.

Modeled free surface elevation for baseline (left) and Rio Hondo Platform Park support walls (right) for the Rio Hondo design peak flow conditions (~0.2% event). Model results indicate similar free surface elevations for both conditions with the flow being contained in the channel. Rebuilding and elevating the UPRR/WSAB Crossing will prevent flow from impinging on the bridge deck during the Rio Hondo design peak flow event.



Baseline Model: Free Surface Elevation



Platform Model: Free Surface Elevation

RIO HONDO PLATFORM PARK

HYDRAULICS

KEY FINDINGS

- The upstream end of the platform will start a safe distance away from the Garfield Avenue bridge to reduce impacts to the flow under the existing bridge. Garfield Avenue bridge piers were not included in the CFD model.

- The downstream end of the platform will terminate a safe distance away from the confluence with the LA River to avoid impacts to the complex flow in that region. CFD modeling indicated that about 500 feet is sufficient distance.

- The existing UPRR bridge deck sits below the elevation of the parapet walls and USACE noted it to be impacted during high flow flood events. This provides substantial hydraulic constraints. Ideally, this bridge will be re-built as the additional Metro WSAB lines are added (Option A), but it is possible that the existing bridge will be retained (Option B).

- The channel side slopes may require modification from grouted stone to smooth concrete throughout the platform extent to offset the slight reduction in capacity caused by the support walls. This smoothing was included in the CFD model. Additional small parapet walls may also be required to maintain sufficient freeboard.

- If the UPRR bridge remains (Option B), the hydraulics become more complex. This option was not modeled using CFD in this phase, but CFD modeling should be done if this option is evaluated in future phases. The following interim hydraulic considerations are provided:

  › It will likely be necessary to hydraulically merge the platform support walls to the existing two bridge piers (while maintaining a seismic gap for structural purposes). This will require gradual transition from ~3' wall thickness to the ~5' pier thickness.

  › This alignment creates relatively equal spans.

  › Gaps between select platform girders above the parapet wall will need to be left open near the UPRR bridge in order to allow for intermittent wave runup and prevent pressurization of the platform during the design flood event.

RIO HONDO PLATFORM PARK

STRUCTURE

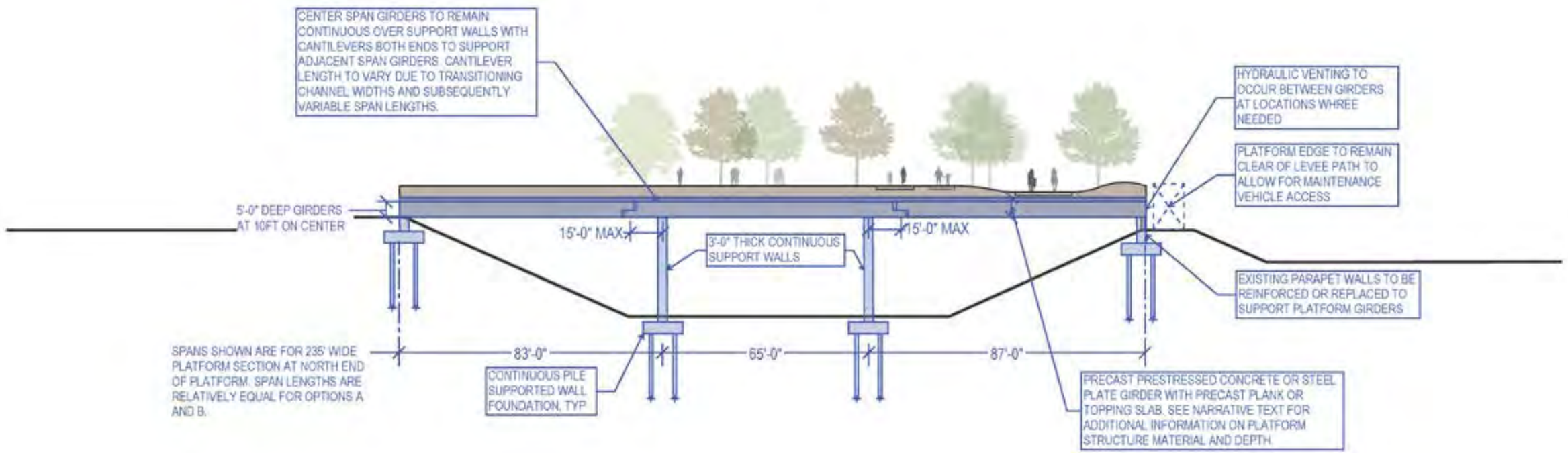
Conceptual design for the structure of the Rio Hondo Platform Park is summarized below.

KEY FINDINGS

- Throughout the concept design phase, various structural systems to support the platform park have been considered. These systems include the following:
    - › Precast pre-stressed concrete Deck Bulb Tee girders with top flange of girder forming slab, connected with a topping slab
    - › Precast pre-stressed concrete I-shaped girders supporting precast plank slab
    - › Built up steel plate girders supporting precast plank slab
- Selection of the structural framing system depends on future studies on the cost effectiveness and constructibility of each one, but the approximate girder depths studied for this report applies to all three systems. Note that in addition to the girder depth, a precast plank slab would account for ~8”-12” of added structural depth and the topping slab would account for 4” of added structural depth.
- Long-span girders to be supported by two continuous walls within the channel and reinforced parapet walls at levee each side of the channel.
- For three-span conditions, center span may remain continuous over wall supports and extend up to 15 feet past support as cantilevers. Exterior spans to be supported at end of cantilevers with bearing splice connections. This alternative to three simply-supported spans reduces support complexities, results in more efficient girder design, and may allow for more repetition in girder lengths as support walls.

RIO HONDO PLATFORM PARK

STRUCTURE



OPTIONS A + B: SIMILAR SECTION FOR FULL REPLACEMENT AND EXISTING UPRR TO REMAIN

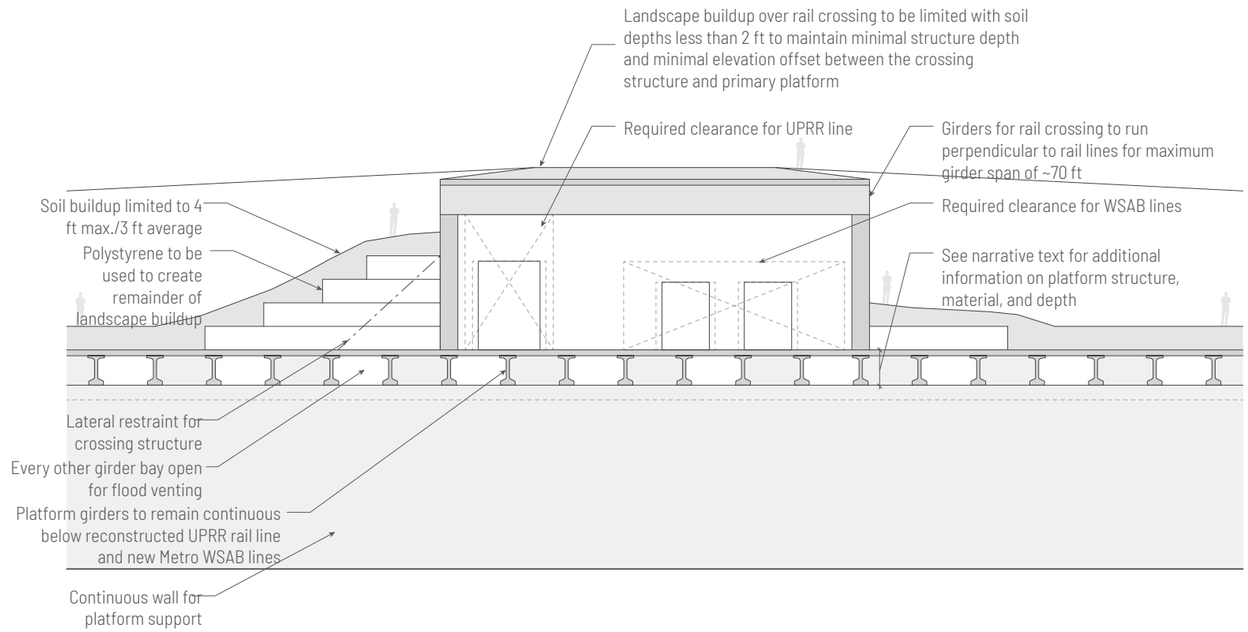
RIO HONDO PLATFORM PARK

STRUCTURE

- OPTION A: For the primary condition where the existing UPRR bridge is to be removed with new lines for the UPRR and Metro WSAB to be constructed on the new platform, the structure of the platform would also need to consider the following:

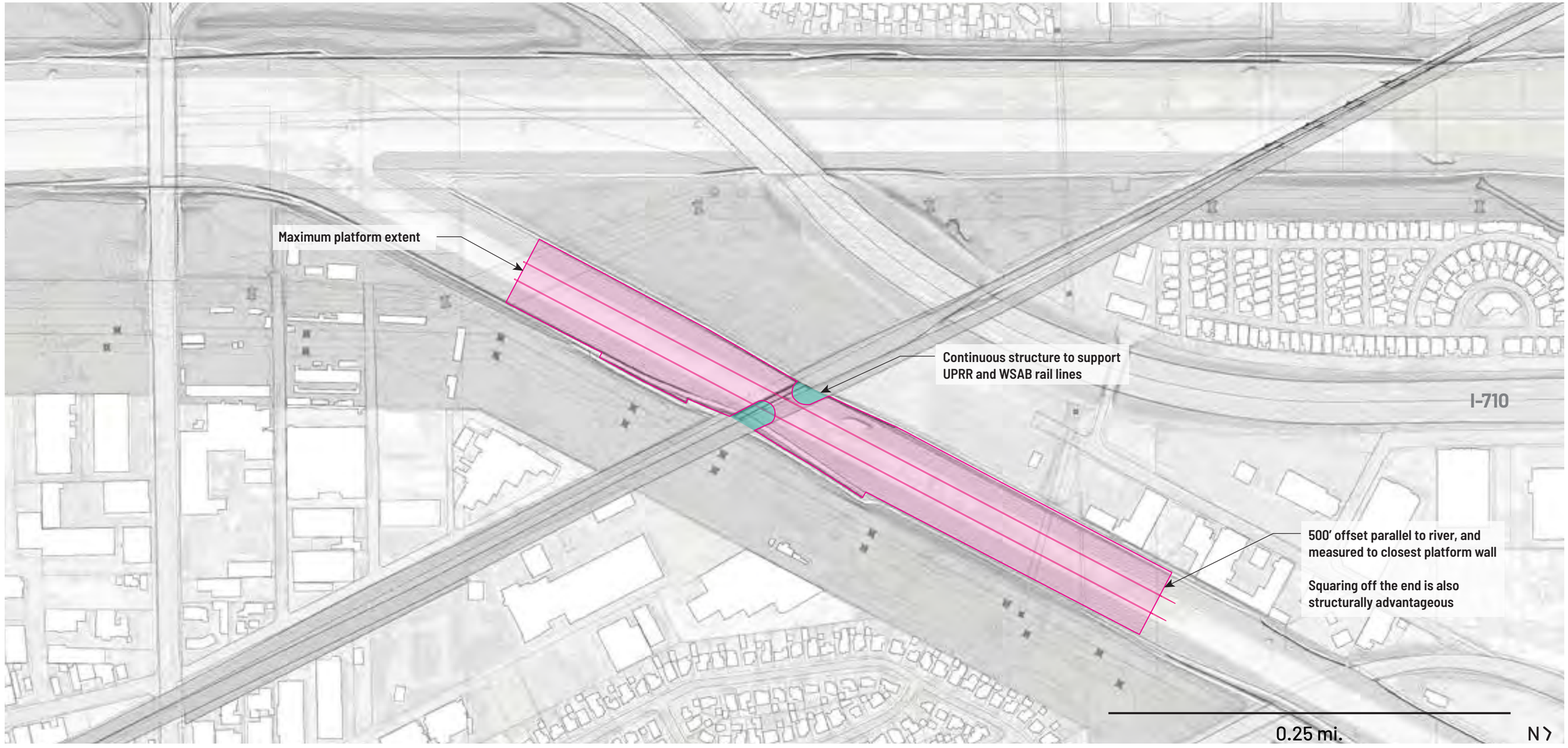
    - With the existing UPRR bridge to be replaced, the two platform support walls can be more equally spaced to create efficient hydraulic flows and more equal platform girder spans. With girder spans within the range of 65’ to 105’, girder depths are anticipated to be approximately 5 feet with girder spacing at 10 feet on center.

    - Design parameters for required platform behavior at the UPRR and Metro WSAB crossings is currently undefined. Depending on strength, deflection, and vibration requirements for rail line support structures, there is potentially the need for thickened walls to support the new rail lines.



RIO HONDO PLATFORM PARK

OPTION A: FULL UPRR REPLACEMENT

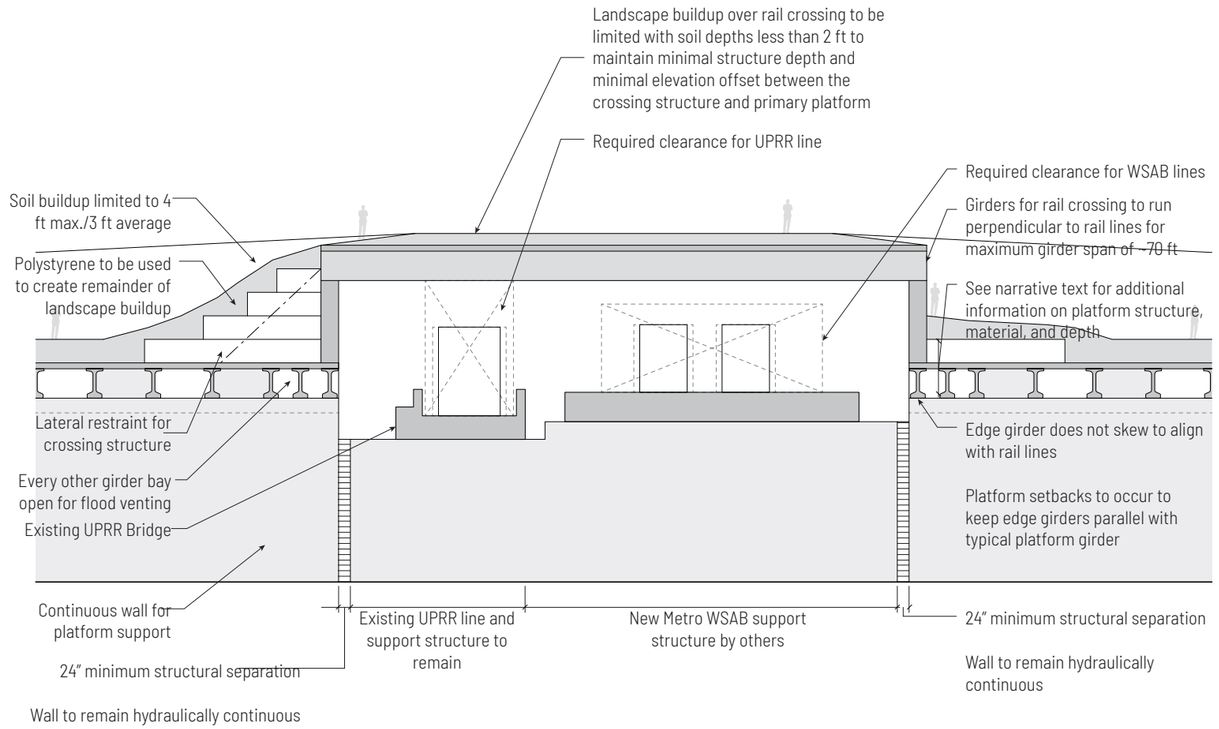


RIO HONDO PLATFORM PARK

STRUCTURE

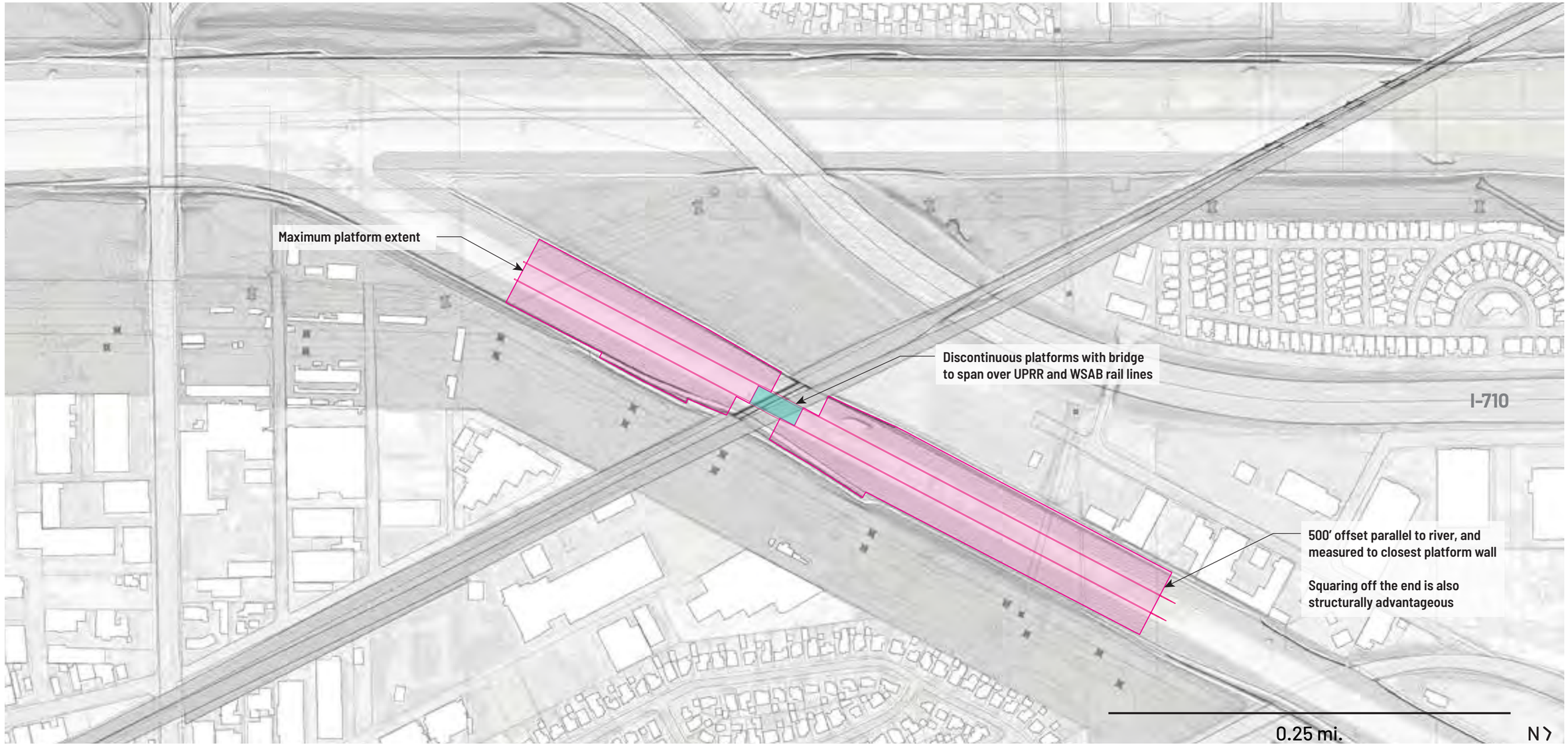
ADDITIONAL CONSIDERATIONS

- One of the primary factors influencing the structural framing requirements is the platform interface with the existing UPRR bridge and bridges for future Metro WSAB lines. As an alternative, Option B below notes considerations to take into account in order to work around the rail lines in situ versus removing and replacing the lines as part of the platform project.
- OPTION B: For the condition where the existing UPRR bridge is to remain, the structure of the platform would need to consider the following:
  - › Platform walls aligning with existing UPRR bridge piers result in fairly equally spaced spans. For 65 to 90 foot span lengths, girder depth is anticipated to be approximately 5 feet with girder spacing at 10 feet on center.
  - › Structural separations must be taken into account between existing infrastructure and the platform park. There must be a structural separation of ~24" between the UPRR/Metro WSAB bridge piers and the platform walls; there must be a ~24" structural separation between the outer edge of the existing crossings and the platform park structure.
  - › Elevated pedestrian crossing to run perpendicular to rail lines to limit structural span. Landscaping at crossing to be minimal to limit structural depth of pedestrian crossing.



RIO HONDO PLATFORM PARK

OPTION B: EXISTING UPRR TO REMAIN



SOUTH GARFIELD TRANSMISSION RIGHT-OF-WAY PARK

SITE INTRODUCTION

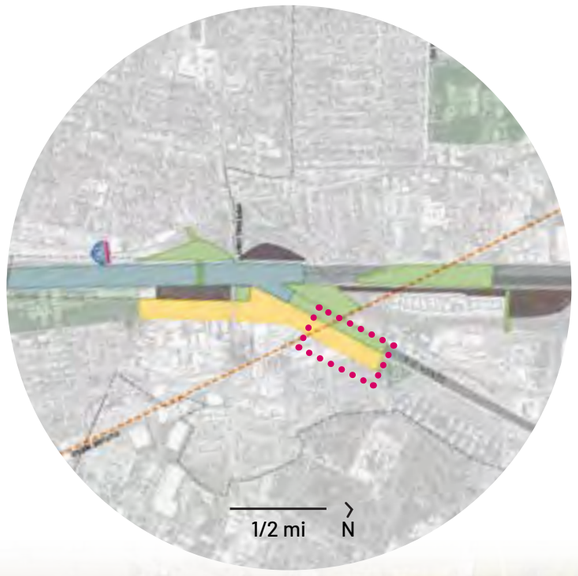
The site of the South Garfield Transmission Right-of-Way Park is currently owned by Southern California Edison (SCE) and occupied with their transmission lines. The 13.5 acre park, approximately 350 foot wide, serves as a connector between Circle Park to its north and the future Metro WSAB Rio Hondo Station to its south

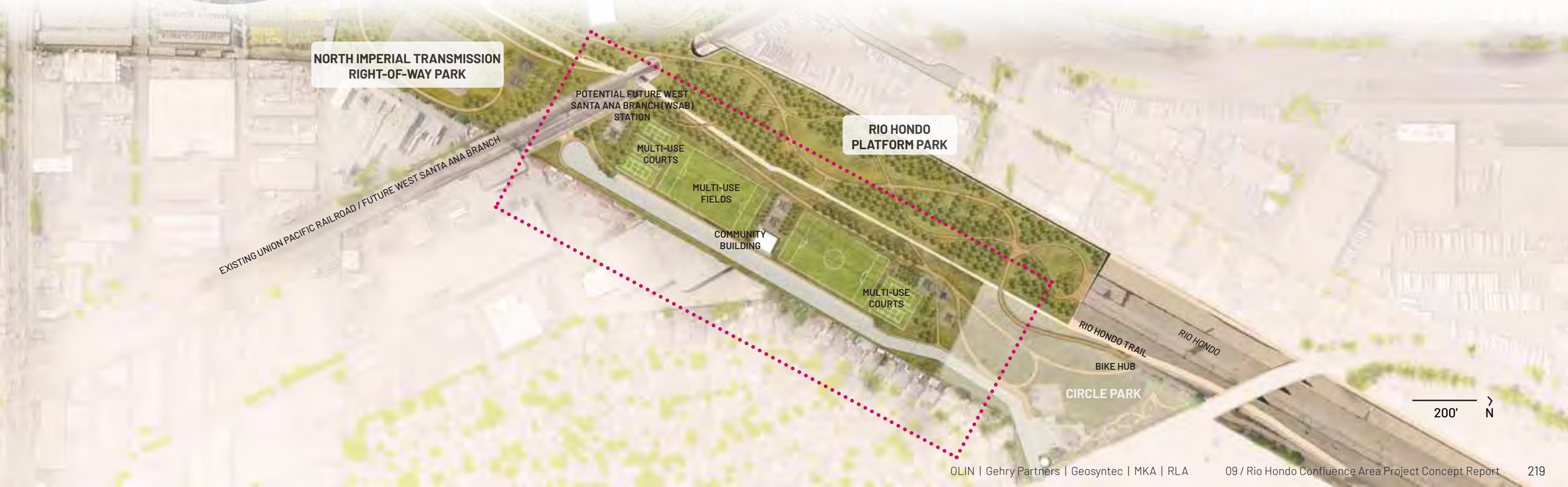


RIO HONDO EAST BANK LOOKING NORTH

Source: OLIN

KEY PLAN


1/2 mi
N


NORTH IMPERIAL TRANSMISSION RIGHT-OF-WAY PARK
POTENTIAL FUTURE WEST SANTA ANA BRANCH (WSAB) STATION
MULTI-USE COURTS
MULTI-USE FIELDS
COMMUNITY BUILDING
EXISTING UNION PACIFIC RAILROAD / FUTURE WEST SANTA ANA BRANCH
RIO HONDO PLATFORM PARK
MULTI-USE COURTS
RIO HONDO TRAIL
RIO HONDO
BIKE HUB
CIRCLE PARK
200'
N

SOUTH GARFIELD TRANSMISSION RIGHT-OF-WAY PARK

CHALLENGES

The land is currently occupied by a plant nursery operation at grade and the SCE transmission lines above. The four western pairs of transmission lines are 220kV suspended from steel truss pylons and the 2 pairs to the east are 66vK lines from wood pylons. The lines require the following vertical clearances: 18 feet for structures, 30 feet for vehicle access, and 25 feet for pedestrian access. Any future development would be vertically constrained by the lowest wires, sag elevation and its required vertical clearance. In addition to vertical clearances there are also horizontal clearances required of 50 feet for the steel suspension towers and 25 feet for the wood pylons. Lastly, a 14 foot wide access road must be maintained along the length of the Transmission Right-of-Way to preserve vehicular access for future maintenance of the power lines.

Further, the South Garfield Transmission Right-of-Way Park lacks connectivity to the existing street grid. Garfield Avenue is the largest arterial road in its proximity, and there is potential to formally connect an existing access driveway through Circle Park to the street. This is imperative in establishing adequate vehicular, pedestrian, and bicycle access to the future Metro WSAB Rio Hondo station, that will require vehicular drop off, bus access, and parking for both the station and park. There are other proximate surface roads, Karmont Avenue and Sessler Street that could provide secondary access, but it would necessitate the acquisition or easement of privately owned land and the possible demolition of existing structures.

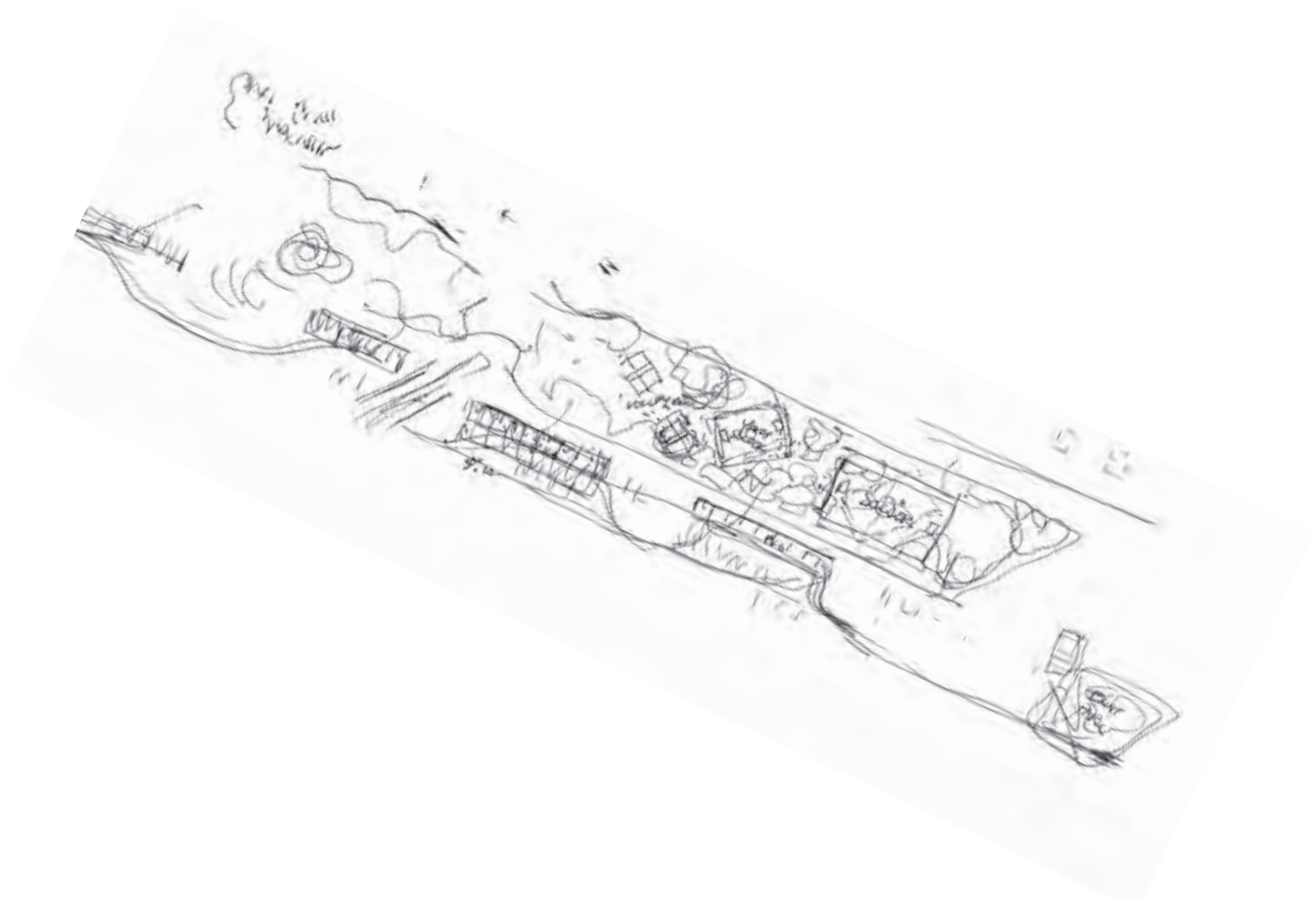
An additional challenge in the design of the future South Garfield Transmission Right-of-Way Park is the relocation of the existing plant nursery operation. The nursery is a commercial asset to the neighborhood, but can exist in other underutilized transmission line rights-of-way. If necessary, the park does not need to occupy all 13.5 acres and could instead utilize a much narrower strip of the transmission right-of-way while preserving existing, yet reduced nursery function. With such, it would be imperative to maintain the park along the eastern bank of the Rio Hondo to promote river accessibility.

PROJECTS

SOUTH GARFIELD TRANSMISSION RIGHT-OF-WAY PARK

DESIGN

The design of this South Garfield Transmission Right-of-Way Park compliments its neighboring Circle Park, the future Rio Hondo Platform Park, and future North Imperial Transmission Right-of-Way Park. It will also enhance access to the Metro WSAB Rio Hondo Station to its south. Further, the park will provide continuous access along the river supplemented by shade structures, native vegetation, and spaces for activity and rest including: soccer pitches; tennis courts; and a pavilion.



NORTH IMPERIAL TRANSMISSION RIGHT-OF-WAY PARK

SITE INTRODUCTION

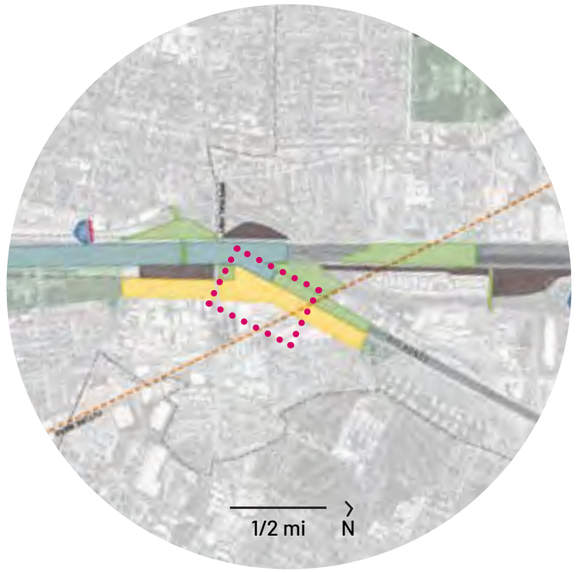
The North Imperial Transmission Right-of-Way Park is situated to the east of the LA River, Rio Hondo, and the future Water Education Center. The Right-of-Way is currently owned by Southern California Edison (SCE) and LADWP and occupied with their transmission lines. The 13 acre site serves to connect Imperial Highway, the future SELA Cultural Center, the South Imperial Transmission Right-of-Way Park, the potential future Metro WSAB Rio Hondo Station, and the future South Garfield Transmission Right-of-Way Park. The site aligns with the existing Imperial Equestrian Center, which will continue to serve as a community asset and resource for the local equestrian community.



RIO HONDO EAST BANK LEVEE LANDSIDE LOOKING NORTH

Source: OLIN

KEY PLAN



CONFLUENCE POINT PARK: BASELINE OPTION

PLANT NURSERY

IMPERIAL EQUESTRIAN CENTER (EXISTING)

COMMUNITY GARDENS

EQUESTRIAN ARENA

POTENTIAL FUTURE WEST SANTA ANA BRANCH (WSAB) STATION

RIO HONDO PLATFORM PARK

EXISTING UNION PACIFIC RAILROAD / FUTURE WEST SANTA ANA BRANCH

200'

N

NORTH IMPERIAL TRANSMISSION RIGHT-OF-WAY PARK

CHALLENGES

The land is currently occupied by two nursery businesses along with the Imperial Equestrian Center at grade and both LADWP and SCE transmission lines above. The transmission lines place various constraints on vertical clearances and permitted programs and vegetation as well as requiring service road access to each of the towers.

Further, despite sitting directly adjacent to Imperial Highway, the North Imperial Transmission Right-of-Way Park lacks pedestrian connectivity along its eastern edge due to the boundary for cars and pedestrians placed by the UPRR as well as the lack of sidewalk connectivity along Meadow Rd and Leeds St, whose primary functions serve the industrial manufacturing on the blocks adjacent to the site.

Additionally, the current processing and treatment of EPA rated hazardous materials at a manufacturing plant and the potential environmental hazards at an aluminum foundry pose possible limitations to safe programming for the public as well as vegetation and habitat.



TRANSMISSION RIGHT-OF-WAY TOWARDS UPRR BRIDGE



TRANSMISSION RIGHT-OF-WAY TOWARDS LEVEE

Source: OLIN

NORTH IMPERIAL TRANSMISSION RIGHT-OF-WAY PARK

DESIGN

The design of the North Imperial Transmission Right-of-Way Park will leverage the existing recreational program anchored at Imperial Equestrian Center along with the future program and connectivity available at the future Water Education Center and potential Metro WSAB Rio Hondo station. Furthermore, the visual and physical connectivity to the existing multiuse Rio Hondo trail along most of the eastern edge of the site offers many design opportunities to engage the Rio Hondo channel and increase multi-modal connectivity to the South Garfield Transmission Right-of-Way Park, Circle Park, and Imperial Equestrian Center.



TRANSMISSION RIGHT-OF-WAY LEEDS ST



TRANSMISSION RIGHT-OF-WAY IMPERIAL EQUESTRIAN CENTER

Source: OLIN

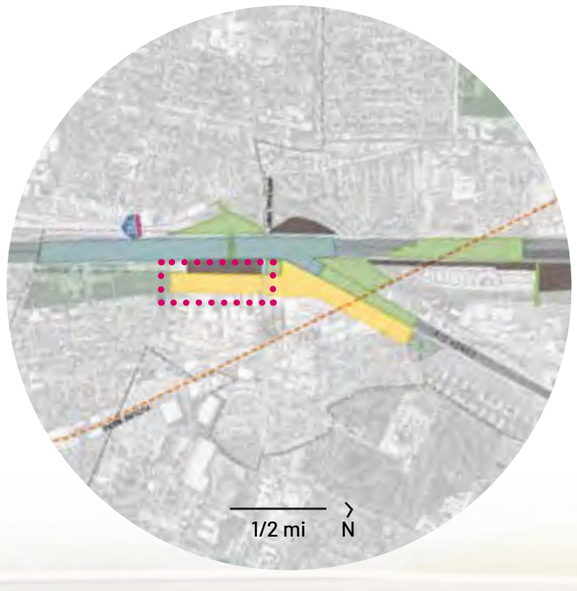
SOUTH IMPERIAL TRANSMISSION RIGHT-OF-WAY PARK

SITE INTRODUCTION

The South Imperial Transmission Right-of-Way Park is situated to the east of the future SELA Cultural Center and connects to Hollydale Regional Park to the south and a medium density residential neighborhood in South Gate to the east. The right-of-way is currently owned by Southern California Edison (SCE) and LADWP and occupied with their transmission lines. A plant nursery previously occupied the entire site on grade. However, currently, most of the site is fenced off with chain link and barbed wire and unoccupied. The future 15.75 acre South Imperial Transmission Right-of-Way Park will serve as a significant linkage of open space, native vegetation, and habitat connecting the residential neighborhood to its east to the LA River.



KEY PLAN


1/2 mi
N


LA RIVER TRAIL
CENTURY EQUESTRIAN CENTER (EXISTING)
FUTURE SELA CULTURAL CENTER
WATER EDUCATION CENTER
BIKE HUB
HOLLYDALE PARK
MEADOW/LAWN
MULTIUSE TRAILS
CREEK
PICNIC GROVE
WILDLIFE HABITAT
EQUESTRIAN ARENA
ORCHARD
IMPERIAL HIGHWAY
NORTH IMPERIAL TRANSMISSION RIGHT-OF-WAY PARK
BORWICK AVENUE
200'
N

SOUTH IMPERIAL TRANSMISSION RIGHT-OF-WAY PARK

CHALLENGES

The South Imperial Transmission Right-of-Way Park is challenging due to LADWP and SCE transmission lines that have varying constraints as the power lines have varying voltages and regulations as per those voltages. The transmission lines place various constraints on vertical clearances and permitted programs and vegetation as well as requiring service road access to each of the towers.

Additionally, an existing petroleum line running along the LADWP transmission lines along the western edge of the site may pose structural and design limitations for what can be developed above the pipeline.



TRANSMISSION RIGHT-OF-WAY TOWARDS CENTURY EQUESTRIAN CENTER

Source: OLIN

PROJECTS

SOUTH IMPERIAL TRANSMISSION RIGHT-OF-WAY PARK

DESIGN

The South Imperial Transmission Right-of-Way Park will extend the programs and amenities of the Hollydale Regional Park. Leveraging visual connectivity, trails and pathways through the site will increase access to the SELA Cultural Center's program as well as the LA River Trail and connections to the north and south.



LA RIVER EAST BANK LOOKING SOUTH ALONG HOLLYDALE REGIONAL PARK

Source: OLIN

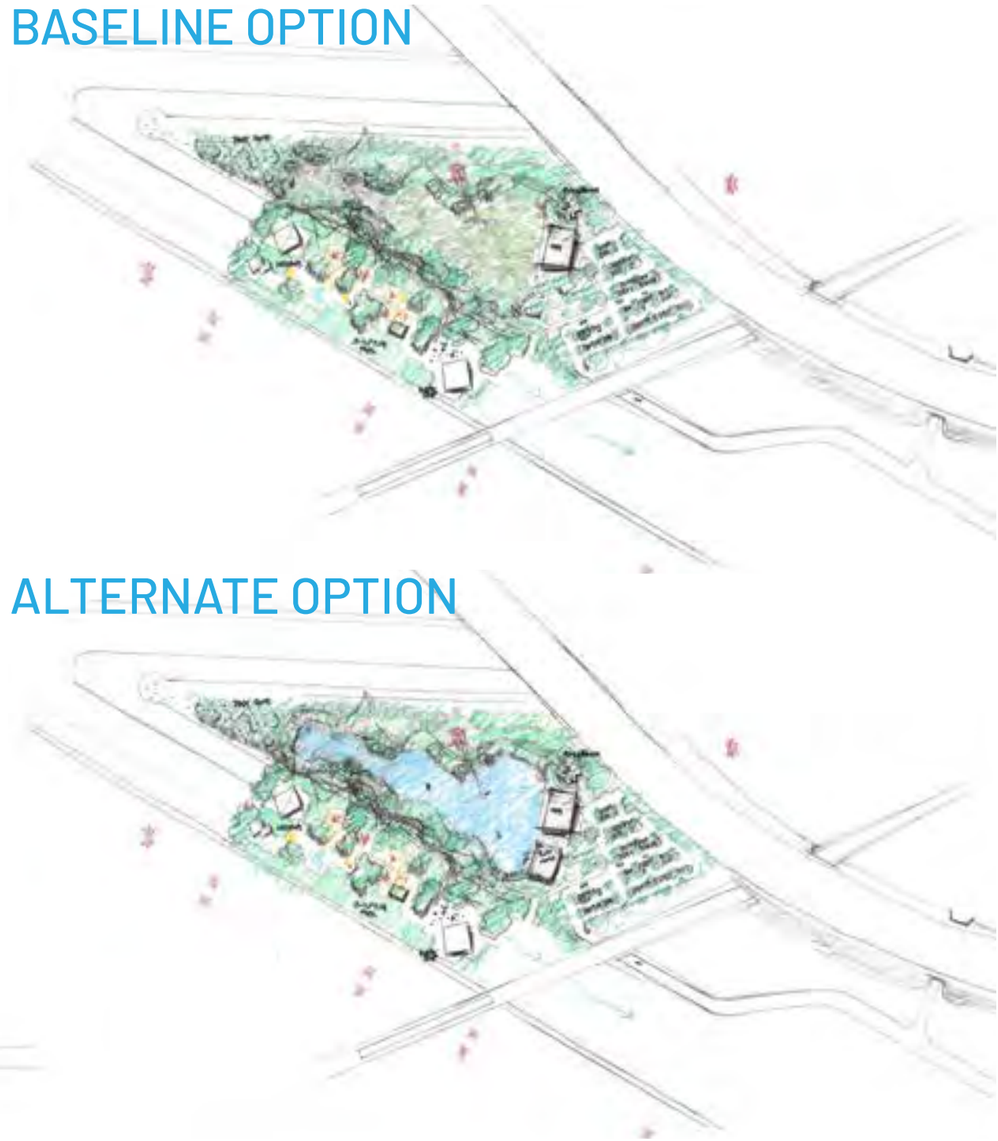
CONFLUENCE POINT PARK

SITE INTRODUCTION

The triangle of land formed by the confluence of the LA River and the Rio Hondo is currently owned by the City of South Gate and the LADWP. The site is bordered by the I-710 to the north, the UPRR railroad to the east, the Rio Hondo to the southeast, and the LA River to the West. This site is currently leased for use as a commercial nursery and soil supplier operation. Historically the site was used as a landfill. Unfortunately, organic waste within the landfill has made the site unstable and subject to uneven settling.

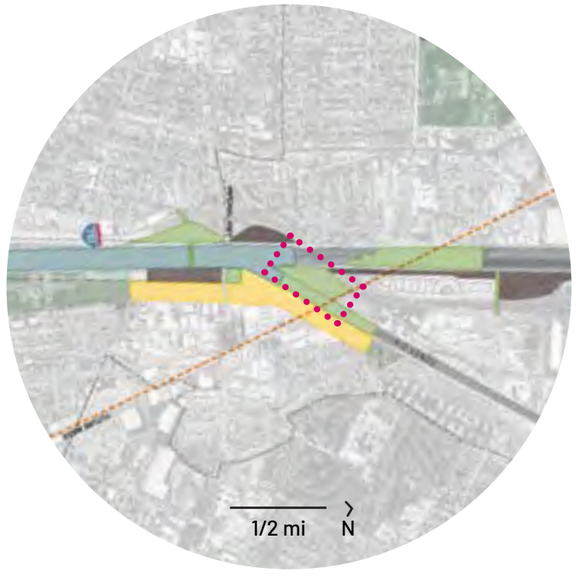


BASELINE OPTION



ALTERNATE OPTION

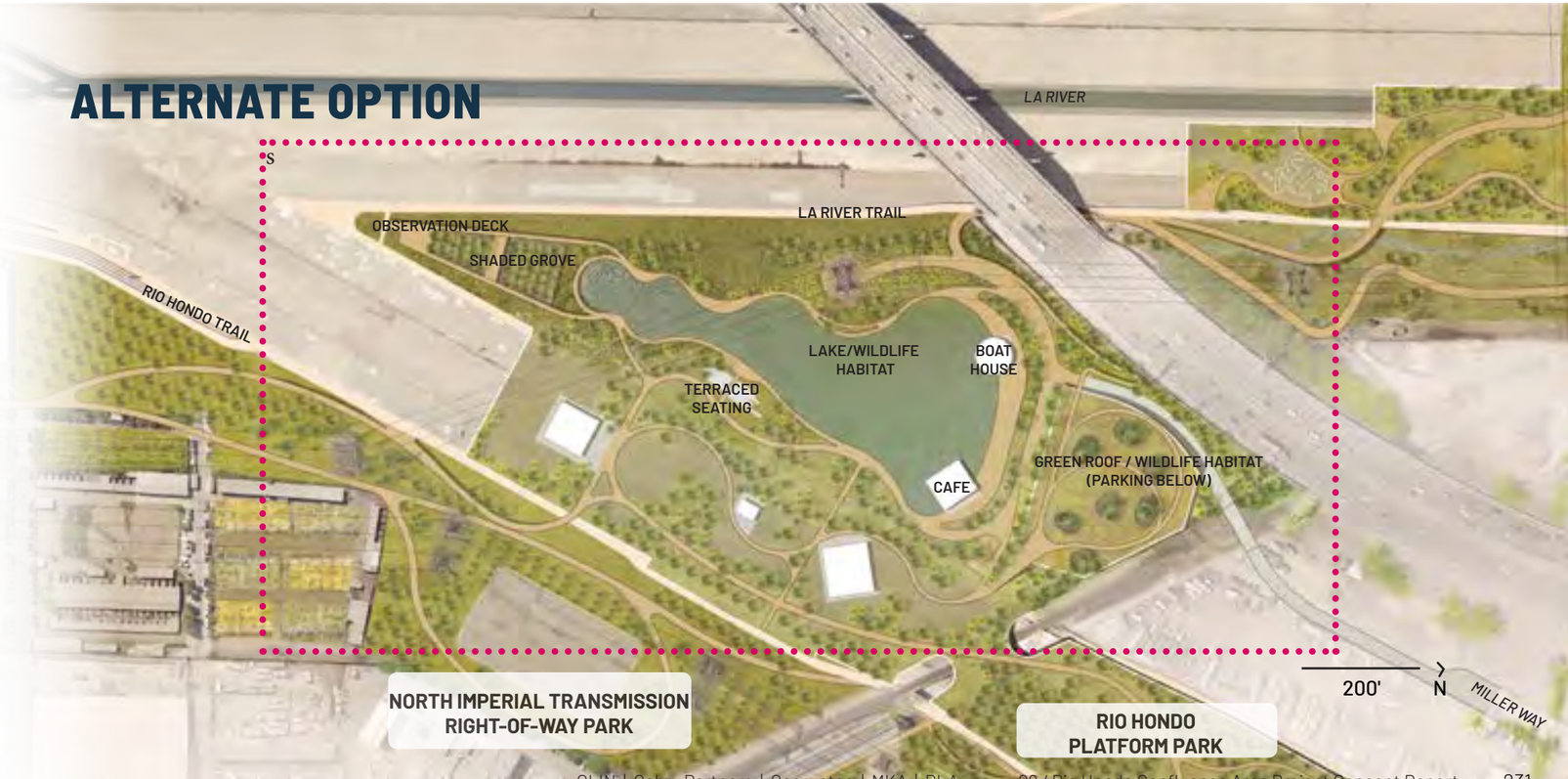
KEY PLAN



BASELINE OPTION



ALTERNATE OPTION

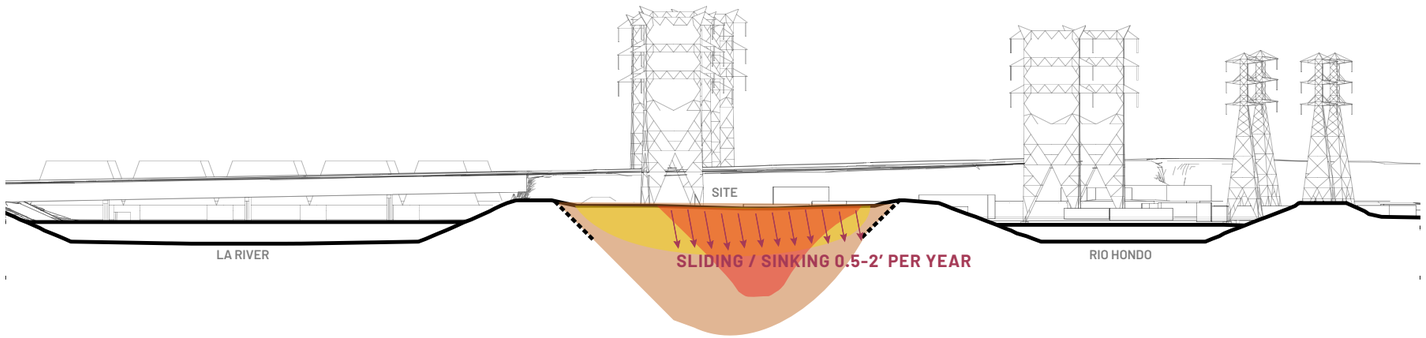


CONFLUENCE POINT PARK

CHALLENGES

Given the history of the site as a former landfill based on information provided by the current tenant of the site, there is still methane being generated by the waste, and as much as two feet of soil has been required to bring the site back to grade every year. This indicates that there is a significant amount of organic waste disposed of at the site that is continuing to decay, settle, and generate methane. There are several potential options for mitigating these challenging conditions, and further investigations should be conducted to better understand the existing site. However, during the development of Confluence Point Park excavation and removal of the waste will likely be required.

Additionally, the LADWP high voltage transmission lines that run along the southern and southwestern edges of the site place various constraints on horizontal and vertical clearances and permitted programming. Site planning for structures, vegetation, and site activities will require careful consideration to not impact the transmission lines nor the ability to maintain the lines and towers.



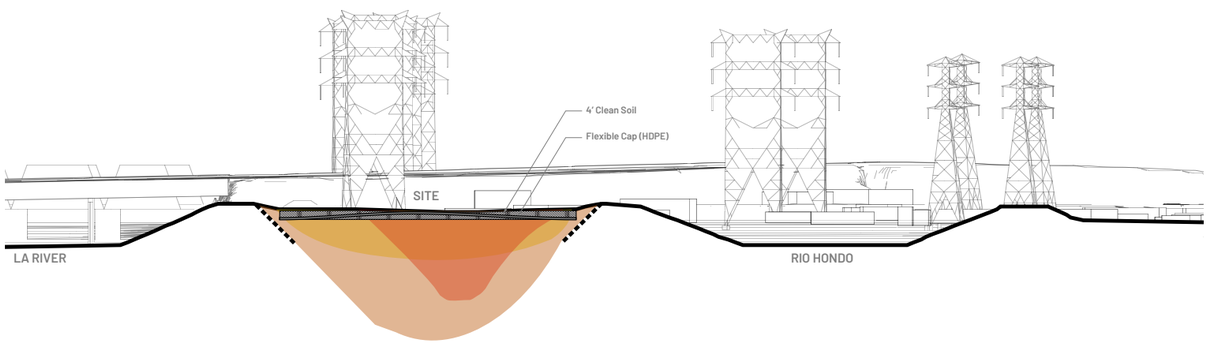
EXISTING



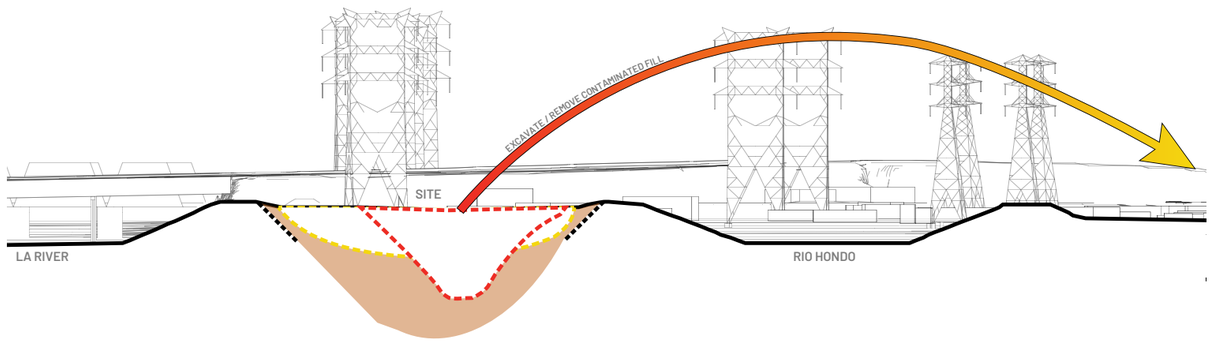
NOTE: Extent and depth of contaminated fill and of landfill are unknown and assumed for graphical purposes

CONFLUENCE POINT PARK

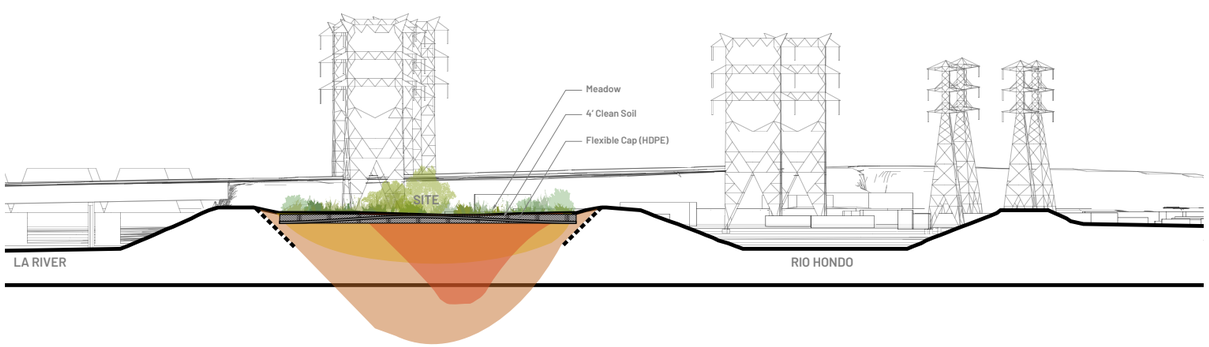
CHALLENGES



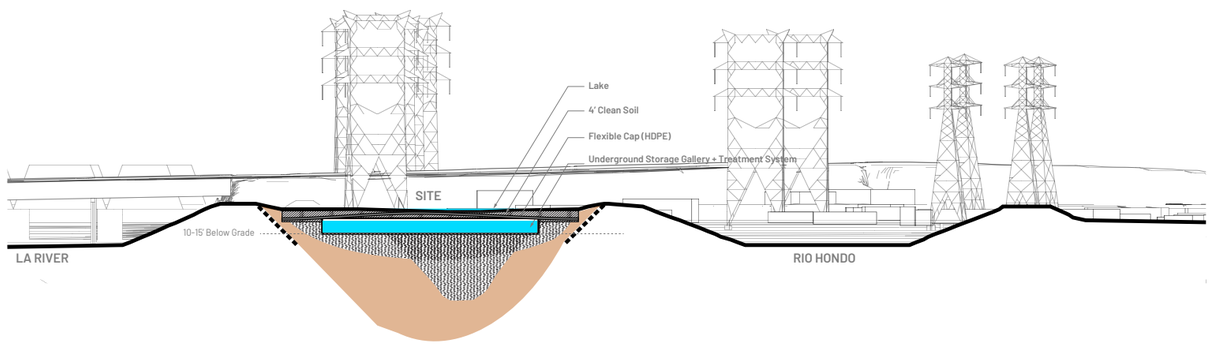
PROPOSED BASELINE OPTION: CAP PHASE



PROPOSED ALTERNATE OPTION: EXCAVATION PHASE



PROPOSED BASELINE OPTION: VEGETATION PHASE



PROPOSED ALTERNATE OPTION: LAKE + SUBSURFACE WATER STORAGE PHASE

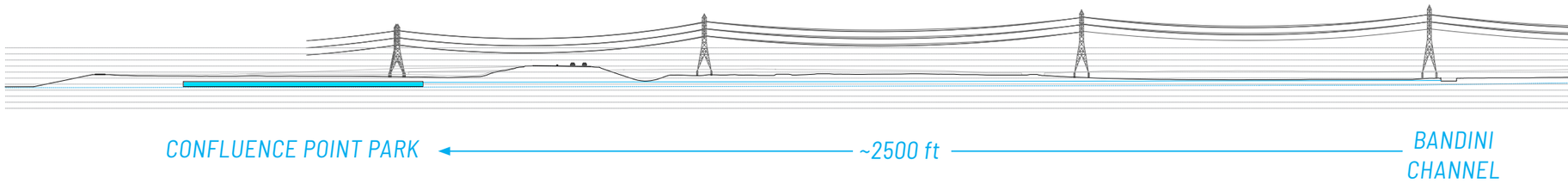
NOTE: Extent and depth of contaminated fill and of landfill are unknown and assumed for illustrative purposes

CONFLUENCE POINT PARK

WATER QUALITY AND WATER SUPPLY OPPORTUNITY

The confluence site represents a large parcel of land that could be used to contribute to large scale water quality and supply improvements. Since it is likely that the current fill will need to be excavated, this will result in a significant depth of excavated space that could be used as an underground water storage facility. The best opportunity to treat stormwater and dry weather flows at the site is to capture flows out of the Bandini Channel, approximately 2,000 feet north, upstream on the east bank of the LA River.

Dry weather and low flow wet weather flows could be diverted out of the Bandini channel and conveyed to an underground storage facility at the confluence. This water would be stored, treated, and beneficially used to offset irrigation demands.



BANDINI TO CONFLUENCE POINT

PROJECTS

CONFLUENCE POINT PARK

DESIGN

Confluence Point Park has the potential to become a landmark park destination in Southeast Los Angeles. Perched above the confluence park-goers will have breathtaking views of the LA and Rio Hondo Rivers. The project could serve as a model for transforming underutilized industrial landscapes into valuable community amenities. The baseline native meadow alternate recreational lake could provide such opportunities as paddle boating, bird habitat, and passive recreation. Visitors to the site arrive via an access road under the UPRR line and can park under or walk above a green roof parking structure. Providing both shade and elevated views, the structure conceals the parking lot as well as buffering the elevated I-710 freeway and future Metro WSAB light rail. A network of ramps and stairs will provide additional access from the future Rio Hondo Platform Park to the lake.

The recreational lake, situated among a series of shade and rest pavilions, and seating along the lake's edge will encourage many species of migratory birds as well as visitors to the park to rest near this calm body of water. Sweeping vistas across the lake reveal a series of "bluffs" along the future adjacent Rio Hondo Platform Park as well as a glimpse of the confluence of the two rivers.

Should the soils and geotechnical conditions at this location require a lighter intervention , an alternative site strategy to introduce meadow plantings and wildlife habitat may prove to be more feasible or cost-effective.

The green roof parking structure will allow for sunlight, wind, and native vegetation to enter into the parking lot and allow for additional recreation areas above while still providing around 150 parking spaces on site. Views from the green roof towards the northeast will allow for views of the San Gabriel Mountains on a clear day, which is rare in the relatively flat landscape of industrial warehouses and medium density residential neighborhoods characteristic of much of SELA. Views south towards the confluence will allow visitors to appreciate the unique prospect and the terraced slope up to the Rio Hondo Platform Park on the east.

A grove of trees creates a dramatic approach to the confluence point itself, with terraced rooms stepping up toward an overlook. The promontory at the confluence point offers a unique open view of the confluence and the LA River to the south as well as the Parque Dos Rios and future Imperial Wetlands. In one expansive view, visitors to the park can appreciate these new habitat opportunities as well as the awe-inspiring scale of the infrastructure of the LA River channel.

PROJECTS

CONFLUENCE POINT PARK

BASELINE OPTION



PROJECTS

CONFLUENCE POINT PARK

ALTERNATE OPTION

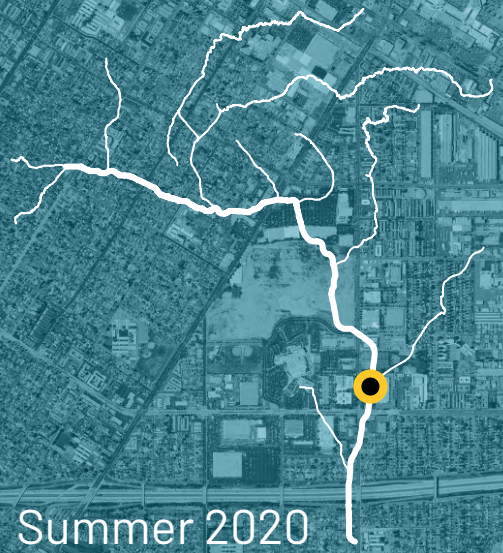


ATTACHMENT 8

DRAFT

RIO HONDO CONFLUENCE AREA PROJECT

SITE DESIGN CONCEPT PROJECT BOARDS



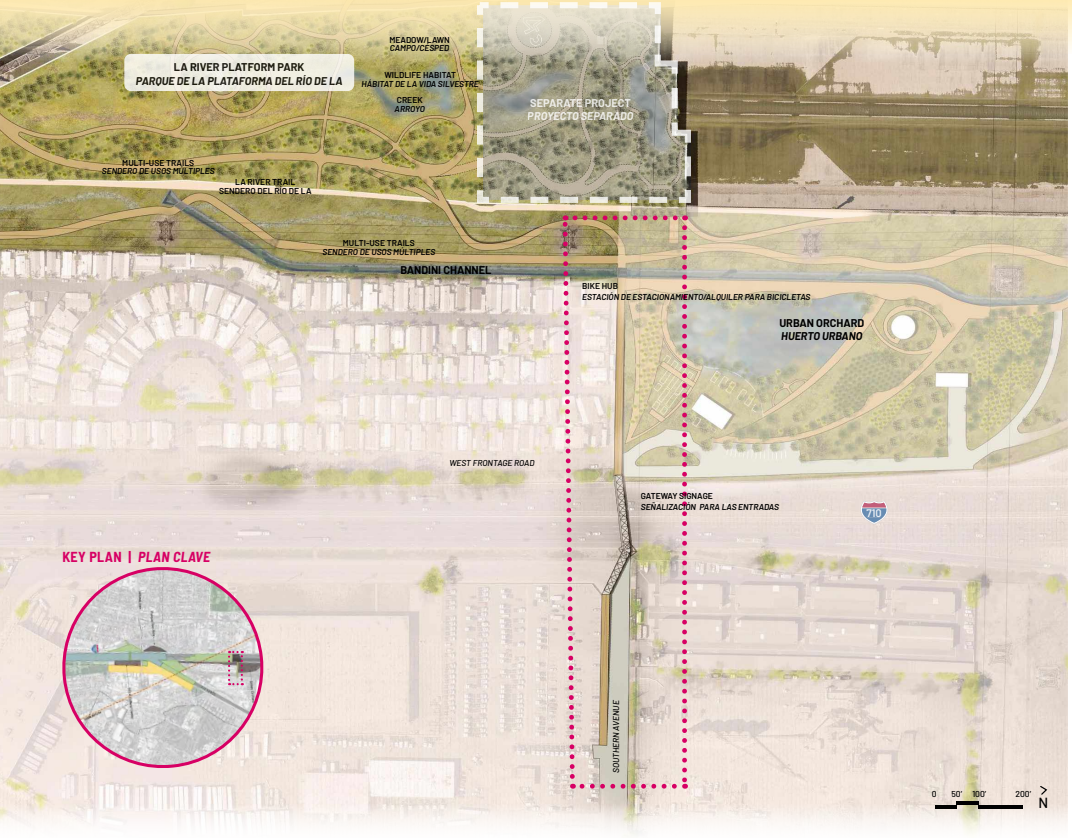
Summer 2020

OLIN
Gehry Partners, LLP
Geosyntec
MAGNUSSON KLEMENCIC ASSOCIATES
RIVER LA

SOUTHERN AVENUE CONNECTOR

CONECTOR DE LA AVENIDA SOUTHERN

1







- The Southern Avenue Connector could provide access across the I-710 from the neighborhoods east of the LA River, to the Urban Orchard, LA River Trail and Platform Park and a rich network of community spaces.

- *El Conector de la Avenida Southern ofrece acceso a través de la I-710 desde los vecindarios al este del Río de LA, hasta la Huerto Urbano, el Sendero del Río de LA, y el Parque Platform y una red abundante de espacios comunitarios.*

WHAT MAKES A PARK ACCESSIBLE?

¿QUÉ HACE QUE UN PARQUE SEA ACCESIBLE?





LA RIVER / RÍO DE LA

LA RIVER PLATFORM PARK

PARQUE DE LA PLATAFORMA DEL RÍO DE LA

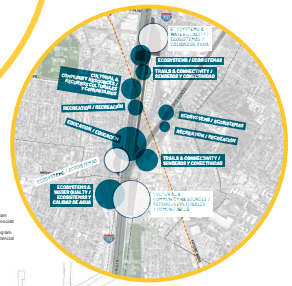
- The LA River Platform Park is situated over the LA River and creates approximately 22 acres of new opportunities for recreation and habitat.
- This park connects the Urban Orchard at the north to the Confluence Point Park at the south and includes active recreation such as sports fields and playgrounds, passive recreation such as planted groves and nature trails, water features such as small streams and ponds, and shade structures for cultural activities and social gatherings.

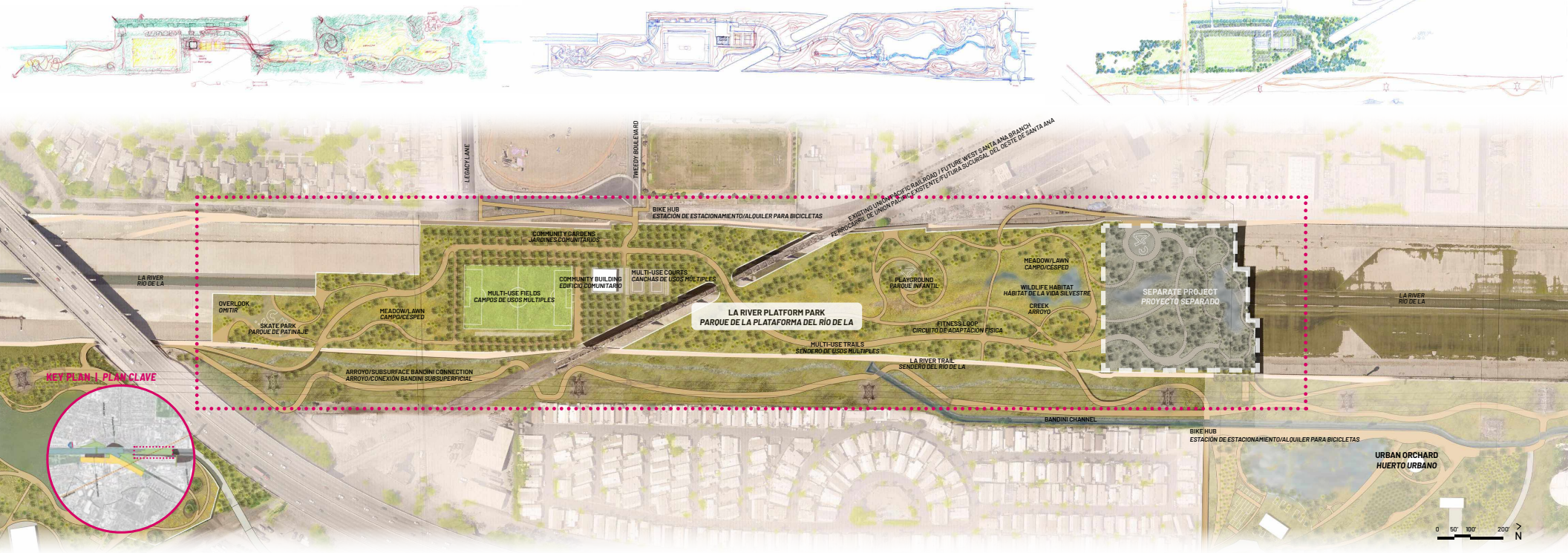
- *El Parque Platform del Río de LA está ubicado sobre el Río de LA y crea aproximadamente 22 acres de nuevas oportunidades para la recreación y el hábitat.*
- *Este parque conecta el Huerto Urbano al norte con Parque de los puntos de confluencia en el sur e incluye recreación activa, como campos deportivos y áreas de juegos infantiles, recreación inactiva, como arboledas plantadas y senderos naturales, elementos acuáticas como riachuelos y estanques, y estructuras de sombra para actividades culturales y reuniones sociales.*

WHAT TYPE OF PASSIVE RECREATION WOULD YOU USE?

¿QUÉ RECREACIÓN INACTIVA UTILIZARÍA?







LA RIVER PLATFORM PARK

PARQUE DE LA PLATAFORMA DEL RÍO DE LA

2



RIO HONDO PLATFORM PARK

PARQUE DE LA PLATAFORMA RÍO HONDO

3

- The Rio Hondo Platform Park is situated over the Rio Hondo and creates approximately 11 acres of new opportunities for recreation, art, and habitat.
- The park features an urban forest, a rare landscape in SELA currently, and a sculpture garden for accessible artistic expression. The park connects visitors to the South Garfield Transmission right-of-way Park and North Imperial Transmission right-of-way Park to its east, and Confluence Point Park to its west.

- *El Parque Platform del Río Hondo está ubicado sobre el Río Hondo y crea aproximadamente 11 acres de nuevas oportunidades para la recreación, el arte, y el hábitat.*
- *El parque cuenta con un bosque urbano, un paisaje exclusivo en SELA actualmente, y un jardín accesible de esculturas para la expresión artísticas. El parque conecta a los visitantes al derecho de paso de la Transmisión del Parque South Garfield y al derecho de paso de la Transmisión del Parque al Norte de Imperial hacia el este y al Parque de los puntos de confluencia hacia el oeste.*

WHAT TYPE OF PROJECTS WOULD YOU MOST LIKE TO SEE?

¿QUÉ TIPO DE PROYECTOS LE GUSTARÍA VER?

FROM BASELINE SURVEY (1000 TOTAL RESPONDENTS)

DE LA ENCUESTA DE REFERENCIA (1000 PERSONAS QUE RESPONDIERON A LA ENCUESTA EN TOTAL)

24% REBUILDING NATURAL HABITATS

RECONSTRUCCIÓN NATURAL

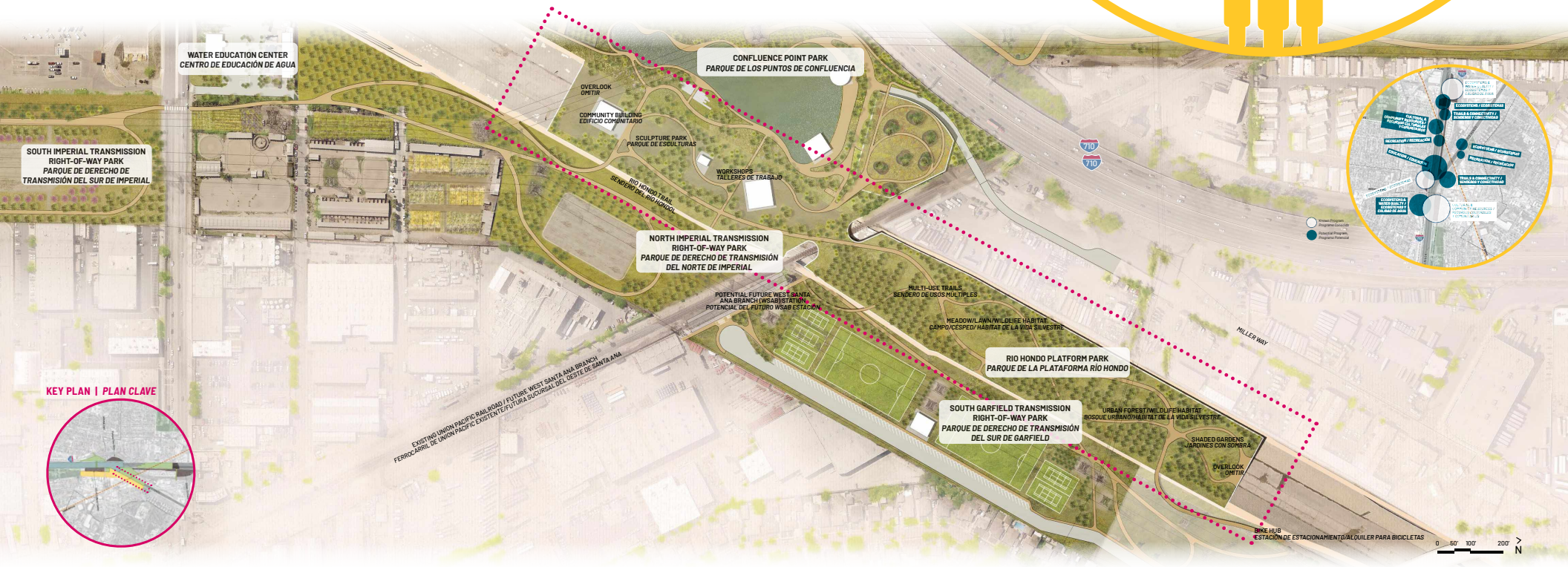
21% NEW PARK / OPEN SPACE

NUEVO PARQUE/ESPACIO ABIERTO

20% BRIDGE PARK THAT CONNECTS BOTH SIDES

PARQUE DEL PUENTE QUE CONECTA AMBOS LADOS





SOUTH GARFIELD TRANSMISSION RIGHT-OF-WAY PARK 4

PARQUE DE DERECHO DE TRANSMISIÓN DEL SUR DE GARFIELD

- The South Garfield right-of-way is currently owned by Southern California Edison (SCE) and occupied with their transmission lines.
- The 8 acre park featuring soccer pitches, tennis courts, and a pavilion, serves as a connector between Circle Park to its north and the North Imperial Transmission right-of-way park and future Metro West Santa Ana Branch station to its south.

- *El derecho de paso del Sur Garfield esta ocupado actualmente por las líneas de transmisión la la compañía Southern California Edison.*
- *El parque de 8 acres que cuenta con canchas de fútbol, canchas de tenis, y un pabellón, sirve como un conector entre el Parque del Circulo hacia el norte y el parque de derecho de paso de la Transmisión Imperial Norte y la futura estación de la Sucursal Oeste de Santa Ana del Metro hacia el sur.*

500 RESPONDENTS SELECTED THESE FEATURES TO INCLUDE IN A PARK:

500 PERSONAS QUE CONTESTARON SELECCIONARON ESTOS ELEMENTOS PARA QUE SEAN INCLUIDOS EN UN PARQUE:

53% WALKING TRAILS / *DE SENDEROS PARA CAMINAR*

44% GRASSY OPEN SPACE / *DE ESPACIOS CON SOMBRA*

32% RESTROOMS/DRINKING FOUNTAINS / *DE BAÑOS/FUENTES DE AGUA POTABLE PARA BEBER*

32% WILDLIFE HABITAT / *DE HÁBITAT DE VIDA SILVESTRE*

31% MULTI-USE SPORTS / *DE DEPORTES MULTIUSOS*

31% SHADED SPACES / *DE ESPACIOS CON SOMBRA*



NORTH IMPERIAL TRANSMISSION RIGHT-OF-WAY PARK 5

PARQUE DE DERECHO DE TRANSMISIÓN DEL NORTE DE IMPERIAL

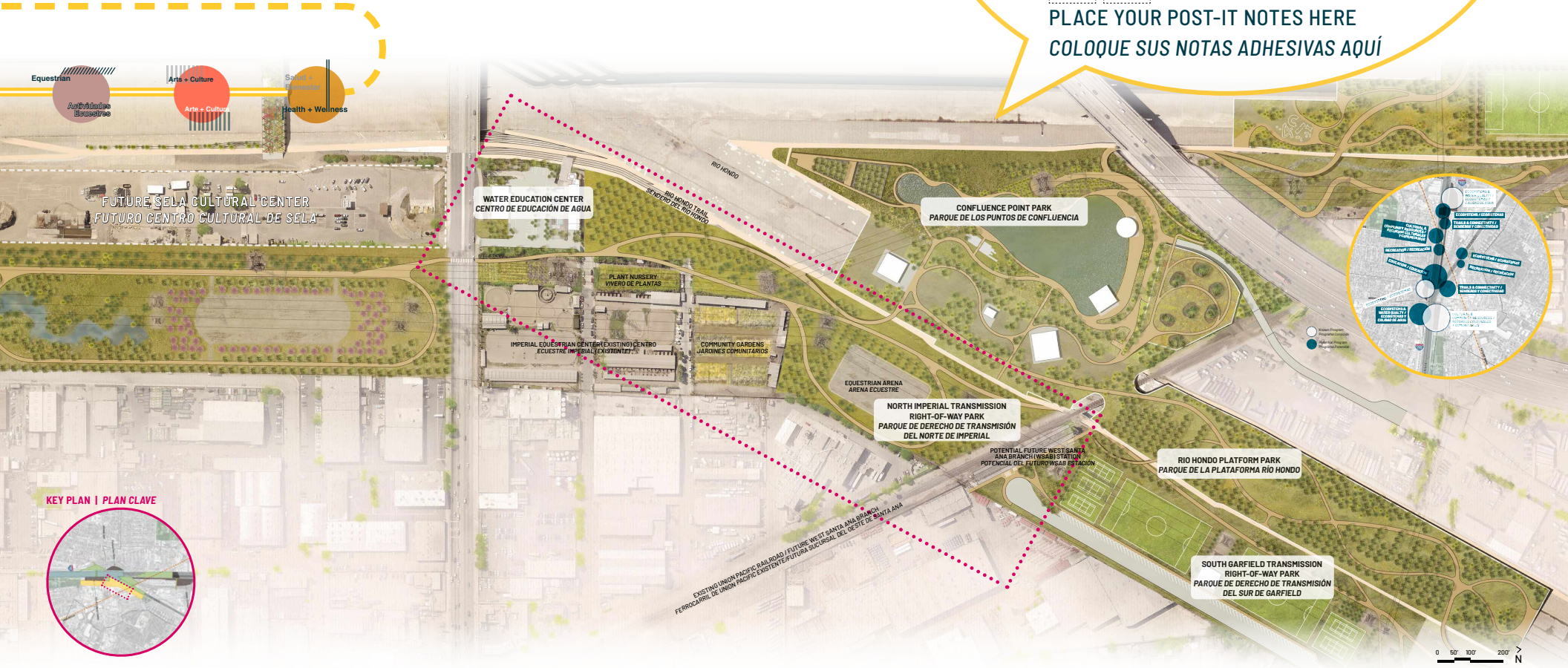
- The North Imperial Right-of-Way is situated to the east of the LA River, Rio Hondo, and the Water Education Center.
- The 15 acre park could feature equestrian facilities and trails, may connect the Imperial Equestrian Center, the future SELA Cultural Center, the South Imperial Transmission Right-of-Way (ROW) Park, the South Garfield Transmission ROW Park, and the future Metro West Santa Ana Branch.
- The site aligns with the existing Imperial Equestrian Center, which will continue to serve as a community asset and resource for the local equestrian community.

- *El derecho de paso del Norte Imperial está situado al este del Río LA, Río Hondo, y el Centro de Educación del Agua.*
- *El parque de 15 acres con instalaciones ecuestres y senderos conectará el Centro Ecuestre Imperial, el futuro Centro Cultural SELA, el Parque Derecho de Paso de la Transmisión Sur Imperial, el Parque Derecho de Paso de la Transmisión Sur Garfield, y la Sucursal del futura Metro Oeste de Santa Ana.*
- *El sitio se adhiere con el Centro Ecuestre Imperial existente, que continuará sirviendo como un activo y recurso comunitario para la comunidad ecuestre local.*

WHAT TYPE OF **ACTIVE** RECREATION WOULD YOU USE?

¿QUÉ TIPO DE RECREACIÓN ACTIVA USARÍA?

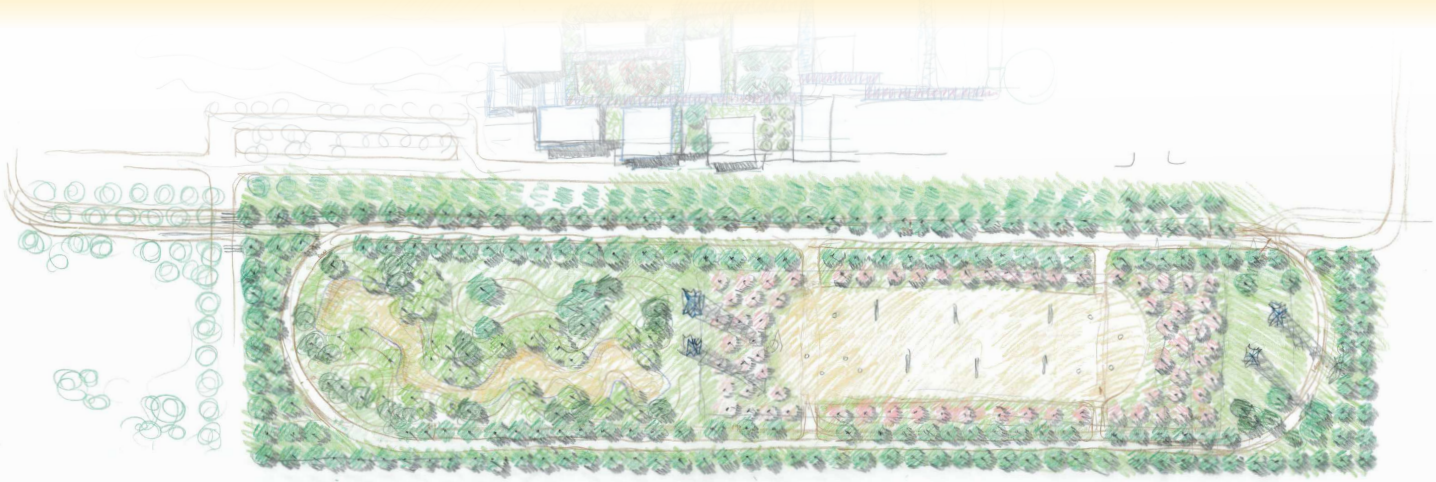
PLACE YOUR POST-IT NOTES HERE
COLOQUE SUS NOTAS ADHESIVAS AQUÍ



SOUTH IMPERIAL TRANSMISSION RIGHT-OF-WAY PARK

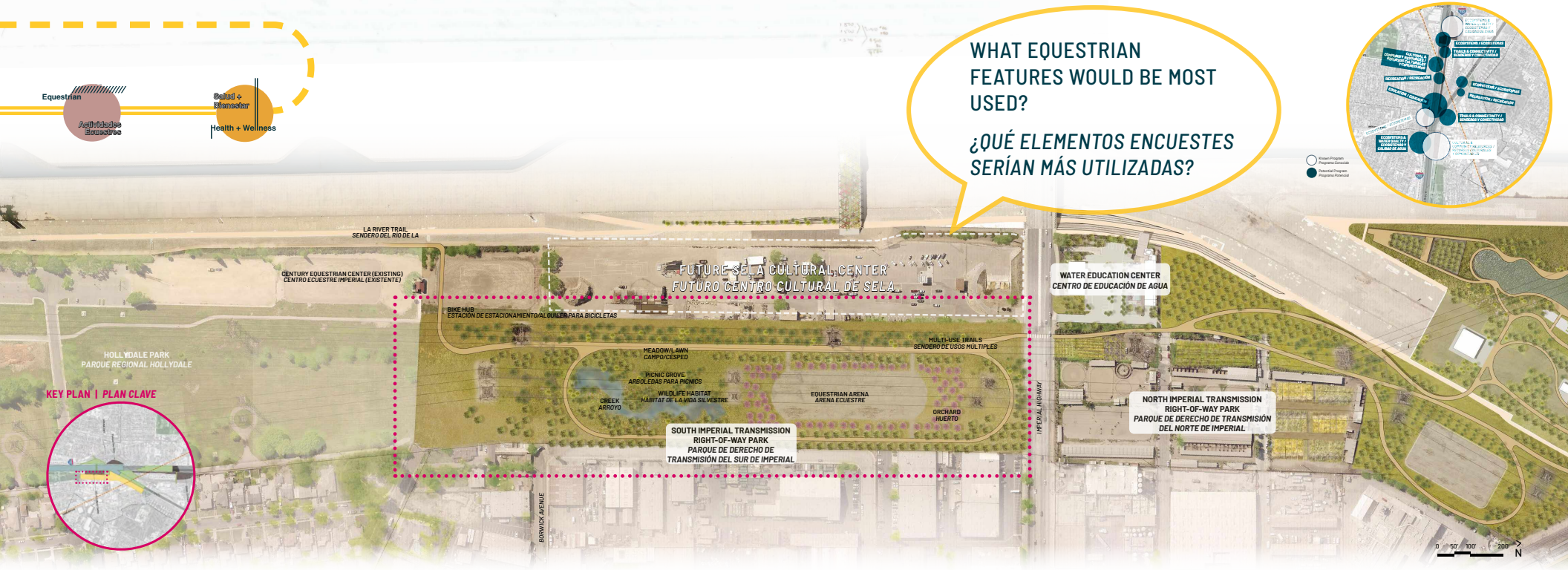
6

PARQUE DE DERECHO DE TRANSMISIÓN DEL SUR DE IMPERIAL



- The South Imperial Transmission right-of-way park is east of the SELA Cultural Center, and connects to Hollydale Regional Park to the south and the future North Imperial Transmission right-of-way Park to the north. The future 15 acre park with equestrian facilities and trails will serve to stitch together an interconnected network of activity, trails, and other park improvements.

- *El parque de derecho de paso de la Transmisión Sur de Imperial está al este del Centro Cultural SELA, y conecta con el Parque Regional Hollydale al sur y con el futuro derecho de vía de la Transmisión Norte de Imperial al Norte. El futuro parque de 15 acres con instalaciones ecuestres y senderos servirán para unir una red interconectada de actividad, senderos, y otras mejorías en el parque.*

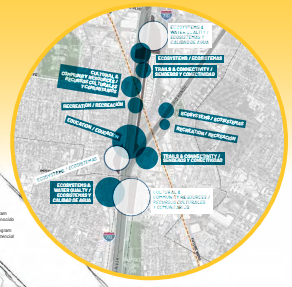


CONFLUENCE POINT PARK

PARQUE DE LOS PUNTOS DE CONFLUENCIA

- The Confluence Point Park is located where the LA River and Rio Hondo meet. The 12 acre park could feature a lake or a meadow.
- A lake can draw migratory birds and visitors to the park can rest near the calm body of water or enjoy water activities like paddle boating. A shaded grove creates a dramatic approach to the confluence tip as they terrace south of the lake. The overlook at the point offers a unique open view of the confluence and the LA River to the south.
- A meadow can draw pollinators and visitors can find respite among native plants.

- *El Parque de los puntos de confluencia se encuentra donde se encuentran el Río LA y el Río Hondo. El parque de 12 acres podría incluir un lago o un campo.*
- *Un lago puede atraer aves migratorias y visitantes al parque pueden descansar cerca del cuerpo tranquilo de agua o disfrutar de actividades acuáticas come paseos en bote de remos. Una arboleda de árboles perennes crea una estrategia dramática a la punta de la confluencia como una terraza al sur del lago. La vista en el punto ofrece una vista abierta única de la confluencia y el Río de LA hacia el sur.*
- *Un prado puedo atraer polinizadores y los visitantes pueden encontrar un descanso entre las plantas nativas.*

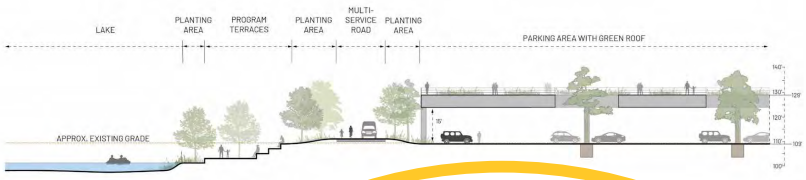




MEADOW OPTION
OPCIÓN DE UN CAMPO



SECTION AT PROPOSED PARKING AND LAKE
SECCIÓN EN ESTACIONAMIENTO PROPUESTO Y LAGO



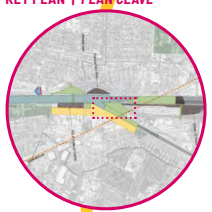


LAKE OPTION
OPCIÓN DE UN LAGO

WHAT TO INCLUDE IN YOUR IDEAL PARK?

¿QUE INCLUIR EN SU PARQUE IDEAL?

KEY PLAN | *PLAN CLAVE*



FROM RECONTACT SURVEY (500 TOTAL RESPONDENTS)

DE LA ENCUESTA DE RE-CONTACTO (500 PERSONAS QUE RESPONDIERON EN TOTAL)

50% PARK/OPEN SPACE
PARQUE/ESPACIO ABIERTO

48% MULTI-USE PATHS
VEREDAS DE USO MÚLTIPLE

48% ENVIRONMENTAL IMPROVEMENTS
MEJORAS MEDIO AMBIENTALES

CONFLUENCE POINT PARK

PARQUE DE LOS PUNTOS DE CONFLUENCIA

7



WHAT FEATURES DO YOU LIKE?



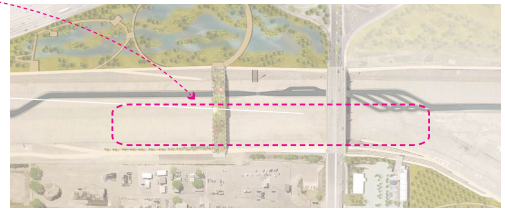
¿QUÉ ELEMENTOS TE GUSTAN?

BLUE PARK
PARQUE AZUL

SELA ARTS FESTIVAL / *FESTIVAL DE LAS ARTES DE SELA*

SPORTING EVENT / *EVENTO DEPORTIVO*

MOVIE NIGHT / *NOCHE DE CINE*



- The Blue Park is within the LA River channel, south of the confluence with the Rio Hondo. The park features a braided channel that divides the low flow channel into a series of channels of varying depths to show varied responses of hydraulics, sediment deposition, and ecology. A primary advantage of shifting the low flow channel is the ability to hold large summer festivals and events in the river bed, providing approximately 4 acres of space.

- *El Parque Azul se encuentra dentro del canal del Río de LA, al sur de la confluencia con el Río Hondo. El parque cuenta con un canal entrelazado que divide el canal de bajo flujo en una serie de canales de diferentes profundidades para mostrar respuestas variadas de hidráulica, depósito de sedimentos y ecología. Una ventaja principal de cambiar el canal de flujo bajo es la capacidad de celebrar grandes festivales y eventos de verano en el lecho del rio, proporcionando aproximadamente 4 acres de espacio.*



BLUE PARK
PARQUE AZUL



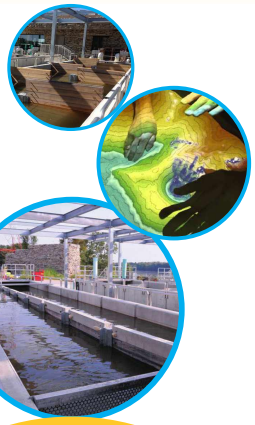
WATER EDUCATION CENTER

CENTRO DE EDUCACIÓN DE AGUA



LEVEES ALONG THE LOWER LA RIVER AND RIO HONDO WERE RAISED IN THE EARLY 2000S.

LOS DIQUES A LO LARGO DE LA PARTE BAJA DEL RÍO DE LA Y DEL RÍO HONDO FUERON ELEVADOS A PRINCIPIOS DEL AÑO 2000.



WHEN YOU THINK OF FLOODING IN YOUR COMMUNITY, WHAT COMES TO MIND?

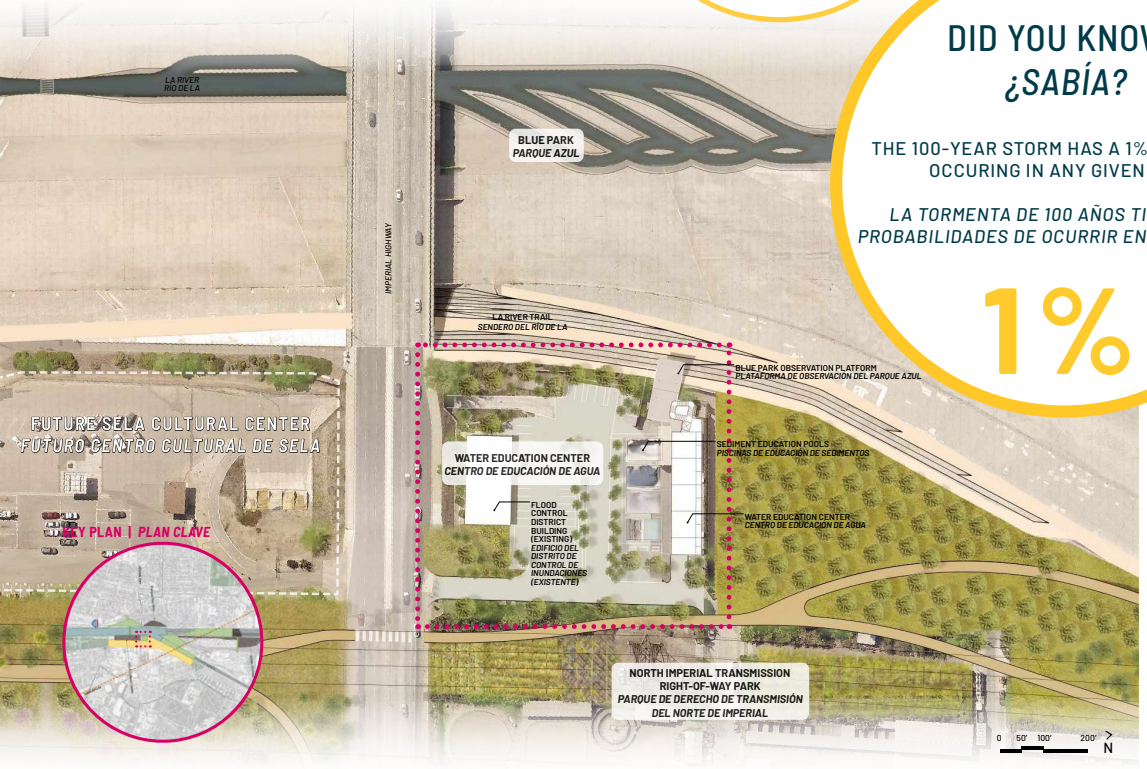
¿CUÁNDO USTED PIENSA EN INUNDACIONES EN SU COMUNIDAD, QUE LE VIENE A LA MENTE?

DID YOU KNOW?
¿SABÍA?

THE 100-YEAR STORM HAS A 1% CHANCE OF OCCURING IN ANY GIVEN YEAR

LA TORMENTA DE 100 AÑOS TIENE 1% DE PROBABILIDADES DE OCURRIR EN UN AÑO DADO

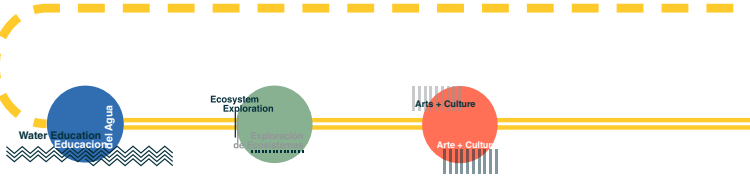
1%



- The mission of the LA County Flood Control District (LACFCD) involves water conservation and flood risk reduction. In an effort to expand public awareness of the LACFCD's mission and provide education on flood control infrastructure and water resource management, the proposed Water Education Center would be built and operated alongside of the LACFCD's offices north of Imperial Highway.
- The Water Education Center provides space for learning related to these topics and includes classrooms, exhibit space, and an outdoor water lab. Youth from local schools and community members will visit the center to learn about water quality, flood risk reduction, and water conservation.

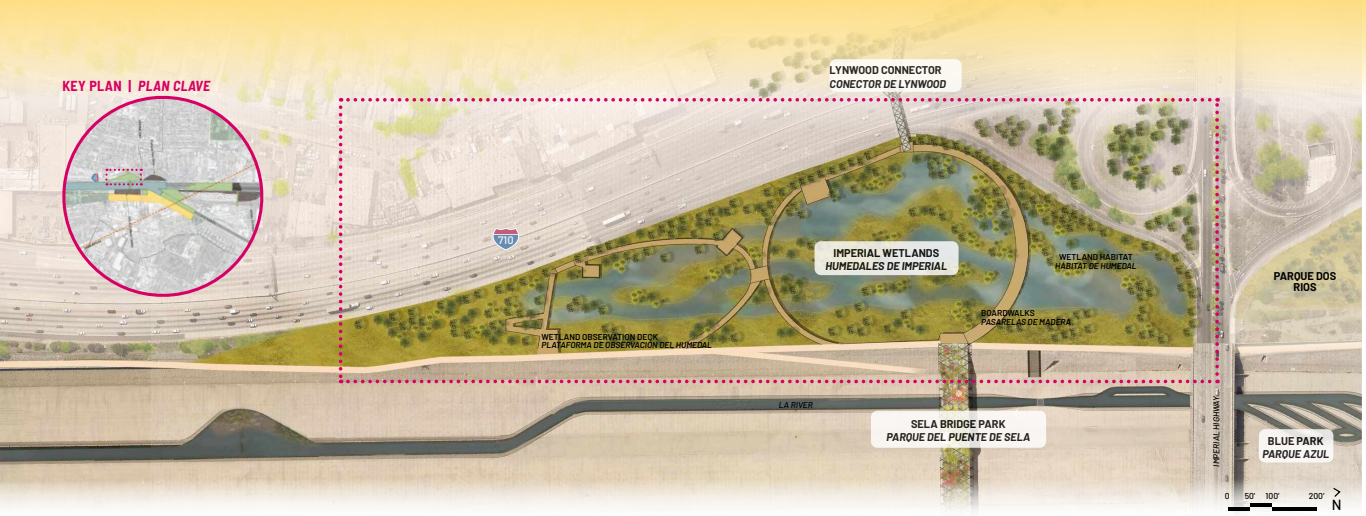
- *La misión del Distrito de Control de Inundaciones del Condado de LA (LACFCD por sus siglas en inglés) incluye la conservación de agua y la reducción del riesgo de inundación. En un esfuerzo por ampliar la conciencia pública de la misión del LACFCD y proporcionar educación sobre la infraestructura de control de inundaciones y la gestión de los recursos hídricos, el propuesto Centro de Educación del Agua será construido y operado junto con las oficinas al norte de la Autopista Imperial del LACFCD.*
- *El Centro de Educación de Agua proporciona espacio para el aprendizaje relacionado con estos temas e incluye aulas, espacio de exhibición y un laboratorio de agua al aire libre. Los jóvenes de las escuelas locales y los miembros de la comunidad visitarán el centro para aprender sobre la calidad del agua, la reducción del riesgo de inundación y la conservación del agua.*





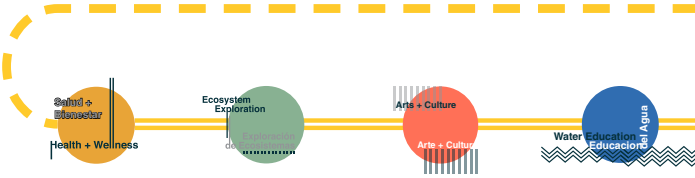
IMPERIAL WETLANDS
HUMEDALES DE IMPERIAL

10



- The Imperial Wetlands will serve as a dynamic wet and dry season water filtration system that will create habitat to increase biodiversity, as well as treating stormwater runoff and possibly the low-flow from the LA River. The boardwalks throughout the wetlands provide a unique opportunity for SELA residents to feel immersed in a native wetlands environment.

- *Los Humedales de Imperial servirán como un sistema dinámico de filtración de agua en temporada húmeda y seca que creará un hábitat para aumentar la biodiversidad, así como el tratamiento de la escorrentía de aguas pluviales y posiblemente el bajo caudal del Río LA. Las pasarelas de madera a través de los humedales brindan una oportunidad única para que los residentes de SELA se sientan inmersos en un entorno de humedales nativos.*



OPTIONS / *OPCIONES*:

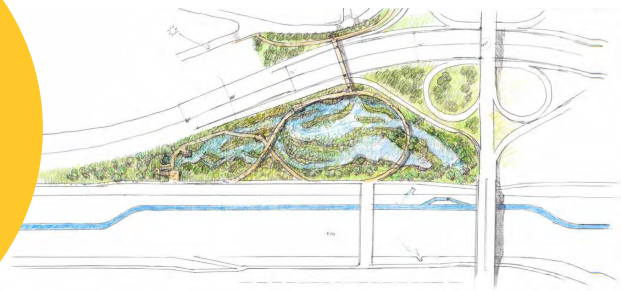
THE WETLAND COULD FUNCTION IN VARIOUS WAYS: WHEN IT RAINS, THE WETLAND COULD TREAT STORMWATER FROM THE ADJACENT NEIGHBORHOODS BEFORE BEING RELEASED INTO THE LA RIVER AND EVENTUALLY OUT TO THE OCEAN

CUANDO LLUEVE, EL HUMEDAL PUEDE TRATAR EL AGUA PLUVIAL DE LOS VECINDARIOS ADYACENTES ANTES DE SER LIBERADA EN EL RÍO DE LA Y EVENTUALMENTE HACÍA EL MAR.

OR / O

THE WETLAND COULD TREAT DIVERTED WATER FROM THE LA RIVER LOW-FLOW CHANNEL DURING THE DRY SEASON

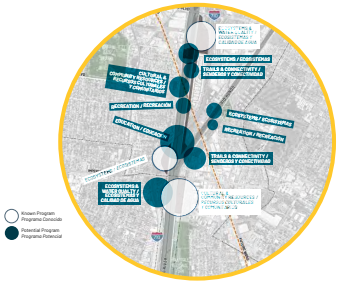
EL HUMEDAL PODRÍA TRATAR EL AGUA DESVIADA DEL CANAL DE BAJO FLUJO DEL RÍO DE LA DURANTE LA TEMPORADA DE SEQUÍA

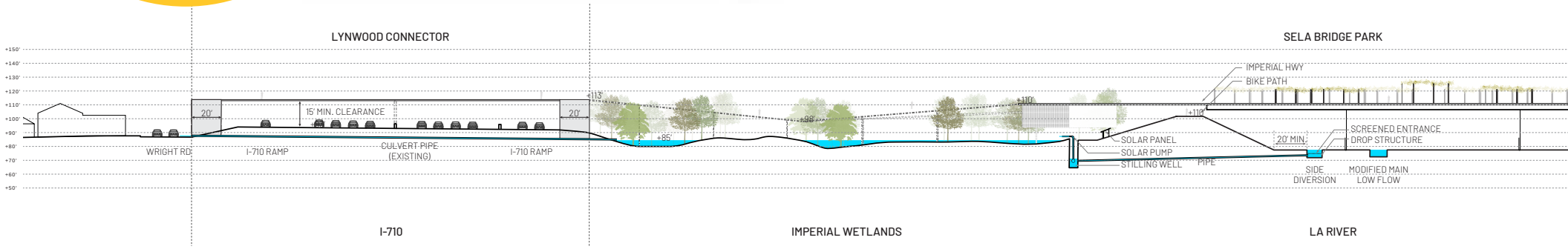


DID YOU KNOW?
¿SABÍA?

WETLANDS CAN IMPROVE WATER QUALITY FROM URBAN STORMWATER RUNOFF BY FILTERING THE WATER THROUGH PLANTS AND REMOVING SEDIMENT, NUTRIENTS, AND POLLUTANTS.

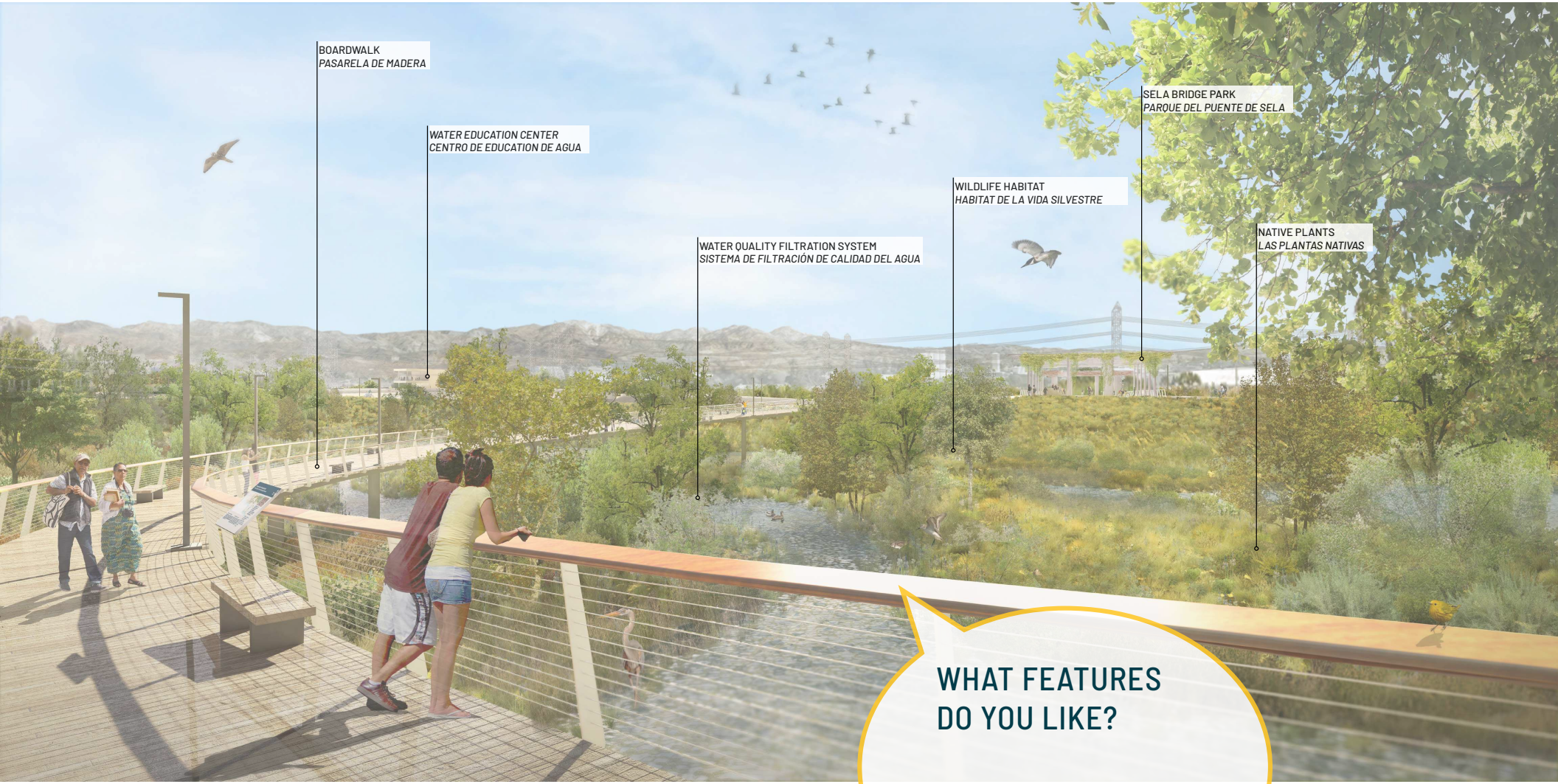
LOS HUMEDALES PUEDEN MEJORAR LA CALIDAD DEL AGUA DE LAS ESCORRENTÍAS DE LAS AGUAS PLUVIALES URBANAS FILTRANDO EL AGUA A TRAVÉS DE LAS PLANTAS Y ELIMINANDO SEDIMENTOS, NUTRIENTES Y CONTAMINANTES





IMPERIAL WETLANDS
HUMEDALES DE IMPERIAL

10



WHAT FEATURES DO YOU LIKE?

¿QUÉ ELEMENTOS TE GUSTAN?

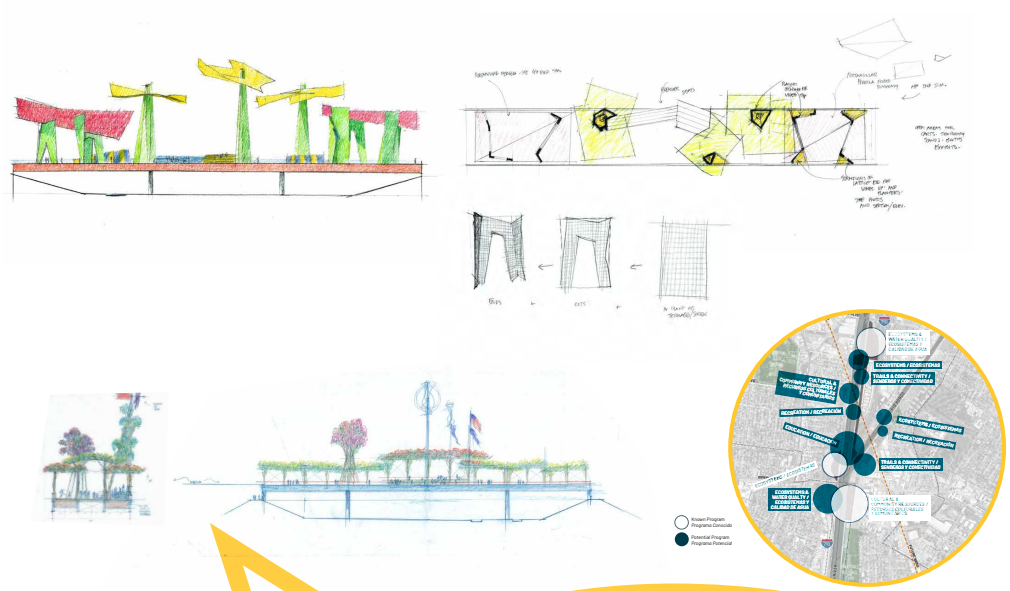
SELA BRIDGE PARK

PARQUE DEL PUENTE DE SELA

- The SELA Bridge Park connects the Imperial Wetlands to the LA County Flood Control District Imperial Yard, slated as the future site of the SELA Cultural Center. It also connects the LA River Trails on opposite river banks that otherwise require challenging crossing at the heavily trafficked Imperial Highway Bridge.

- *El parque del puente de SELA conecta los Humedales Imperial con el Corralón del Distrito de Control de Inundaciones de Imperial del Condado de LA, que ha sido propuesto como el futuro lugar del Centro Cultural SELA. También conecta los Senderos del Río de LA en riberas opuestas que de otra manera requieren un cruce peligroso en el altamente transitado Puente de la Autopista Imperial.*





WHAT TYPES OF OUTDOOR EVENTS WOULD YOU ATTEND?

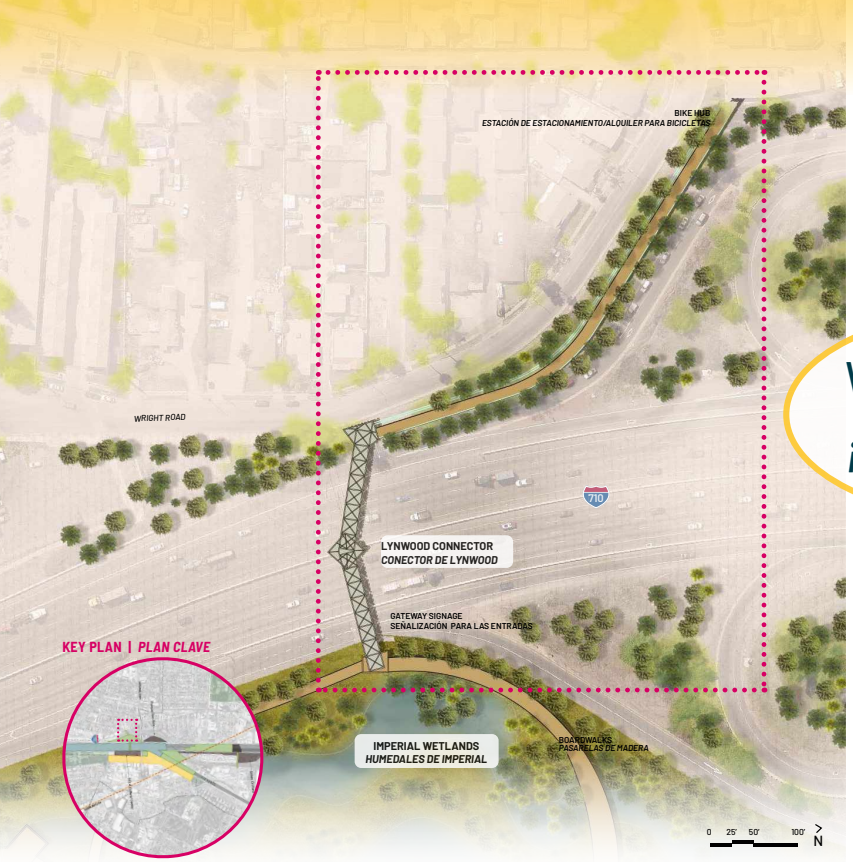
¿A QUÉ TIPOS DE EVENTOS AL AIRE LIBRE LE GUSTARÍA ASISTIR?

PLACE YOUR POST-IT NOTES HERE

COLOQUE SUS NOTAS ADHESIVAS AQUÍ

LYNWOOD CONNECTOR

CONECTOR DE LYNWOOD



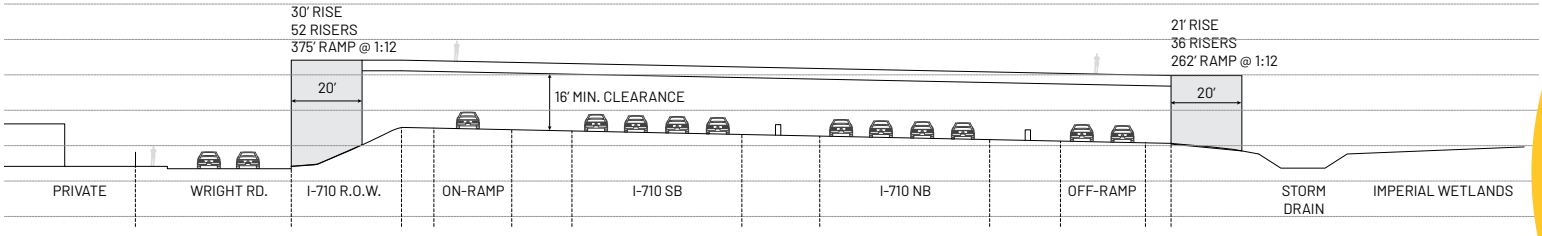


WE'RE HERE!

¡ESTAMOS AQUI!

- The Lynwood Connector is a pedestrian and bicycle connection over the I-710 to connect Lynwood's residents to the Imperial Wetlands project. It is a critical linkage for a community that can otherwise only access the river along the busy Imperial Highway interchange. The bridge will also connect to both existing and future assets: Hollydale Regional Park, Imperial Wetlands, Confluence Blue Park, the Water Education Center, and SELA Cultural Center.

- *El Conector de Lynwood es una conexión peatonal y para bicicletas sobre la I-710 para conectar a los residentes de Lynwood con el proyecto de Humedales Imperial. Es un vínculo crítico para una comunidad que de otra manera sólo puede tener acceso al río a lo largo del muy concurrido cruce de Imperial Highway. El puente también se conectará con los activos existentes y futuros: El Parque Regional Hollydale, Los Humedales de Imperial, la Confluencia del Parque Azul, el Centro de Educación del Agua y el Centro Cultural SELA.*



THE MOST IMPORTANT FACTORS FOR YOUR PARK!

LO MÁS IMPORTANTE ¡FACTORES PARA SU PARQUE!

SAFE AND COMFORTABLE SPACE TO VISIT
ESPACIO SEGURO Y CÓMODO PARA VISITAR

EASILY ACCESSIBLE TO ALL COMMUNITY MEMBER
FACILMENTE ACCESIBLE PARA TODOS LOS MIEMBROS DE LA COMUNIDAD

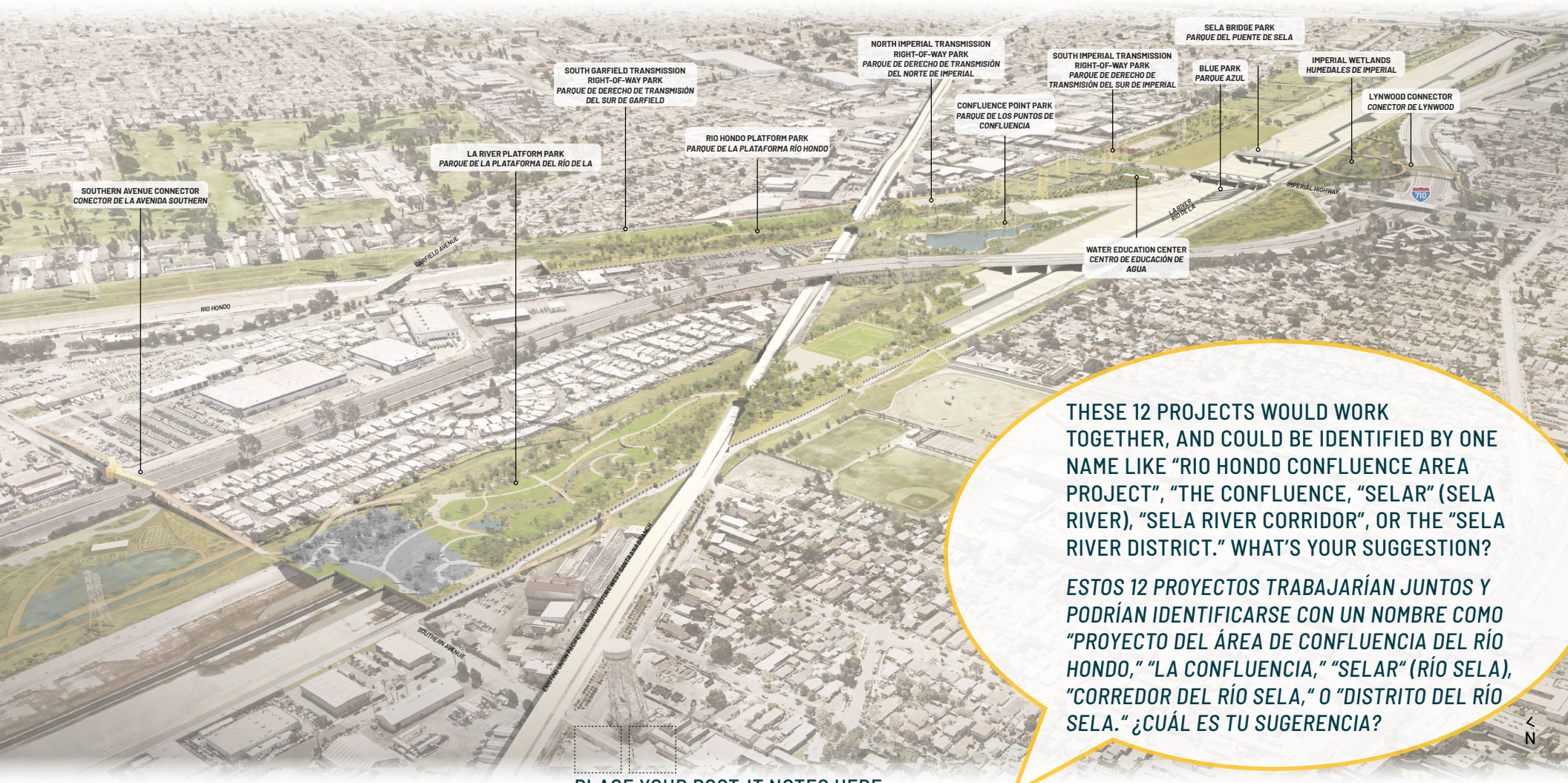
CONNECTION TO NATURE
CONEXIÓN CON LA NATURALEZA

FROM RECONTACT SURVEY (500 TOTAL RESPONDENTS)

DE LA ENCUESTA DE RE-CONTACTO (500 PERSONAS QUE RESPONDIERON EN TOTAL)

RIO HONDO CONFLUENCE AREA PROJECT

PROYECTO DEL ÁREA DE CONFLUENCIA DEL RÍO HONDO



THESE 12 PROJECTS WOULD WORK TOGETHER, AND COULD BE IDENTIFIED BY ONE NAME LIKE "RIO HONDO CONFLUENCE AREA PROJECT", "THE CONFLUENCE, "SELAR" (SELA RIVER), "SELA RIVER CORRIDOR", OR THE "SELA RIVER DISTRICT." WHAT'S YOUR SUGGESTION?

ESTOS 12 PROYECTOS TRABAJARÍAN JUNTOS Y PODRÍAN IDENTIFICARSE CON UN NOMBRE COMO "PROYECTO DEL ÁREA DE CONFLUENCIA DEL RÍO HONDO," "LA CONFLUENCIA," "SELAR" (RÍO SELA), "CORREDOR DEL RÍO SELA," O "DISTRITO DEL RÍO SELA." ¿CUÁL ES TU SUGERENCIA?

PLACE YOUR POST-IT NOTES HERE

COLOQUE SUS NOTAS ADHESIVAS AQUÍ

ATTACHMENT 9

Process and Decision Support Tools for Evaluating Flow Management Targets to Support Aquatic Life and Recreational Beneficial Uses of the Los Angeles River

Los Angeles River Environmental Flows Project







Eric D. Stein
Kris Taniguchi-Quan
Jordyn Wolfand
Elizabeth Gallo
Katie Irving
Daniel Philippus
Reza Abdi
Victoria Hennon
Anna Tinoco
Peter Mohammadi
Ashley Rust
Terri S. Hogue

Southern California Coastal Water Research Project

SCCWRP Technical Report #1196

Process and Decision Support Tools for Evaluating Flow Management Targets to Support Aquatic Life and Recreational Beneficial Uses of the Los Angeles River: Los Angeles River Environmental Flows Project

Eric D. Stein[1], Kris Taniguchi-Quan[1], Jordyn Wolfand[2], Elizabeth Gallo[3], Katie Irving[1], Daniel Philippus[3], Reza Abdi[3], Victoria Hennon[3], Anna Tinoco[2], Peter Mohammadi[2], Ashley Rust[3], Terri S. Hogue[3]

[1]Southern California Coastal Water Research Project, Costa Mesa, CA
[2]Shiley School of Engineering, University of Portland, Portland, OR
[3]Civil and Environmental Engineering, Colorado School of Mines, Golden, CO

April 2021
SCCWRP Technical Report #1196

EXECUTIVE SUMMARY

Increasing potable water scarcity associated with population growth, drought, climate change, regulatory/legal policy, and protection of endangered species has led to expanded efforts to conserve and reuse wastewater and other discharges, particularly in drier regions of California, such as the greater Los Angeles area. Water reuse is encouraged by the State's recycled water policy which calls for diversification of local water supplies to mitigate the effects of short-term drought and long-term climate change through the safe use of recycled water from wastewater sources. The state policy also requires that reuse programs ensure the protection of existing water rights and beneficial uses.

The State Water Resources Control Board (State Water Board), in coordination with City of Los Angeles, Los Angeles County Department of Public Works, and Los Angeles County Sanitation Districts, initiated *the Los Angeles River Environmental Flows Project* (Project) to provide a toolset to evaluate a series of flow reduction scenarios for the LA River. These tools will be used to inform development of flow management targets that sustain specific species, habitats, and beneficial uses. This toolkit may be used to develop policies on how to balance the need for local water supply and still support beneficial uses. In the near term, the outcomes of this analysis can inform decisions associated with proposed wastewater change petitions and stormwater management programs. In the longer term, the outcomes could inform decisions regarding the ability to support beneficial uses not currently supported, in combination with broader restoration planning efforts.

The intent of this analysis is to evaluate whether proposed management actions would influence flow conditions that could potentially support beneficial uses, recognizing that there are many other factors that currently affect the ability to support these uses (e.g., channelization, lack of vegetative cover, lack of suitable substrate, mechanical channel maintenance). This analysis is based on existing channel geometry and existing substrate, vegetation, and channel roughness with a focus on changes to flow. Channel modification or potential restoration are not evaluated in this report.

The study area for the project includes the mainstem of the LA River (from the DC Tillman water reclamation plant to the Pacific Ocean), plus two LA River tributaries (Rio Hondo and Compton Creeks; Figure ES-1). The goals of the project are to:

- Develop a process for evaluating flow management targets.
- Apply the process to provide example flow management targets in the LA River (ultimate goals or recommendations will result from negotiations between regulatory and discharger agencies).
- Produce tools and approaches to help evaluate how potential modified flow regimes in the LA River may affect the likelihood of supporting aquatic life and recreational beneficial uses.

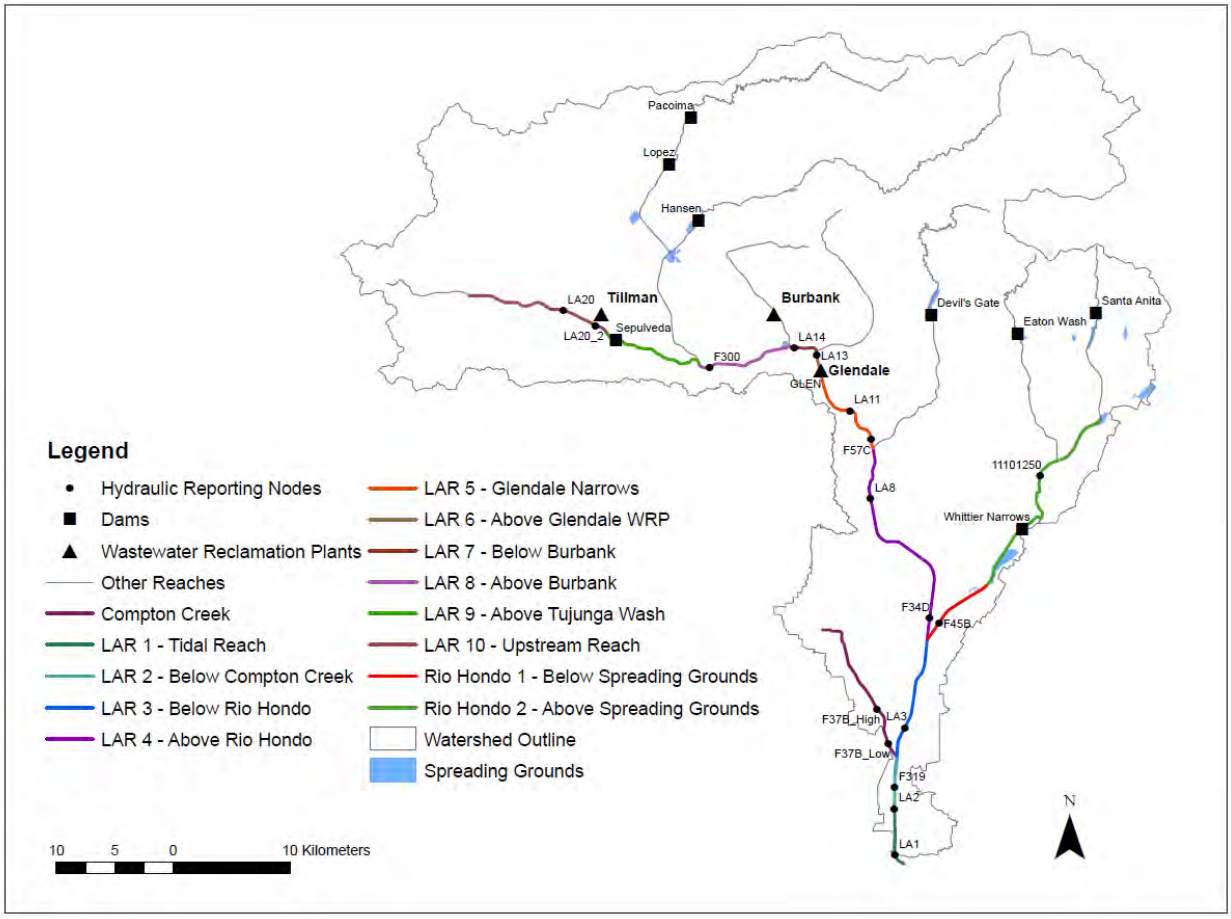


Figure ES-1. Project study area showing the major study reaches, locations of major dams and wastewater reclamation plants (WRPs). Hydraulic reporting nodes (circles) represent locations where the effect of various discharge scenarios on instream flows were evaluated.

Previous reports detail development, calibration, and validation of the hydrologic (rainfall-runoff), hydraulic (instream flow properties), temperature, water quality, and ecological response models used to support the environmental flows analysis (Stein et al. 2021). Existing aquatic life use (Stein et al. 2021) and non-aquatic life use (Stein and Sanchez 2019) have also been previously assessed and reported.

This report builds on the previous efforts to provide ranges of flows (or hydraulic conditions) associated with the support of existing, potential, or possible future beneficial uses. The tools provided in this report can be used to inform flow management decisions. To that end, we also provide a series of curves that relate potential changes in discharge from water reclamation plants or stormdrains to changes in flow in the LA River at various locations.

The central research questions that are addressed using the data, tools, and approach developed in this report include:

1. What are some of the flow ranges associated with the support of specific beneficial uses?
2. What are the potential effects of changes in WRP and stormdrain discharge relative to in-river flow range targets?

3. How can potential changes in discharge from WRPs and opportunities to increase local water supply be balanced while supporting beneficial uses?

Flow evaluations were conducted by coupling hydrologic/hydraulic and temperature modeling with a series of ecological response models (to relate flow conditions to beneficial uses). Hydrologic, hydraulic, temperature, and water quality models were created for the LA River Basin. Ecological response models were created for key species in six identified habitat types within the banks of the channel using data from the LA River and other similar river systems in the region. The model outputs were used to calculate flow metrics that relate probability of species occurrence to different management scenarios (Figure ES-2). Details on the modeling approach and development are provided in Stein et al. (2021).

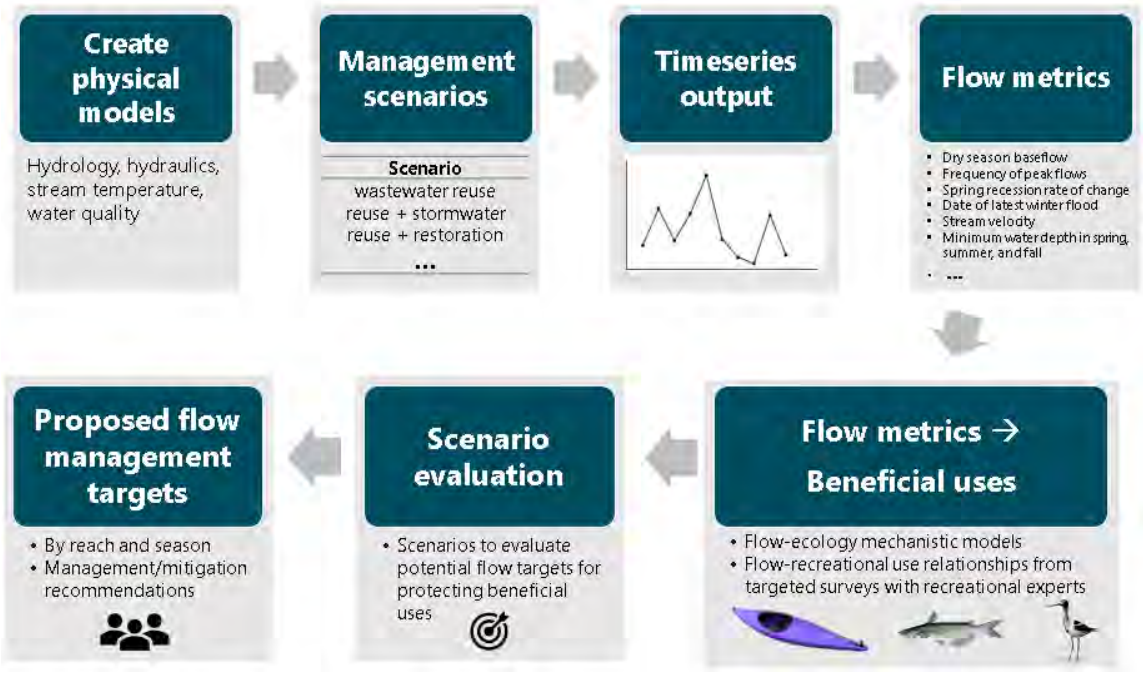


Figure ES-2. Process used to develop flow management targets.

Flow ranges associated with designated existing and potential uses and possible future beneficial uses were developed based on needs of the associated focal species (and life stages) and recreational uses for each relevant location along the river (Table ES-1). Relationships between focal species and beneficial uses were developed in consultation with the project's Technical Advisory Committee. Although cold freshwater habitat (COLD) is not currently a designated beneficial use in the mainstem of the LA River, one goal of this study is to evaluate whether proposed management actions could influence flow conditions that have the potential to support non-designated beneficial uses, such as COLD, in the future.

Table ES-1. Focal species associated with beneficial uses. Highlighted species do not currently occur in the mainstem of the LA River. Cold freshwater habitat (COLD) is currently not a designated beneficial use for any LA River reach covered by this study.

Focal Species	Beneficial Uses						
	WARM[1]	EST[2]	WILD[3]	RARE[4]	MIGR[5]	SPWN[6]	COLD[7]
Santa Ana Sucker				x		x	x
Unarmored threespine stickleback				x		x	x
Steelhead/Rainbow trout		x		x	x		x
Cladophora spp		x	x				
Typha			x				
Duckweed			x				
Black Willow			x	x			
African clawed frog	x						
Mosquitofish	x						

[1]WARM: Warm freshwater habitat
[2]EST: Estuarine habitat
[3]WILD: Wildlife habitat
[4]RARE: Rare, threatened, or endangered species
[5]MIGR: Migration of aquatic organisms
[6]SPWN: Spawning, reproduction, and/or early development
[7]COLD: Cold freshwater habitat

The draft flow ranges table organized by species for all modeled stream reaches can be viewed at: https://sccwrp.sharepoint.com/:x:/s/LARiverEflowsStudy/EVoSEKZ6EBdKh2sqcsahoZsBmA_jj1hmdh4WWxyddvgd3w?e=cALJ4U.

Additionally, the draft flow range table for species life stages, recreational uses, and current flows and beneficial uses by location can be viewed at: https://sccwrp.sharepoint.com/:x:/s/LARiverEflowsStudy/EXe7HmwHbgpFn5qhgFjAb7gBGQoCvaaB1ZYoyMg72B_18Q?e=Jsctsl.

Beneficial use definitions and water body designations can be found in the Los Angeles Regional Water Quality Control Board Basin Plan: https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.html

Given the extensive set of flow ranges for multiple species and locations, a process was developed to synthesize flow ranges into more integrative flow management targets based on a series of decisions (ES-3).

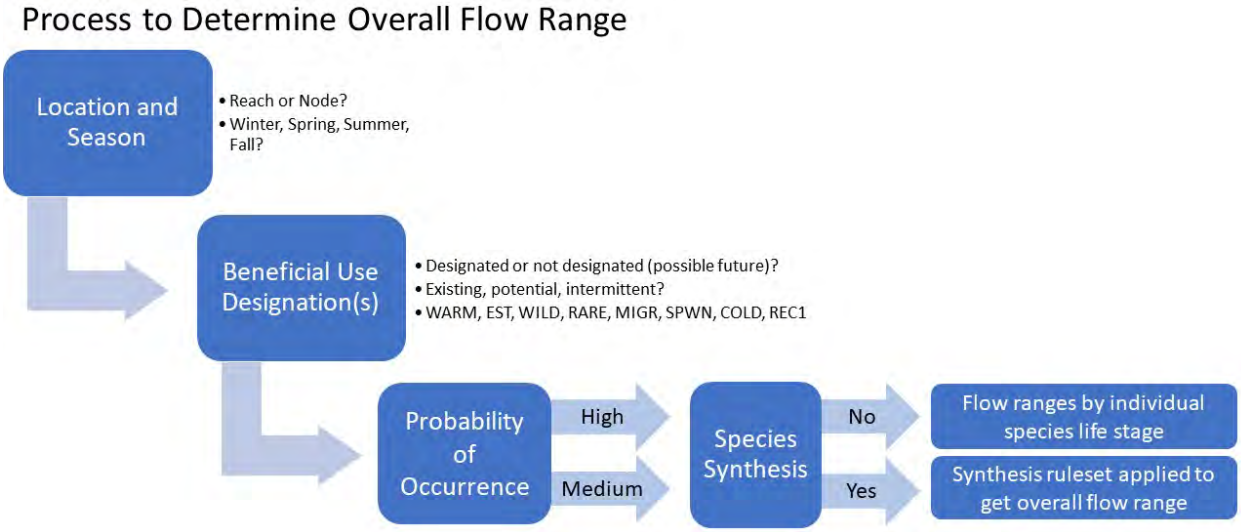


Figure ES-3. Proposed process for synthesizing and interpreting flow ranges to develop overall flow management target. Medium probability is defined as 50% of the maximum probability of occurrence; high probability is defined as 75% of the maximum probability of occurrence. Low probability was determined to not be a desirable management goal.

Potential changes to wastewater discharge, stormwater management, and dry weather stormdrain discharge were simulated using a "sensitivity curve" approach that relates discharge to instream flow conditions as measured by functional flow metrics. Instead of identifying a finite set of scenarios, sensitivity curves allow for consideration of a broad range of management options based on the amount of discharge to the river. Wastewater discharge scenarios were based on a Monte Carlo simulation[1] which evaluated the effects of 500 randomly selected scenarios ranging from 0-100% of current discharge, representing multiple combinations of potential WRP discharge reductions from each plant. Sensitivity curves for stormwater management and dry weather stormdrain scenarios were simulated using a series of discrete scenarios representing a range of Best Management Practices (BMPs) implementation. Ranges of BMP implementation scenarios were derived from the City of Los Angeles Stormwater Capture Master Plan (SCMP), and the watershed management program plans for the Upper and Lower LAR, LAR Upper Reach 2, and Rio Hondo/San Gabriel River.

A total of 66 flow-based sensitivity curves were developed for 13 reporting nodes along the river (see Figure ES-1), two seasonal functional flow components (wet-season baseflow and dry-season baseflow), and for multiple management scenarios (WRP discharge and dry weather stormdrain discharge scenarios). Sensitivity curves were only developed for the wet- and dry-season baseflow magnitude metrics because they were the most sensitive flow metrics to changes in WRP discharge and dry weather stormdrain reductions. A process was developed to use the flow ranges associated with different scenarios with the sensitivity curves to evaluate how much

[1] Monte Carlo simulation is a model used to predict the probability of different outcomes in the presence of random variables. Monte Carlo simulations are used to help explain the impact of uncertainty in prediction and forecasting models.

and under which scenarios flows can be reduced and still meet flow ranges that support a majority of beneficial uses for a given location along the river (Figure ES-4).

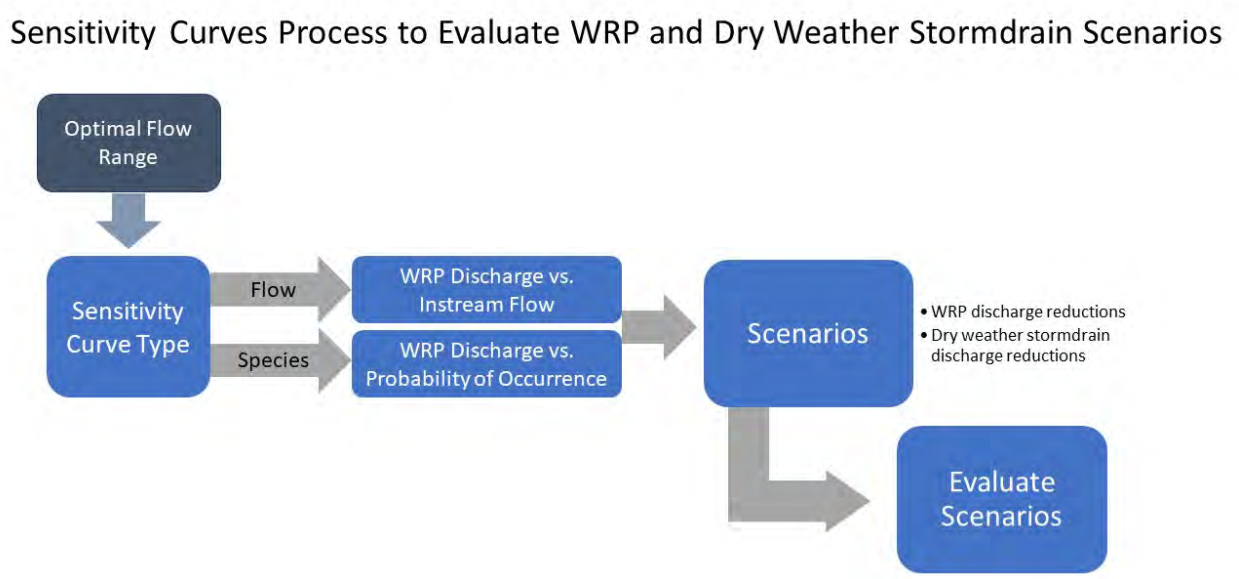


Figure ES-4. Proposed process to use optimal flow range of specific management targets with sensitivity curves to evaluate WRP and dry weather stormdrain scenarios. The optimal flow range can be derived from the process shown in Figure ES-3.

An example application of sensitivity curves at Glendale Narrows (GLEN), shows the optimal flow range for Willow and Typha plotted with the flow-based sensitivity curves representing changes in both WRP and dry weather stormdrain discharge (Figure ES-5).

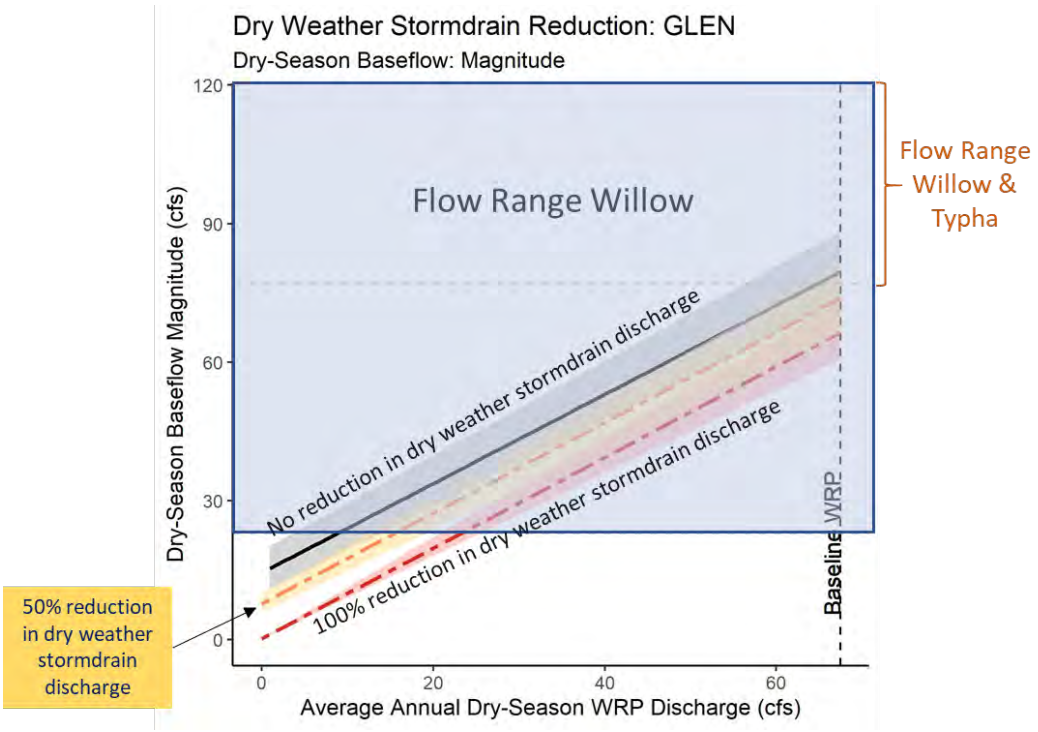


Figure ES-5. Flow-based sensitivity curves illustrating the combined effects of change in WRP discharge and 50% (yellow) and 100% reduction (red) in dry weather stormdrain discharge at GLEN reporting node. Solid and dashed lines represent median values; bounds of the gray and colored bands are the 10th and 90th percentile dry-season instream flows across the modeled period. Optimal flow range in this example is based on a 50% (medium) probability of occurrence of Willow and Typha.

Results at GLEN for all 45 scenarios that include WRP reduction, dry weather stormdrain discharge reductions, and stormwater BMPs are shown in Figure ES-6. The average annual flow volume across all simulated water years was used to compare the relative performance of all scenarios. Results at GLEN show that reductions in WRP also have a larger impact on average annual flow than reductions in dry weather stormdrain discharge. While a 100% reduction in WRP flows results in a decrease of 51,000 AF (2.223 billion cubic feet), a 100% reduction in dry weather stormdrain discharge flows only results in a decrease of 17,800 AF (0.776 billion cubic feet). However, the relative impacts of reductions in WRP and dry weather stormdrain discharge vary spatially throughout the LA River.

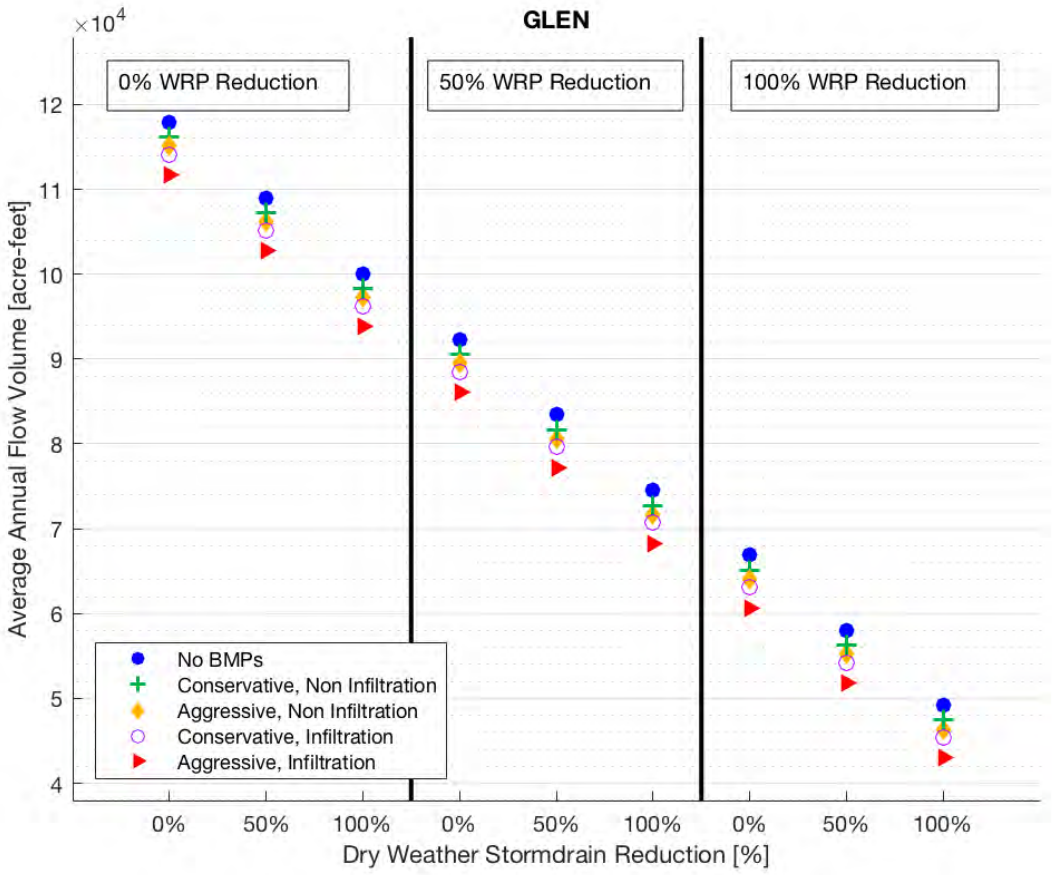


Figure ES-6. A visual comparison of average annual flow volumes (acre feet) for all 45 scenarios at GLEN.

The goal of this project was to develop a set of tools that can be used to evaluate potential effects of various changes in WRP discharge and stormdrain outflows on instream flows necessary to support beneficial uses. The goal was not to provide a definitive set of flow targets. If the State Water Board ultimately elects to adopt flow management targets, such targets will be a function of technical and policy decisions regarding beneficial use protection the LA River. The State Water Board may elect to set flow management targets that vary seasonally or be based on water year type (i.e., wet vs. dry). Once flow management targets are determined (for the existing channel morphology), various implementation scenarios and management actions can be evaluated for their ability to produce the desired in-river flows.

ACKNOWLEDGMENTS

This project was conducted through a collaboration with the State Water Resources Control Board, the Los Angeles Regional Water Quality Control Board, and local municipalities and stakeholders. Principal funding was provided by the City of Los Angeles, Department of Water and Power (DWP) and Los Angeles Sanitation and Environment (LASAN). Additional funding was provided by Los Angeles County Public Works (LADPW), Los Angeles County Flood Sanitation Districts (LACSD), the Watershed Conservation Authority (WCA), a joint powers authority between the Rivers and Mountains Conservancy (RMC) and the Los Angeles County Flood Control District, and the Mountains Recreation and Conservation Authority (MRCA), a joint power of the Santa Monica Mountains Conservancy, the Conejo Recreation and Park District and the Ranch Simi Recreation and Park District. We thank all members of the Stakeholder Working Group and the Technical Advisory Group who provided critical input, advice, and review over the course of this project. Additional project information is available at https://www.waterboards.ca.gov/water_issues/programs/larflows.html and https://www.sccwrp.org/about/research-areas/ecohydrology/los-angeles-river-flows-project/.

TABLE OF CONTENTS

Executive Summary i
Acknowledgments ix
Table of Contents x
Introduction and Background 1
Intended Use and Key Assumptions 2
Study Area 3
Organization of this Report 4
Approach 6
Reporting Nodes 6
Hydrologic, Hydraulic, and Temperature Modeling 7
Dry Weather Stormdrain Discharge 10
Tidal Model 10
Flow Ecology Modeling 11
Non-aquatic Life Uses 15
Scenario Analysis 16
Wastewater Discharge 16
Stormwater and Dry Weather Stormdrain Discharge 17
Process for Establishing Flow Management Targets 19
Relationship to the California Environmental Flows Framework 25
Scenario Results 30
Wastewater Discharge 30
Stormwater and Dry Weather Discharge 35
Conclusions and Next Steps 39
References 40
Appendix A. Flow-based and Species-based Sensitivity Curves 42
WRP Discharge Scenarios 42
Dry Weather Stormdrain Scenarios 42
Appendix B. Stormwater Management Methods 43
Appendix C. Stormwater and Dry Weather Discharge Plots 46

INTRODUCTION AND BACKGROUND

Increasing potable water scarcity associated with population growth, drought, climate change, regulatory/legal policy, and protection of endangered species has led to expanded efforts to conserve and reuse wastewater and other discharges, particularly in drier regions of California, such as the greater Los Angeles area. Water reuse is encouraged by the State's recycled water policy which calls for diversification of local water supplies to mitigate the effects of short-term drought and long-term climate change through the safe use of recycled water from wastewater sources. The state policy also requires that reuse programs ensure the protection of existing water rights and beneficial uses.

Wastewater reclamation plants (WRPs) statewide have expanded their capabilities to treat wastewater using advanced methods that make the resulting recycled water a valuable reusable resource, including potable reuse. Recycled water has been used for irrigation and industrial applications, reducing the demand on potable water supplies. Municipalities can now use advanced treated recycled water from the WRPs to recharge groundwater basins (via injection and percolation through spreading basins) for subsequent extraction and potable reuse. Groundwater recharge serves as a management tool for basin users and managers and can allow cities to rely more on groundwater. Higher reliance on groundwater can help reduce the municipalities' demand from other over-allocated water systems, such as the Bay-Delta and the Colorado River.

As municipalities use more recycled water, the WRPs discharge less to waterways. Water conservation in the region has also reduced the volume of wastewater available for recycling. Reductions in discharges to waterways can have unintended consequences affecting fish, wildlife, or other public resources (such as access to recreation) that have come to rely on these flows. To balance these interests and minimize impacts, wastewater dischargers who want to reduce their discharges to watercourses to allow reuse and recycling of the water need approval from the State Water Board under Water Code Section 1211. The State Water Board requires that the wastewater discharger demonstrate that a change in flow will not unreasonably harm beneficial uses.

The Los Angeles (LA) River is at the forefront of the need to better understand and quantify potential impacts from changes in flow regimes. The cities of Burbank, Glendale, and Los Angeles have been beneficially reusing and recycling wastewater for decades and plan to recycle more wastewater to meet the needs of their residents and businesses. They have petitioned, or are planning to petition, the State Water Board to reduce their discharges of treated wastewater from their respective WRPs to the LA River for this purpose. The LA River also serves as an important stormwater management system. The potential reduction in wastewater discharge, along with requirements to better manage stormwater and dry weather stormdrain flows, would reduce or potentially eliminate flows in certain stretches of the LA River during the dry season. The State Water Board and Los Angeles Regional Water Quality Control Board are currently supporting the development of technical tools, including this study, to help serve as decision support tools to help municipalities balance the needs of water users and other beneficial uses.

The State Water Board, in coordination with the City of Los Angeles (through the Los Angeles Department of Water and Power and Los Angeles Sanitation and Environment), Los Angeles County Department of Public Works, and Los Angeles County Sanitation Districts, initiated *the*

Los Angeles River Environmental Flows Project (Project) to provide a toolset to evaluate a series of flow reduction scenarios for the LA River. The State Water Board may use these tools to inform the development of flow management targets that sustain specific species, habitats, and beneficial uses. The State Water Board may also use this toolkit to develop policies on how to balance the need for local water supply and groundwater recharge, and to ensure the reasonable protection of beneficial uses. In the near term, the outcomes of this analysis can inform decisions associated with proposed wastewater change petitions and stormwater management programs. In the longer term, the outcomes could inform decisions regarding the ability to support beneficial uses not currently supported, in combination with broader restoration planning efforts. The goals of the project are:

- Develop a process for evaluating flow management targets.
- Apply the process to provide example flow management targets in the LA River (ultimate recommendations will result from negotiations between regulatory and discharger agencies).
- Produce tools and approaches to help evaluate how potential modified flow regimes in the LA River may affect the likelihood of supporting aquatic life and recreational beneficial uses.

The project also serves as an important pilot application of the California Environmental Flows Framework (CEFF)[2] by demonstrating how CEFF can be applied in a highly urbanized watershed where flow alteration is primarily caused by wastewater and stormwater discharges. The outcomes of this project may also serve as an approach for assessing similar situations in other river systems.

All phases of the project, beginning with initial project scoping, have been coordinated through both a Stakeholder Working Group (SWG) and a Technical Advisory Committee (TAC). Additional project information including meeting notes and presentations are available on the project website at https://www.waterboards.ca.gov/water_issues/programs/larflows.html#background.

Intended Use and Key Assumptions

The intent of this analysis is to evaluate whether proposed management actions would influence flow conditions that could potentially support beneficial uses, recognizing that there are many other factors that currently affect the ability to support these uses (e.g., need for a local water supply, channelization, lack of vegetative cover, lack of suitable substrate, mechanical channel maintenance). The tools developed are not intended to produce specific recommendations or requirements, which would ultimately result from consideration of numerous factors, besides those modeled here, that affect the ability to support one or more beneficial uses. The intention is for dischargers to use the tools to evaluate the potential effects of various scenarios involving changes in discharge to the LA River. The tools can also be used to inform a larger process for development of flow criteria that balances water supply, flood control, specific species, habitats,

[2] The California Environmental Flows Framework provides a set of reference-based ecological flow criteria for each stream reach in the state and provides guidance for developing refined flow criteria when appropriate.

and beneficial uses. This toolkit may be used to develop policies on how to balance the need for local water supply and groundwater recharge, and still support beneficial uses.

Additional assumptions and considerations include:

- The primary intended use is to apply the tools to evaluate potential effects of changes in discharge on existing beneficial uses. The tools can be used to evaluate potential restoration of future uses, but that is not the primary objective of this study.
- The analysis assumes that the physical structure of the channel remains unchanged. In the concrete reaches, minimal changes to channel morphology will occur in the future unless physical channel modification or restoration actions are performed. In the soft bottom reaches, there will be changes to the morphology and those morphologic changes will be influenced by the flow regime and will in turn impact hydraulics. The potential effects on channel modifications on flow targets could be explored during a later phase of the study.
- The term "optimal flow" recommendation is derived based on the overlap of flow needs for different beneficial uses. The term does NOT constitute a regulatory recommendation regarding optimization.
- Confidence and resolution of flow ranges associated with species or habitat occurrences typically should be interpreted in light of the inherent uncertainty in the hydrologic, hydraulic, and ecological models limited by model resolution.

Study Area

The study area for the project includes the mainstem of the LA River (from the Donald C. Tillman WRP to the Pacific Ocean), plus two LA River tributaries, Rio Hondo and Compton Creek (Figure 1). The mainstem of the LA River is defined as the area between the concrete banks. Tributaries of the LA River above the WRPs are included in the project's hydrologic model to characterize the watershed more accurately. The models produced could be used in the upper reaches to support future studies but are not currently part of the flow-ecology analysis.

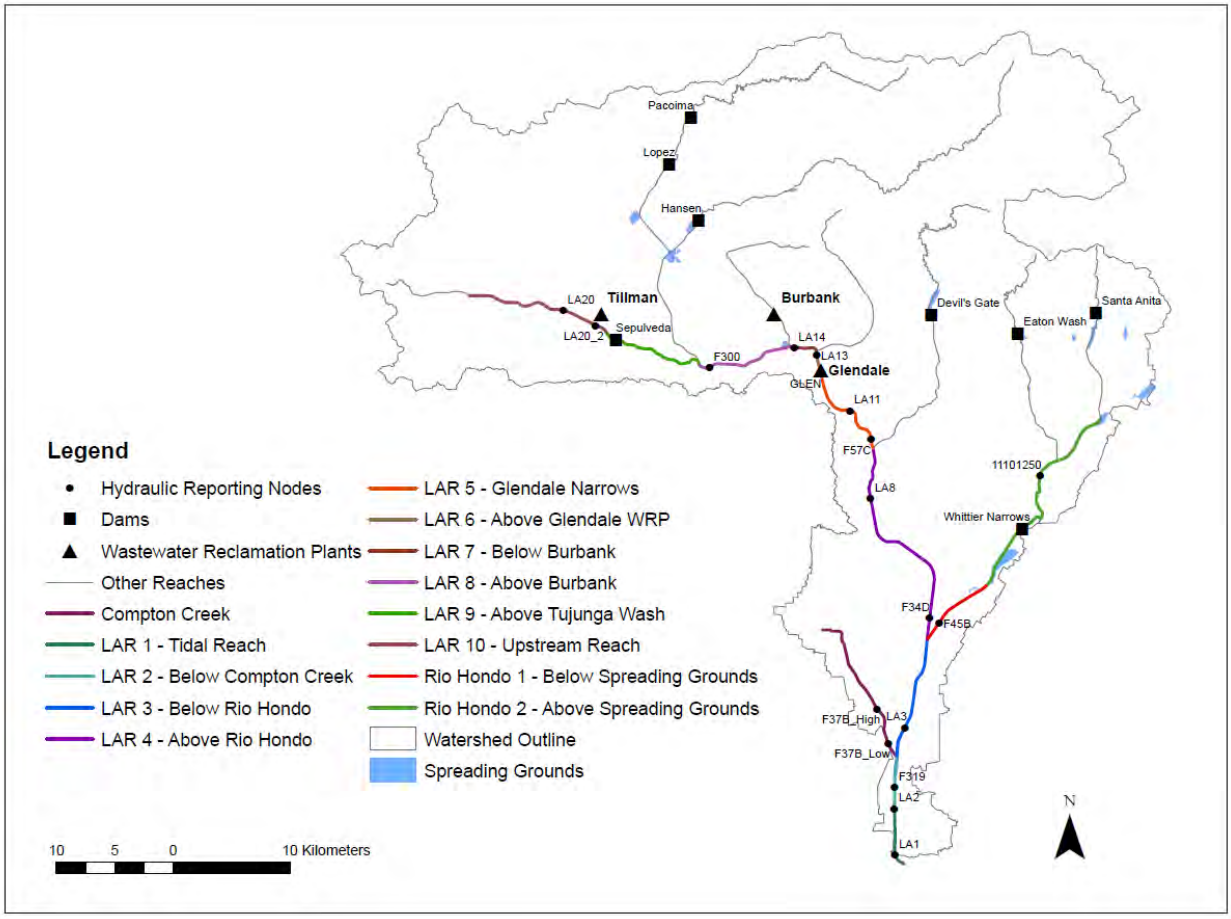


Figure 1. Project study area showing the major study reaches, locations of major dams and wastewater reclamation plants (WRPs). Hydraulic reporting nodes (circles) represent locations where the effect of various discharge scenarios on instream flows were evaluated.

Organization of this Report

The project consists of seven activities, each with a series of tasks:

- Activity 1 - Stakeholder coordination
- Activity 2 - Non-aquatic Life Use Assessment
- Activity 3 - Aquatic Life Beneficial Use Assessment
- Activity 4 - Apply Environmental Flows and Evaluate Scenarios
- Activity 5 - Monitoring and Adaptive Management Plan
- Activity 6 - Summary of results/reporting
- Activity 7 - Water Quality Assessment

Previous reports are available online and organized by activity (Table 1). These reports detail development, calibration, and validation of the hydrologic, hydraulic, temperature, water quality, and ecological response models used to support the environmental flows analysis (Stein et al. 2021). Existing aquatic life use (Stein et al. 2021) and non-aquatic life use (Stein and Sanchez 2019) have also been previously assessed and reported.

Table 1. Project reports organized by activity and available for download at https://www.sccwrp.org/about/research-areas/ecohydrology/los-angeles-river-flows-project/.

Activity	Report	Year	Summary
Activity 1	Stakeholder Working Group (SWG) and Technical Advisory Committee (TAC) Meeting Materials	2019-2021	Supporting documents from all SWG and TAC meetings
Activity 2	Review of Recreational Uses and Associated Flow Needs Along the Main-stem of Los Angeles River	2019	Evaluation of recreational uses and associated flow needs along the mainstem of the LA River
Activity 3	Assessment of Aquatic Life Use Needs for the Los Angeles River	2021	Development, calibration, and validation of the hydrologic, hydraulic, temperature, and ecological response models used to support the environmental flows analysis
Activity 4	Process and Decision Support Tools for Establishing Flow Recommendations to Support Aquatic Life and Recreational Beneficial Uses of the Los Angeles River (this report)	2021	Process and decision support tools to determine flow management targets to support beneficial uses and evaluate WRP, stormwater, and stormdrain reduction scenarios
Activity 5	Proposed Monitoring and Adaptive Management Plan	In progress	Recommended monitoring and adaptive management plan to evaluate effect of changes in flow on beneficial uses
Activity 6	Technical Study Progress Reports	2019-2021	Quarterly progress reports for the technical study
Activity 7	Water Quality Assessment and Restoration Opportunities in the LA River Watershed	In progress	Evaluation of WRP and flow management scenarios on water quality and restoration opportunities to offset potential changes in flow

This report builds on the previous efforts to provide ranges of flows (or hydraulic conditions) likely to support designated existing and potential, and possible future beneficial uses (Activity 3). The ranges provided in this report can be used to inform flow management decisions. To that end, we also provide a series of curves that relate discharge from WRPs or stormdrains to flow in the river at various locations (Activity 4).

The central research questions that are addressed using the data, tools, and approach developed in this report include:

1. What are some of the flow ranges associated with the support of specific beneficial uses?
2. What are the potential effects of changes in WRP and stormdrain discharge relative to in-river flow range targets?
3. How can potential changes in discharge from WRPs and opportunities to increase local water supply be balanced while supporting beneficial uses?

APPROACH

Flow ranges associated with designated existing and potential uses and possible future beneficial uses were developed based on needs of focal species (and life stages) and recreational uses for each relevant location along the river. Flow evaluations were conducted by coupling hydrologic, hydraulic and temperature modeling with a series of ecological response models. Hydrologic, hydraulic, temperature, and water quality models were created for the LA River Basin. Ecological response models were created for key species in six identified habitat types[3] within the banks of the channel using data from the LA River and other similar river systems in the region. The model outputs were used to calculate flow metrics that relate probability of species occurrence to different management scenarios (Figure 2). Details on the modeling approach and development are provided in Stein et al. (2021).

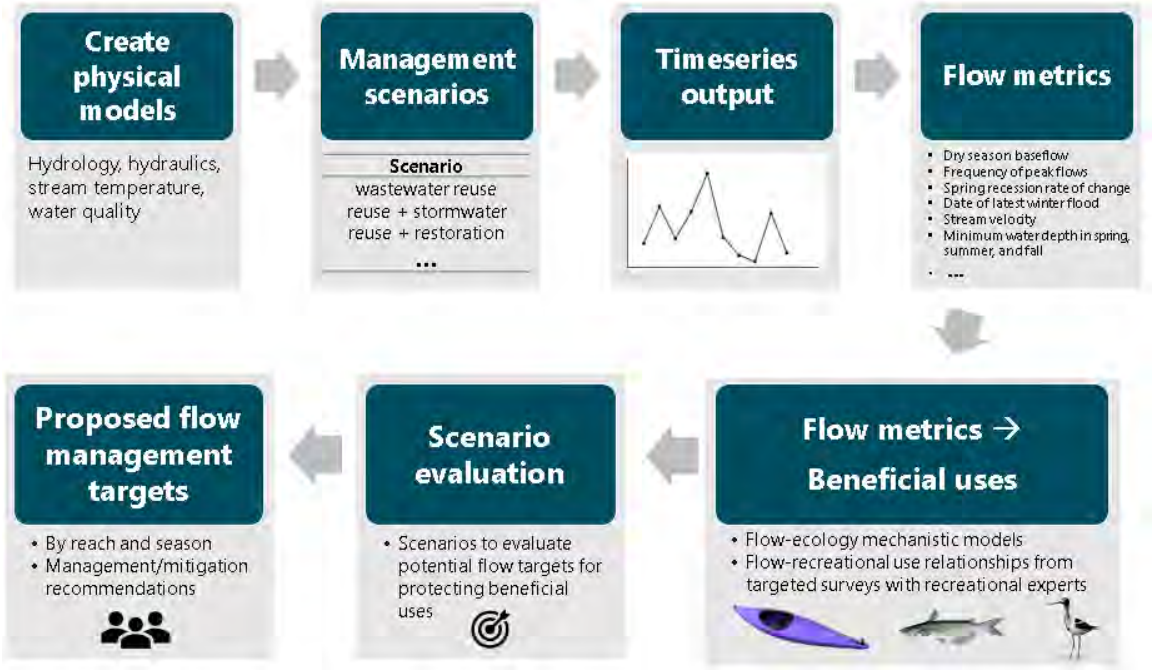


Figure 2. Process used to develop flow management targets.

Reporting Nodes

Reporting nodes were selected to represent specific reaches of the river where the effect of various discharge scenarios on instream flows were evaluated (Figure 1). The reporting nodes were selected to represent a range of different hydraulic and hydrologic conditions, prioritizing cross sections in soft-bottom reaches such as within Glendale Narrows. Hydrologic outputs were paired with hydraulic outputs for the evaluation at these nodes. The selection of the reporting nodes was reviewed and coordinated with both the project SWG and TAC.

[3] Key focal species and habitats are listed in Table ES-1 and Table 3 and described in Stein et al. 2021.

Hydrologic, Hydraulic, and Temperature Modeling

The hydrologic, hydraulic, and temperature models used in this study are described in detail in Stein et al. 2021. Briefly, we estimated flow conditions in the study area using a coupled hydrologic-hydraulic model created in EPA's Storm Water Management Model (SWMM) and the Hydrology Engineering Center's River Analysis System (HEC-RAS). Current hydrologic conditions, referred to as baseline conditions, were defined as the flows and operations that occurred during water year (WY) 2011 to 2017. This period was chosen because: (1) high-resolution (hourly) data was available for wastewater discharge, in-stream flows, dam operations, and spreading grounds, and (2) wastewater discharge during this period remained relatively constant. The baseline period is considered hydrologically dry based on precipitation (Figure 3), which occurs in the LAR basin seasonally, mostly between October and April. However, changes to WRP discharge will primarily impact the river in the dry summer months (Figure 4), when flows in the river are mainly comprised of WRP discharge and dry weather runoff, which includes irrigation return flows and other urban runoff from activities such as car-washing. Previous work has found winter and summer flows in the Los Angeles River are not strongly correlated, unlike unaltered natural hydrologic systems where groundwater storage may provide replenishment of surface waters in the drier months. Instead, summer flows are more closely related to changes in WRP discharge, irrigation, and conservation practices (Manago and Hogue 2017).

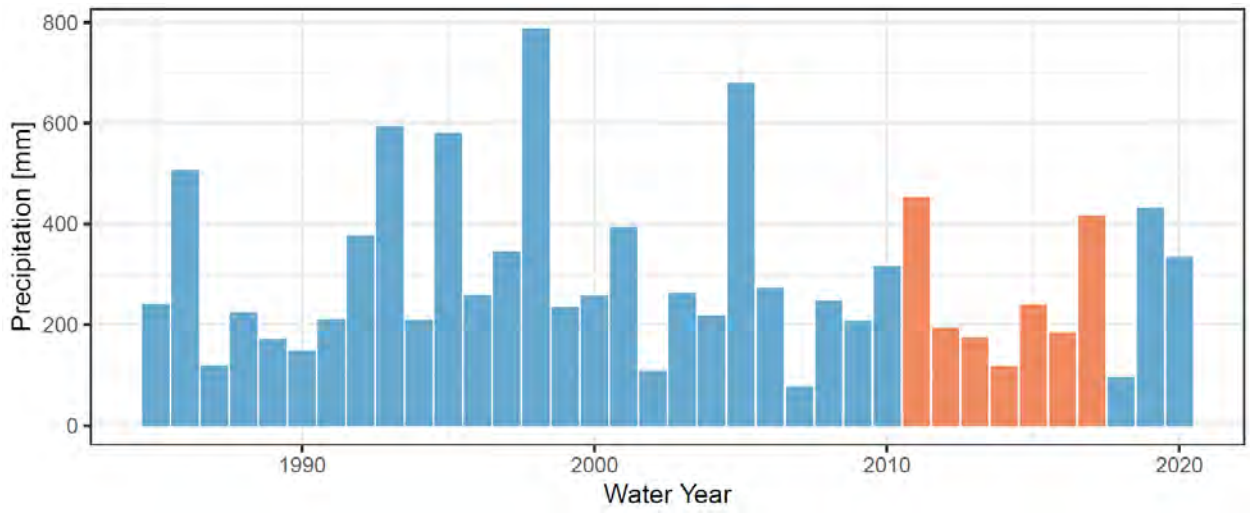


Figure 3. Water year precipitation at Los Angeles International Airport from 1985 (when D.C. Tillman started operation) to 2020. Data from the National Climatic Data Center (NCDC) Climate Data Online (Station USW00023174). Orange bars show the simulation period (WY 2011 through 2017), also referred to as the baseline condition.

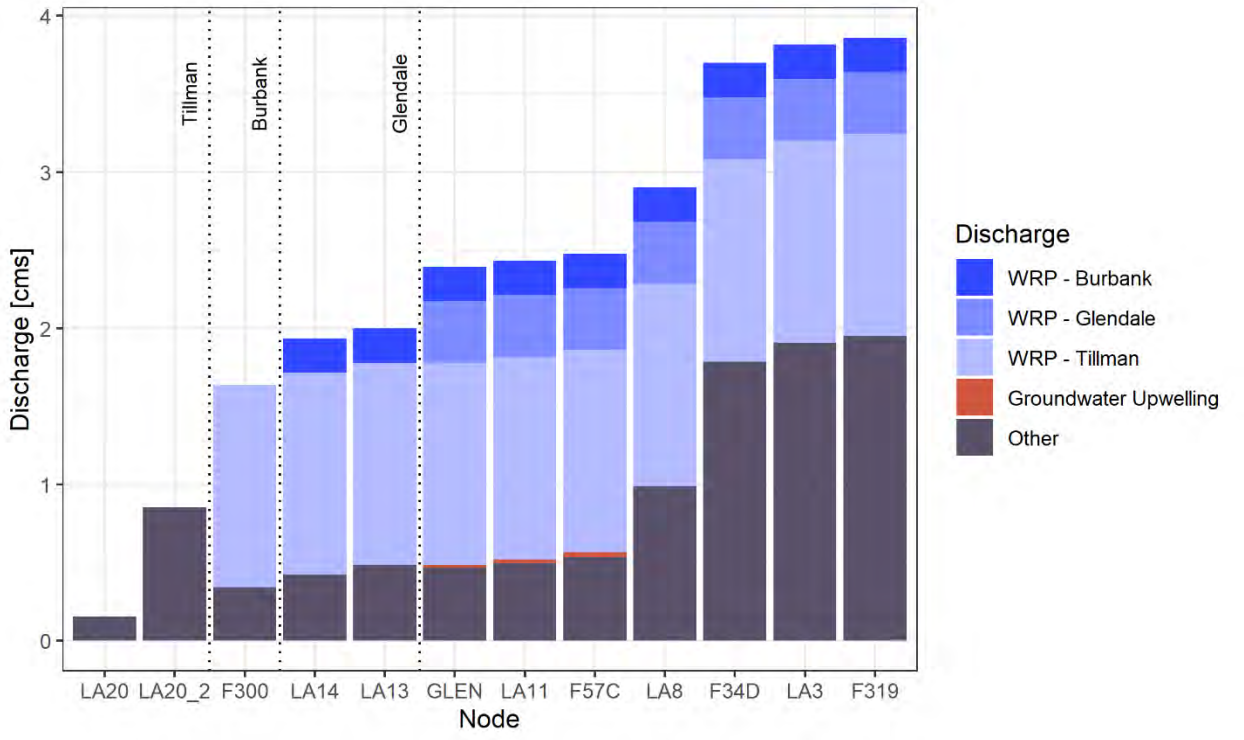


Figure 4. Contributions to discharge during the summer months (June, July, and August) across all reporting nodes in the Los Angeles River for the baseline conditions (WY 2011 through 2017). Groundwater upwelling occurs in the Glendale Narrows, contributing to overall flow/discharge. "Other" flows include dry weather stormdrain discharge, dam discharge, and industrial discharge. Vertical dashed lines show the locations of the water reclamation plants.

The hydrologic model simulates discharge on the mainstem of the LA River, Compton Creek, and Rio Hondo at an hourly time step from WY 2011 through 2017. The model was validated from WY 2011 through 2013 and calibrated from WY 2014 through 2017 at seven locations throughout the watershed (4 on the mainstem, 3 on tributaries) by comparing daily discharge values. The hydraulic model was created for a subset of this spatial domain—specifically the mainstem of the LA River from Sepulveda Basin to the outlet to the harbor, and for Compton Creek and Rio Hondo (Figure 5).

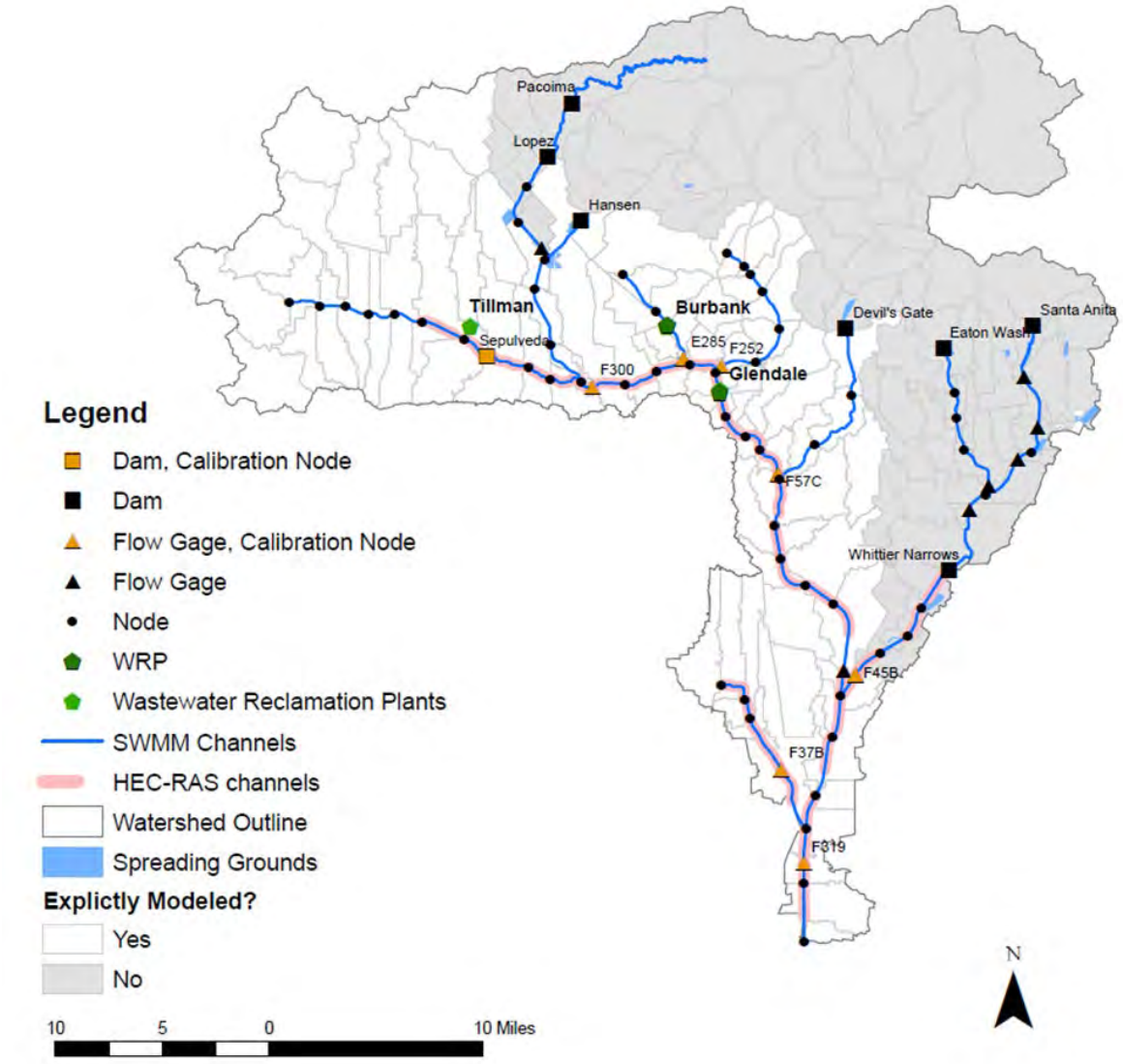


Figure 5. Hydraulic and hydrologic model domain. The hydraulic model was developed in HEC-RAS and paired with a hydrologic model created in EPA SWMM.

The one-dimensional hydraulic model was created by combining existing HEC-RAS models for the LA River and updating channel geometry and Manning's roughness[4] based on field observations and calibration. The hydraulic model was run under steady-state conditions, which were used to develop rating curves to apply to the simulated hydrographs, producing time series hydraulic data for velocity, maximum channel depth, and shear stress. Field observations showed that the rating curves created for the reporting node within Sepulveda Basin (LA20_2) were inaccurate as the basin acts as a storage instead of a conveyance feature. To account for the storage behind Sepulveda Dam, a static level of 1.34 m (4.39 feet) was added to the depth rating

[4] Manning's roughness represents the friction in the channel associated with substrate type, vegetation, etc. The 'roughness' affects hydraulic properties such as velocity.

curve for LA20_2 such that observed flows in July 2020 (about 0.85 cms [30 cfs]) matched the observed depths of about 1.5 m in the basin.

The final SWMM model included 77 catchments, and 78 channels. The final HEC-RAS model contained over 1,600 cross sections. Please see Stein et al. 2021 for results from the calibration and validation for both the hydrologic and hydraulic models. The coupled hydrologic-hydraulic model was used as a base for the temperature model, created in i-Tree Cool River (see Stein et al. 2021 for details) and the water quality model, created using EPA SWMM. All models were calibrated and validated using local data sources from a variety of ongoing monitoring programs.

Dry Weather Stormdrain Discharge

We modeled stormdrains that discharge directly to the LA River. Dry weather stormdrain flows were isolated for the whole modeled time period from the SWMM model using a water budget approach (Table 2). The total simulated flows (Q_{tot_sim}) were composed of storm runoff (Q_{storm_runoff}), urban baseflow ($Q_{baseflow}$), and dam discharge (Q_{dam}; Eq. 1) where urban baseflow is defined as the sum of discharge from WRPs (Q_{WRP}), groundwater upwelling that occurs in Glendale Narrows ($Q_{upwelling}$), industrial discharges ($Q_{industrial}$), and non-storm runoff ($Q_{non-storm\ runoff}$; Eq. 2). In the mass balance model, dam discharge may be positive or negative, as the dams in the system provide storage, which change the timing and peak of the river hydrograph. Storm runoff is surface runoff due to precipitation events whereas non-storm runoff is defined as flows resulting from other activities that create urban runoff such as irrigation and car-washing. *Dry weather stormdrain discharge* is defined as industrial discharges ($Q_{industrial}$) and non-storm runoff ($Q_{non-storm\ runoff}$) discharged through stormdrains to the river (Eq. 3).

$$Q_{tot\_sim} = Q_{storm\_runoff} + Q_{baseflow} - Q_{dam} \quad \text{(Eq. 1)}$$

$$Q_{baseflow} = Q_{WRP} + Q_{upwelling} + Q_{industrial} + Q_{non-storm\ runoff} \quad \text{(Eq. 2)}$$

$$Q_{dry\_weather\_stormdrain\_discharge} = Q_{industrial} + Q_{non-storm\ runoff} \quad \text{(Eq. 3)}$$

Table 2. Summary of Water Budget Components

Mass Balance Component	Method of Estimation
Storm runoff	Nonlinear reservoir routing (EPA SWMM)
Dam operations	Observed discharge data
Groundwater upwelling	Assumed constant at 3,000 acre-ft/yr (0.12 cms)
WRP discharges	Observed discharge data
Dry weather stormdrain discharge	Water budget approach

Tidal Model

The LA River below Willow St. is tidally influenced (Everest International Consultants, Inc. 2017) and supports wading shore birds. For the tidal area, a separate one-dimensional HEC-RAS model was created. The model was run in unsteady-state conditions, with the simulated hydrographs as an upstream boundary condition at Wardlow Rd (F319, 1.8 km upstream of

Willow St.) and tidal water surface elevation data as a downstream boundary condition, to directly output the timeseries of hydraulic data. Hourly water levels relative to mean sea level were extracted from NOAA (Gauge 9410660) for the tidal data (CO-OPS 2021). Two reporting nodes fall within the estuary portion of the river, LA2 and LA1. While both nodes demonstrate that water in the channel is affected by the tides, model outputs show that the upstream reporting node LA2 is primarily influenced by the inflows from the LA River while the downstream node LA1 is primarily influenced by the tides. Timeseries results from the tidal model were used as inputs to the scenario analysis as described below. Reductions in flows throughout the LA River (WRP, storm flow, or dry weather stormdrain discharge) resulted in greater tidal effects at both nodes.

Flow Ecology Modeling

Aquatic life beneficial uses in the LA River are defined based on the ability of the river and its tributaries to support characteristic aquatic plant and animal communities (Table 3). The overarching goal of this project is to provide tools to evaluate the potential effects of reduced WRP discharge and increased stormwater capture on existing beneficial uses. Through discussions with the TAC, that goal was expanded to also consider possible future beneficial uses. Therefore, our analysis included characterizing species and habitats that currently occur and those that could potentially occur in the future (based on a comparison to similar southern California watersheds). Current beneficial use designations for the mainstem of the LA River, Compton Creek, and Rio Hondo are set forth in the *Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*, and adopted by the Los Angeles Regional Water Quality Control Board (https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/). Our analysis focuses on the current beneficial uses but may also be used to consider support for species and habitats that are not currently supported in study area. The intent of considering potential future conditions is to extend the utility of the decision support tool described in this report to allow evaluation of proposed management actions that may influence flow conditions that could potentially support other beneficial uses in the future (e.g., Cold Freshwater Habitat [COLD], Migration of Aquatic Organisms [MIGR]). We recognize that there are many other factors that currently limit or preclude the ability to support these uses (e.g., local water supply needs, channelization, lack of vegetative cover, lack of suitable substrate, mechanical channel maintenance). Although this report provides examples of how changes to flow may influence current and potential future beneficial uses, we do not intend to propose management recommendations for beneficial uses not currently designated. More detailed modeling of micro-habitats and specific hydraulic conditions would be necessary to support restoration efforts for species not currently supported.

Table 3. Habitats and representative focal species. Shaded cells represent habitats and species not currently supported in the entire mainstem LA River, Compton Creek, or Rio Hondo.

Habitat	Focal Species	Description
Cold water habitat	Santa Ana Sucker (SAS)	Not currently present
	Unarmored threespine stickleback	
Migration habitat	Steelhead/Rainbow trout	Currently, MIGR[1] is only designated for LA River Reach 1. Overlays with other habitats
Wading shorebird habitat	Cladophora spp	Green algae to support prey of wading birds
Freshwater marsh habitat	Typha	
	Duckweed	
Riparian habitat	Black Willow	
Warm water habitat	African clawed frog	Surrogate for invasive spp. habitat
	Mosquitofish	

[1]MIGR: Migration of aquatic organisms

We determined the flow conditions likely necessary to support the life history needs of each focal species using readily available species and habitat data from a variety of sources including literature, surveys in the LA River and other similar watersheds and species/habitat databases. We then used these relationships to create ecological response curves or models relating key hydrologic, hydraulic, and temperature conditions to the probability of occurrence for each focal species life stage at each reporting node (Figure 3). The ecological response curves were then used to identify flow ranges likely to support each focal species for different life stages at different habitat locations in the river and time periods associated with certain life history phases such as breeding or growth (please see Stein et al. 2021 for full description of species habitat and ecological response curves). Critical life stages and habitat requirements were identified in coordination with the project TAC and used to develop a series of example flow recommendations for each reporting node in the study area (see below). Given the channelized nature and predominantly concrete substrate of the LA River, there are limited opportunities to modify flows in a way that reduces suitability for invasive species while still providing sufficient flows for native species. Therefore, we did not provide management targets aimed at reducing habitat for invasive warm water species.

Example flow management targets were determined based on the thresholds of probability of occurrence from each species ecological response curve, i.e., medium (50% of maximum probability of occurrence) and high (75% of maximum probability of occurrence[5]). Each ecological response curve was related to the flow at several cross-sectional positions at each node and by applying the rating curve describing the relationship between the hydraulic variable in the ecological response curve and flow in the stream (see example in Figure 6). The flow associated with the hydraulic value for each probability threshold was determined for each node, cross section position, species life stage and hydraulic variable to create a target flow range for that species. Hydraulic flow ranges for each species life stage were combined for each node and cross section position to develop example ranges of integrative flow management targets for each species life stage (i.e., growth and adult).

[5] Based on input from the TAC, we did not consider management targets aimed at achieving a low probability of occurrence (i.e., less than 50% probability of occurrence) for the focal species.

Most hydraulic flow ranges overlapped and therefore were intuitive to combine. However, on the occasions where flow ranges did not overlap, the range of the most limiting hydraulic factor was used. "Limiting hydraulic factor" is defined as the variable least supported by the current flow range. The depth and wetted width corresponding to specific flows in the LA River can be visualized using a beta R Shiny App (https://mohammap.shinyapps.io/LAVIS/). Figure 7 illustrates the dry season baseflow range for willow adult on the channel cross-sectional plot at GLEN adapted from the R Shiny App.

Caution must be used when interpreting and making decisions about appropriate flow ranges for some species and reaches given the limitations of applying a one-dimensional hydraulic model using existing channel morphology compared to a two-dimensional, spatially continuous model. In the concrete reaches, there are strengths in using a one-dimensional model of current morphology as there will be minimal changes to the morphology in the future, unless channel modifications or restoration actions are performed. However, there may be model limitations in the soft-bottom reaches, given that there will be changes to the morphology and those morphologic changes will be influenced by the flow regime and will in turn impact hydraulics. The potential effects of channel modifications on flow targets could be explored during a later phase of the study. In addition, the ecological model was built from a combination of data from the LA River and other watersheds and input from the TAC, which introduce some uncertainty in interpretation of the model results. Due to the large scale of our analysis, as well as multiple species and scenarios being evaluated, we used a nodal approach that considers the cross-sectional area at each node split into three sections (i.e., main channel and overbanks or depositional areas within the concrete banks of the river) to evaluate hydraulic conditions and associated flow ranges necessary to support the selected focal species. Using this approach may be more appropriate for the stationary focal species such as the Willow, Typha, or Cladophora which are more dependent on conditions at a given location. However, this still neglects factors such as availability of suitable substrate and presence of adequate subsurface moisture conditions.

The model may pose additional limitations for evaluation of reintroduction efforts of fish species. One-dimensional models can miss the complexity of microhabitats, such as edgewater areas and vernal pools, that species can use as refugia both longitudinally and laterally across the cross-section. For example, for potential future support of steelhead migration, we are using an average velocity across the main channel to evaluate if conditions are suitable for in-migration. Although the average velocity in the main channel may be unsuitably high for migration, velocity in the edgewater may be suitable. Additionally, flow requirements for steelhead must be considered in the context of channel hydraulics, seasonal hydrology, swimming performance, availability of cover and velocity refugia, and other factors.

Longitudinally, although flow and hydraulic conditions may be suitable at a given node, there may be locations along the reach where conditions are unsuitable, which may pose a barrier to re-establishing migration. In addition, the nodal approach does not account for conditions between nodes, e.g., velocity, that may affect suitability for some focal species. For example, under a future restoration scenario, certain velocities may limit the ability for steelhead to migrate from node to node due to exhaustion, particularly when microhabitats and refugia do not exist in uniform concrete reaches. Therefore, a "low probability" of occurrence does not necessarily preclude the ability of a species to persist in the actual, or potential future conditions

in the river, similarly a “high probability” of occurrence does not confirm that a fish would persist or successfully migrate upstream.

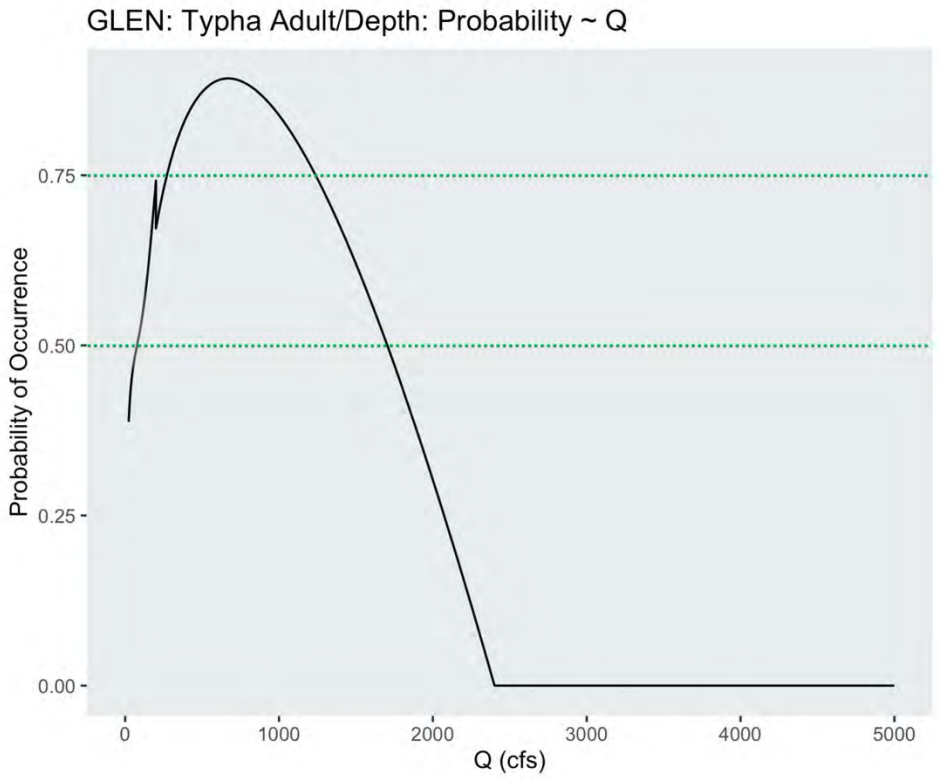


Figure 6. Typha adult patch probability of occurrence at node GLEN. Probability of occurrence related to flow at the node from the Typha adult patch ecological response curve though depth vs. flow rating curve. Dotted green lines show medium (0.5: 50% of maximum probability of occurrence - flow range 77-1704 cfs) and high (0.75: 75% of maximum probability of occurrence - flow range 271-1238 cfs) probability thresholds.



Figure 7. Dry-season flow range for willow adult at GLEN plotted on the channel cross section to visualize corresponding depth and wetted width of the upper and lower limits adapted from the beta R Shiny App (https://mohammap.shinyapps.io/LAVIS/).

Non-aquatic Life Uses

Example flow management targets to support non-aquatic life uses were not based on empirical observations, but instead were based on input obtained through a series of workshops and targeted interviews. Recreational use experts[6] were asked to identify key uses associated with different reaches of the river and the associated flows, depths or velocities needed to support those uses (see Stein and Sanchez 2019 for details). Key uses that could be affected by changes in flow included fishing, kayaking, wading, and other educational and community events. Recreational experts provided their best professional judgement on flow needs associated with recreational uses relative to those proposed for supporting aquatic life. Based on this input, the flow ranges associated with at least 0.9–1.5 ft (0.27-0.5 m) depth of water at the deepest part of the channel were used for kayaking and 1–2 ft (0.3-0.6 m) for fishing were incorporated into the tools used to develop example flow management targets. Recreational experts also noted that deeper pools (depth range of 3–8 ft or 0.9-2.4 m) were important for fishing. However, the cross sections at representative nodes may not capture these pools. Nodes that may support priority recreational uses are in Sepulveda Basin (LA20_2), at or near Glendale Narrows and Elysian Park (LA14, GLEN, LA11, F57C), and the Long Beach Estuary (LA1 and LA2).

[6] Recreational use experts consisted of local community docents, non-governmental organization representatives, local land conservancy representatives, and concessionaires who conduct recreational tours along the river.

Scenario Analysis

Wastewater discharge, stormwater management, and dry weather stormdrain discharge scenarios were simulated using the developed models. Wastewater discharge scenarios were simulated using a "sensitivity curve" approach. Instead of identifying a finite set of scenarios, sensitivity curves allow for consideration of a broad range of management options based on the amount of discharge to the river. Stormwater management and dry weather stormdrain scenarios were simulated as discrete scenarios due to model complexity and simulation time.

Wastewater Discharge

Potential wastewater discharge scenarios were selected using a Monte Carlo approach. Discharge timeseries from the WRPs from WY 2011 to 2017 were randomly scaled by 0 to 100% for 500 scenarios, representing multiple combinations of potential WRP discharge reductions from each plant. Two types of sensitivity curves were developed: flow-based and species-based. Seasonal average annual WRP discharge was calculated for both the wet- and dry-season for each scenario. Only the WRP's that contribute flow to each node were used for the seasonal WRP calculation. For example, at LA14, a node upstream of the Glendale WRP, the average annual discharge was calculated from Burbank and Tillman only. Annual functional flow metrics were calculated across the simulation period, WY 2011 to 2017, for each of the 500 WRP scenarios.

Flow-based sensitivity curves were developed that relate changes in WRP discharge to in-stream flow conditions (i.e., functional flow metrics). For each scenario, the range of flow metric values from the 10th, 50th, and 90th percentiles were plotted against the average seasonal WRP discharge to account for the variability in flow metric values from each scenario across the period of record. Curves were developed for the dry-season baseflow (50th percentile of flow during the dry-season) and wet-season baseflow (10th percentile of flow during the wet-season) magnitude metrics, as they were the most sensitive to changes in WRP discharge. The wet-season metrics, baseflows from the start of the storm season to the start of the dry-season, and dry-season metrics, baseflows from the start of the dry-season to the start of the following wet-season, are calculated on an annual basis. Typically, the start of the wet-season is between November to January and the start of the dry-season is between May to July depending on the climatic conditions for a given water year. Curves were not developed for the upstream node in Rio Hondo (11101250) and Compton Creek (F37B and F37B), locations not impacted by potential changes in WRP discharge. Sensitivity curves were also not developed for LA1 and LA2 (tidal reach) because the tidal model yielded negative flow values indicating flow moving in the upstream direction due to the influence of tides. Therefore, functional flow metrics could not be calculated for the tidally influenced reach.

Species-based sensitivity curves were also developed that relate changes in WRP discharge directly to probability of species occurrence. For each scenario and relevant reporting node where the species are likely to be supported, the average probability of occurrence during the life stage critical period were plotted against average seasonal WRP. The average probabilities for species habitat models were calculated directly from the predictive models (e.g., Willow seedling, Typha Adult). For species habitat models that were based on thresholds, the average probabilities were calculated on the likelihood of the flow timeseries providing suitable flow based on the threshold values (e.g., Willow adult, Steelhead migration). For Santa Ana sucker,

the maximum probability of occurrence was 0.4, therefore, the curves were rescaled to a 0-1 range to promote comparison between species.

Stormwater and Dry Weather Stormdrain Discharge

In addition to the WRP sensitivity curves, discrete scenarios were run to assess the impacts of reducing dry weather stormdrain discharge and capturing storm flows with distributed stormwater treatment (also known as best management practices (BMPs)). Unlike the WRP scenarios where we modeled 500 scenarios to develop the sensitivity curves, for the stormdrain analysis, we developed three discreet scenarios representing a range of BMP implementation and created a sensitivity curve using only those. In this study, dry weather stormdrain discharge is defined as any flows running off the land surface and into the LA River that are not a result of a precipitation event (i.e., irrigation, car wash return-flows, or shallow groundwater dewatering operations) as well as industrial discharges. Storm flows are defined as urban runoff due to precipitation events.

The EPA's System for Urban Stormwater Treatment and Analysis IntegratioN (SUSTAIN) (Shoemaker et al. 2009) was used to simulate dry weather stormdrain discharge reduction and storm flow capture. SUSTAIN was chosen as it simulates BMPs on an aggregate level which is appropriate for a watershed-scale analysis, it can be modified to simulate underground BMPs such as infiltration galleries, and it uses timeseries from hydrologic models, such as SWMM, to drive the BMP simulation module. First, hydrologic timeseries from the calibrated and validated SWMM model were isolated as three timeseries, storm flows, dry weather stormdrain discharge flows, and all other flows (Figure 8). Refer to the *Dry Weather Stormdrain Discharge* section above for details on the water balance approach used to isolate flows. *All other flows* include model inputs and outputs such as WRP flows, groundwater upwelling, evapotranspiration, and dams. The three timeseries for each node were set as inputs to the SUSTAIN model. Scenarios were run with 0%, 50%, and 100% of historic WRP flows combined with 0%, 50%, and 100% of dry weather stormdrain discharge flows, plus five stormwater management scenarios, for a total of forty-five discrete scenarios (3 x 3 x 5 = 45; Figure 8).

Stormwater planning documents for the LA River basin were reviewed, including the City of Los Angeles Stormwater Capture Master Plan (SCMP) (LADWP 2015), and the watershed management program plans for the Upper and Lower LAR, LAR Upper Reach 2, and Rio Hondo/San Gabriel River (Tetra Tech 2018; CWE 2015; Hunters 2017; Ch2m, Paradigm Environmental, and Black & Veatch 2016). The documents reviewed discuss a range of distributed and regional stormwater capture practices for each jurisdiction as well as projected ranges of BMP implementation; some estimates include total structural capacity, catchment prioritization indexes (based on land use), and pollutant source control. All the plans consider infiltration and non-infiltration based structural BMPs such as infiltration basins, bioretention systems, and vegetated swales. Modeling efforts in this project were consolidated to one methodology by adapting strategies from the five stormwater planning documents listed above.

First, a representative group (six BMPs identified in the SCMP) that were consistent across all five stormwater planning documents were chosen for modeling. Two BMP types were chosen for this analysis, infiltrating and non-infiltrating, to assess the impacts of stormwater management on flows and water depth in the LA River. Infiltrating BMPs simulated in SUSTAIN include porous pavement, bioretention, and underground infiltration structures while non/low-infiltrating BMPs

include detention pond, vegetated swales, and underground detention structures. SUSTAIN simulates BMPs as an aggregate, meaning storm flow runoff from an entire subwatershed is routed to a set number of BMP units that are simulated in parallel. Thus, the area of land to be routed to BMPs is required.

The SCMP was used as a guide to estimate the total potential area of land that may be treated with BMPs. The SCMP outlines conservative and aggressive approaches[7] that provide a feasible range of BMP implementation rates (by the year 2095) that could be uniformly applied to the whole watershed. The conservative and aggressive rates were estimated by considering the social, financial, and political barriers or opportunities that could impede or accelerate stormwater capture (LADWP 2015). These rates were used to determine the area of land in each subwatershed routed to BMPs in the SUSTAIN model (see Appendix B for more details on how land use types, geophysical categorization, and percent imperviousness were used with the implementation rates to estimate the area of land routed to BMPs). The goal of this analysis is to provide a window that specific jurisdiction implementation plans fall within. This analysis assumes all jurisdictions and subregions will implement their respective stormwater capture plans. It should be noted that meeting target capture volumes and complying with water quality regulations (such as total maximum daily loads) on a watershed level relies on the successful implementation within each jurisdiction or subregion. While the conservative implementation rate considers barriers to implementing stormwater infrastructure, collaboration across jurisdictional lines may be needed to meet county wide goals and regulations.

The resulting percent area of land from the entire LA River watershed routed to BMPs was 9.85% and 16.42% for the conservative and aggressive scenarios, respectively. This compares similarly to the values reported in the SCMP, 7.58% and 14.14% for the conservative and aggressive scenarios, respectively (LADWP 2015). Note that the SCMP only calculated these values within the City of Los Angeles Boundary while the values for SUSTAIN were calculated for the entire LA River watershed. However, estimated implementation rates for SUSTAIN are also similar to other stormwater planning documents. For example, the Lower LA River plan (Hunters 2017) predicted 803 acre-ft of runoff to be captured by BMPs, or around 34% of the entire area. The methodology used in this study estimated between 19% to 36% for the conservative and aggressive scenarios, respectively, from the lower LA River subwatersheds (F319).

Average annual flow volumes were used to compare the relative performance of all 45 management scenarios.

[7] Conservative and aggressive approaches are defined in the SCMP based on funding availability and sociopolitical support. The conservative approach plans for up to 50% stormdrain capture; the aggressive approach plans for up to 95% stormdrain capture.

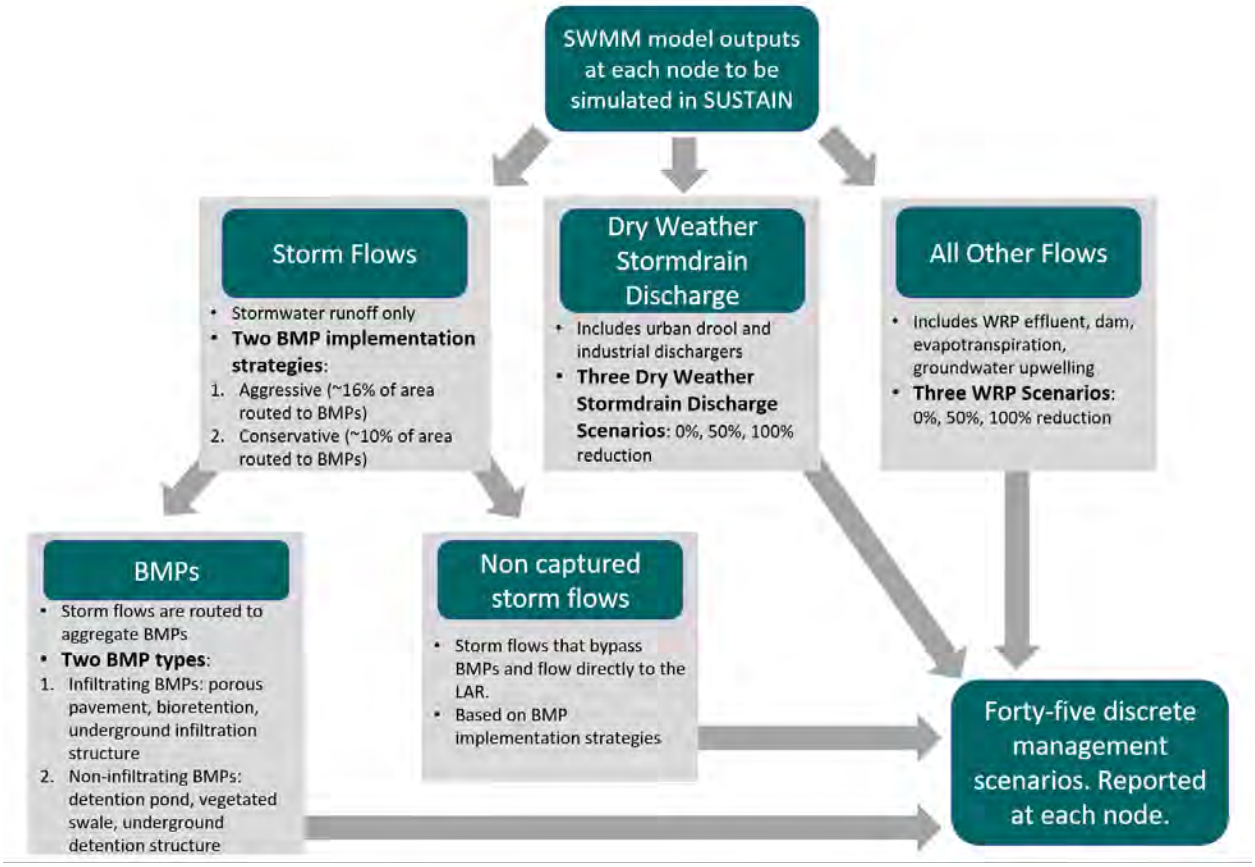


Figure 8. Conceptual model showing the forty-five management scenarios that were simulated in SUSTAIN. Scenarios included storm flow capture via infiltrating and non-infiltrating storm control measures (BMPs), dry weather stormdrain diversions, and combined effects with WRP discharge scenarios.

PROCESS FOR ESTABLISHING FLOW MANAGEMENT TARGETS

Flow ranges associated with designated existing and potential, and possible future beneficial uses were determined based on our current understanding of the needs of the associated focal species (and life stages) and recreational uses for each relevant reporting node (an example of flow recommendations for GLEN is shown in Table 4). Relationships between focal species and beneficial uses were developed in consultation with the TAC (Table 5). Although COLD is not currently a designated beneficial use in the mainstem of the LA River, Compton Creek, and Rio Hondo, one goal of this study is to extend the utility of the tools to evaluate flow conditions that have the potential to support non-designated beneficial uses, such as COLD, in the future. In many cases, additional management or restoration actions may be necessary to fully support focal species (e.g., substrate modifications, creation of refugia and resting habitat). Furthermore, current augmented non-storm flows and elevated temperatures provide conditions conducive for invasive species which may outcompete or predate native species. Management actions to reduce invasive species would be a necessary as part of any strategy aimed at restoring habitat for native cold-water species.

The flow ranges table is organized by individual species and is separated into two life stages: growth and adult. Growth is defined as any life stage describing early life history before reaching adult maturity (e.g., seedling, juvenile, smolt). The flow ranges are organized by node, within its associated reach. The current suitability is defined as described in Stein et al. (2021). Critical cross section is defined as the most suitable area of cross section for that species e.g., riparian willow would be suited to overbanks, fish species suited to active main channel. In cross sections where the active main channel is not mid-channel due to a sand bar e.g., GLEN, the sand bar is designated as an overbank and the deepest part of the channel designated as the active main channel.

Table 4. Example flow ranges by focal species' life stage or recreational uses for reporting node GLEN. Color coding: green; flow conditions currently supported, red; flow conditions not currently supported: grey; flow ranges not applicable, white: flow ranges not available. The current flow range represents the 10th and 90th percentile of flow observed during the dry season across the baseline period.

Species (habitat)	Life Stage	Reporting Node	Reporting Reach	Current suitability	Critical Cross section position	Dry-Season Baseflow			
						Current flow range (cfs)	Optimal Flow Range (cfs, Medium Probability – 50%)	Optimal Flow Range (cfs, High Probability – 75%)	Duration
Willow (riparian birds)	Growth	GLEN	LAR 5	Partial	Overbank	72-89	> 23	> 23	April-September
Typha (Freshwater marsh)	Growth	GLEN	LAR 5	Partial	Overbank	72-89	> 23		April - September
Typha (Freshwater marsh)	Adult	GLEN	LAR 5	Partial	Overbank	72-89	> 77	> 270	Annual
Willow (riparian birds)	Adult	GLEN	LAR 5	High	Overbank	72-89	>23		Annual
SAS (Coldwater fish)	Growth	GLEN	LAR 5	Partial	Main Channel	72-89	> 34	> 149	March-July
SAS (Coldwater fish)	Adult	GLEN	LAR 5	Partial	Main Channel	72-89	> 34	> 149	Annual
Steelhead (Migration)	Adult (Prolonged)	GLEN	LAR 5	High	Main Channel	72-89	> 23		April - June
Steelhead (Migration)	Adult (Burst)	GLEN	LAR 5	High	Main Channel	72-89	> 23		April - June
Steelhead (Out-Migration)	Smolts	GLEN	LAR 5	High	Main Channel	72-89	> 23		April - June
Kayaking		GLEN	LAR 5		Main Channel	72-89	65-253		May - September
Fishing		GLEN	LAR 5		Main Channel	72-89	96-447		May - September

Flow ranges associated with species/habitat occurrence are separated by season and associated flow metric (i.e., dry-season baseflow, wet-season baseflow, and wet-season peak flows) to account for seasonal differences in flow condition. The following adjustments were made to the flow ranges:

- When channel hydraulics resulted in the modeled upper baseflow tolerances being substantially above current baseflow ranges in the main channel, we relied on the lower flow limit and include a separate upper (peak flow) limit above which high flow conditions are expected to result in a low probability of occurrence.

- For some species (i.e., Willow Adult, Steelhead burst swimming and Cladophora Adult) the upper hydraulic limit corresponded to flows that overtop the concrete banks. In these instances, wet-season peak flow limits were not reported.

- Adult willows require flows to inundate the overbank area seasonally, but these areas should not remain inundated for prolonged periods that may result in mortality or impaired growth. In these cases, we identify a lower limit necessary to maintain flow in the river, and an upper limit that would completely inundate the overbank area (and thereby potentially results in unsuitable conditions)

The current flow range of each flow metric represents the range in flow metric values from the 10th percentile to the 90th percentile calculated from mean daily flow across the baseline condition (WY 2011-2017). For both dry-season and wet-season baseflow, the low magnitude values are presented in Table 4. The flow ranges for each flow metric are given for both medium and high probability thresholds, except in cases where threshold values (vs. probabilities) were used in the species habitat model (e.g., willow adult, steelhead migration and recreational uses); in these cases, only one flow value (the threshold) is presented. Flow duration is the critical time period for each species and the start date of that period denotes the timing during which flow conditions should be met to meet the beneficial use needs. Flow ranges are color coded to show whether the current flow ranges support the recommendations: green; flow ranges currently supported, red; flow ranges not currently supported: gray; flow recommendations not applicable, white; flow recommendations not available. Note that although current flow ranges may be outside of the flow range associated with a medium or high probability of species/habitat occurrence, this does not guarantee that focal species or recreational uses cannot be supported. For example, although the current dry season baseflow magnitude in the main channel of GLEN is lower than the flow range associated with fishing, fishing could be supported in pools that may be upstream or downstream of the reporting node.

The draft flow ranges table organized by species for all relevant nodes can be viewed at: https://sccwrp.sharepoint.com/:x:/s/LARiverEflowsStudy/EVoSEKZ6EBdKh2sqcsahoZsBmA_jj1hmdh4WWxyddvgd3w?e=cALJ4U. Additionally, the draft flow range table for species life stages, recreational uses, and current flows and beneficial uses by location can be viewed at: https://sccwrp.sharepoint.com/:x:/s/LARiverEflowsStudy/EXe7HmwHbgpFn5qhgFjAb7gBGQoCvaaB1ZYoyMg72B_18Q?e=Jsctsl.

Table 5. Focal species associated with beneficial uses. Highlighted species do not currently occur in the mainstem of the LAR. Cold freshwater habitat (COLD) is currently not a designated beneficial use for any LA River reach covered by this study. Beneficial use definitions and water body designations can be found in the LA Regional Water Quality Control Board Basin Plan (*https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.html*).

Focal Species	Beneficial Uses						
	WARM[1]	EST[2]	WILD[3]	RARE[4]	MIGR[5]	SPWN[6]	COLD[7]
Santa Ana Sucker				x		x	x
Unarmored threespine stickleback				x		x	x
Steelhead/Rainbow trout		x		x	x		x
Cladophora spp		x	x				
Typha			x				
Duckweed			x				
Black Willow			x	x			
African clawed frog	x						
Mosquitofish	x						

[1]WARM: Warm freshwater habitat
[2]EST: Estuarine habitat
[3]WILD: Wildlife habitat
[4]RARE: Rare, threatened, or endangered species
[5]MIGR: Migration of aquatic organisms
[6]SPWN: Spawning, reproduction, and/or early development
[7]COLD: Cold freshwater habitat

Given the extensive set of flow ranges for multiple species and locations, a process was developed to synthesize flow ranges into overall flow management targets based on a series of decisions (Figure 9). Additionally, a user-friendly application is being developed that interactively identifies potential flow management targets based on the decision process. The process includes determining which location and seasons are of interest and depending on the location, either designated or non-designated beneficial uses and the related focal species from Table 5 can be evaluated. Next, flow ranges for the focal species life stages can be obtained based on the probability of species occurrence (i.e., high [75%] or medium [50%]) or defined thresholds. Based on the decisions made, overall flow management targets can be developed by using a ruleset to synthesize flow ranges across multiple species life stages. The ruleset includes the following steps:

1. Find the overlap across all species life stages.
2. If no overlap across all species life stages, find the flow range that satisfies the most species life stages.
3. Or decision can be based on agreed upon management priorities.

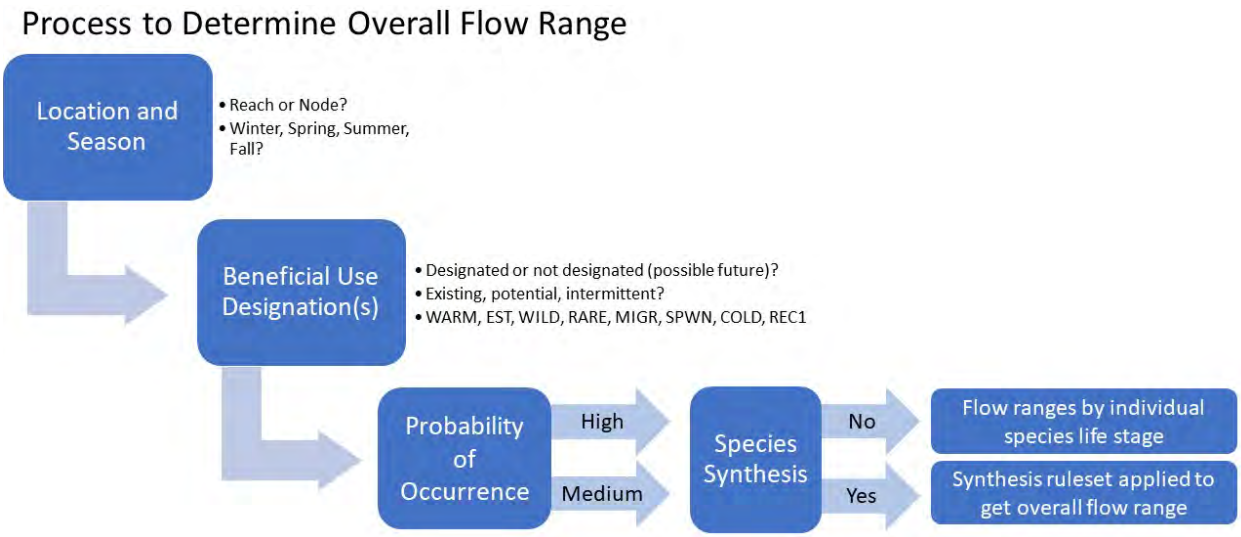


Figure 9. Proposed process for synthesizing and interpreting flow ranges to develop overall flow management targets. Medium probability is defined as 50% of the maximum probability of occurrence; high probability is defined as 75% of the maximum probability of occurrence. Low probability was determined to not be a desirable management goal.

Flow management targets can be developed for individual life stages, individual species, or across multiple species at a node. For example, in Glendale Narrows (reporting node GLEN), flow management targets for the designated beneficial use WILD can be developed for individual species, Willow and Typha, by finding the overlap between the flow ranges for adult and growth life stages (Figure 10a). If overall flow management targets across multiple species are desired, the flow range that satisfies the most species life stages can be utilized (Figure 10b).

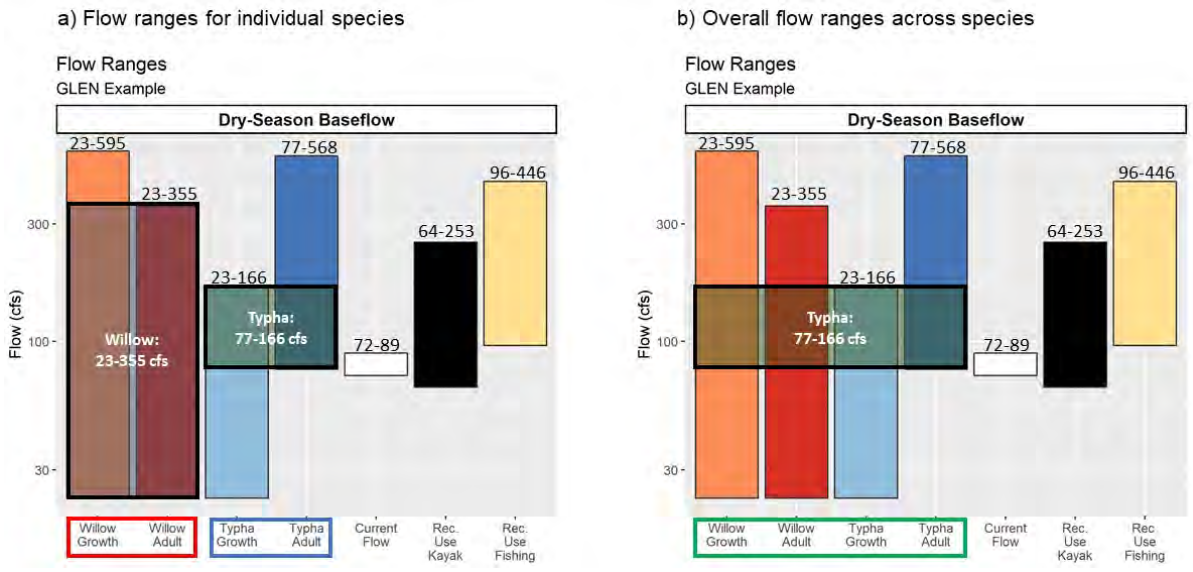


Figure 10. Illustration of synthesizing flow ranges for: (a) individual species, Willow and Typha, and (b) overall flow ranges across multiple species. This example is using flow ranges for medium probability of occurrence.

The overall flow range being considered as a potential management target can be plotted on an annual hydrograph to evaluate when instream flows are outside of this range. For example, the wet-season peak flow limit and baseflow lower limit for Willow and Typha at GLEN were plotted on the annual hydrograph for WY 2015 (Figure 11). In WY 2015, the dry season baseflow is near the lower limit for Willow and Typha. In contrast, wet season baseflow following large storm events were typically higher than the lower limit. Therefore, there may be additional opportunities for WRP reuse to occur during and after large storm events. This is particularly relevant because suggested flow ranges are averaged over time relative to species/habitat needs. Because WRP discharge typically varies diurnally (and day-to-day), there could be opportunities for discharges to vary between day and night and maintain overall flow levels supportive of beneficial uses.

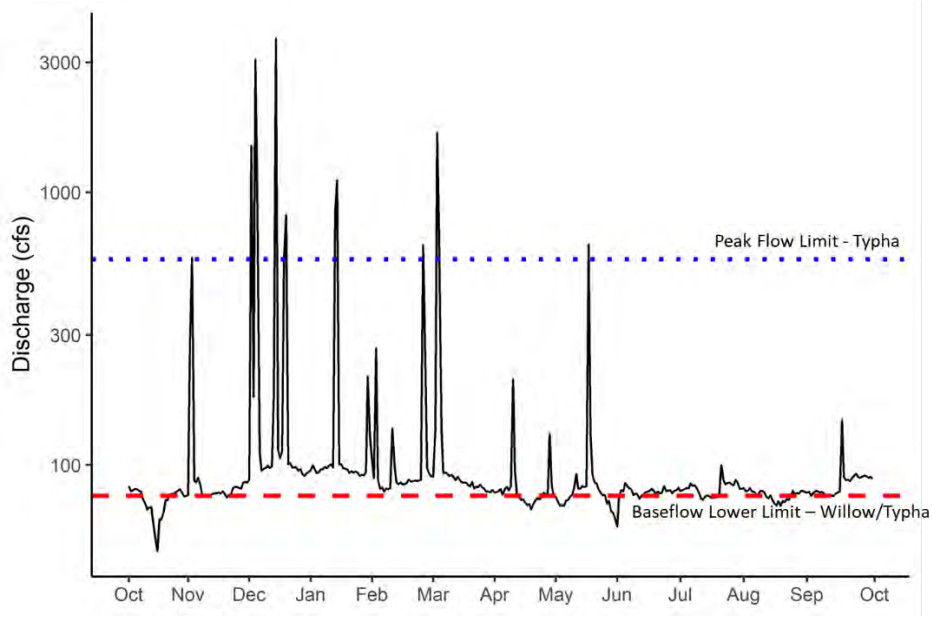


Figure 11. Modelled annual hydrograph from Glendale Narrows (GLEN) for water year 2015 with the wet-season peak flow limit for Typha (blue dotted line) and baseflow lower limit for Willow and Typha (dashed red line). Note that the y-axis is in log scale.

Depending on the decisions made, an output summary table can be downloaded from the user-interface (Table 6). The table includes the current and optimal flow ranges and additional details on timing and duration.

Table 6. Example summary output table based on decision process

Example In-River Flow Management Targets
Location: GLEN
Beneficial Use: Existing, WILD
Synthesis: Multiple Species (Willow, Typha)
Probability: Medium (50%)

Dry-Season Baseflow			Wet-Season Baseflow			Wet-Season Peak Flow	
Current flow range (cfs)	Optimal flow range (cfs)	Duration	Current flow range (cfs)	Optimal flow range (cfs)	Duration	Current Annual Peak Q range[1] (cfs)	Optimal flow range (cfs)
72-89	77-166	April - September	82-130	77-355	October - March	8,188-32,608	< 568

[1] Current annual peak Q range represents the 10th and 90th percentile of annual peak discharge calculated from the hourly flow timeseries period of record (WY 2011-2017)

Relationship to the California Environmental Flows Framework

The California Environmental Flows Framework (CEFF) is a unified approach that provides management guidance to develop ecological flow criteria and environmental flow recommendations statewide[8]. This framework uses a functional flows approach that focuses on key aspects of the natural flow regime that sustain ecological, geomorphic, or biogeochemical functions and that support the specific life history needs of native aquatic and riparian-dependent species (Yarnell et al. 2015). Ecological flow criteria, or natural ranges of key functional flow metrics that must be maintained instream to support natural functions of healthy ecosystems, can be quantified and serve as a management goal to preserve stream health. However, in highly modified systems such as the LA River, mediating factors, including the physical form and structure of the stream channel, impairments to water quality, and biological interactions among species, may alter the relationship between flow and ecology, limiting the ability of natural flows to support desired ecosystem functions. Because the LA River is a highly engineered channel with water quality impairments, reference functional flows would likely not support the existing species and recreational uses of the river. For example, historically, sections of the LA River were naturally intermittent and supported species adapted to thrive under seasonal flow conditions. Such conditions rely on natural floodplain morphology and substrate (in addition to natural flows) to provide the broad suite of ecological functions. Restoring such natural conditions is not realistic in the short term given the highly urbanized setting. Consequently, for this study, we do not identify natural functional flow ranges (CEFF Section A), instead, we consider the current engineered channel morphology to identify ranges of functional flow metrics needed to support the life history needs of a suite of focal species representative of various habitat types and beneficial uses (CEFF Section B). However, achieving flow ranges necessary

[8] The terms ecological flow criteria and environmental flow recommendations as used here are defined in the CEFF (https://ceff.ucdavis.edu/).

to support focal species alone does not ensure persistence of those species. Habitat restoration would need to be coupled with flow management to provide resilient conditions for native species and habitats.

Although we are using a species-based approach to identify functional flow ranges, we have cross-walked our focal species analysis with key functions identified in CEFF (Table 7). Some functions are not expected to be supported in the LA River given the engineered nature of the channel and therefore we do not capture that representation in the analysis. Furthermore, certain functional flow components are not always well represented in flashy systems in semi-arid portions of the state, such as the LA River. Pronounced spring recession flows are often absent in the LA River due to the lack of snowmelt runoff, lack of strong groundwater influence, and channelized nature of the river which hastens "draining" of the system following storms. Although they are an important part of the hydrograph for steelhead migration, current functions of the LA River are not heavily dependent on spring recession flows. Similarly, fall pulse flows can be important for initial flushing of fine sediments and "priming" of the system for subsequent winter storms. However, in the LA River, such flows seldom support current functions because of the lack of natural substrate, stochastic nature of early season storms, and the fact the first storms of the season are often captured for water quality purposes.

Table 7. Relationship between focal species flow ranges and the supported ecosystem functions by functional flow component. Red ◯'s indicate that flow ranges for focal species were not developed for the given flow component and ecosystem functions may not be fully supported.

Functional Flow Component	Type of Ecosystem Function	Supported Ecosystem Function	Associated Flow Characteristic	Willow	Typha	Cladophora	Steelhead Migration	Santa Ana Sucker
Fall Pulse Flow	Physical	Flush fine sediment and organic material from substrate	magnitude					
		Increase longitudinal connectivity	magnitude, duration				◯	
		Increase riparian soil moisture	magnitude, duration	◯				
	Biogeochemical	Flush organic material downstream and increase nutrient cycling	magnitude, duration	◯				
		Modify salinity conditions in estuaries	magnitude, duration			◯		
		Reactivate exchanges/connectivity with hyporheic zone	magnitude, duration					◯
		Decrease water temperature and increase dissolved oxygen	magnitude, duration					
	Biological	Support fish migration to spawning areas	magnitude, timing, rate of change				◯	
Wet-season Baseflow	Physical	Increase longitudinal connectivity	magnitude, duration				**X**	
		Increase shallow groundwater (riparian)	magnitude, duration	**X**				
	Biogeochemical	Support hyporheic exchange	magnitude, duration					
	Biological	Support migration, spawning, and residency of aquatic organisms	magnitude				**X**	**X**
		Support channel margin riparian habitat	magnitude	**X**				**X**
Wet-season Peak Flows	Physical	Scour and deposit sediments and large wood in channel and floodplains and overbank areas. Encompasses maintenance and rejuvenation of physical habitat.	magnitude, duration, frequency	**X**				
		Increase lateral connectivity	magnitude, duration					
		Recharge groundwater (floodplains)	magnitude, duration	**X**				
	Biogeochemical	Increase nutrient cycling on floodplains	magnitude, duration	**X**				

		Increase exchange of nutrients between floodplains and channel	magnitude, duration	X				
	Biological	Support fish spawning and rearing in floodplains and overbank areas and/or adult migration	magnitude, duration, timing				○	X
		Support plant biodiversity via disturbance, riparian succession, and extended inundation in floodplains and overbank areas	magnitude, duration, frequency	X	X			
		Limit vegetation encroachment and non-native aquatic species via disturbance	magnitude, frequency	X				
Spring Recession Flow	Physical	Sorting of sediments via increased sediment transport and size selective deposition	magnitude, rate of change				○	
		Recharge groundwater (floodplains)	magnitude, duration	X				○
		Increase lateral and longitudinal connectivity	magnitude, duration				○	
	Biogeochemical	Decrease water temperatures and increase turbidity	duration, rate of change			○		○
		Increase export of nutrients and primary producers from floodplain to channel	magnitude, duration, rate of change					
	Biological	Provide hydrologic cues for fish outmigration and amphibian spawning; support juvenile fish rearing	magnitude, timing, rate of change				○	
		Increase hydraulic habitat diversity and habitat availability resulting in increased algal productivity, macroinvertebrate diversity, arthropod diversity, fish diversity, and general biodiversity	magnitude, timing, rate of change, duration			○		○
		Provide hydrologic conditions for riparian species recruitment (e.g., cottonwood)	magnitude, timing, rate of change, duration	X				
		Limit riparian vegetation encroachment into channel	magnitude, rate of change					
	Physical	Maintain riparian soil moisture	magnitude, duration	X				

Dry-season Baseflow		Limit longitudinal connectivity in ephemeral streams; limit lateral connectivity to disconnect floodplains	magnitude, duration, timing					
		Maintain longitudinal connectivity in perennial streams	magnitude				○	
	Biogeochemical	Maintain water temperature and dissolved oxygen	magnitude, duration			**X**		**X**
	Biological	Maintain habitat availability for native aquatic species (broadly)	magnitude, timing, duration		**X**	**X**	○	**X**
		Condense aquatic habitat to limit non-native species and support native predators	magnitude, duration					**X**
		Support algal growth and primary producers	magnitude			**X**		**X**

SCENARIO RESULTS

Wastewater Discharge

A total of 66 flow-based sensitivity curves were developed for 13 reporting nodes, two seasonal functional flow components (wet-season baseflow and dry-season baseflow), and for multiple management scenarios (WRP discharge and dry weather stormdrain discharge scenarios). Sensitivity curves were only developed for the wet- and dry-season baseflow components because they were the most sensitive flow components to changes in WRP discharge and dry weather stormdrain reductions—other flow components, such as spring recession and peak flows, were insensitive to the change scenarios. Two types of sensitivity curves were developed: flow-based curves that predict changes in instream flow conditions (functional flow metrics) associated with varying amounts of discharge or "capture" and species-based curves that predict changes in probability of species occurrence. All links to access flow-based and species-based sensitivity curves developed can be found in Appendix A.

A process was developed to use the flow ranges associated with medium and high probability of species occurrence along with the sensitivity curves to evaluate how much and under which scenarios flows can be reduced and still meet the optimal flow ranges (Figure 12). This process will also be incorporated into the online tool being created, which will allow users to interactively view and evaluate sensitivity curves for different scenarios. There are two starting perspectives when determining which type of sensitivity curve to use: (1) protecting the species or beneficial use at the location using the optimal flow range and (2) evaluating how much WRP discharge can be reduced before seeing an effect. For (1), use the flow-based sensitivity curves to evaluate the scenarios that meet the optimal flow range. For (2), use the species-based sensitivity curves to evaluate the effect on the species probability of occurrence.

Caution must be taken when using the curves to evaluate future scenarios given the previously discussed model uncertainties. Although a reduction in WRP discharge may lead to predicted instream flows that satisfy the optimal flow range, it does not guarantee that associated beneficial uses will be supported. Likewise, the probability of species occurrence does not guarantee that the species can be supported. There may be other limiting factors such as substrate, temperature, water quality, or mechanical channel maintenance activities that can impact the potential for species support.

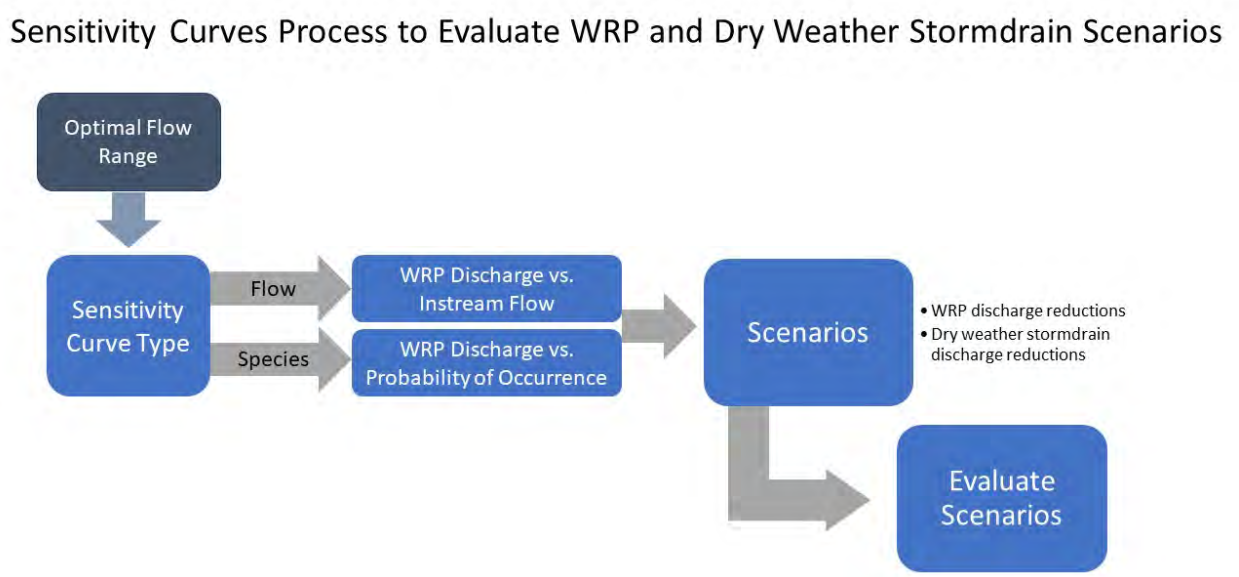


Figure 12. Proposed process to use optimal flow range of specific management targets with sensitivity curves to evaluate WRP and dry weather stormdrain scenarios.

An example application of sensitivity curves at GLEN shows the optimal flow range for Willow and Typha plotted with the flow-based sensitivity curve (Figure 13). The overlap between the optimal flow range and the sensitivity curve indicates scenarios where the optimal flow range is likely achieved. In this example, the median dry season baseflow magnitude reduced by 81%, from 79 cfs under baseline conditions to 15 cfs under 100% reduction in WRP discharge. Under baseline conditions with no change in WRP discharge, some water years had flow within the optimal range and some water years had flow lower than the optimal flow range. At GLEN, there may be more flexibility in terms of reductions in WRP discharge if managing for flows supportive of Willows only. In contrast, if managing flows for both Willow and Typha, there may be limited opportunities for reductions in WRP discharge during the dry season.

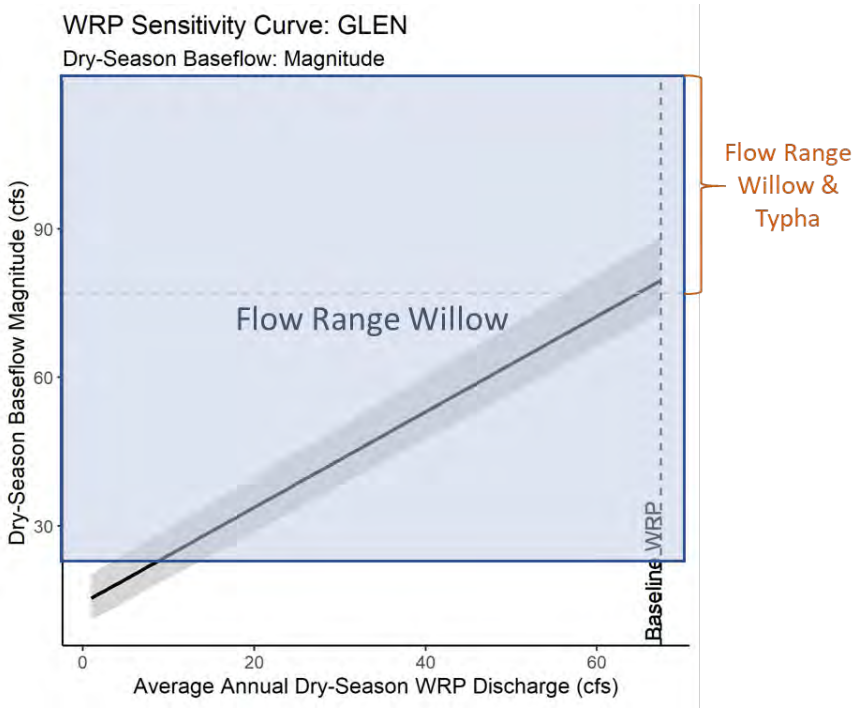


Figure 13. WRP sensitivity curve for dry season baseflow magnitude and optimal flow range for Willow (blue box) based on a 50% (medium) probability of occurrence at GLEN reporting node. Solid line represents median values; bounds of the gray band are the 10th and 90th percentile dry season flows across the modeled period. Optimal flow range for supporting both Willow and Typha is from 77 to 166 cfs.

The combined effects of changes in WRP discharge and dry weather stormdrain discharge can also be evaluated using the dry weather stormdrain sensitivity curves (Figure 14). Under baseline WRP discharge and 50% and 100% reduction in dry weather flows at GLEN, dry season baseflow magnitude only reduces by ~6 cfs and 13 cfs, respectively. However, the combined effects of 100% removal of both WRP discharge and dry weather stormdrain discharge results in an elimination of nearly all instream flows. In contrast, for the downstream most gage on the mainstem, Wardlow (F319), the relative impact of dry weather stormdrain discharge reduction was larger than the reductions at GLEN. Under baseline conditions at Wardlow, dry season baseflow magnitude reduces from 124 cfs to 62 cfs with 100% reduction in dry weather discharge and no changes to WRP discharge (Figure 15).

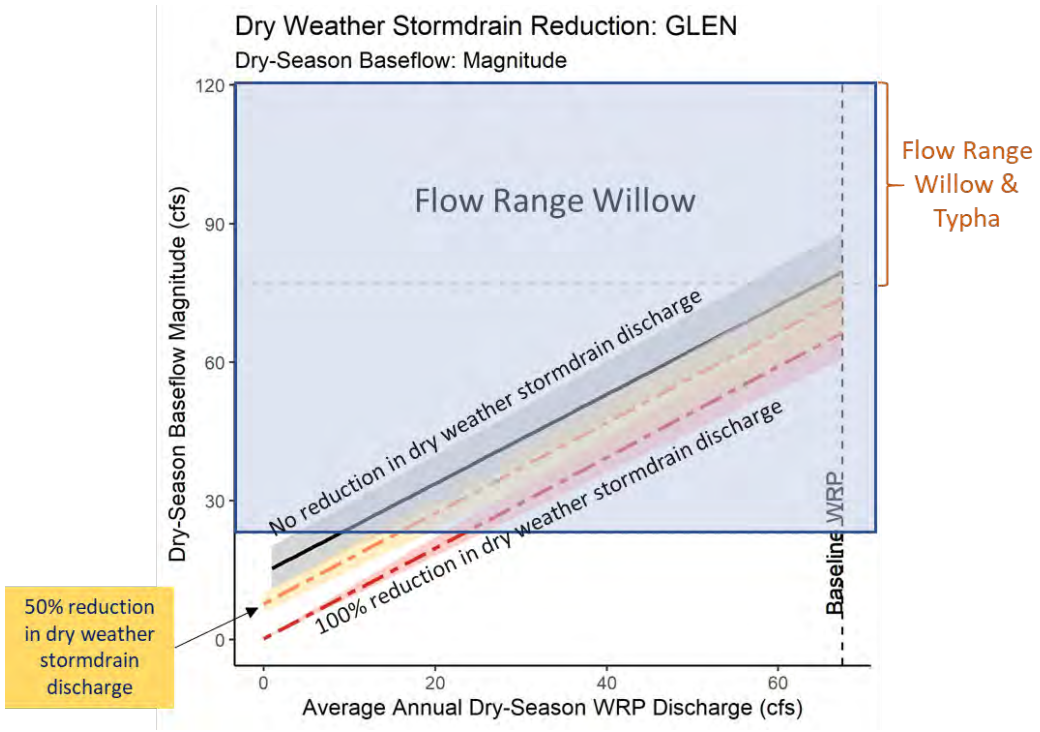


Figure 14. Flow-based sensitivity curves illustrating the combined effects of change in WRP discharge and 50% (yellow) and 100% reduction (red) in dry weather stormdrain discharge at GLEN reporting node. Solid and dashed lines represent median values; bounds of the gray and colored bands are the 10th and 90th percentile dry-season instream flows across the modeled period. Optimal flow range in this example is based on a 50% (medium) probability of occurrence of both Willow and Typha.

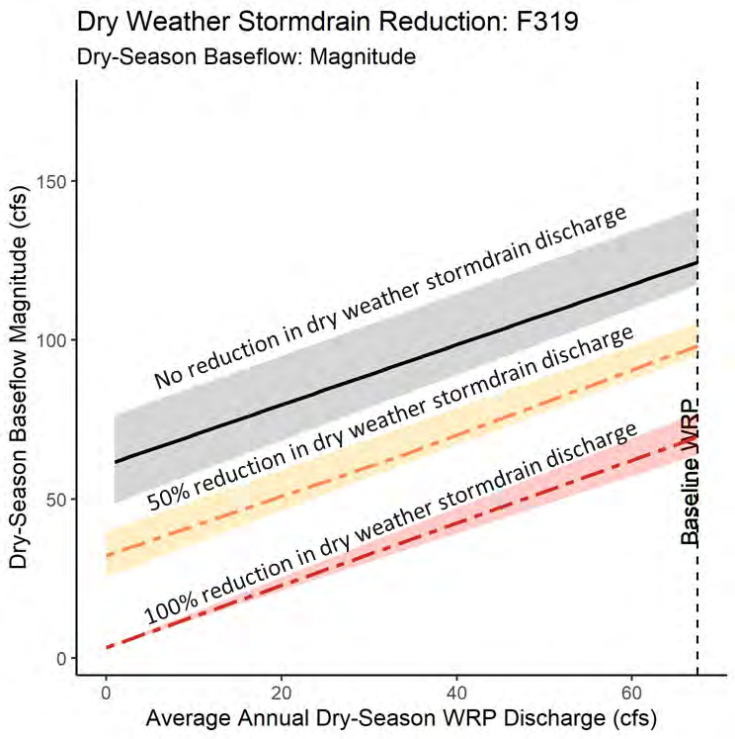


Figure 15. Flow-based sensitivity curves illustrating the combined effects of change in WRP discharge and 50% (yellow) and 100% reduction (red) in dry weather stormdrain discharge at the downstream most gage on the mainstem, Wardlow (F319). Under baseline conditions with no change in WRP discharge, dry season baseflow reduces from 124 cfs to 62 cfs with 100% reduction in dry weather discharge. Solid and dashed lines represent median values; bounds of the gray and colored bands are the 10th and 90th percentile flows across the modeled period.

Species-based sensitivity curves can be used to evaluate the relative impact of reductions in WRP discharge on specific focal species life stages (Figure 16). At GLEN, under baseline conditions in the dry season, average annual probability of occurrence for Typha adult is approximately 50%. Any reductions to WRP discharge will cause a decline in probability of occurrence. If using species-based sensitivity curves, managers need to determine the probability thresholds to aim for (e.g., 52% to 48% probability) and the range in seasonal WRP discharge associated with those thresholds. Alternatively, the proposed change in WRP discharge could be used to determine the change in probability of occurrence, for example reducing the WRP discharge by half would reduce the probablity of occurrence from 51% to 46%. In this example a 50% reduction in WRP flows would result in a change of less than 10% in the probability of occurrence. Web links to all species-based sensitivity curves can be found in Appendix A and a user-friendly application is being developed to evaluate sensitivity curves based on the proposed decision processes.

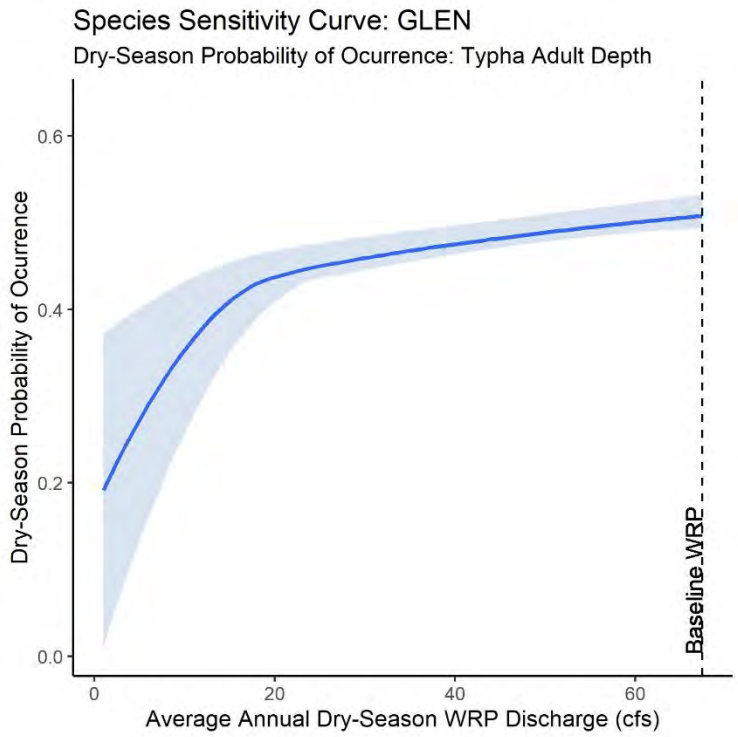


Figure 16. Species-based sensitivity curve relating changes in average annual dry-season WRP discharge with Typha adult habitat suitability at GLEN reporting node. The limiting hydraulic factor for Typha adult at GLEN during the dry season was depth. Solid line represents the median habitat suitability; blue band is the 10th and 90th percentile of habitat suitability across the modeled period.

Stormwater and Dry Weather Discharge

The effects of changes to WRP discharge as well as reductions in dry weather stormdrain discharges is illustrated at GLEN for water year 2012 (Figure 17). Results show that reductions in WRP flows have a larger impact on overall discharge than reductions in dry weather stormdrain discharge. The baseline (no reductions), 100% reduction in dry weather stormdrain discharge, 100% reduction in WRP flows, and 100% reduction in both sources of flow have median daily flow values of 96 cfs, 76 cfs, 21 cfs, and 1.3 cfs, respectively. Thus, while reductions in WRP flows lowers the median flow in 2012 by around 75 cfs, reductions in dry weather stormdrain discharge lowers the median flow by only 20 cfs. The implications of combining multiple management types across varying sources of flows may need to be considered when assessing the impact on species.

Peaks that are greater than ~100 cfs are considered storm flows. Managing storm flows with BMPs does not have an impact on inter-storm flows, which are driven by WRP and dry weather stormdrain discharge.

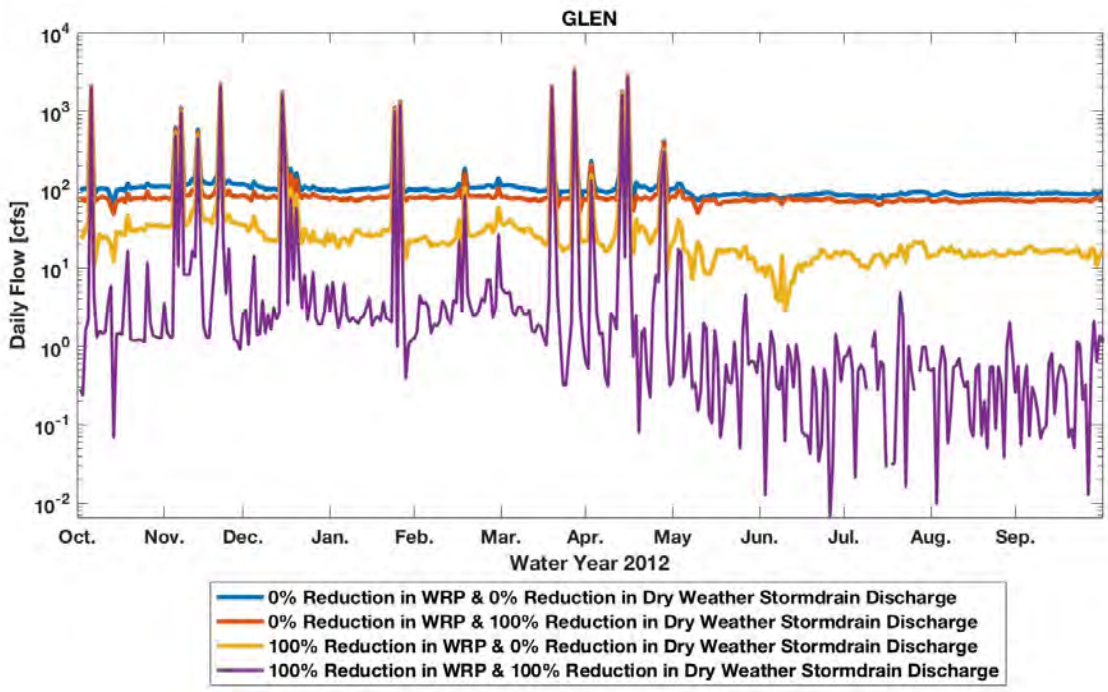


Figure 17. Example of combined impacts of reduction in WRP and dry weather stormdrain discharge flows. Order of lines within the plot (top to bottom) correspond to the order of lines in the legend. Note the log scale.

Results at GLEN for all 45 discrete scenarios that include WRP discharge reductions, dry weather stormdrain discharge reductions, and stormwater BMPs are shown in Figure 18 and Table 8. The average annual flow volume across all simulated water years was used to compare the relative performance of all scenarios. The WRP, dry weather stormdrain discharge, and BMP scenarios are applied independently in the model (Figure 8). For example, 100% reduction in dry weather stormdrain discharge with no BMPs and 0% reduction in WRP shows the volume of water that is reduced due to removing only dry weather inter-storm runoff (not storm) and industrial discharges. Similarly, the aggressive infiltration BMP scenario with 0% reduction in WRP and 0% reduction in dry weather stormdrain discharge shows the volume of water that is reduced by only capturing storm flows under the aggressive BMP implementation rate with infiltration based BMPs.

Results at GLEN show that reductions in WRP also have a larger impact on average annual flow than reductions in dry weather stormdrain discharge. While a 100% reduction in WRP flows results in a decrease of 51,000 AF (2.223 billion cubic feet), a 100% reduction in dry weather stormdrain discharge flows only results in a decrease of 17,800 AF (0.776 billion cubic feet). However, the relative impacts of reductions in WRP and dry weather stormdrain discharge vary spatially throughout the LA River. Results at LA20 (Appendix C) show that reductions in discharge are solely due to reductions in dry weather stormdrain discharge as there are no WRP discharges upstream of LA20. Results at F319 (Appendix C and Table 9) demonstrate that various combinations of discharge management (WRP and dry weather stormdrain discharge) will achieve similar average annual flow volume goals. For example, 100% reduction in WRP and 0% reduction in dry weather stormdrain discharge, 50% reduction in WRP and 50%

reduction in dry weather stormdrain discharge, and 0% reduction in WRP and 100% reduction in dry weather stormdrain discharge all have an average annual flow volume value close to seven billion cubic feet per year.

Results at GLEN demonstrate that varying BMP management scenarios will achieve similar average annual flow volume goals (Figure 18 and Table 8). For example, under 0% WRP reduction the 100% dry weather stormdrain discharge reduction without BMPs scenario has a similar average annual flow volume value as 50% reduction in dry weather stormdrain discharge with infiltration based BMPs and an aggressive BMP implementation plan (100,000 and 103,000 AF, respectively). BMP scenarios perform relatively the same with non-infiltration based BMPs and a conservative BMP implementation plan removing the lowest volume of water relative to baseline (no BMPS) and infiltration based BMPs with an aggressive BMP implementation plan removing the largest volume of water relative to baseline. This is seen across all WRP and dry weather stormdrain discharge reduction scenarios as well as at every reporting node.

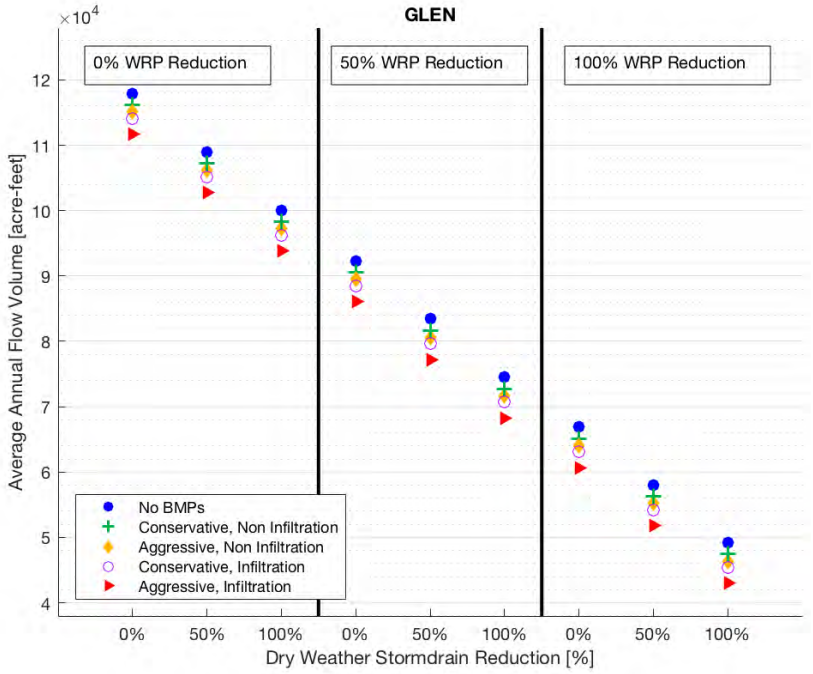


Figure 18. A visual comparison of average annual flow volumes (acre-feet) for all 45 discrete scenarios at GLEN.

Table 8. Average annual flow volumes values for all 45 discrete scenarios in acre-feet at GLEN.

WRP Reduction		0% WRP Reduction			50% WRP Reduction			100% WRP Reduction		
Dry Weather Stormdrain Reduction		0%	50%	100%	0%	50%	100%	0%	50%	100%
Average Annual Flow Volume (acre-feet)	No BMPs	117,932	108,997	100,062	92,321	83,416	74,511	66,890	58,040	49,190
	Conservative, Non-Infiltration	116,196	107,261	98,327	90,583	81,681	72,776	65,154	56,304	47,454
	Aggressive, Non-Infiltration	115,104	106,169	97,234	89,493	80,588	71,683	64,051	55,211	46,364
	Conservative, Infiltration	114,123	105,188	96,254	88,513	79,608	70,703	63,081	54,233	45,383
	Aggressive, Infiltration	111,713	102,778	93,845	86,102	77,197	68,294	60,673	51,823	42,975
	Color Coding	Higher Average Annual Flow Volume			<----------		---------->	Lower Average Annual Volume		

Table 9. Average annual flow volume values for all 45 discrete scenarios in acre-feet at F319.

WRP Reduction		0% WRP Reduction			50% WRP Reduction			100% WRP Reduction		
Dry Weather Stormdrain Reduction		0%	50%	100%	0%	50%	100%	0%	50%	100%
Average Annual Flow Volume (acre-feet)	No BMPs	211,302	186,364	161,440	185,698	160,802	135,889	160,262	135,400	110,558
	Conservative, Non Infiltration	206,451	181,497	156,566	180,831	155,923	131,015	155,395	130,533	105,696
	Aggressive, Non Infiltration	203,306	178,352	153,421	177,686	152,778	127,870	152,250	127,388	102,544
	Conservative, Infiltration	200,871	175,919	150,827	175,253	150,345	125,434	149,817	124,954	100,108
	Aggressive, Infiltration	194,078	169,123	144,192	168,458	143,549	118,641	143,021	118,173	93,317
	Color Coding	Higher Average Annual Flow Volume			<----------		---------->	Lower Average Annual Volume		

CONCLUSIONS AND NEXT STEPS

The goal of this project was to develop a set of tools that State and local water managers can use to evaluate potential effects of changes in WRP discharge and stormdrain outflows on instream flows and the potential effect on support of currently designated and possible future beneficial uses based on current channel morphology. The relationship between flow and beneficial uses does not account for the effect of factors such as substrate, temperature, water quality, or mechanical channel maintenance activities, and therefore flow management alone may not support the focal species even if the calculated optimal flows were to exist. For example, actions to reduce invasive species in the LA River would be an important element of any plan aimed at supporting native species and habitats.

The goal of this project was not to provide a definitive set of flow targets, but to provide tools that can be used by managers and stakeholders to evaluate potential effects of future changes in flow. Staff in the State Water Board's Division of Water Rights may use the tools developed by this study as non-binding guidance to inform the processing of future Water Code section 1211 wastewater change petitions. This may include evaluating different flow scenarios and proposed reductions due to recycling and how those changes impact beneficial uses. If the State Water Board ultimately elects to adopt flow management targets, such targets may be the subject of a future rulemaking. As part of a possible future rulemaking, the State Water Board may elect to set flow management targets that vary seasonally or be based on water year type (i.e., wet vs. dry) that could be achieved through various combinations of management actions that collectively produce the desired in-river conditions. Flow management targets developed using the tools created through this process would be one component of a larger evaluation considering all aspects of a proposed project that would ultimately set flow criteria in consideration of multiple management objectives for the LA River.

Moving forward, additional work is ongoing by the study team to assess potential water quality implications of changes in discharges and effects of potential restoration actions. This study assumed no changes to the physical condition of the river; however, future phases can further explore the relationship between changes in discharge and proposed restoration actions, such as creation of in-channel pools or other refugia, changing roughness, etc. Future work will also investigate opportunities to use habitat restoration in tributaries to the LA River to offset potential adverse effects of changing flow on habitats in the mainstem of the river. Such restoration opportunities may allow for provision of beneficial uses in areas where they can be supported in a more sustainable manner and could be used to demonstrate opportunities to restore sections of the watershed to more natural conditions and support the need for local water supply and groundwater replenishment. Finally, we plan to develop a monitoring and adaptive management program that can be used to assess the effects of changes in discharge on instream beneficial uses.

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APPENDIX A. FLOW-BASED AND SPECIES-BASED SENSITIVITY CURVES

A suite of flow-based and species-based sensitivity curves were developed for the WRP and dry weather stormdrain discharge scenarios.

WRP Discharge Scenarios

A total of 22 flow-based sensitivity curves for the WRP scenarios for wet-season baseflow magnitude (wet-season 10th percentile flow magnitude) and dry-season baseflow magnitude (dry-season 50th percentile flow magnitude) were developed and will be available through the Shiny App. Solid lines represent median percentile flows; bounds of the grey and colored bands are the 10th and 90th percentile baseflows across the modeled period. The plots are also available at: https://sccwrp.sharepoint.com/:f:/s/LARiverEflowsStudy/EgJAr4I0Yu5HoD37ICJRvV0BcG9d1JJO6HPe8VGdKwIcyg?e=seYqq3

A total of 83 species-based sensitivity curves for the WRP scenarios for wet-season habitat suitability and dry-season habitat suitability were developed and will be available through the Shiny App. Solid lines represent median habitat suitability; bounds of blue are the 10th and 90th percentile habitat suitability across the modeled period. The plots are also available at:

https://sccwrp.sharepoint.com/:f:/s/LARiverEflowsStudy/En0e0gVemzRGhoqK4AycdcgBrWuiQXcFYD8TECIOsE6ajg?e=iLw7i8

Dry Weather Stormdrain Scenarios

A total of 44 flow-based sensitivity curves illustrating the combined effects of change in WRP discharge (gray) and 50% (yellow) and 100% reduction (red) in dry weather stormdrain discharge for wet-season and dry-season baseflow magnitude were produced and will be available through the Shiny App. Solid and dashed lines represent median baseflow values; bounds of the grey and colored bands are the 10th and 90th percentile baseflows across the modeled period. For Santa Ana sucker, the maximum probability of occurrence was 0.4, therefore, the curves were rescaled to a 0-1 range to promote comparison between species. The plots are also available at:

https://sccwrp.sharepoint.com/:f:/s/LARiverEflowsStudy/EqKjLBIvbDxBrzVvtShU5SwBYLAa4_Mf_l6Opv5QMPEeMQ?e=7R0bgn

A total of 83 species-based sensitivity curves illustrating the combined effects of change in WRP discharge (blue) and 50% (yellow) and 100% reduction (red) in dry weather stormdrain discharge for wet-season and dry-season habitat suitability were produced and will be available through the Shiny App. Solid and dashed lines represent median habitat suitability; bounds of the grey and colored bands are the 10th and 90th percentile habitat suitability across the modeled period For Santa Ana sucker, the maximum probability of occurrence was 0.4, therefore, the curves were rescaled to a 0-1 range to promote comparison between species. The plots are also available at:

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APPENDIX B. STORMWATER MANAGEMENT METHODS

BMP Implementation rates (LADWP 2015) were used to determine the area of land routed to BMPs in SUSTAIN for each watershed. Table B-1 displays implementation rates across varying land use types and geophysical categories for the conservative and aggressive scenarios. The conservative and aggressive BMP implementation rates are based on political, financial, and social opportunities or boundaries that shape future potential stormwater capture.

Table B-1. Implementation rates used to determine the area of land routed to BMPs in SUSTAIN.

	Conservative Scenario			Aggressive Scenario		
Geophysical Category	A	B	C	A	B	C
High Density Single-family	35%	25%	15%	50%	40%	30%
Low Density Single-family	30%	20%	10%	40%	30%	20%
Multi-family	35%	25%	15%	50%	40%	30%
Commercial	37%	27%	17%	55%	45%	35%
Institutional	57%	47%	37%	95%	85%	75%
Industrial	50%	40%	30%	80%	70%	60%
Transportation	52%	42%	32%	85%	75%	65%
Secondary Roads	47%	37%	27%	75%	65%	55%

To calculate the area of land routed to BMPs (Eq. B-1) under the conservative and aggressive approach, geophysical categorization, land use area, and percent imperviousness spatial data is needed for each subwatershed within the SUSTAIN model. Subwatersheds for SUSTAIN were first delineated based on reporting nodes (Figure B-1).

$$Area\ routed\ to\ aggregate\ BMP_{i,k} = \sum(A_{i,j} * Imp_{i,j} * Rate_{i,j,k}) \qquad \text{(Eq. B-1)}$$

Where:

A = Land use area

Imp = Percent Imperviousness

Rate = Geophysical Category Implementation Rate

i = SUSTAIN reporting node subwatershed

j = Applicable land use type

k = Conservative and Aggressive Scenario

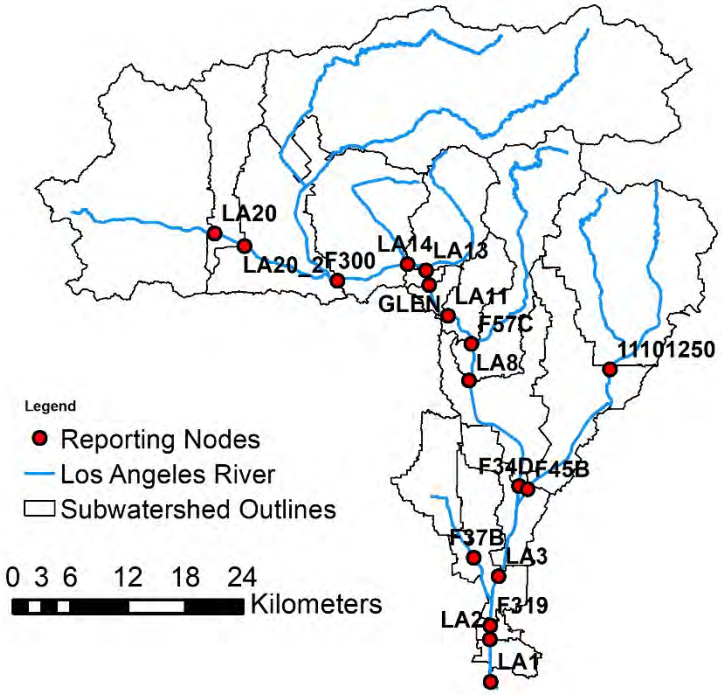


Figure B-1. SUSTAIN model domain. Subwatersheds were delineated in respect to reporting nodes.

Geophysical categories (A, B, C in Table B-1) are based on the infiltration potential of the area based on geophysical obstacles and aquifer class (LADWP 2015). Each subwatershed was assigned one geophysical categorization (A, B, or C). The geophysical categorization map was acquired from the California Department of Water Resources GIS Data Portal and loaded into ArcMap (DWR Atlas 2015). The geophysical category for each subwatershed was determined by overlaying the geophysical categorization GIS layer with the SUSTAIN subwatershed delineation map (Figure B-2A) and identifying the dominant geophysical category in each subwatershed (Figure B-2B). As the SCMP only includes the area within the LA City Boundaries, SUSTAIN subwatersheds that exist outside these boundaries were defaulted to the medium geophysical category, B.

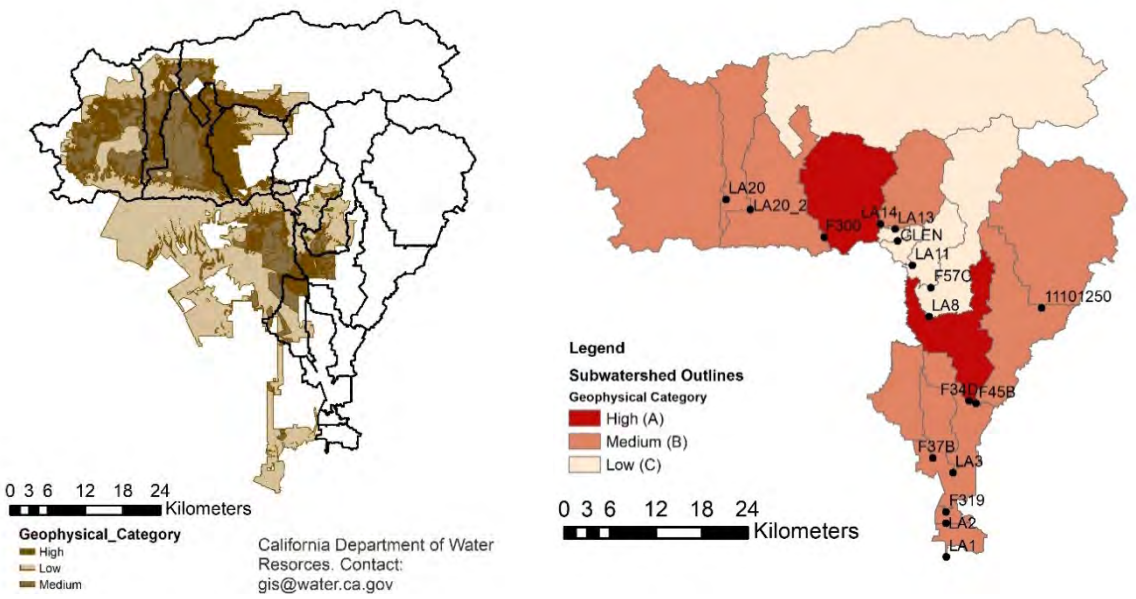


Figure B-2. A (left) shows the SCMP geophysical category map with the delineated SUSTAIN reporting node subwatersheds. B (right) shows the dominant geophysical category within each subwatershed. Subwatersheds that do not overlap were automatically set to medium.

Land use data (2016) from Southern California Association of Governments was used in GIS to calculate the area of each land use type within each subwatershed (SCAG 2016). Applicable land use types from SCAG include those that overlap with Table B-1 . An impervious cover layer developed for the Watershed Management Modeling System (WMMS) model was used to calculate the total area of impervious cover within each applicable land use type (Los Angeles County Flood Control District 2020). See Figure B-3 for an example of the land use and impervious cover data for reporting node LA20 subwatershed.

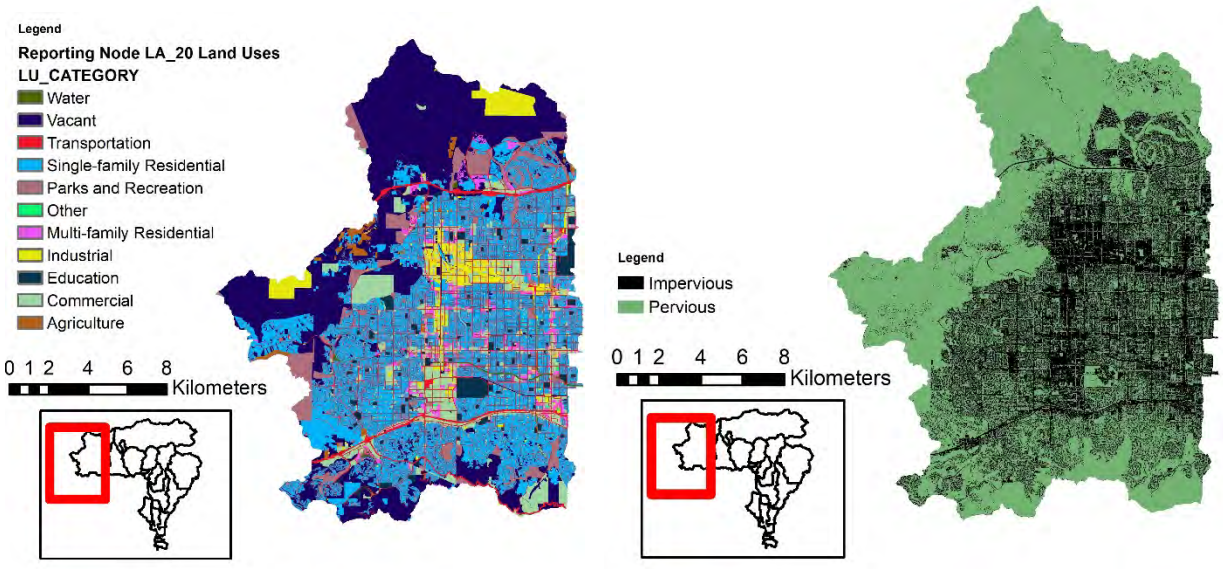
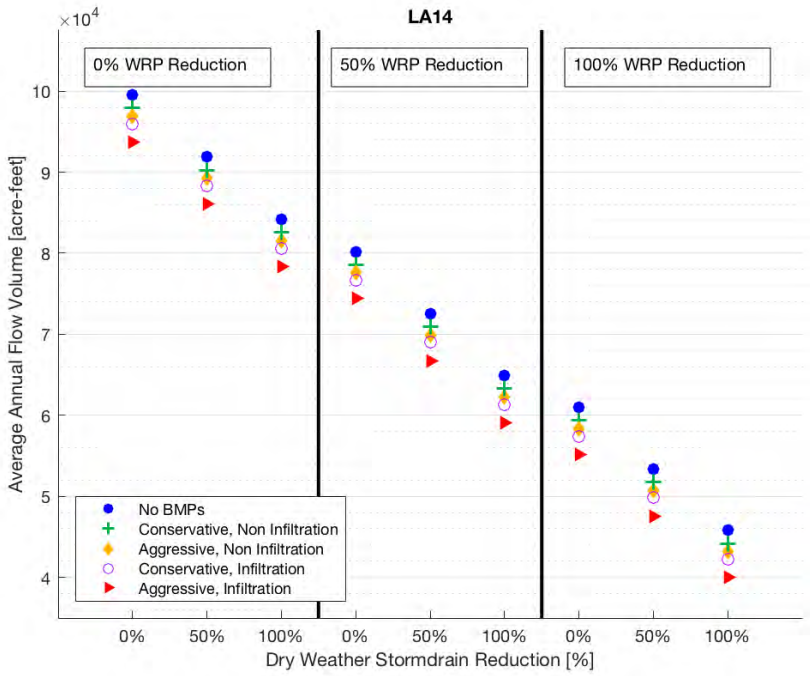
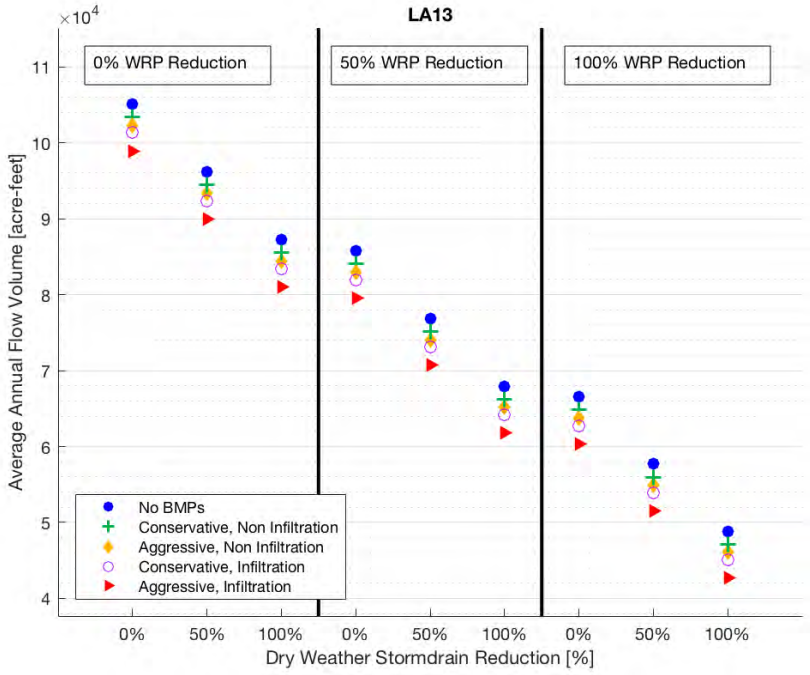
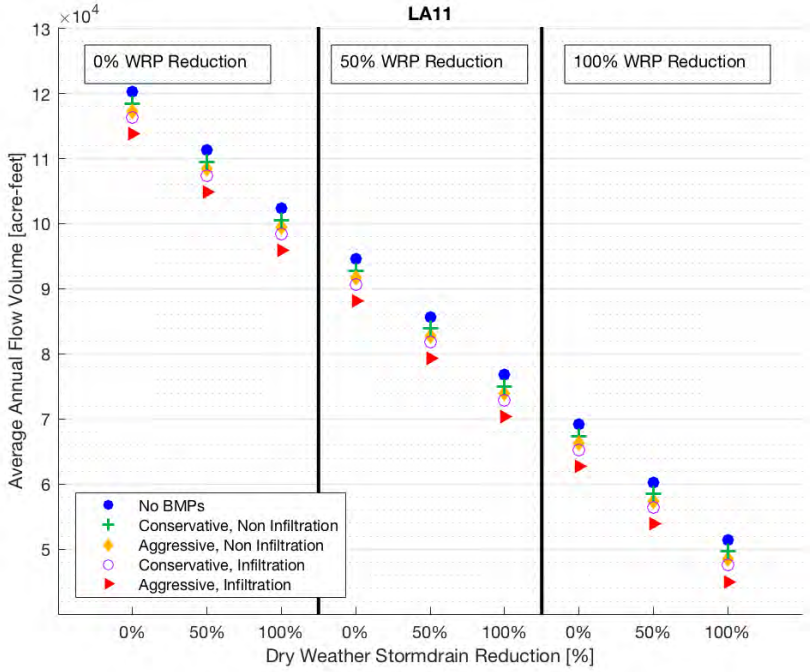


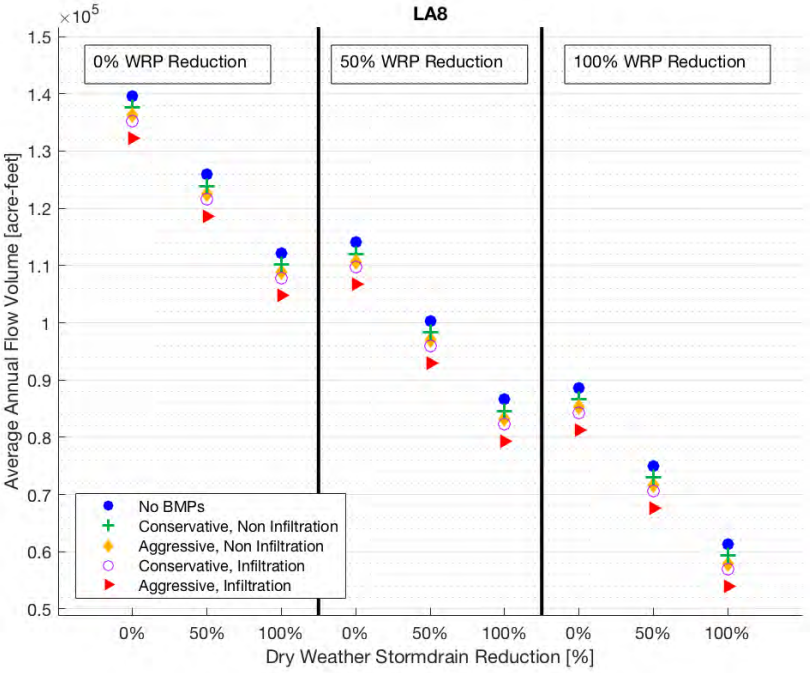
Figure B-3. A (left) shows an example of the SCAG land use data set in the LA20 subwatershed. B (right) shows an example of the WMMS impervious surface data set in the LA20 subwatershed.

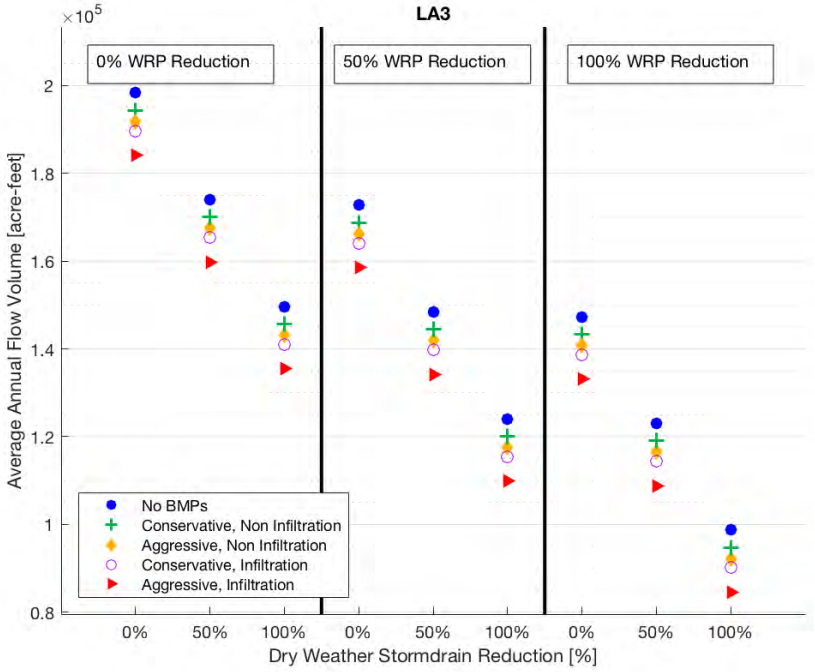
APPENDIX C. STORMWATER AND DRY WEATHER DISCHARGE PLOTS

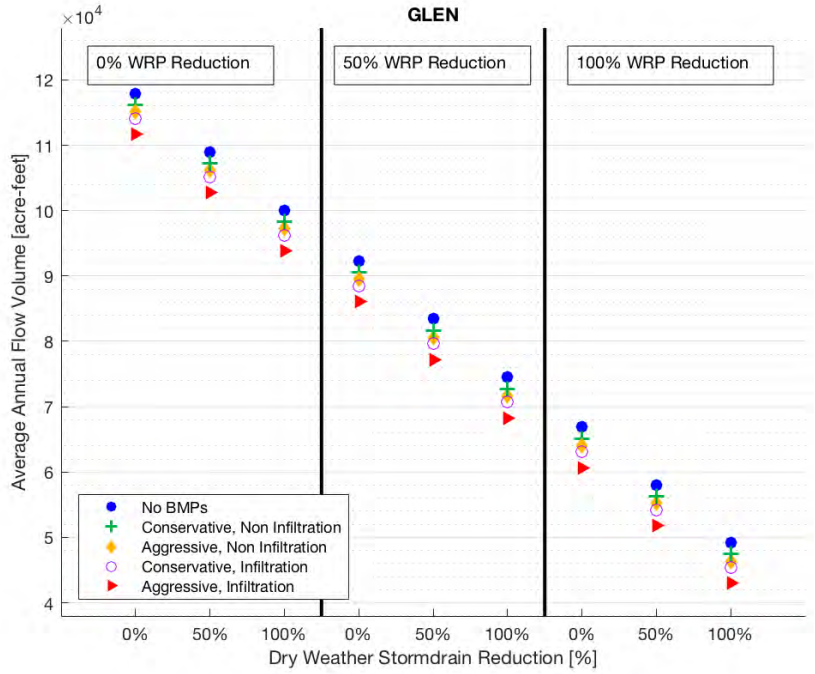


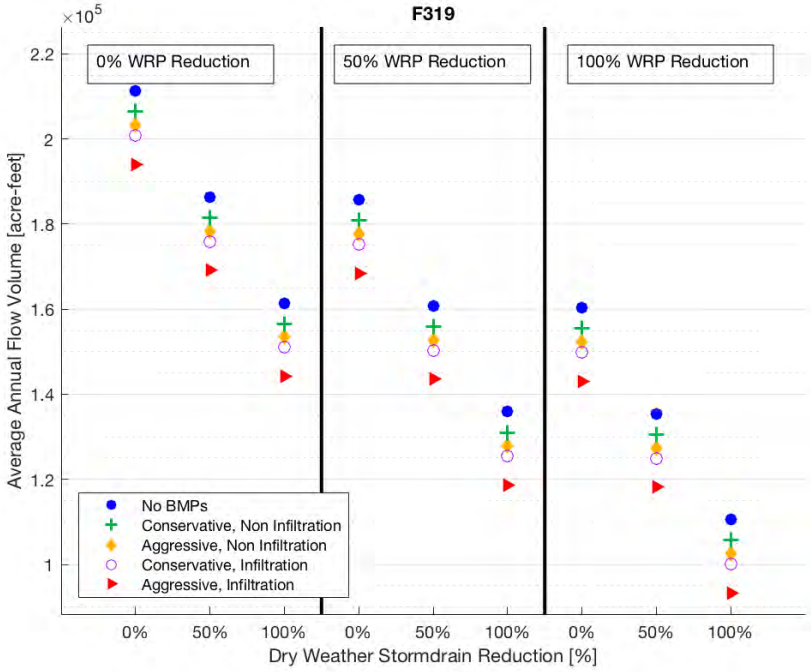


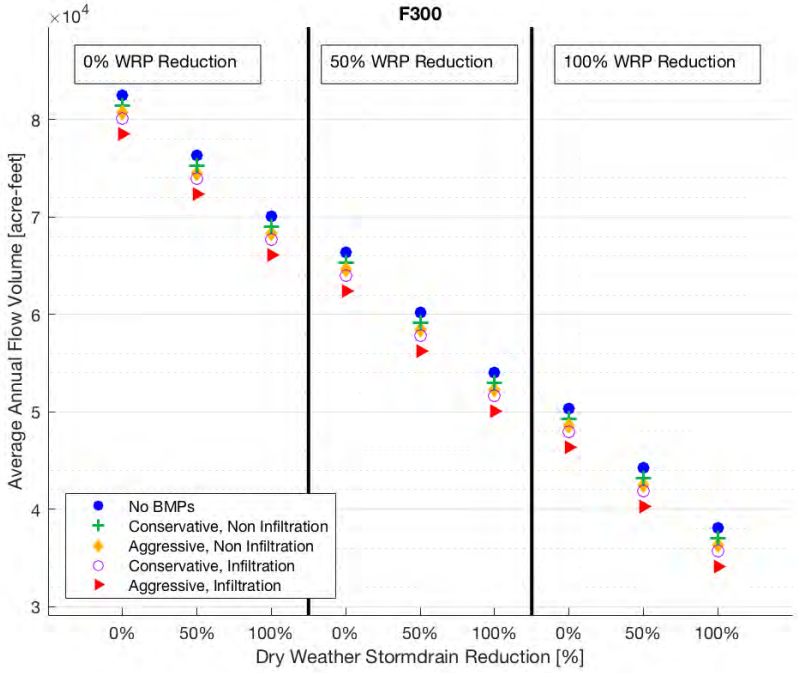

LA11
×10^4
0% WRP Reduction
50% WRP Reduction
100% WRP Reduction
Average Annual Flow Volume [acre-feet]
No BMPs
Conservative, Non Infiltration
Aggressive, Non Infiltration
Conservative, Infiltration
Aggressive, Infiltration
0%
50%
100%
Dry Weather Stormdrain Reduction [%]

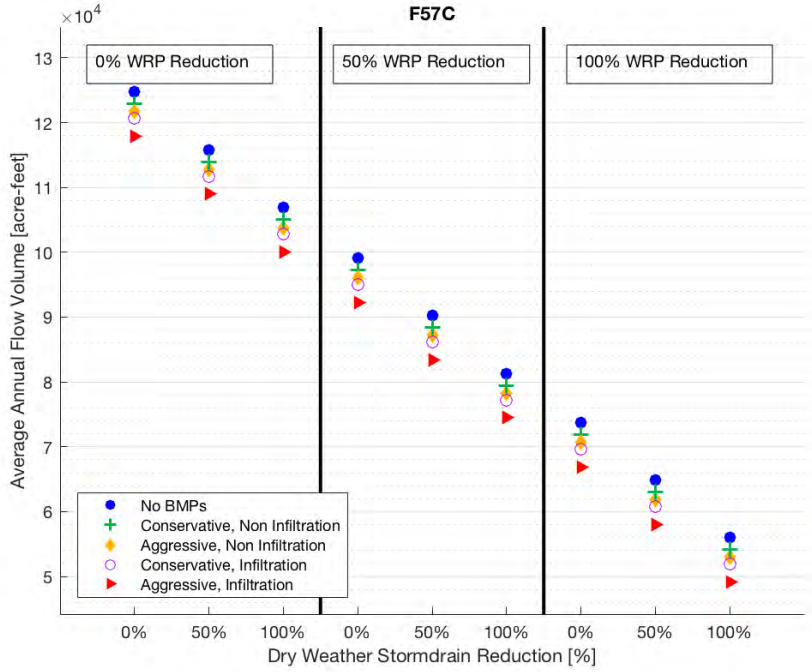

LA8
×10^5
0% WRP Reduction
50% WRP Reduction
100% WRP Reduction
Average Annual Flow Volume [acre-feet]
No BMPs
Conservative, Non Infiltration
Aggressive, Non Infiltration
Conservative, Infiltration
Aggressive, Infiltration
0%
50%
100%
Dry Weather Stormdrain Reduction [%]

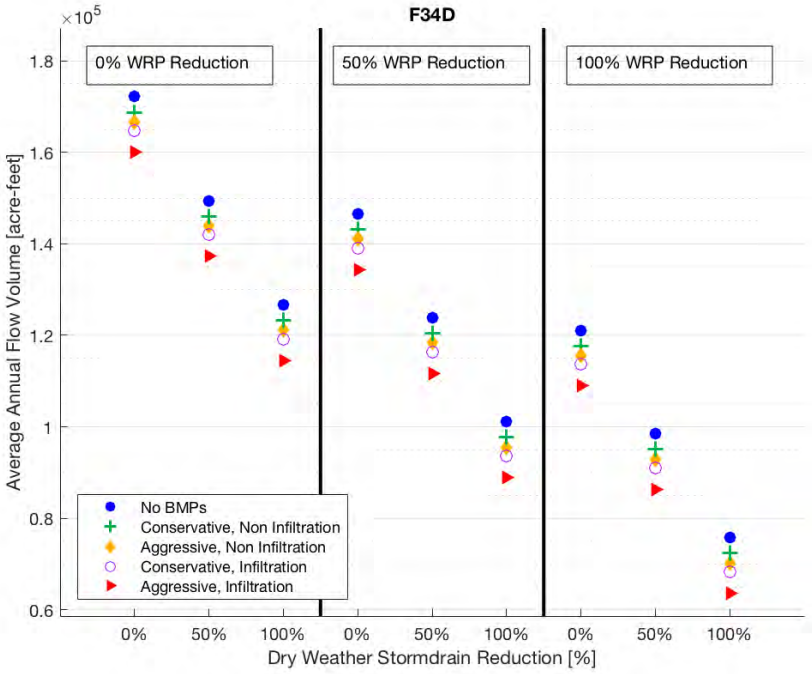

LA3
×10^5
0% WRP Reduction
50% WRP Reduction
100% WRP Reduction
Average Annual Flow Volume [acre-feet]
2
1.8
1.6
1.4
1.2
1
0.8
No BMPs
Conservative, Non Infiltration
Aggressive, Non Infiltration
Conservative, Infiltration
Aggressive, Infiltration
0%
50%
100%
Dry Weather Stormdrain Reduction [%]

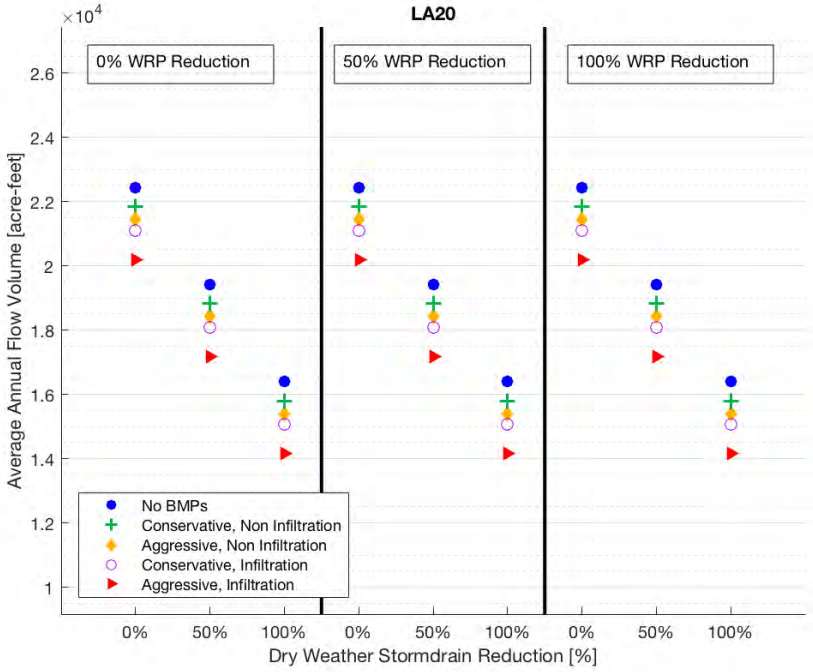

GLEN
×10^4
0% WRP Reduction
50% WRP Reduction
100% WRP Reduction
Average Annual Flow Volume [acre-feet]
12
11
10
9
8
7
6
5
4
No BMPs
Conservative, Non Infiltration
Aggressive, Non Infiltration
Conservative, Infiltration
Aggressive, Infiltration
0%
50%
100%
Dry Weather Stormdrain Reduction [%]

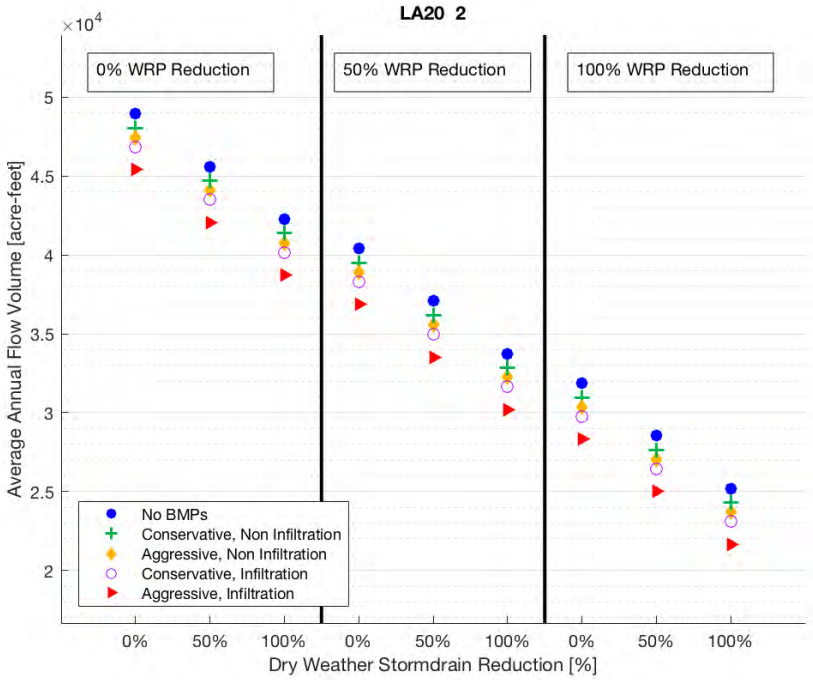

F319
×10^5
0% WRP Reduction
50% WRP Reduction
100% WRP Reduction
Average Annual Flow Volume [acre-feet]
2.2
2
1.8
1.6
1.4
1.2
1
No BMPs
Conservative, Non Infiltration
Aggressive, Non Infiltration
Conservative, Infiltration
Aggressive, Infiltration
0%
50%
100%
Dry Weather Stormdrain Reduction [%]


F300
×10^4
0% WRP Reduction
50% WRP Reduction
100% WRP Reduction
Average Annual Flow Volume [acre-feet]
8
7
6
5
4
3
No BMPs
Conservative, Non Infiltration
Aggressive, Non Infiltration
Conservative, Infiltration
Aggressive, Infiltration
0%
50%
100%
Dry Weather Stormdrain Reduction [%]


F57C
×10^4
0% WRP Reduction
50% WRP Reduction
100% WRP Reduction
Average Annual Flow Volume [acre-feet]
13
12
11
10
9
8
7
6
5
No BMPs
Conservative, Non Infiltration
Aggressive, Non Infiltration
Conservative, Infiltration
Aggressive, Infiltration
0%
50%
100%
Dry Weather Stormdrain Reduction [%]


F34D
×10^5
0% WRP Reduction
50% WRP Reduction
100% WRP Reduction
Average Annual Flow Volume [acre-feet]
1.8
1.6
1.4
1.2
1
0.8
0.6
No BMPs
Conservative, Non Infiltration
Aggressive, Non Infiltration
Conservative, Infiltration
Aggressive, Infiltration
0%
50%
100%
Dry Weather Stormdrain Reduction [%]


LA20
×10^4
0% WRP Reduction
50% WRP Reduction
100% WRP Reduction
Average Annual Flow Volume [acre-feet]
2.6
2.4
2.2
2
1.8
1.6
1.4
1.2
1
No BMPs
Conservative, Non Infiltration
Aggressive, Non Infiltration
Conservative, Infiltration
Aggressive, Infiltration
0%
50%
100%
Dry Weather Stormdrain Reduction [%]


LA20 2
×10^4
0% WRP Reduction
50% WRP Reduction
100% WRP Reduction
Average Annual Flow Volume [acre-feet]
5
4.5
4
3.5
3
2.5
2
No BMPs
Conservative, Non Infiltration
Aggressive, Non Infiltration
Conservative, Infiltration
Aggressive, Infiltration
0%
50%
100%
Dry Weather Stormdrain Reduction [%]

ATTACHMENT 10

UC ANR Water Webinar



Restoring the Los Angeles River for Ecosystems and People

By: Dr. Sabrina Drill, Natural Resources Advisor, UC Cooperative Extension, Los Angeles County

Day/Time: Friday 02/19/2021, 3 - 4 PM

Join Zoom Meeting: https://ucmerced.zoom.us/j/93722796133?pwd=a2FsKzBTUGVtOEovSTNVanRSNjZMdz09; Meeting ID: 937 2279 6133; Passcode: 92837

Speaker Bio: Dr. Sabrina Drill is a Natural Resources Advisor for UC Cooperative Extension in Los Angeles and Ventura Counties in Southern California. She helps agencies, organizations, and communities get the scientific information they need to restore urban streams and habitats, manage invasive species, prepare for and recover from wildfires, and use urban nature to increase resilience to extreme weather and climate change. She works to connect communities to nature, especially underserved BIPOC communities, through training for community members to become environmental stewards and leaders in managing the nature around them, as well as promoting equality and justice in outdoor access. She supports citizen and community science to help better document urban nature. She serves on the Steering Committees for the National Urban Extension Leaders and the National Extension Climate Initiative. She has a Ph.D. in Geography and a M.S. in Biology, both from UCLA, a B.S. in Biology from Virginia Tech, and an A.A. in Natural Science from Simon's Rock of Bard College.

Abstract: Urban rivers support ecosystems services and biodiversity, but they also facilitate connections linking communities to nature, and to each other. Like other urban streams, the Los Angeles River has been massively modified to reduce the impact of flooding by draining stormwater and the pollutants that come along with it. For years the river has primarily served as a stormwater conveyance, while it still supported wildlife and a grab bag of artists, Angelenos without homes, and a mostly immigrant population of fisherfolk. In the past few decades, however, it has become a focal point of efforts to restore instream and riparian ecosystems, provide recreation and connection to nature, and utilize the waterway as an economic driver akin to the riverwalks in other cities. The LA River offers an extreme challenge, both as an arid flashy hydrologic system and as an ecosystem that's management is shared by numerous federal and state departments, one of the largest and most complicated county governments in the US, and over 43 cities who share the watershed – not to mention one of the most ethnically and economically diverse megalopolises in the world. I will report on our efforts to characterize instream habitat and the fish community, examine how changes in flow due to water conservation efforts and climate change might affect habitat, and discuss proposals to alter concrete channels to increase habitat value. I will also examine recent work to explore whether river re-development proposals can sustain this novel ecosystem and the human communities connected to it, while supporting biodiversity and avoiding the pitfalls of gentrification.

Host: Safeeq Khan, CE Specialist in Water and Watershed Sciences & Ellen Bruno, CE Specialist in Agriculture and Resource Economics

UNIVERSITY OF CALIFORNIA
Agriculture and Natural Resources

ATTACHMENT 11

CLIMATE & ENVIRONMENT

Frank Gehry's bold plan to upgrade the L.A. River seeks to atone for past injustices



Renowned architect Frank Gehry has unveiled a plan to transform the Los Angeles River into more than just a concrete flood channel and establish it as an unprecedented system of open space. (Brian van der Brug / Los Angeles Times)

By LOUIS SAHAGÚN | STAFF WRITER
JAN. 11, 2021 6 AM PT

In the decades since engineers first blanketed the Los Angeles River with concrete, working-class communities along its armored banks have struggled with blight, poverty and crowding — unintended consequences perhaps of an epic bid to control Mother Nature.

Now, as many of these neighborhoods suffer disproportionately higher rates of infection from COVID-19 — and as the nation seeks to atone for racial and institutional injustices laid bare in the police killing of George Floyd — famed architect Frank Gehry has unveiled a bold plan to transform the river into more than just a concrete flood channel and establish it as an unprecedented system of open space.



A bicyclist rides along the Los Angeles River in South Gate. (Brian van der Brug / Los Angeles Times)

For more than half a century, Gehry has been better known for sketching ideas that became flashy cultural and commercial landmarks, such as the dazzling Walt Disney Concert Hall, whose tilting forms have reinforced Los Angeles' place among the

world's great urban centers.

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Today, the 91-year-old has emerged as a lead architect in far-reaching proposals designed to uplift the profiles of Southern California's poorest, most densely crowded communities along the backbone of the county's flood-control system.

Critics, including some influential environmental groups, would prefer to see naturalization of the river itself. But during a recent Zoom call from his Los Angeles studio, a grin crossed the Pritzker Prize winner's face as he shared his plans to transform the forlorn industrial confluence of the Los Angeles River and the Rio Hondo in South Gate into an urban cultural park like no other.



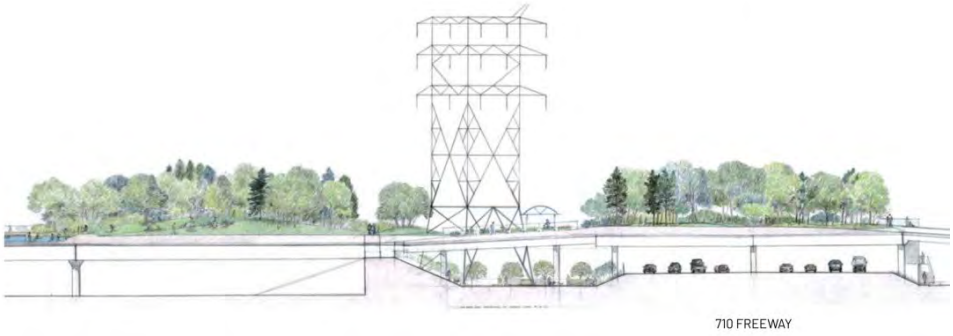
Architect Frank Gehry at his offices in Los Angeles in 2019. (Jay L. Clendenin / Los Angeles Times)

"We studied the river upside and down and found that less than 2% of the time it runs very fast and is very dangerous," he said. "So, we thought if we can't get rid of the concrete, maybe we can cover it."

Picture "elevated platform parks" — massive, bridge-like green spaces that occupy government airspace high above the flood channel's musty floor, and four feet above the rim of the channel walls. Constructed on hulking concrete planks and enormous girders, the earthen parks would stretch nearly a mile over both rivers and support a lush landscape of trees, grass, scenic ponds, horse trails and walking paths.

Nearby, children from throughout the region would mill around the courtyard of a $150-million cultural center, taking lunch and sharing what they learned there about music, dance, painting, culinary arts, ceramics, photography and filmmaking.

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An artist's rendering of a proposed platform park alongside the 710 Freeway. (Olin Studio | Gehry Partners | Geosyntec)

The platform parks are big-ticket projects that could take a decade or more to build. But the cultural center, which has the support of influential state, county and local lawmakers — and would be just a stone's throw from a proposed Metro transit hub — could be realized much sooner.

"I'm excited about the cultural center and want to see it built," Gehry said. "I think it will grow into something very special because it is so important to future generations. The life expectancy of kids south of downtown is 10 years shorter than it is elsewhere."

His ideas arose from research and meetings with community leaders in such riverfront towns as South Gate, Downey, Maywood and Paramount — communities where a dearth of open space and other urban woes long ago tarnished their ZIP Codes.

It may sound like an idealist's dream, but it builds on potential improvements and water management policies floated in Los Angeles County Public Works' new 2020

master plan for the Los Angeles River along its entirety, from Chatsworth to Long Beach.

The updated document's recommendations for the next 25 years take their cues from increased occurrences of extreme weather events due to climate change. But another goal is a reckoning with a legacy of flood control that "subjected riverfront neighborhoods to overt discrimination along racial and ethnic lines."



Bikers ride on a path along the Los Angeles River at its confluence with the Rio Hondo in South Gate. (Dania Maxwell / Los Angeles Times)

Areas off the river's east bank near downtown L.A., for example, were described by home lenders as being honeycombed with "diverse and subversive racial elements," according to the river master plan.

"This classification established major barriers for residents seeking home loans and stalled their upward economic mobility," it says. "Neighborhoods bypassed by this grading exercise tended to have more affluent and homogenous populations and were, by contrast, set up as white suburbs."

Redlining, it says, produced landscapes of segregation that both created and reinforced racial and ethnic enclaves along the river: Chinatown, Bronzeville and Sonoratown. The legacy endures, it says, "particularly in the San Fernando Valley and south of downtown, where some Latino and Asian communities today are disproportionately challenged by deteriorating social, economic and environmental conditions."

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More recently, construction of the freeway system during the 1950s and ’60s displaced nearly 250,000 people. Today, the 710 Freeway, which runs adjacent to the lower L.A. River, contributes to the poor air quality and heightened disease rates of nearby neighborhoods.

“Revitalizing the river south of downtown offers our southeast communities an opportunity to rebuild our connections, to the river and each other,” said Assembly Speaker Anthony Rendon (D-Lakewood), whose 63rd Assembly District includes South Gate, Bell and Long Beach.

“Southeast L.A. deserves parks and trails, education and cultural centers,” he added. “Equity comes when every community has access to the tools to make life better.”

The partners in Gehry’s firm who have been overseeing research on the river and preliminary project designs — alongside prominent landscape architect Laurie Olin, whose projects include the Getty Center in Los Angeles, and Mark Hanna, a water resources engineer at Geosyntec Consultants — say they aren’t ready to unveil any formal proposals.


Hydrologist Mark Hanna and landscape architect Jessica Henson at the L.A. River’s confluence with the Rio Hondo in South Gate. (Dania Maxwell / Los Angeles Times)

Whether their plans become reality hinges on their ability to compromise.

The river master plan has no legal jurisdiction over land use, and no authority to implement its recommendations. Ultimate decisions about what happens along the lower river corridor will be made by the county and the 14 cities that border it, many of them impoverished, working-class enclaves where local politics is often a clamor of

conflict and scandal.

Still, Carolina Hernandez, principal engineer for countypublic works, is optimistic. “I can see the platform parks happening within 10 years,” she said. “But it will depend on local decisions and availability of funding because they will cost hundreds of millions of dollars.”

Denise Diaz, 34, a South Gate city councilwoman and lifelong resident of the area, hopes to see the cultural center open in 2024. “A significant project like this,” she said, “could help transform our long-overlooked landscape into a prime location shared by thriving, walkable and healthy communities.”



Renowned architect Frank Gehry plans to transform the Los Angeles River with elevated platforms with parks and cultural spaces. (Brian van der Brug / Los Angeles Times)

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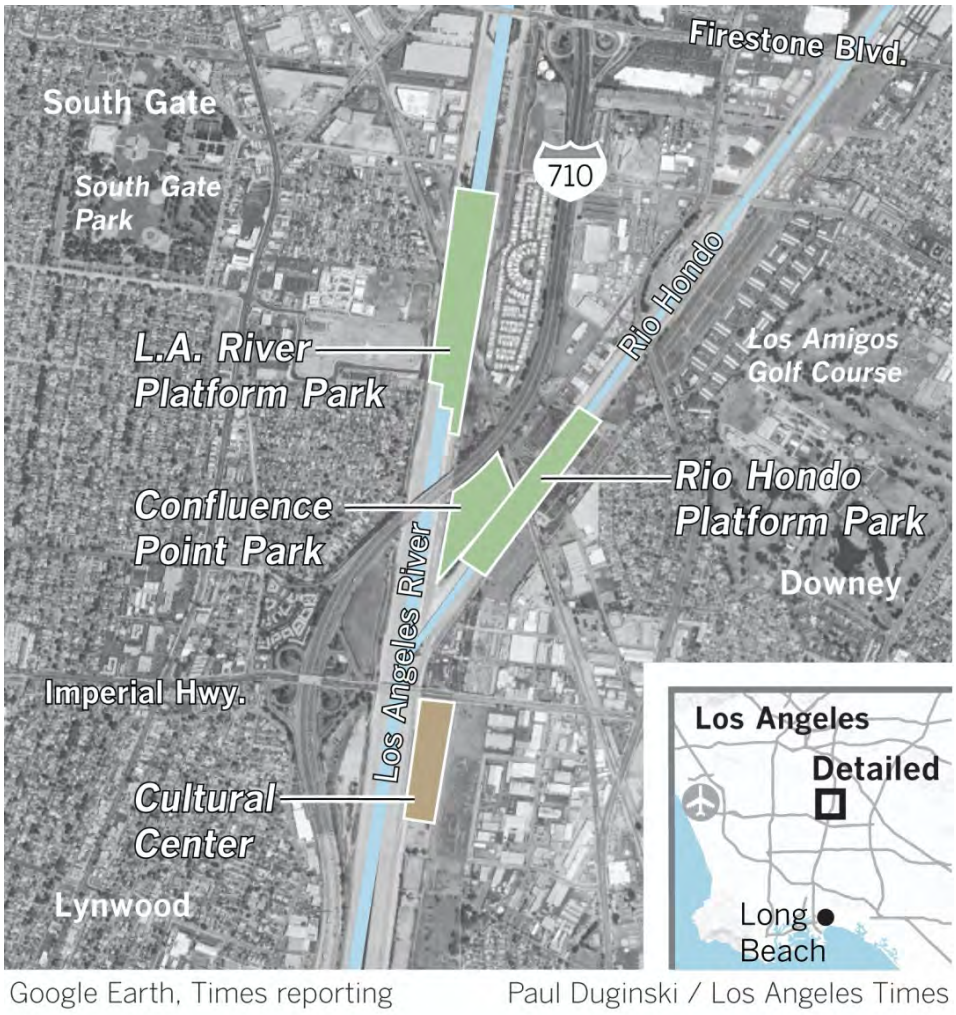
Paul Adams, South Gate parks director, however, urged patience. “It is exciting to see the lower river communities finally getting the attention they deserve,” he said. “But at this early phase of the process, everyone needs to take a few grains of salt along with it.

“Even projects designed by architects of this stature tend to shrink fast,” he added, “in the face of the cold-hearted reality of political and budget considerations.”

Whether the area in the vicinity of the confluence can survive as it is today — a gateway for new arrivals and a sea of low-rise industrial and commercial districts where 72% of all businesses are minority owned — is an open question in the minds of some community leaders. They fear that Gehry’s high-profile amenities will attract upscale developers, leading to displacement of thousands of people who now call it home.

Housing affordability is a key goal of the river master plan embraced by L.A. County Supervisor Hilda Solis, whose district includes struggling communities in the southeastern part of the county. For decades, these areas have been plagued by environmental affronts, including insensitive land use and pollution from freeways, railyards and industrial sites laden with toxic substances.

“The gatekeepers of these proposals will be the people who live among them,” she said. “We must make sure that they are culturally sensitive to the area, set aside land for senior citizens and keep housing stock affordable.”



(Los Angeles Times)

There are signs that gentrification is already underway. In Maywood, which with 30,000 residents crowded into 1.13 square miles is the most densely populated city in California, typical home values surged about 10% over the last year to roughly $482,000, according to Zillow Real Estate Research. Zillow predicts they will rise more than 10% in the next year.

Community-based nonprofits, whose revenues shrank but whose expenses remained during the COVID-19 pandemic, are asking stakeholders to step up their support.

“Nonprofits play a huge role in sewing the fabric of a community,” said Miguel Luna, who serves on both the Statewide Watershed Partnership Program and the city of L.A.’s Pedestrian Advisory Committee. “We have to ensure that they have the ability to continue to do so in a robust and fair way — as opposed to cities and developers.”

Taking a less welcoming position, some environmentalists say that installing platform parks is about the worst thing you can do to the river and adjacent communities. Ever since Gehry listed them among the ambitious projects he wants to design in the

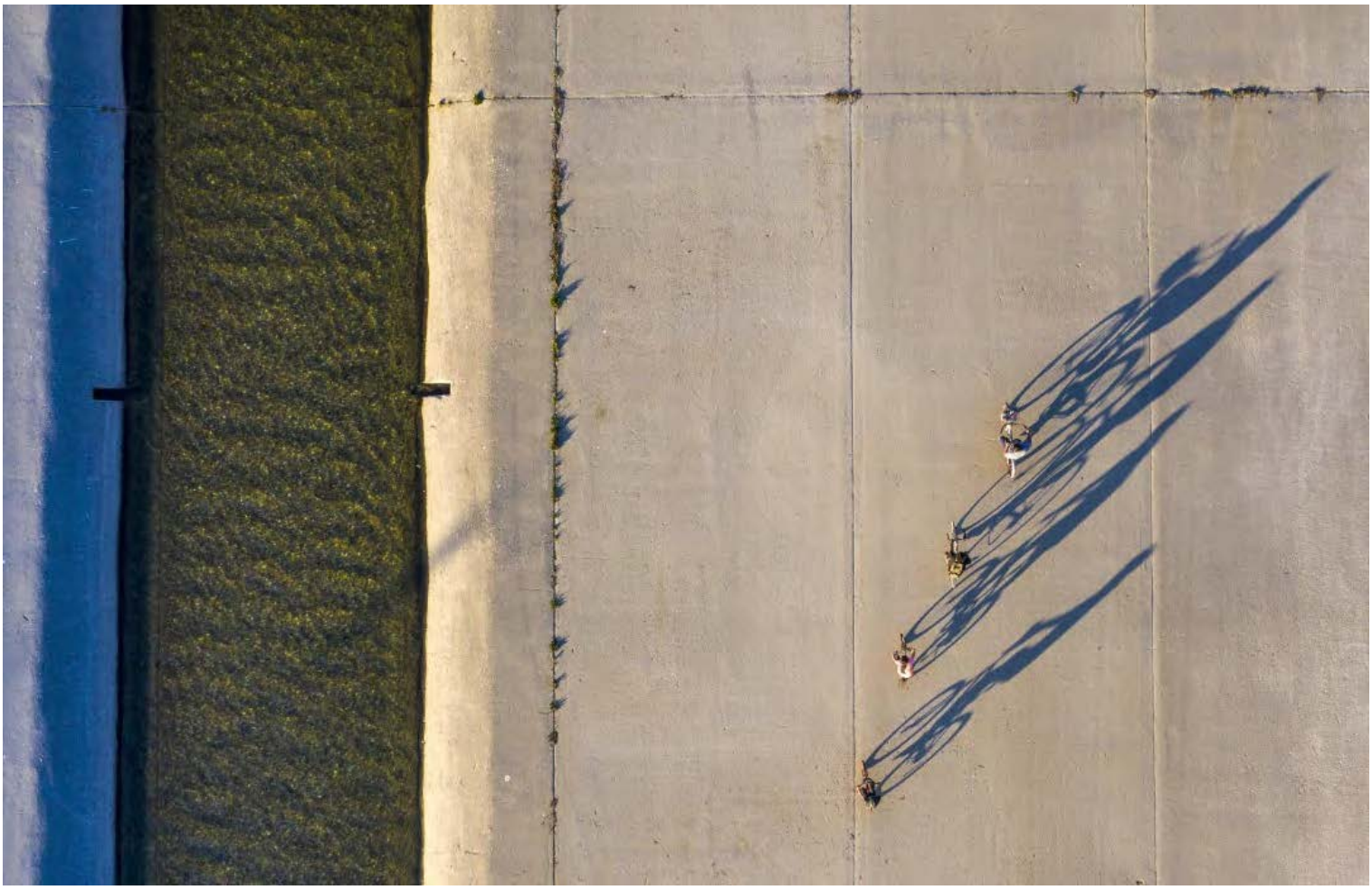
autumn of his career, anger and fear have simmered.

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A coalition of environmental groups led by Friends of the Los Angeles River, Heal the Bay, the Nature Conservancy, Los Angeles Waterkeeper, the Trust for Public Land and East Yard Communities for Environmental Justice threatened in November to withhold support for the river master plan if any mention of such structures was not removed before its publication.

“This proposal stands to do particular ecological harm,” the group argued in a letter to county officials, “create real estate speculation, and precludes future opportunities for climate resilience.”



Cyclists ride along the Los Angeles River in South Gate. (Brian van der Brug / Los Angeles Times)

"More concrete," it added, "does not help any of these issues or support the goals and methods described in the plan."

::

The entire 51-mile L.A. River channel was built in response to historic floods and was designed to flush storm water to the Pacific Ocean as quickly and efficiently as possible.

Recent U.S. Geological Survey studies suggest that more of these events are expected. They could even rival the flood of 1862, when 30 consecutive days of rain dumped 36 inches of precipitation over L.A. and forever changed the course of the river — relocating its mouth from Venice to Long Beach.

Early Anglo settlers "used to talk among themselves when they first came and wonder why the Mexicans were such fools as to build their houses on the hills and pack their water instead of building close to the water," according to U.S. Army Corps of Engineers historical records. "But they knew after the 1862 flood."

More than 150 years later, the proposals sketched by the Gehry, Olin and Hanna teams would be a long-awaited boost for a region shot through with random approaches to architecture, much of it beset with a tired feel of yesterday.

White flight and urban decay hit the area hard in the 1960s and '70s as major steel, rubber and auto plants moved away and left behind toxic waste sites and thousands of unemployed workers in Bell, Bell Gardens, Cudahy, South Gate, Downey, Maywood, Lynwood and Paramount.

In their wake came Latinos eager to rent and buy mostly old wood-frame and stucco homes and establish businesses that turn their backs to the river's flow of treated runoff and occasionally rampaging floodwaters.

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There are no visible signs that large-scale development will occur near the rivers' confluence anytime soon. But building the Southeast Los Angeles Cultural Center there is a priority of the San Gabriel River and Lower Los Angeles Rivers and Mountains Conservancy, a state agency overseeing its design and soliciting community input.

The nonprofit River LA conducted much of the outreach and survey work needed to align its programming and educational opportunities with the desires of people in surrounding communities. "Culinary arts are high on local wish lists," said Ed Reyes, River LA's executive director, because they are key to understanding the area's culture and history.

As envisioned by Gehry, the center will rear skyward from a riverside parcel currently used as a county maintenance yard just north of the massive 710 and 105 freeway interchange.

"It will have a quasi-industrial aesthetic — simple and not expensive, perhaps using

corrugated metal," Gehry said during the Zoom interview, his eyes darting back and forth as if he were reading a blueprint.

"There will be buildings along either side of a pedestrian street," he said. "In the middle there will be small artists' studios, a large concert hall, a restaurant and a plaza where everyone can interact. Movies will be projected against a wall of the concert hall.

"To the left of the restaurant is a culinary school. To the left of that, places for choir, photography and ceramics, among other things. And far to the left of that is an outdoor stage."

Gehry has already explored programming opportunities with directors of the Los Angeles Philharmonic, the Hammer Museum and the Los Angeles County Museum of Art.

"We're also going to create a bridge across the river," he said, "and add a connection leading down to the river bottom so that when Godzilla isn't raging with floodwaters it can serve as a concourse where people can have outdoor events."

::

As the morning sun rose over the confluence on a recent weekday, Hanna and Jessica Henson, a landscape architect and partner at Olin Studio who helped guide the development of the new river master plan, walked along the concrete no-man's land.

"There's no doubt that surrounding communities are better off than before the river was straightened and paved," Hanna mused. "But the engineers who did this only had one thing in mind — getting stormwater out to sea — and fast."

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"We wouldn't build it like this today," he added, shaking his head. "Launching a new stage in the life of this river won't be easy."

Henson would not argue with any of that.

“That’s OK,” she said. “The role of the lower L.A. River has changed, and that never mattered as much as it does today.”



A cyclist rides along the Los Angeles River near what might be Confluence Point Park in South Gate. (Brian van der Brug / Los Angeles Times)

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Louis Sahagún is a staff writer at the Los Angeles Times. He covers issues ranging from religion, culture and the environment to crime, politics and water. He was on the team of L.A. Times writers that earned the Pulitzer Prize in public service for a series on Latinos in Southern California and the team that was a finalist in 2015 for the Pulitzer Prize in breaking news. He is a CCNMA: Latino Journalists of California board member, and author of the book, “Master of the Mysteries: the Life of Manly Palmer Hall.”

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ATTACHMENT 12

APRIL 2019
R: 19-04-B

REPORT

OMISSION ACCOMPLISHED II:

THE LACK OF MUNICIPAL STORMWATER ENFORCEMENT IN THE LOS ANGELES REGION

AUTHOR
Corinne Bell



ACKNOWLEDGMENTS

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Days before publication of this report, the 2012 Los Angeles MS4 Permit, which is the focus of this report, was set aside by the Superior Court of Orange County because, in the court's opinion, the Regional Water Board failed to conduct a proper economic analysis of some of its requirements. It is unclear whether the Regional Board will appeal this decision. While the permit is currently invalidated, the major takeaways from this report remain the same: the Regional Board has not prioritized municipal stormwater enforcement during the 2012 permit period or during previous permit terms. The Regional Board was aware of the thousands of violations identified in this report soon after they occurred and yet took no action. Further, as demonstrated by the Orange County Superior Court decision, the Regional Board is increasingly ineffective at regulating the number one source of surface water pollution in the Los Angeles region. The residents of LA County deserve an effective Regional Water Board.

Table of contents

Executive Summary **5**

Introduction **8**

The Problem of Urban Runoff **9**

Federal and State Stormwater Regulation **9**

Board Enforcement Authority **10**

Regional Board MS4 Enforcement Actions from 1990-2018 ..... **12**

Bacteria TMDL Violations Pursuant to the 2012 Los Angeles County MS4 Permit **14**

Conclusion **19**

Appendix I: MS4 Permitting History **21**

Appendix II: Enforcement Authority and Enforcement Action Details **23**

Appendix III: Violations Maps and Details **30**

Executive Summary

Urban runoff is the leading source of surface water pollution for Los Angeles County. It is responsible for up to 278 million dollars of public health costs annually, causing hundreds of thousands of cases of gastrointestinal illnesses. Every day, an estimated 100 million gallons of runoff contaminated with trash, bacteria from human and animal waste, metals from industrial processes, herbicides and pesticides from homes and businesses, and oil and grease from our roads flows through the region's massive stormdrain system to foul our rivers, creeks and, ultimately, our coastal waters. During a storm, this total can swell to ten billion gallons or more.

The State Water Resources Control Board (State Board) and nine Regional Water Quality Control Boards are responsible for protecting surface water and groundwater quality in California, including protecting the humans and ecosystems that depend on clean water. The Los Angeles Regional Water Quality Control Board (Regional Board) has jurisdiction over a region mostly covered in asphalt, concrete, and other impervious surfaces that result in a large amount of urban runoff in both dry and wet weather.

Municipal Separate Storm Sewer Systems (MS4s) channel polluted runoff into waterbodies, and therefore require permits under the Clean Water Act. The Los Angeles MS4 permit incorporates limits, known as total maximum daily loads (TMDLs), on the total amount of a given pollutant that can be added to a pollutant-impaired waterbody. There are numerous TMDLs included in the Los Angeles County MS4 permit, including TMDLs for trash and bacteria. The Regional Board oversees the Los Angeles County MS4 permit and is tasked with enforcing permit violations, including TMDL violations.



Venice Beach

Despite the fact that urban runoff has been regulated through MS4 permits since 1990, it remains the most significant source of surface water pollution in the Los Angeles region. To understand why runoff is still such a big problem, NRDC analyzed MS4 enforcement actions taken by the Regional Board since permitting in the Region began. NRDC also performed a review of bacterial TMDL violations since the adoption of the 2012 LA County MS4 permit to provide a snapshot of the violations eligible for enforcement actions and to gain a general sense of permit compliance. We found that permittees, which include cities, are not complying with TMDL-related permit requirements and these violations are regularly unenforced by the Regional Board.

Specifically, this report calculates the number of dry-weather violations of the Santa Monica Bay Beaches, Ballona Creek, and the Malibu Creek bacteria TMDLs that occurred under the 2012 permit. NRDC focused on violations of the dry weather bacteria TMDLs because of the negative public health and environmental impacts of bacteria pollution and because these violations are not subject to the permit's "safe harbor" exemptions.

In all, NRDC found 2,079 violations of the permit's dry weather bacteria TMDL provisions from December 29, 2012 through October 31, 2017. These bacteria TMDL violations include:

- 1,265 violations of the Santa Monica Bay Beaches bacteria TMDL
- 449 violations of the Ballona Creek bacteria TMDL
- 365 violations of the Malibu Creek bacteria TMDL

The ten most egregious sites are spread across the three watersheds examined and are as follows:

1. Santa Monica Pier, Santa Monica State Beach (SMB 3-03): 455 violations[1]
2. Lower Lindero Creek (MCW-13, MCW-CIMP11): 155 violations
3. Malibu Creek, Malibu Lagoon County Beach (SMB MC-2): 151 violations
4. Palo Comado Creek (MCW-10, MCW-CIMP9): 126 violations
5. Topanga Canyon, Topanga County Beach (SMB 1-18): 114 violations
6. Ballona Creek Estuary (McConnell Ave) (BCB-6, BCE_MCC): 89 violations
7. Centinela Creek (Inglewood Blvd) (BCB-7, CC_ING): 88 violations
8. Sepulveda Channel (BCB-4, SC_CUL): 86 violations
9. Pico Kenter stormdrain, Santa Monica State Beach (SMB 3-04): 78 violations
10. Duquesne (Duquesne Ave) (BCB-2, BC_02_DUQ): 50 violations

The Regional Board has undertaken a total of ten enforcement actions related to the 2012 MS4 permit; however, none of these enforcement actions addressed the 2,079 violations we identified. In fact, apart from Time Schedule Orders—which gave violators *more time* to comply with permit requirements—none of the Regional Board's post-2012 enforcement actions addressed the bacteria TMDLs we examined. These thousands of violations and the accompanying lack of enforcement demonstrate that water quality in the Region is suffering, and the Regional Board has failed to address the problem.

Furthermore, violations occurred despite the fact that at some sites, the Regional Board had significantly raised the threshold for what constitutes a violation. The Regional Board did this by increasing the number of allowable exceedance days (i.e., the number of days a permittee could exceed limits without violating the permit) for monitoring sites in some of the most polluted areas. In some cases, under the guise of an enforcement Time Schedule Order and basin plan amendment, the Regional Board increased the allowances so high that permittees could exceed bacteria TMDL limits for a majority of their samples without ever triggering a violation. For example, the Sepulveda Channel monitoring station (BCB-4) recorded 45 exceedances from November 2013–October 2014. During this time period, the TMDL provided *one* allowable exceedance, typical for that watershed, resulting in 44 total violations for that site. That same monitoring station had 36 exceedances from November 2015–October 2016 but had zero violations for that year


Ballona Creek

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because the Regional Board had simply raised the number of allowable exceedances from one to *forty-eight*. Because this site is sampled weekly, this means that the site could exceed bacteria limits over 92 percent of the time without triggering a violation.

Unfortunately, our analysis of municipal stormwater enforcement since permitting began reveals that lack of enforcement is not new to the 2012 permit but instead is part of a long-term trend. NRDC's assessment of the enforcement actions taken by the Regional Board from 1990 to March 2018 found only 51 unique enforcement actions that were not later withdrawn or rescinded.

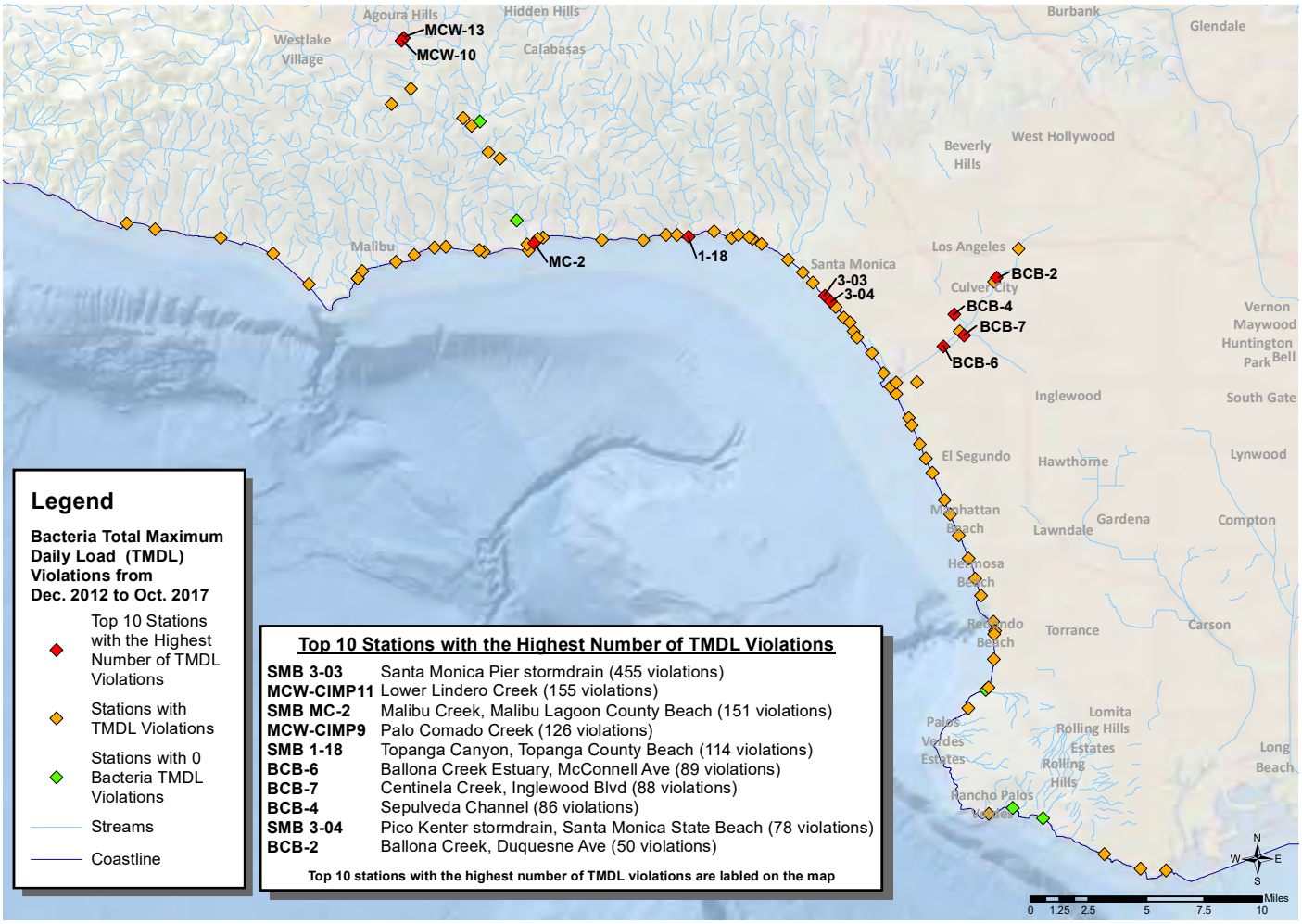
As a result of our analysis, this report concludes:

- The Regional Board's lack of enforcement of water quality violations has created a culture of non-compliance among permittees, while pollution goes unabated and continues to jeopardize public health and the environment.
- The Regional Board's lack of enforcement violates the State Board's Enforcement Policy and the Memorandum of Agreement between USEPA and the State Board.
- For some monitoring sites like those found in Ballona Creek, instead of requiring compliance, the Regional Board has simply weakened standards in order to make compliance easier.

To improve water quality and stormwater enforcement, we recommend that the Regional Board take the following actions:

- Provide annual updates to Regional Board members regarding stormwater violations, with more frequent updates on repeat offenders such as those listed at the beginning of this report.
- Adhere to the Enforcement Policy by consistently and progressively addressing MS4 permit violations via

Total Bacteria TMDL Violations from December 2012 to October 2017



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Created by Susan Lee on 3/19/2019

enforcement, including mandatory minimum penalties where applicable.

- Create an easily enforceable MS4 permit in 2019, which includes numeric limits and removes safe harbors.
- Devote significantly more resources to investigations and enforcement, including a full-time employee and increased legislative budget allocations if needed.
- To ease the burden on the Regional Board, all permittees should be required to submit monitoring reports in the same format, and monitoring site names should remain consistent. If site identifiers change this should be made clear in subsequent monitoring reports.
- To further aid transparency, permittees' monitoring reports should be easily accessible and searchable on the Regional Board's website; enforcement action timelines, including any required next steps, responses, or resolutions, should also be outlined and easily accessible online.
- Educate permittees on the effective use of Measure W funds to increase resources for the implementation of stormwater projects.

Without the threat of meaningful enforcement, there is little to no incentive for dischargers to comply with permit terms whose goal it is to protect water quality. The Regional Board's current enforcement record has shown an omission of duty; the Board must start taking its enforcement duties seriously if stormwater pollution will ever be addressed in the region.

Introduction

The California State Water Resources Control Board and the nine Regional Water Quality Control Boards are responsible for the protection of water quality in California.[2] The mission of the Water Boards is "[t]o preserve, enhance, and restore the quality of California's water resources and drinking water for the protection of the environment, public health, and all beneficial uses...for the benefit of present and future generations."[3] The State Water Board establishes statewide water quality control policy and regulations, coordinates Regional Water Board efforts, and reviews petitions contesting Regional Water Board actions.[4] The Regional Water Boards are semi-autonomous and make critical water quality decisions for their region.[5] The Los Angeles Regional Water Quality Control Board (Regional Board) was established in 1970 and has jurisdiction over the Los Angeles region, which includes the coastal watersheds of Los Angeles and Ventura counties, along with small portions of Kern and Santa Barbara counties.[6]

Over the past several decades, the population of Los Angeles County has skyrocketed. In 1990, the county's population totaled 8.86 million[7], and by 2010, that number had risen by nearly 1 million, to 9.82 million.[8] Los Angeles County now has over ten million residents spread across 88 cities[9] and is the most densely populated region in the state. This explosive growth has put tremendous pressure on the environment. To accommodate the needs of Los Angeles' rapid population growth, urban development and expansion have replaced the vast majority of the region's natural landscape with impervious surfaces (e.g. roads, rooftops, and parking lots).[10] Stormwater and dry weather runoff travel over these impervious surfaces and is channeled into Municipal Separate Storm Sewer Systems (MS4s), which consist of stormwater drains and pipes that then discharge the runoff into ocean waters and rivers, resulting in serious threats to public health, safety, and the environment.

Every day, an estimated 100 million gallons of runoff contaminated with trash, bacteria from human and animal waste, metals from industrial processes, herbicides and pesticides from homes and businesses, and oil and grease from our roads flows through the region's massive stormdrain system to foul our rivers, creeks and, ultimately, our coastal waters.[11] The Regional Board is responsible for regulating the runoff within its jurisdiction, and does so by issuing and enforcing County MS4 permits pursuant to the federal Clean Water Act's National Pollutant Discharge Elimination System (NPDES) program.[12] Recognizing that a strong enforcement program is critical to the success of this regulatory framework, the California Legislature granted significant enforcement authority to the Regional Water Boards.[13]

Despite the Los Angeles Regional Board's duty to regulate urban runoff, their broad enforcement powers to fulfill that duty, and the fact that it has been regulated since 1990, urban runoff remains a leading cause of water pollution in the Los Angeles area.[14] Enforcement is critical to reducing water pollution; a strong enforcement program can achieve significant public health and environmental benefits, whereas a weak enforcement regime has the opposite effect. To gain a full picture of the problem and the Regional Board's response, NRDC assessed related enforcement efforts since 1990, in addition to examining specific violations of the 2012 MS4 permit.

To conduct this review, NRDC filed Public Records Act requests[15] with the Regional Board for all documents regarding enforcement actions for municipal stormwater discharges since 1990. In addition to analyzing the extent of the Regional Board's enforcement efforts, NRDC examined a portion of the Regional Board's *opportunities* for enforcement through an assessment of existing violations of certain Bacterial TMDLs under the current Los Angeles County municipal stormwater permit. We did this by reviewing violations data detailed in permittees' monitoring reports, which permittees are required to submit regularly to the Regional Board.

This report provides an overview of the State and Regional Boards' enforcement authority, and an in-depth assessment of the Regional Board's MS4-related enforcement actions since 1990. Finally, this report provides an analysis of bacterial TMDL violations under the current Los Angeles MS4 permit, finding 2,079 violations with no enforcement thereof.

The Problem of Urban Runoff

Much of Los Angeles' urban and suburban landscape is covered by impervious surfaces,[16] which do not allow rain to soak into the ground. As a result, the rainfall "runs off" these surfaces and picks up harmful contaminants, such as trash, pesticides, heavy metals, automobile oil, and bacteria along the way. This polluted mixture, known as "stormwater runoff," enters storm drain systems which then discharge the runoff, often untreated, into the ocean, rivers, and other local waterbodies. In addition to polluted stormwater, these systems also discharge "dry-weather runoff," which comes from activities such as water from car washing and excessive landscape irrigation.[17]

The negative water quality impacts of urban runoff are well-known. The U.S. Environmental Protection Agency (USEPA) views urban runoff as a "significant" threat to water quality and considers it "one of the most significant reasons that water quality standards are not being met nationwide."[18] In Southern California, urban runoff is—and has been for at least a decade—the largest source of surface water pollution.[19] Polluted runoff not only harms aquatic life, but also poses serious human health risks; as early as 1996, urban runoff was recognized as a source of fecal bacteria at beaches, and therefore a public health concern.[20] One study of Southern California beaches showed that illnesses nearly doubled for people who swim near storm drain outlets.[21] Other studies have found that polluted stormwater in Los Angeles County causes between 427,800 and 993,000 cases of gastrointestinal illnesses each year, resulting in annual public health costs of up to $278 million.[22]

The Regional Board is well aware of the stormwater problem, as it has stated that "[p]olluted storm water and non-storm water discharges from MS4s are a leading cause of water quality impairment in the Los Angeles Region."[23]

Federal and State Stormwater Regulation

The 1972 amendments to the Clean Water Act established the NPDES program, which prohibits the discharge of any pollutant from a point source into the nation's waters unless authorized by a permit.[24] A "point source" is defined as any "discrete conveyance," such as a pipe or channel.[25] In 1987, Congress amended the Clean Water Act to specifically bring stormwater discharges from municipal sources into the NPDES program.[26]

The Clean Water Act also requires each state to identify beneficial uses for all waters in the state and set water quality standards that protect those various uses.[27] For example, California waters designated as "water contact recreation" (REC-1), are waters that are historically or potentially used for swimming, surfing, diving, and other activities that risk ingesting water.[28]

When waterbodies are polluted and do not support their beneficial uses, the Water Boards are required by section 303(d) of the Clean Water Act[29] to add that waterbody to a list of "impaired" waterbodies and to establish total maximum daily loads (TMDLs) for that waterbody. Essentially, TMDLs put dischargers on a "pollution diet" and dictate the total amount of a given pollutant that can be added to a waterbody without exceeding the applicable water quality standard.[30]

NPDES MS4 permits for discharges to impaired waterbodies with TMDLs must include effluent limits consistent with the TMDL.[31] The current Los Angeles MS4 permit covers 86 permittees (84 cities, the County Flood Control District, and Los Angeles County) and numerous impaired waterbodies.[32] For a more complete history of NPDES permitting for MS4s, see Appendix I.

Board Enforcement Authority



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Venice Beach

California's Porter-Cologne Act establishes the responsibilities and authorities of the nine Regional Water Boards and State Water Board. The Act identifies the Water Boards as "the principal State agencies with primary responsibility for the coordination and control of water quality."[33] To carry out that responsibility, the Water Boards are given the authority to implement and enforce water quality laws, regulations, policies, and plans.[34] Enforcement is critical to the success of the water quality program, and to protect public health and the environment.[35] To this end, the Porter-Cologne Act conferred broad enforcement authority upon the Water Boards by making available a suite of administrative and judicial enforcement tools to ensure compliance with state and federal water quality requirements.

In the 1989 Memorandum of Agreement between USEPA and the State Water Board, USEPA affirmed that the primary authority to enforce all NPDES permits rests with the State and Regional Water Boards.[36] This document requires the State Board to "assure that enforcement of the NPDES program is exercised aggressively, fairly, and consistently by all nine Regional Boards."[37] Specifically, the Regional Water Boards are responsible for "[t]aking timely and appropriate enforcement actions in accordance with the [Clean Water Act], applicable Federal regulations, and State Law…"[38]

STATE WATER QUALITY ENFORCEMENT POLICY

The Boards' stated approach to enforcement is outlined in the State Water Board's Water Quality Enforcement Policy. While the Regional Water Boards have primary responsibility for enforcement matters within their regions, the State Water Board has oversight authority over the Regional Boards' enforcement actions. The State Water Board may also take enforcement action in lieu of the Regional Board under specific circumstances.[39]

The Enforcement Policy clearly states that the principal goal of enforcement is to encourage compliance with pollution control requirements so that water quality is protected.[40] The Policy recognizes that "[e]nforcement is a critical ingredient in creating the deterrence needed to encourage the regulated community to anticipate, identify, and correct violations."[41]

To ensure the most efficient and effective use of available resources, the Water Boards rely on the principle of progressive enforcement. This involves ranking violations by severity and using escalating levels of enforcement, beginning with informal actions as simple as a phone call or staff letter, followed by formal, increasingly more severe actions until compliance is achieved.[42] While the Water Boards have a variety of enforcement tools at their disposal, some enforcement options are considered

discretionary while others are mandatory.[43] Despite the fact that some actions are discretionary, "[i]t is the policy of the State Water Board that every violation results in the appropriate enforcement response consistent with the priority of the violation established in accordance with [the Enforcement] Policy."[44]

INFORMAL ENFORCEMENT ACTIONS

An informal enforcement action is "any enforcement action taken by Water Board staff that is not defined in statute or regulation," including oral and written contacts, notices of violation (NOV), and certain requests for information.[45] The purpose of informal actions is to promptly bring a violation—actual, threatened, or potential—to a discharger's attention so they can address the violation and comply as soon as possible.[46] Importantly, the Enforcement Policy states that "continued noncompliance, particularly after informal actions have been unsuccessful, *will* result in escalation to more formal enforcement."[47] More information on informal enforcement actions can be found in Appendix II.

FORMAL ENFORCEMENT ACTIONS

A Water Board may take formal enforcement actions simultaneously with informal actions or take the formal approach as its first response. "Formal enforcement actions are statute-based actions to address a violation or threatened violation of water quality laws, regulations, policies, plans, or orders."[48] Formal actions that impose or conditionally impose penalties are considered "major" enforcement actions. Formal enforcement actions are detailed in Table 1 below, in order of increasing severity. More information on formal enforcement actions can be found in Appendix II.

MANDATORY MINIMUM PENALTIES

While the Water Boards have discretion to take any of the enforcement actions described above, the Porter-Cologne Act imposes mandatory enforcement obligations in some circumstances. Pursuant to § 13385(h) and (i), mandatory minimum penalties (MMPs) are required for certain violations of NPDES permits. The Water Boards, for example, must assess a minimum penalty of $3,000 for each serious violation.[57] A "serious violation" is defined in Water Code §§ 13385(h)(2) and 13385.1, and includes certain waste discharges that violate effluent limitations[58] or the failure to file a discharge monitoring report.[59]

In order to address chronic violations,[60] the Water Boards are also required to assess a minimum penalty of $3,000 for each non-serious recurring violation. As is stipulated in the Water Code, a non-serious violation occurs when a discharger: "(A) Violates a waste discharge requirement (WDR) effluent limitation; (B) Fails to file a report of waste discharge pursuant to California Water Code section 13260..."[61]

Certain violations of TMDLs incorporated into the 2012 MS4 permit may be subject to mandatory minimum penalties because they are violations of WDR effluent limitations. The 2012 Los Angeles County MS4 permit sets out "waste discharge requirements for...MS4 discharges..." and the permit itself "serves as waste discharge requirements pursuant to article 4, chapter 4, division 7 of the California Water Code..."[62] The current MS4 permit incorporates the water-quality based effluent limitations (WQBELs) for relevant TMDLs,[63] and the Regional Board has defined effluent limits as a numeric restriction on the quantity or concentration of pollutants.[64] Additionally, both the State and Regional Board have stated that the stormwater program may be subject to MMPs. For these reasons, chronic violations of the TMDLs' WQBELs in the 2012 MS4 permit may be subject to MMPs.

TABLE I: ENFORCEMENT ACTIONS AND DESCRIPTIONS

FORMAL ENFORCEMENT ACTION	DESCRIPTION
Notice to Comply	States the nature of the violation, how the violation will be addressed, and a time limit (not to exceed 30 days) by which to comply.[49] The only means by which a Water Board can commence a formal enforcement action for a "minor" violation.[50]
Technical Reports/Technical Investigation	The Board may require technical or monitoring reports from any discharger.[51]
Cleanup and Abatement Orders	Requires the discharger to clean up the pollution, abate the effects of the pollution, or both.[52]
Time Schedule Orders	"[S]ets forth the actions the discharger will take to address actual or threatened illegal discharges of waste..." by a certain deadline.[53] Section 13308 Time Schedule Orders prescribe civil penalties in advance.[54]
Cease and Desist Orders	An administrative order requiring dischargers to stop polluting or face tougher legal penalties.[55]
Administrative Civil Liabilities Complaints	Fines administratively imposed by the Water Boards.[56]

Regional Board MS4 Enforcement Actions from 1990–2018

Despite all the aforementioned enforcement tools, including mandatory actions, and the severity of runoff-related pollution in Los Angeles County, little action has been taken by the Boards to address municipal stormwater violations in the region. For this report, NRDC performed an extensive review of MS4 enforcement-related documents[65] issued by the Regional Board since 1990. NRDC obtained these documents through Public Records Act (PRA) requests to the Regional Board; we requested documents through September 30, 2018, and analyzed actions through March 2018. These were then cross-checked with the State Board's California Integrated Water Quality System (CIWQS) database[66] to ensure that we had obtained a complete view of the Regional Board's enforcement activities. Details on these enforcement actions can be found in Appendix II.

Based on our review of these documents, the Regional Board has taken a total of 74 enforcement actions since 1990, 23 of which were later rescinded or withdrawn.[67] The bulk of these enforcement actions were for violations of the 2001 Los Angeles County MS4 Permit, the permit that was in place until the 2012 permit. Among the 74 enforcement actions, the Regional Board brought only five enforcement actions that impose civil penalties, known as Administrative Civil Liabilities (ACLs). All but one of these ACLs were substantially reduced from the maximum penalty; the one ACL that was not reduced was a mandatory minimum penalty. The largest recommended penalty, for $274,896, was ultimately withdrawn by the Regional Board. We also found that when there was a follow-up enforcement action, it often occurred months or even more than a year later.

During this time, the Regional Board also issued three Time Schedule Orders (TSOs) pursuant to the 2012 Los Angeles County MS4 Permit. These three TSOs should be considered enforcement actions in name only, as the reality is that these Orders granted permittees *additional time* to comply with TMDL requirements at the request of the permittees.[68] The TSOs also increased the threshold that must be met for an exceedance day to trigger a violation, making compliance easier. The TSO affecting the Ballona watershed is discussed in detail below.

A summary of the Regional Board's enforcement actions[69] can be seen in Tables 2, 3, 4, and 5, below and more details of the enforcement actions can be found in Appendix II.

TABLE 2: INFORMAL MS4-RELATED ENFORCEMENT ACTIONS FROM 1990–2012

TYPE OF INFORMAL ENFORCEMENT ACTION	NUMBER OF ENFORCEMENT ACTIONS	RESCINDED	TOTAL
Oral Contact	0	0	0
Notice of Violation (NOV)	8	3	5
Request for Information	0	0	0
Total	8	3	5

TABLE 3: FORMAL MS4-RELATED ENFORCEMENT ACTIONS FROM 1990–2012

TYPE OF FORMAL ACTION	NUMBER OF FORMAL ACTIONS	RESCINDED	TOTAL
Notice to Comply[70]	7	0	7
Request for Technical Reports & Investigation[71]	45[72]	19[73]	26
Cleanup and Abatement Order (CAO)	0	0	0
Time Schedule Order (TSO)	0	0	0
Cease and Desist Order (CDO)	0	0	0
Administrative Civil Liabilities (ACL) Complaint	4	1	3
Total	56	20	36

Total Non-Rescinded Actions from 1990–2012: 41
Average Number of Non-Rescinded Actions per year 1990–2012: 1.82[74]

TABLE 4: INFORMAL MS4 ENFORCEMENT ACTIONS FROM 2013–2018[75]			
TYPE OF INFORMAL ENFORCEMENT ACTION	**NUMBER OF INFORMAL ENFORCEMENT ACTIONS**	**RESCINDED**	**TOTAL**
Oral Contact	0	0	0
Notice of Violation (NOV)	1	0	1
Request for Information[76]	4	0	4
Total	5	0	5

TABLE 5: FORMAL MS4 ENFORCEMENT ACTIONS FROM 2013–2018			
TYPE OF FORMAL ACTION	**NUMBER OF FORMAL ACTIONS**	**RESCINDED**	**TOTAL**
Notice to Comply	0	0	0
Request for Technical Reports & Investigation	1	0	1
Cleanup and Abatement Order (CAO)	0	0	0
Time Schedule Order (TSO)[77]	3	0	3
Cease and Desist Order (CDO)	0	0	0
Administrative Civil Liabilities (ACL) Complaint	1	0	1
Total	5	0	5

Total Non-Rescinded Actions from 2013–2018: 10
Average Number of Non-Rescinded Actions per year 2013–2018: 1.90[78]

TABLE 6: ACL ENFORCEMENT ACTIONS FROM 1990–2018					
PERMITTEE	**DATE ISSUED**	**POTENTIAL PENALTY (MAX) OR MMP**	**ASSESSED PENALTY**	**PERCENTAGE REDUCTION**	**PAID OR RESCINDED**
City of Pomona and County Department of Public Works	4/2/98	$1,690,000 (max)	$6,700	99.6%	Paid
City of Los Angeles	9/24/03	$10,000 (max)	$4,310	56.9%	Paid
City of Torrance	1/30/09	$140,000 (max)	$52,455	62.5%	Paid
Los Angeles County Flood Control District	2/18/10	$22,158,000 (max)	$274,896	98.8%	Rescinded
City of South El Monte	6/23/17	$21,000 (MMP)	$21,000	N/A	Paid

Bacteria TMDL Violations Pursuant to the 2012 Los Angeles County MS4 Permit


Los Angeles

In addition to assessing the Regional Board's enforcement efforts since 1990, NRDC also examined some MS4 permit violations, focusing on violations of the bacteria TMDLs. NRDC analyzed violations of the bacteria TMDLs in three watersheds and uncovered thousands of ignored violations with severe consequences for the health of our waters.

NRDC chose to focus on bacteria TMDLs in part because waters contaminated with bacteria can cause various adverse health effects, including fever, chills, eye and ear infections, coughing and respiratory ailments, vomiting, diarrhea, and skin rashes.[79] Additionally, bacteria TMDLs are an enforceable part of the 2012 permit and not subject to the permit's broad safe harbors. When the Regional Board adopted the 2012 LA MS4 Permit, they included broad safe harbors[80] that excuse permittees from violations when certain stormwater management plans are developed and submitted to the Regional Board for approval. There are elements of the MS4 permit which impose effluent limits (such as TMDLs) that are not subject to the safe harbors and therefore can give rise to a permit violation.[81]

For this report, NRDC assessed noncompliance through the lens of three bacteria TMDLs that are incorporated into the MS4 permit. Specifically, NRDC set out to determine the number of violations of the Santa Monica Bay Beaches (SMB) TMDL; the Ballona Creek, Ballona Estuary, and Sepulveda Channel (Ballona Creek) TMDL; and the Malibu Creek and Lagoon Basins (Malibu Creek) TMDL. We examined monitoring data that permittees are required to regularly submit to the Regional Board, which we obtained via Public Records Act requests or from the Permittees themselves.[82]

Given the low number of enforcement actions taken by the Regional Board, NRDC hypothesized that enforcement actions do not accurately reflect the actual frequency of violations in the region. Rather, we suspected that there are numerous chronic violations that currently go unenforced.[83] Unfortunately, this was confirmed.

NRDC's analysis reveals that thousands of MS4 permit violations have occurred since 2012 and are likely still occurring. The Regional Board, however, has taken no enforcement action to ensure that the dischargers remedy

these bacterial TMDL violations and cease violating in the future. Consequently, these violations continue to cause significant harm to the region's waters and to public health. The following section describes NRDC's methodology for calculating the TMDL violations and presents our findings. Additional details and maps illustrating the 2,079 violations can be found in Appendix III.

METHODOLOGY USED TO DETERMINE VIOLATIONS

Each TMDL sets numeric limits (or waste load allocations) for four bacterial indicators and allows for exceedances of these limits depending on the season, monitoring station, water type, sampling frequency, and/or whether the runoff occurred during dry weather or wet weather. The bacterial indicators are E. coli, enterococcus, total coliforms, and fecal coliforms; limits vary for each indicator. Exceedances of any one or more of the limits on the same day constitute an exceedance day. For example, if the limits for total coliform and fecal coliform are both exceeded at one site on a given day, that day is only counted as *one* exceedance day. Different monitoring stations are given different numbers of allowable exceedance days per season/year.[84]

A bacteria TMDL violation occurs when the monitoring sample meets all of the following criteria: (1) at least one of the single sample limits is exceeded on a given sampling day, (2) the day is "dry," (meaning it did not rain 0.1 inch on that day or the three days prior) and (3) the number of exceedance days surpasses the allowable exceedance days for that season. The following equation shows how the number of violations is calculated:

> # of violations = # of exceedance days - # of allowable exceedance days

In general, allowable exceedance days are grouped into three time periods:

1. Summer dry weather (April 1–October 31)
2. Winter dry weather (November 1–March 31)
3. Wet weather (defined as days with 0.1 inch of rain or more and the three days following the rain event)

Some stations' allowable exceedance days are grouped annually and not according to summer/winter seasons. Because the wet weather requirements of these TMDLs are not yet in effect, we identified wet weather days via appropriate rain gauge data and omitted any exceedances that occurred during wet weather.[85]

Bacterial TMDL violations were calculated for the following time periods for each of the three watersheds (based on TMDL compliance deadlines and the MS4 permit period[86]):

> Santa Monica Bay Beaches: December 29, 2012–October 31, 2017
>
> Ballona Creek: April 27, 2013–October 31, 2017
>
> Malibu Creek: December 29, 2012–October 31, 2017

The ten sites with the most violations are spread across the three watersheds we examined, and are as follows:

1. Santa Monica Pier, Santa Monica State Beach (SMB 3-03): 455 violations[87]
2. Lower Lindero Creek (MCW-13, MCW-CIMP11): 155 violations
3. Malibu Creek, Malibu Lagoon County Beach (SMB MC-2): 151 violations
4. Palo Comado Creek (MCW-10, MCW-CIMP9): 126 violations
5. Topanga Canyon, Topanga County Beach (SMB 1-18): 114 violations
6. Ballona Creek Estuary (McConnell Ave) (BCB-6, BCE_MCC): 89 violations
7. Centinela Creek (Inglewood Blvd) (BCB-7, CC_ING): 88 violations
8. Sepulveda Channel (BCB-4, SC_CUL): 86 violations
9. Pico Kenter stormdrain, Santa Monica State Beach (SMB 3-04): 78 violations
10. Duquesne (Duquesne Ave) (BCB-2, BC_02_DUQ): 50 violations

VIOLATIONS OF SANTA MONICA BAY BEACHES BACTERIA TMDL

In 1998, the Santa Monica Bay beaches were designated as impaired and placed on California's section 303(d) list due to excessive amounts of coliform bacteria.[88] Consequently,[89] the Regional Board developed and adopted the dry weather elements of the Santa Monica Bay Beaches bacteria TMDL on January 24, 2002 and USEPA approved the TMDL on June 19, 2003.[90] The Regional Board amended the TMDL on June 7, 2012, raising the threshold for what constitutes a violation, and USEPA approved the revision in July of 2014.[91]

The Santa Monica Bay Beaches bacteria TMDL sets the following single sample limits:

1. Total coliform density shall not exceed 10,000/100 mL.
2. Fecal coliform density shall not exceed 400/100 mL.
3. Enterococcus density shall not exceed 104/100 mL.
4. Total coliform density shall not exceed 1,000/100 mL, if the ratio of fecal-to-total coliform exceeds 0.1.[92]

For each monitoring site in the Santa Monica Bay Beaches, the allowable number of exceedance days is set for summer dry weather, winter dry weather, and wet weather. The number of allowable exceedance days also depend on whether daily or weekly sampling is conducted at the site. No exceedances are permitted at any shoreline monitoring location during the summer dry period.

From December 29, 2012 to October 31, 2017, there have been **a total of 1,265 violations** of the Santa Monica Bay Beaches bacteria TMDL. A summary of the total allowable exceedances, actual exceedances, and violations by season can be found in Table 7 below, and a full break down of the violations by station can be found in Appendix III.

TABLE 7: SANTA MONICA BAY BEACHES BACTERIA TMDL ALLOWABLE EXCEEDANCES, ACTUAL EXCEEDANCES, AND TOTAL VIOLATIONS

Allowable exceedances are set for each monitoring station and vary for each station. When one station has not met or surpassed its allowable exceedances, this "unused" allowable exceedance cannot be used by another site that has met its limit. For this reason, the total violations cannot be calculated by merely subtracting actual exceedances from the allowable number of exceedances.

SEASON AND WEATHER	DATE	TOTAL ALLOWABLE EXCEEDANCES	ACTUAL EXCEEDANCES	TOTAL VIOLATIONS
Winter Dry	Dec 2012–Mar 2013	80	104	70
Summer Dry	Apr 2013–Oct 2013	0	185	185
Winter Dry	Nov 2013–Mar 2014	80	226	168
Summer Dry	Apr 2014–Oct 2014	0	158	158
Winter Dry	Nov 2014–Mar 2015*	162	226	108
Summer Dry	Apr 2015–Oct 2015	0	152	152
Winter Dry	Nov 2015–Mar 2016	162	159	84
Summer Dry	Apr 2016–Oct 2016	0	128	128
Winter Dry	Nov 2016–Mar 2017	162	140	61
Summer Dry	Apr 2017–Oct 2017	0	151	151
TOTAL				**1,265**

*indicates season when allowable number of exceedance days were increased.

VIOLATIONS OF BALLONA CREEK, BALLONA ESTUARY, AND SEPULVEDA CHANNEL BACTERIA TMDL

In 1998, the Ballona Estuary was placed on California's Clean Water Act Section 303(d) list as impaired due to coliform bacteria.[93] In 2002, Ballona Creek was added to the list for the same reason.[94] The Regional Board adopted the Ballona Creek bacteria TMDL on June 8, 2006, and USEPA approved it on March 26, 2007.[95] The TMDL was later revised by the Regional Board on June 7, 2012[96] and USEPA approved the revised version on July 2, 2014.[97] The Ballona Creek bacteria TMDL sets different limits for each monitoring station based on water type (marine or fresh water) and recreation type (contact or non-contact recreation uses).[98]

The effective date of the Ballona Creek bacteria TMDL is April 27, 2013. However, on May 14, 2015, the Regional Board issued a TSO that significantly raised the threshold for what constitutes a violation[99] by increasing the number of allowable exceedance days (the number of days a site could exceed limits without triggering a violation of the permit). For example, the Sepulveda Channel monitoring station (BCB-4) recorded 45 exceedances from November 2013 – October 2014. During this time period, the TMDL provided *one* allowable exceedance, resulting in 44 total violations for that site. That same monitoring station had 36 exceedances from November 2015–October 2016, but had zero violations for that year, because the Regional Board had raised the number of allowable exceedances from one to *48*. Because this site is sampled weekly,[100] this increase to 48 allowable exceedance days means that the site could exceed bacteria limits over 92 percent of the time without triggering a violation. Making the situation even more dangerous, the Ballona TSO increased the number of allowable exceedance days in the summer season—when people are more likely to recreate and therefore be harmed by polluted water.

All Ballona sites have a set number of allowable exceedances with the exception of site BCB-1, which had a ten percent exceedance frequency until the May 14, 2015 TSO was issued, which granted BCB-1 a set number.[101] BCB-1 through BCB-5 are reported in annual, dry weather periods while BCB-6 through BCB-9 are reported as summer dry, winter dry, and wet weather periods.[102]

Based on NRDC's calculations, since April 27, 2013, there have been **a total of 449 violations** of the Ballona Creek bacteria TMDL. A summary of the total allowable exceedances, actual exceedances, and total violations by season/year for BCB-1 through BCB-5 and BCB-6 through BCB-9 can be found below in Tables 8 and 9, respectively. A full break down of the violations by station can be found in Appendix III.

TABLE 8: BALLONA CREEK AND BALLONA ESTUARY BACTERIA TMDL ALLOWABLE EXCEEDANCES, ACTUAL EXCEEDANCES, AND TOTAL VIOLATIONS— BCB-1 THROUGH BCB-5

Allowable exceedances are set for each monitoring station and vary for each station. When one station has not met or surpassed its allowable exceedances, this "unused" allowable exceedance cannot be used by another site that has met its limit. For this reason, the total violations cannot be calculated by merely subtracting actual exceedances from the allowable number of exceedances.

SEASON AND WEATHER	DATE	TOTAL ALLOWABLE EXCEEDANCES*	ACTUAL EXCEEDANCES	TOTAL VIOLATIONS
Dry Exceedance	Apr 2013–Oct 2013	4	75	71
Dry Exceedance	Nov 2013–Oct 2014	4	132	128
Dry Exceedance	Nov 2014–May 13, 2015[103]	4	34	30
Dry Exceedance	May 14, 2015–Oct 2015	64	48	0
Dry Exceedance	Nov 2015–Oct 2016	146	69	0
Dry Exceedance	Nov 2016–Oct 2017	146	77	0

* This total includes the percentage limit for BCB-1.

TABLE 9: BALLONA CREEK AND BALLONA ESTUARY BACTERIA TMDL ALLOWABLE EXCEEDANCES—BCB-6 THROUGH BCB-9

SEASON AND WEATHER	DATE	TOTAL ALLOWABLE EXCEEDANCES	ACTUAL EXCEEDANCES	TOTAL VIOLATIONS
Summer Dry	Apr 2013–Oct 2013	0	66	66
Winter Dry	Nov 2013–Mar 2014	8	42	34
Summer Dry	Apr 2014–Oct 2014	0	68	68
Winter Dry	Nov 2014–Mar 2015	8	38	30
Summer Dry	Apr 2015–May 13, 2015[104]	0	10	10
Summer Dry	May 14, 2015–Oct 2015	59	50	3
Winter Dry	Nov 2015–Mar 2016	45	42	2
Summer Dry	Apr 2016–Oct 2016	77	65	6
Winter Dry	Nov 2016–Mar 2017	45	27	0
Summer Dry	Apr 2017–Oct 2017	77	62	1

VIOLATIONS OF MALIBU CREEK AND LAGOON BASINS BACTERIA TMDL

"Several reaches and tributaries to the Malibu Creek and Lagoon were designated as impaired [in 1998 and 2002] and included on the state's…303(d) list due to excessive amounts of coliform bacteria."[105] The Regional Board adopted the Malibu Creek bacteria TMDL on December 13, 2004, and USEPA approved it on January 10, 2006.[106] The TMDL was revised and adopted by the Regional Board on June 7, 2012[107] and USEPA approved the revised version on July 2, 2014.[108]

Like Ballona, the Malibu Creek and Lagoon bacteria TMDL sets different limits for each monitoring station based on water type (marine or fresh water) and recreation type (contact or non-contact recreation uses).[109]

The single monitoring site in Malibu Lagoon is assigned an allowable number of exceedance days for summer dry weather and winter dry weather. These exceedances are detailed in Table 10. Each existing monitoring site in Malibu Creek and its tributaries are assigned an allowable number of exceedance days for annual dry weather. These exceedances are detailed in Table 11.

Based on NRDC's analysis, since December 29, 2012, there have been **a total of 365 violations** of the Malibu Creek bacteria TMDL. A summary of the total allowable exceedances, actual exceedances, and total violations by season for MCW-1 and the remaining MCW sites we examined can be found in below Tables 10 and 11, respectively. A full breakdown of the violations by station can be found in Appendix III.

TABLE 10: MALIBU LAGOON BACTERIA TMDL ALLOWABLE EXCEEDANCES, ACTUAL EXCEEDANCES, AND TOTAL VIOLATIONS—MCW-1

Allowable exceedances are set for each monitoring station and vary for each station. When one station has not met or surpassed its allowable exceedances, this "unused" allowable exceedance cannot be used by another site that has met its limit. For this reason, the total violations cannot be calculated by merely subtracting actual exceedances from the allowable number of exceedances.

SEASON AND WEATHER	DATE	TOTAL ALLOWABLE EXCEEDANCES	ACTUAL EXCEEDANCES	TOTAL VIOLATIONS
Winter Dry	Dec 2012–Mar 2013	2	4	2
Summer Dry	Apr 2013–Oct 2013	0	3	3
Winter Dry	Nov 2013–Mar 2014	2	4	2
Summer Dry	Apr 2014–Oct 2014	0	3	3
Winter Dry	Nov 2014–Mar 2015	2	11	9
Summer Dry	Apr 2015–Oct 2015	0	2	2
Winter Dry	Nov 2015–Mar 2016	2	7	5
Summer Dry	Apr 2016–Oct 2016	0	2	2
Winter Dry	Nov 2016–Mar 2017	2	4	2
Summer Dry	Apr 2017–Oct 2017	0	9	9

TABLE 11: MALIBU CREEK BACTERIA TMDL ALLOWABLE EXCEEDANCES, ACTUAL EXCEEDANCES, AND TOTAL VIOLATIONS FOR MCW-2 THROUGH MCW-7, MCW-10, 11, 13, AND 16

SEASON AND WEATHER	DATE	TOTAL ALLOWABLE EXCEEDANCES	ACTUAL EXCEEDANCES	TOTAL VIOLATIONS
Dry Exceedance	Dec 2012-Oct 2013	10	84	78
Dry Exceedance	Nov 2013 - Oct 2014	10	97	89
Dry Exceedance	Nov 2014 - Oct 2015	10	81	74
Dry Exceedance	Nov 2015 - Oct 2016	10	63	55
Dry Exceedance	Nov 2016 - Oct 2017	10	38	30

SUMMARY OF 2012 MS4 PERMIT TMDL VIOLATIONS

NRDC's findings reveal the following:

- From December 29, 2012 to October 31, 2017, there have been 1,265 violations of the Santa Monica Bay Beaches dry weather bacteria TMDL, and 365 violations of the Malibu Creek dry weather bacteria TMDL.
- From April 27, 2013 to October 31, 2017, there have been 449 violations of the Ballona Creek dry weather bacteria TMDL.
- These 2,079 bacteria TMDL violations constitute violations of the 2012 Los Angeles County MS4 Permit, none of which have been enforced or otherwise penalized by the Regional or State Board. Further, hundreds of these chronic violations may be subject to mandatory minimum penalties. Taken together, these unenforced violations show that the Board has failed to protect the region's water quality and to ensure clean and safe water for local communities.

Conclusion

Based on NRDC's examination of the Los Angeles Regional Board's enforcement efforts, not only did the Regional Board fail to meaningfully enforce violations over the past 27 years, the majority of the relatively few enforcement actions were rescinded or withdrawn, and none resulted in meaningful financial penalties. In fact, all but one of the penalties collected by the Regional Board were substantially reduced from the maximum penalty. This record of enforcement hardly meets the USEPA's standards and expectation that Regional Water Boards take an aggressive approach to enforcement of the NPDES program.[110]

Moreover, when permittees fail to comply with the requirements of the Regional Board's initial enforcement, the Regional Board rarely follows its own policy of progressive enforcement to bring escalating, more severe actions to address continuing noncompliance.[111] When the Regional Board does take subsequent action, it is slow to do so, as demonstrated by the year plus lag time between a first Notice of Violation and a second Notice. Because there has been limited, if any, follow-up or proper escalation, it is unlikely that the Regional Board's enforcement actions have created the deterrence goal outlined in the State Water Board's Enforcement Policy.[112] The Enforcement Policy states that "continued noncompliance, particularly after informal actions have been unsuccessful, *will* result in escalation to more formal enforcement;" however, this is hardly the reality.[113]

The complete lack of enforcement of these violations demonstrates that the Regional Board has not prioritized the health of our waters or communities.

Meanwhile, NRDC's examination of bacteria TMDL violations confirmed its hypothesis: the Regional Board's lack of enforcement is not due to a lack of violations, as illustrated by the 2,079 violations in a period of less than five years. These unchecked violations, which are just a snapshot of all potential MS4 violations, have direct consequences for human health and environmental quality. The complete lack of enforcement of these violations demonstrates that the Regional Board has not prioritized the health of our waters or communities, particularly during the 2012 MS4 permit period.

Additionally, the TSO issued to Ballona demonstrates the Regional Board's willingness to relax requirements to make compliance easier for permittees.

As a result of our analysis, this report concludes:

- The Regional Board's lack of enforcement of water quality violations has created a culture of non-compliance among permittees, while pollution goes unabated and continues to jeopardize public health and the environment.
- The Regional Board's lack of enforcement violates the State Board's Enforcement Policy and the Memorandum of Agreement between USEPA and the State Board.

These unenforced violations not only have significant public health consequences, including the economic burden of health costs, and allow pollution and polluters to go completely unchecked, but they also represent missed opportunities to collect penalties that can be used to address water quality issues. In lieu of penalties, the Regional Board also could have allowed for the development of Supplemental Environmental Projects (SEPs), environmentally beneficial projects that could help address the cause of a violation while also creating multiple community benefits.[114]

The Regional Board must fulfill its enforcement duties as outlined in the State Board's Enforcement Policy if runoff-related pollution will ever be addressed in the region. Measure W, a ballot initiative recently passed by Los Angeles County voters, also presents a unique opportunity to address the number one source of pollution of the Region's surface waters by creating a steady funding source for runoff-related projects in the County. When coupled with proper enforcement of the Region's MS4 permit, this funding, which will generate approximately $300 million annually, will help permittees come into compliance and thereby improve the region's water quality.[115]

Going forward, we recommend that the Regional Board take the following actions:

- Provide annual updates to Regional Board members regarding stormwater violations, with more frequent updates on repeat offenders such as those listed at the beginning of this report.
- Adhere to the Enforcement Policy by consistently and progressively addressing MS4 permit violations via enforcement, including mandatory minimum penalties where applicable.

- Create an easily enforceable MS4 permit in 2019, which includes numeric limits and removes safe harbors.
- Devote significantly more resources to investigations and enforcement, including a full-time employee and increased legislative budget allocations if needed.
- To ease the burden on the Regional Board, all permittees should be required to submit monitoring reports in the same format, and monitoring site names should remain consistent. If site identifiers change it should be made clear in monitoring reports.
- To further aid transparency, permittees' monitoring reports should be easily accessible and searchable on the Regional Board's website, and enforcement action timelines, including any required next steps or responses, or their resolution, should also be outlined and easily accessible online.
- Educate permittees on the effective use of Measure W funds to increase resources for the implementation of stormwater projects.

Without the threat of meaningful enforcement, there is little to no incentive for dischargers to comply with permit limits designed to protect water quality. It is thus unsurprising that urban runoff remains the leading cause of water quality impairment in the Los Angeles region. The Regional Board must address MS4 violations through robust enforcement if it is ever to achieve its mission to "preserve, enhance, and restore the quality of California's water resources."[116]

Appendix I: MS4 Permitting History

FEDERAL AND STATE STORMWATER REGULATION

The 1972 amendments to the Clean Water Act established the National Pollutant Discharge Elimination System (NPDES) program, which prohibits the discharge of any pollutant from a point source into the nation's waters unless authorized by a permit.[117] A "point source" is defined as any "discrete conveyance," such as a pipe or channel.[118] Although Congress intended the 1972 amendments to cover urban stormwater point source discharges, EPA unsuccessfully attempted to exempt those discharges from the NPDES program.[119]

In 1987, Congress formally recognized the growing threat that urban runoff posed to the nation's waters and the inadequacy of EPA's regulations, and amended the Clean Water Act to specifically bring stormwater discharges from municipal sources into the NPDES program.[120] Regulations for the NPDES municipal stormwater program were developed in two phases. The Phase I Stormwater Rules, finalized in 1990, require NPDES permits for operators of "medium" and "large" MS4s, which include cities or counties serving populations of 100,000 or more.[121] The Phase II Stormwater Rules, finalized in 1999, expanded the NPDES permitting requirements to smaller MS4s, which serve populations fewer than 100,000.[122] NPDES permits must be renewed every five years.[123]

Section 402 of the Clean Water Act governs the NPDES program and allows states to assume NPDES permitting authority subject to EPA approval and oversight.[124] California is one of forty-six[125] states with delegated authority under the Act to administer the NPDES permitting program.[126] California's Porter-Cologne Water Quality Control Act (Porter-Cologne Act) authorizes the State Water Board, through the nine Regional Water Boards, to regulate and control the discharge of pollutants into waters of the state through the issuance of NPDES permits.[127]

The Clean Water Act also requires each state to identify beneficial uses for all waters in the state and set water quality standards that protect those various uses.[128] For example, California waters designated as "water contact recreation" (REC-1), are waters that are historically or potentially used for swimming, surfing, diving, and other activities that risk ingesting water.[129] When waterbodies fail to support their beneficial uses, the Water Boards are required by section 303(d) of the Clean Water Act to add that water body to a list of "impaired" waterbodies (waterbodies that do *not* meet water quality standards) and to establish total maximum daily loads (TMDLs) for that waterbody.[130]

TMDLs put dischargers on a "pollution diet" and represent the total amount of a given pollutant that can be added to a waterbody without exceeding the applicable water quality standard.[131] Each point source that discharges to the waterbody is assigned a "waste load allocation," which is the maximum amount of a pollutant that a point source is allowed to release into that water body.[132] MS4 permits for discharges to impaired waterbodies having TMDLs must include effluent limits consistent with the waste load allocations for that TMDL.[133] Both the state's section 303(d) list of impaired waters and TMDLs need to be approved by EPA.[134]

HISTORY OF PHASE I MS4 PERMITTING IN THE LOS ANGELES REGION

The Los Angeles Regional Board currently regulates discharges from medium and large MS4s within its jurisdiction through the issuance of three NPDES permits: the Los Angeles County MS4 Permit, the Long Beach MS4 Permit, and the Ventura County MS4 Permit.

Los Angeles County MS4 Permit

In 1990, the Regional Board issued its first Phase I MS4 permit for Los Angeles County, which covered discharges for the County of Los Angeles, the Los Angeles County Flood Control District, and the incorporated cities within the County.[135] The Regional Board reissued the permit in 1996 and again in 2001.[136] The 2001 Permit expired in 2006 but was administratively extended for an additional six years.[137] It was subsequently amended in 2006, 2007, and 2009 to incorporate provisions to implement three TMDLs,[138] and further amended in 2011 per a court order.[139] The Regional Board finally adopted a new permit in 2012 that, among other things, incorporated provisions to implement thirty-three TMDLs.[140] The 2012 Permit was amended by the State Water Board in 2015 as a result of an administrative appeal of the permit, and again in 2016 to incorporate provisions consistent with two revised TMDLs.[141] The amended 2012 Permit is the current permit in effect for Los Angeles County.

Long Beach MS4 Permit

The City of Long Beach was initially included in the Los Angeles County MS4 permit.[142] Following the adoption of the 1996 Los Angeles County Permit, the City of Long Beach requested its own MS4 permit and as a result, the Regional Board issued a separate MS4 permit to Long Beach in 1999.[143] The 1999 Long Beach MS4 Permit expired in 2004, but was administratively extended for twice the length of the permit term, or ten years,

until 2014.[144] The 2014 Permit was amended in 2016 to incorporate provisions of a revised TMDL and remains in effect until a new permit is adopted by the Regional Board.[145]

Ventura County MS4 Permit

The Regional Board issued the first MS4 permit for Ventura County in 1994[146] and the permit was renewed in 2000 and again in 2009.[147] Following an administrative appeal of the 2009 Permit to the State Water Board, the Regional Board amended the permit in 2010.[148] The 2009 Permit remains in effect until a new permit is adopted.

Appendix II: Enforcement Authority and Enforcement Action Details

BOARD ENFORCEMENT AUTHORITY

The Porter-Cologne Act establishes the responsibilities and authorities of the nine Regional Water Boards and State Water Board. The Act identifies the Water Boards as "the principal State agencies with primary responsibility for the coordination and control of water quality."[149] To carry out that responsibility, the Water Boards are given the authority to both implement and enforce water quality laws, regulations, policies, and plans.[150] Enforcement is critical to the success of the water quality program, as well as to protect public health and the environment.[151] To this end, the Porter-Cologne Act conferred broad enforcement authority upon the Water Boards by making available a suite of administrative and judicial enforcement tools to ensure compliance with state and federal water quality requirements.

In delegating to the State Board the authority to administer the federal NPDES program, USEPA affirmed that the primary authority to enforce all NPDES permits rests with the State and Regional Water Boards.[152] This authority is memorialized in a Memorandum of Agreement between USEPA and the State Board. This document also requires the State Board to "assure that enforcement of the NPDES program is exercised aggressively, fairly, and consistently by all nine Regional Boards."[153] Specifically, the Regional Boards are responsible for "taking timely and appropriate enforcement actions in accordance with the [Clean Water Act], applicable Federal regulations, and State Law..."[154]

The Water Boards' stated approach to enforcement is outlined in the State Board's Water Quality Enforcement Policy. While the Regional Boards have primary responsibility for enforcement matters within their regions, the State Board has oversight authority over the Regional Boards' enforcement actions. Moreover, an aggrieved member of the public can petition the State Board to review certain Regional Board enforcement actions.[155] The State Board may also take enforcement action in lieu of the Regional Board under specific circumstances.[156]

The Enforcement Policy makes clear that the principal goal of enforcement is to encourage compliance with pollution control requirements so that water quality is protected.[157] "The Water Boards' regulatory effort promotes compliance by ensuring that permits are enforceable, by conducting inspections, by reviewing discharger self-monitoring reports, investigating complaints, and addressing non-compliance with enforcement."[158] The enforcement component of the Water Board's regulatory framework focuses on "documenting and tracking violations, initiating formal and informal enforcement [actions], coordinating with law enforcement and regulatory agencies...[and] monitoring and reporting on the effectiveness of the Water Boards' enforcement actions."[159] According to the Enforcement Policy, "[e]nforcement is a critical ingredient in creating the deterrence needed to encourage the regulated community to anticipate, identify, and correct violations."[160]

A main objective of the Enforcement Policy is to define an enforcement process that properly addresses violations "in the most fair, efficient, effective, and consistent manner."[161] To ensure the most efficient and effective use of available resources, the Water Boards rely on the principle of progressive enforcement, which involves ranking violations and using escalating levels of enforcement actions, beginning with informal actions as simple as a phone call or staff letter, followed by increasingly more formal, severe, and forceful actions until compliance is achieved.[162] Lastly, it is a fundamental goal of the Water Boards to provide "consistent treatment for violations that are similar in nature and have similar water quality impacts."[163]

The Water Boards have a variety of enforcement tools at their disposal; some enforcement options are considered discretionary while others are mandatory.[164] Moreover, enforcement actions are categorized as either "informal" or "formal" and are discussed in further detail below.

Informal Enforcement Actions

An informal enforcement action is "any enforcement action taken by Water Board staff that is not defined in statute or regulation."[165] The purpose of informal actions is to promptly bring a violation – actual, threatened, or potential – to a discharger's attention to provide an opportunity to address the violation and come into compliance as soon as possible.[166] Importantly, the Enforcement Policy states that "continued noncompliance, particularly after informal actions have been unsuccessful, *will* result in escalation to more formal enforcement."[167] Informal actions include oral and written contacts, Notices of Violation, and non-statute-based requests.

Oral and Written Contacts: Board staff can contact the discharger by phone, in person, or via letter/email, to inform the discharger of the specific or potential violation(s), "discuss how and why the violation(s) has occurred or may occur...and should ask how and when the discharger will correct the violation(s) and achieve compliance."[168] Phone or in-person conversations must be documented in the enforcement database.[169] Letters and emails require a prompt response—either in the

form of an email or a formal written letter—and a certification from the discharger that the violation has been corrected.[170] Actual correction of the violation must be recorded in the enforcement database.[171]

Notices of Violation and Requests for Information: A Notice of Violation (NOV) letter is issued to a discharger when a violation has already occurred. The Notice of Violation letter must "include a description of the specific violation(s), a summary of potential enforcement options (including potential ACL [administrative civil liability] assessments), and a request for a certified, written response by a specified date that either confirms the violation has been corrected or identifies a date by when the violation will be corrected."[172] A Notice of Violation can be combined with a request for technical information or similar requests.[173]

Formal Enforcement Actions

Formal enforcement actions may be taken simultaneously with informal actions or as the first response. "Formal enforcement actions are statute-based actions to address a violation or threatened violation of water quality laws, regulations, policies, plans, or orders."[174] Formal actions that impose or conditionally impose penalties are considered "major" enforcement actions. Formal enforcement actions include the following (in order of increasing severity):

Notices to Comply: A Notice to Comply is the only means by which a Water Board can commence a formal enforcement action for a "minor" violation.[175] The State Board or Regional Board determines if a violation is minor after considering various factors defined in California Water Code § 13399(e) and (f), such as the danger or the potential danger the violation poses to human health, safety, or the environment.[176] A Notice to Comply must state the nature of the violation, the means by which the violation will be addressed, and a time limit (not to exceed 30 days) by which to comply.[177] Nothing precludes the Water Boards from imposing a civil penalty for minor violations if circumstances warrant that action, and especially if the discharger fails to achieve compliance within the required timeframe.[178]

Technical Reports and Investigations: Pursuant to California Water Code §§ 13267(b) and 13383, the Boards may conduct investigations and require technical or monitoring reports from any discharger or potential discharger. The Board must explain, in writing, the need for the reports and identify the evidence supporting that need.[179] Failure to comply with these requirements may result in the imposition of an ACL.[180]

Cleanup and Abatement Orders (CAO): A CAO may be issued to any discharger that has violated or threatens to violate a permit—or other order or prohibition—issued by the Water Boards.[181] A CAO requires the discharger to clean up the pollution, abate the effects of the pollution, or both.[182] In the case of threatened pollution or nuisance,[183] the discharger is required to "take other necessary remedial action, including, but not limited to, overseeing cleanup and abatement orders."[184] If the discharger violates a CAO, it "should trigger further enforcement in the form of an ACL complaint, a Time Schedule Order pursuant to Water Code § 13308, or a referral to the Attorney General for injunctive relief or monetary remedies."[185]

Time Schedule Orders (TSO): "[A] Regional Water Board can require [a] discharger to submit a time schedule that sets forth the actions the discharger will take to address actual or threatened illegal discharges of waste..."[186] Alternatively, a Board can issue a "13308" TSO "that prescribes, in advance, a civil penalty if compliance is not achieved in accordance with the time schedule...The Regional Water Board may issue a section 13308 TSO if there is a threatened or continuing violation of a CAO, a cease and desist order, or any requirement" pursuant to Water Code §§ 13267 and 13383.[187] Failure to comply with a section 13308 TSO may result in the imposition of an ACL.[188]

Cease and Desist Orders (CDO): A CDO is an administrative order requiring dischargers to stop polluting or face tougher legal penalties. "CDOs may be issued to dischargers violating or threatening to violate waste discharge requirements (WDR) or prohibitions prescribed by the Regional Water Board or the State Water Board."[189] Further, "[v]iolations of CDOs should trigger further enforcement in the form of an ACL, 13308 TSO, or referral to the Attorney General for injunctive relief or monetary remedies."[190]

Administrative Civil Liabilities (ACL) Complaints: ACLs are fines administratively imposed by the Water Boards. Various sections in the California Water Code specify instances of noncompliance where ACL complaints may be issued.[191] According to the State Board's Enforcement Policy, ACL penalties should be calculated consistently, should deter further violations by both the responsible party and similarly situated entities, and "bear a reasonable relation to the gravity of the violation and the harm or potential for harm to beneficial uses."[192] Further, the State Board's Enforcement Policy recognizes that in court, the defendant has the burden to "demonstrate that the penalty should be less than the statutory maximum."[193] Within ninety days of serving a discharger with an ACL complaint, a hearing before the Regional or State Board must be conducted.[194] However, a discharger may waive their right to a hearing, thereby not contesting the fine.[195] The State Water Board's Enforcement Policy establishes a penalty calculation methodology for assessing ACLs.[196]

Mandatory Minimum Penalties

While the Boards have discretion to take any of the enforcement actions described above, the Porter-Cologne Act imposes mandatory enforcement obligations in some circumstances. Pursuant to California Water Code § 13385(h) and (i), mandatory minimum penalties (MMPs) are required for certain violations of NPDES permits. The Water Boards, for example, must assess a minimum penalty of $3,000 for each serious violation.[197] A "serious violation" is defined in Water Code §§ 13385(h)(2) and 13385.1, and includes a waste discharge of a Group I pollutant that exceeds an effluent limitation by 40 percent or more,[198] or a failure to file a discharge monitoring report, for example.[199]

In order to address chronic violations, the Water Boards are also required to assess a minimum penalty of $3,000 for each non-serious violation. A non-serious violation occurs when a discharger:

(a) Violates a waste discharge requirement (WDR) effluent limitation;

(b) Fails to file a report of waste discharge pursuant to California Water Code section 13260;

(c) Files an incomplete report of waste discharge pursuant to California Water Code section 13260; or,

(d) Violates a whole effluent toxicity effluent limitation where the WDRs do not contain pollutant-specific effluent limitations for any toxic pollutants.[200]

These actions by a discharger must occur four or more times in a 180-day period (although the penalty calculation does not include the first three violations).[201] The 2012 Los Angeles County MS4 Permit sets out "waste discharge requirements for...MS4 discharges..." and the Order itself "serves as waste discharge requirements...pursuant to article 4, chapter 4, division 7 of the California Water Code..."[202] The Regional Board has recognized TMDLs as water-quality based effluent limitations and has defined effluent limits as a numeric restriction on the quantity or concentration of pollutants.[203] For these reasons, certain violations of the MS4 permit are subject to MMPs.

LOS ANGELES REGIONAL BOARD ENFORCEMENT ACTIONS FROM 1990–MARCH 2018

Administrative Civil Liability Complaints (ACLs)

During the time period we examined, the Regional Board issued just five ACL complaints. All but one of these ACLs were substantially reduced from the maximum penalty; the one ACL that was not reduced was a mandatory minimum penalty issued for failure to submit an annual report. The largest recommended penalty, for $274,896, was ultimately withdrawn by the Regional Board.

City of Pomona and County Department of Public Works

In April 1998, the Regional Board issued an ACL complaint against the City of Pomona for failing to comply with reporting requirements.[204] Regional Board staff notified the City of Pomona of its violation on March 9, 1998 through a Notice of Noncompliance.[205] The City failed to submit the Annual Report by the final submittal date indicated in the Notice, which ultimately resulted in the Board's issuance of the ACL complaint.[206] The recommended penalty was $6,700, whereas the statutory maximum penalty totaled $1,690,000.[207] The Board cited three reasons for reducing the penalty: "substantial" costs to comply, the City's lack of previous violations, and the City's reduced staff. While the ACL was issued to the City of Pomona, the Board indicated that the discharger was the County Department of Public Works, and that the assessed liability of $6,700 was paid by the County Department of Public Works on May 14, 1998.[208]

City of Los Angeles

On September 24, 2003, the Regional Board issued an ACL complaint against the City of Los Angeles for discharging 360 gallons of colorant-laden waste water to the Los Angeles River, in violation of the 2001 Los Angeles County MS4 Permit.[209] The issuance of this complaint was preceded by a Notice of Violation and Request for Information,[210] both of which were sent to the City on May 2, 2003. The recommended penalty was $4,310, reduced from the statutory maximum penalty amount of $10,000.[211] The Regional Board gave the City the option of paying up to $3,233 of the civil liability by contributing to a Supplemental Environmental Project and paying the rest to the State Water Board's Cleanup and Abatement Account.[212] The Regional Board's Compliance and Enforcement Office confirmed that the entire suggested penalty amount of $4,310 was paid by the City of Los Angeles to the State Board's Cleanup and Abatement Account.[213]

Los Angeles County Flood Control District

In February 2010, the Regional Board issued an ACL complaint against the Los Angeles County Flood Control District for exceeding bacteria TMDL limits in the Marina del Rey Harbor Mothers' Beach and Back Basins, in violation of the 2001 Los Angeles County MS4 Permit.[214] The Regional Board issued the ACL because the District allegedly failed to address the illegal discharges despite having ample notice to do so: in 2007, the District received an Investigative Order, in 2008 it received a Notice of Violation, and finally a Second Notice of Violation requesting supplemental reports was issued in 2009. The recommended penalty was $274,896, reduced from the statutory maximum penalty amount of $22,158,000. The complaint, however, was eventually withdrawn by the Regional Board.[215]

City of Torrance

In January 2009, the Regional Board issued an ACL complaint against the City of Torrance for violations of best management practices and unauthorized non-stormwater discharges, in violation of the 2001 Los Angeles County MS4 Permit requirements.[216] The issuance of the complaint was preceded by a Notice of Violation in January 2006, a Second Notice of Violation sent in October 2006, and a Third Notice of Violation sent in May 2007.[217] The assessed liability was $87,455, reduced from the statutory maximum penalty amount of $140,000.[218] The City and the Regional Board eventually reached a settlement agreement that imposed a penalty of $52,455.[219] The Regional Board approved the agreement and adopted the proposed Order on December 9, 2009.[220] The Regional Board indicated that the City paid the penalty on February 8, 2010.[221]

City of South El Monte

In June 2017, the Regional Board settled an ACL complaint with the City of South El Monte for its failure to submit an annual report pursuant to the 2012 Los Angeles County MS4 permit. An NOV, which was sent to the City on July 29, 2016, preceded the settlement and detailed three previous notices that were sent to the City of South El Monte.[222] The City submitted a Request for Alleged Violation Review on March 8, 2017 and the Regional Board issued a response to the City on April 11, 2017.[223] The mandatory minimum penalty of $21,000 was paid by the City of South El Monte on June 1, 2017.[224]

Requests for Technical Reports and Investigation

The Board uses several different names for requests falling under this category: "Requests for Information," "Request for Investigation," "Requirement to Submit Information," "Requirement to Provide Information," or "Investigative Order." A Notice of Violation is often accompanied by a Request for Information, but based on our review of enforcement actions, it appears as though the Regional Board will issue Requests for Information without an NOV in some circumstances. The Regional Board issued 46 Requests for Information and rescinded 19, for a total of 27 during the period we examined. These Requests were issued in response to exceedances of water quality objectives.

The first Request for Information was issued on May 2, 2003 to the City of Los Angeles.[225] This was accompanied by an NOV and on September 24, 2003, an ACL was issued, discussed above.[226] 23 Requests (including one rescinded request[227]) were issued on 12 different dates in 2006 and 2007.[228] 21 Requests were issued on March 4, 2008 for violations of TMDLs included in the 2001 Los Angeles County MS4 Permit.[229] Each of these Requests was accompanied by an NOV.[230] 20 of the original recipients did not comply with the Request and were sent Second Notices of Violation.[231] All of the Second NOVs were issued by the Regional Board over a year and a half after the initial NOVs, on October 15, 2009.[232] In these Second Notices of Violation, the Regional Board concluded that the permittees were in continuing violation of the 2001 Los Angeles County MS4 Permit and directed permittees to submit supplemental reports to correct the deficiencies of their first reports.[233] The Board informed the permittees that their failure to comply with the requirements of the Second Notice of Violation "will be met with the institution of formal enforcement proceedings, and without further notice."[234] A year later, in October of 2010, the Regional Board rescinded 18 NOVs and partially rescinded three because of a successful court challenge by the County.[235] It is unknown how the three partially-rescinded NOVs from March 4, 2008 were resolved, if at all. The remaining Request was issued to the City of Los Angeles on August 11, 2014, in response to MS4 discharges due to a water main break.[236] The Order was amended on September 22, 2014 to allow an additional month to comply, and it appears the City complied with this Order.[237]

Notices to Comply

The Regional Board issued seven Notices to Comply,[238] six of which were issued on July 3, 2002. These six Notices to Comply were issued to Alhambra, Beverly Hills, Downey, the City of Industry, Lynwood City, and Rolling Hills. The remaining Notice to Comply was issued to the County of Los Angeles on April 10, 2000. These actions were found via the CIWQS database; it is unclear whether these Notices were addressed by the permittees.

Requests for Information

The Regional Board issued four informal Requests for Information, all on June 10, 2016. Three were issued for information regarding implementation of the trash TMDL[239] and the final Request for Information was issued to Oxnard on June 10, 2016 in follow up to a sewage spill.[240] It is unclear based on our review of relevant documents and the CIWQS database whether permittees ever complied with these four Requests for Information. These Requests were categorized as informal (as opposed to formal Requests for Technical Reports and Investigation) because the letters sent by the Board did not cite relevant code sections or otherwise indicate the Request was statute-based.

Notices of Violation

Since 1990, the Regional Board has issued a total of nine stand-alone initial Notices of Violation, three of which were later rescinded. Two eventually resulted in an ACL (see the discussion of Torrance and South El Monte ACLs above). The other seven NOVs were issued on February 8, 2012 to permittees of the 2001 Los Angeles County MS4 Permit for failure to submit a Trash TMDL Compliance Report that was due October 31, 2011.[241] The Regional Board directed the permittees to immediately comply by submitting the report within 30 days of receiving

the Notice. The Notices further stated that pursuant to Water Code § 13385, assessment of a minimum mandatory penalty of $3,000 is required for each serious violation (which includes a failure to submit a monitoring report), and that permittees are also subject to discretionary ACLs of up to $10,000 for each day the permittee fails to submit the report.[242] The Regional Board also reserved the right to refer the matter to the Attorney General or to take any further enforcement actions authorized by law.[243]

Notices of Violation issued to three of the cities; Duarte, El Monte, and San Gabriel; were ultimately rescinded because the Regional Board verified that those cities had indeed submitted a compliance report on time.[244] It is unclear why the Board was unaware that these reports were in fact previously submitted. The Regional Board has confirmed that no further enforcement actions were taken against the four remaining cities, despite the fact that Calabasas, Cudahy, Montebello, and Pico Rivera never submitted the relevant compliance reports.[245] The Regional Board did indicate, however, that the cities submitted reports for the following year.[246] These compliance reports are part of the 2001 MS4 permit's monitoring and reporting requirements, and were therefore subject to Mandatory Minimum Penalties, as acknowledged by the Board in its original NOV.[247]

ENFORCEMENT ACTION	ALLEGED VIOLATOR	FOLLOW UP ACTION
Administrative Civil Liability	County of Los Angeles, Pomona	
Request for Information	City of Los Angeles	NOV issued same day, ACL issued Sept 24, 2003
Request for Information	City of Los Angeles	
Notice of Violation	City of Torrance	2nd NOV issued Oct 6, 2006; 3rd NOV issued May 11, 2007; ACL issued Jan 30, 2009
Notice of Violation	City of Calabasas	
Notice of Violation	City of Cudahy	
Notice of Violation	City of Duarte	WITHDRAWN
Notice of Violation	City of El Monte	WITHDRAWN
Notice of Violation	City of Montebello	
Notice of Violation	City of Pico Rivera	
Notice of Violation	City of San Gabriel	WITHDRAWN
Notice of Violation	City of South El Monte	ACL issued on Jun 23, 2017
Notice to Comply	County	
Notice to Comply	Alhambra	
Notice to Comply	Beverly Hills	
Notice to Comply	Downey	
Notice to Comply	City of Industry	
Notice to Comply	Lynwood	
Notice to Comply	Rolling Hills	
Request for Information	County of Los Angeles	
Request for Information	City of Santa Monica	
Request for Information	City of Redondo Beach	
Request for Information	County of Los Angeles	

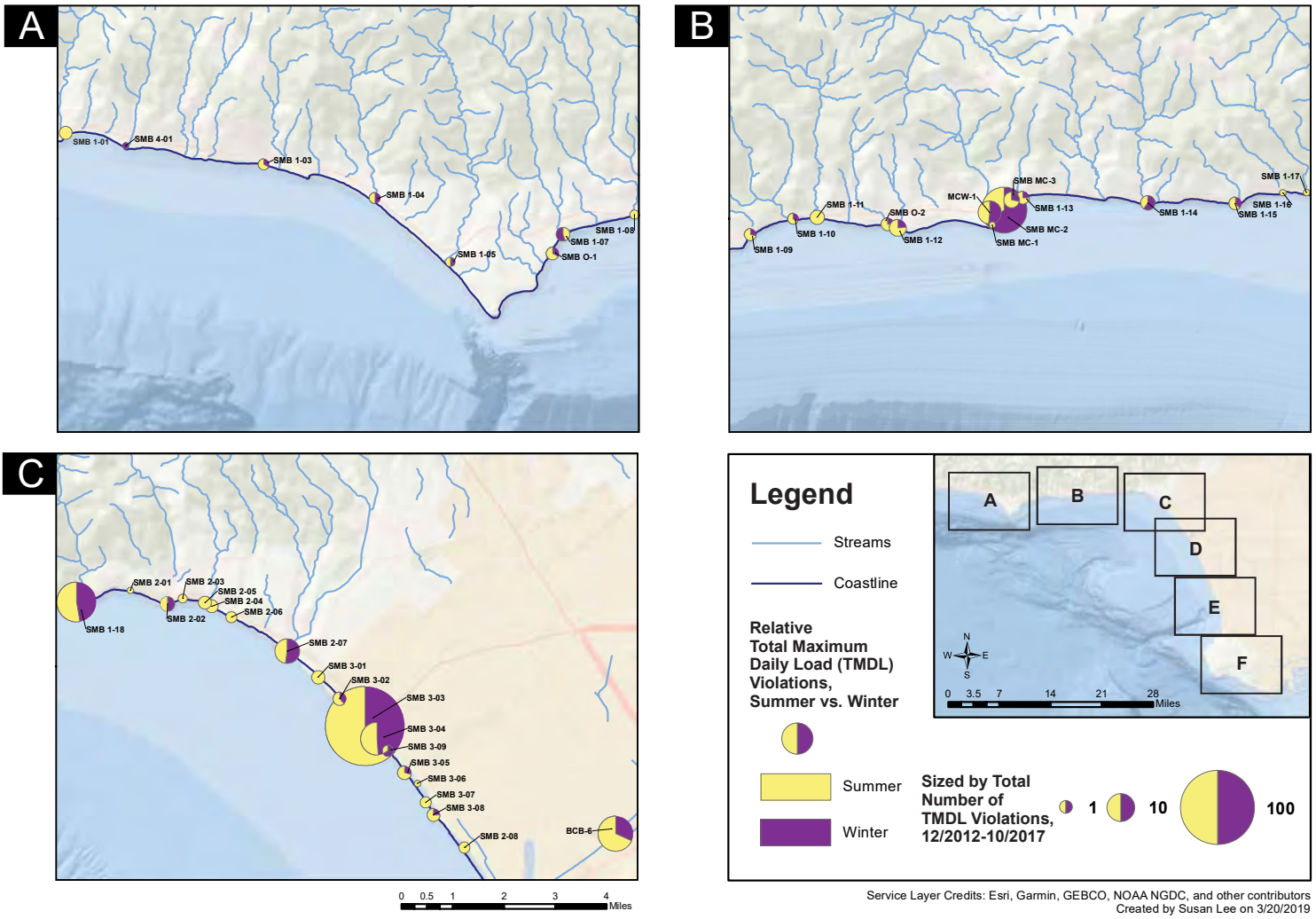
ENFORCEMENT ACTION	ALLEGED VIOLATOR	FOLLOW UP ACTION
Request for Information	County of Los Angeles	
Request for Information	County of Los Angeles	
Request for Information	City of Redondo Beach	
Request for Information	County of Los Angeles	
Request for Information	City of Los Angeles	
Request for Information	County of Los Angeles	
Request for Information	City of Manhattan Beach	
Request for Information	City of Los Angeles	
Request for Information	City of Redondo Beach	
Request for Information	County of Los Angeles	
Request for Information	City of Manhattan Beach	WITHDRAWN
Request for Information	County of Los Angeles	
Request for Information	City of Santa Monica	
Request for Investigation	City of Santa Monica, County, FCD	
Request for Investigation	County, FCD, El Segundo, Manhattan Beach	
Request for Investigation	City of Los Angeles, FCD, CalDOT	
Request for Information	County of Los Angeles	
Investigative Order	County of Los Angeles Flood Control District	13267 Order. 1st NOV Issued 3/4/08, 2nd NOV Issued on Oct 15, 2009; ACL 2/18/2010 Partially Rescinded
Requirement to Provide Information	City of Agoura Hills	NOV issued same day; 2nd NOV Issued on Oct 15, 2009; RESCINDED
Requirement to Provide Information	City of Beverly Hills	NOV issued same day; 2nd NOV Issued on Oct 15, 2009; RESCINDED
Requirement to Provide Information	City of Calabasas	NOV issued same day; 2nd NOV Issued on Oct 15, 2009; RESCINDED
Requirement to Provide Information	City of Los Angeles	NOV issued same day; 2nd NOV Issued on Oct 15, 2009; Partially Rescinded
Requirement to Provide Information	City of El Segundo	NOV issued same day; 2nd NOV Issued on Oct 15, 2009; RESCINDED
Requirement to Provide Information	City of Hermosa Beach	NOV issued same day; 2nd NOV Issued on Oct 15, 2009; RESCINDED
Requirement to Provide Information	City of Hidden Hills	NOV issued same day; 2nd NOV Issued on Oct 15, 2009; RESCINDED
Requirement to Provide Information	City of Inglewood	NOV issued same day; Petition Filed; RESCINDED
Requirement to Provide Information	County of Los Angeles	NOV issued same day; 2nd NOV Issued on Oct 15, 2009; Partially Rescinded
Requirement to Provide Information	City of Malibu	NOV issued same day; 2nd NOV Issued on Oct 15, 2009; RESCINDED
Requirement to Provide Information	City of Manhattan Beach	NOV issued same day; 2nd NOV Issued on Oct 15, 2009; RESCINDED
Requirement to Provide Information	City of Palos Verdes Estates	NOV issued same day; 2nd NOV Issued on Oct 15, 2009; RESCINDED
Requirement to Provide Information	City of Rancho Palos Verdes	NOV issued same day; 2nd NOV Issued on Oct 15, 2009; RESCINDED
Requirement to Provide Information	City of Redondo Beach	NOV issued same day; 2nd NOV Issued on Oct 15, 2009; RESCINDED
Requirement to Provide Information	City of Rolling Hills Estates	NOV issued same day; 2nd NOV Issued on Oct 15, 2009; RESCINDED
Requirement to Provide Information	City of Rolling Hills	NOV issued same day; 2nd NOV Issued on Oct 15, 2009; RESCINDED

ENFORCEMENT ACTION	ALLEGED VIOLATOR	FOLLOW UP ACTION
Requirement to Provide Information	City of Santa Monica	NOV issued same day; 2nd NOV Issued on Oct 15, 2009; RESCINDED
Requirement to Provide Information	City of Torrance	NOV issued same day; 2nd NOV Issued on Oct 15, 2009; RESCINDED
Requirement to Provide Information	City of West Hollywood	NOV issued same day; 2nd NOV Issued on Oct 15, 2009; RESCINDED
Requirement to Provide Information	City of Westlake Village	NOV issued same day; 2nd NOV Issued on Oct 15, 2009; RESCINDED
Requirement to Provide Information	City of Culver City	NOV issued same day; Petition Filed; Partially Rescinded
Investigative Order	City of Los Angeles	
Request for Information (informal)	San Gabriel	
Request for Information (informal)	Rosemead	
Request for Information (informal)	San Fernando	
Request for Information (informal)	Oxnard	
Time Schedule Order	City of Los Angeles	Amended 8/9/17
Time Schedule Order	County of Los Angeles, FCD, LA	
Time Schedule Order	City of Los Angeles, County, FCD, Beverly Hills, Culver City, Inglewood, West Hollywood	

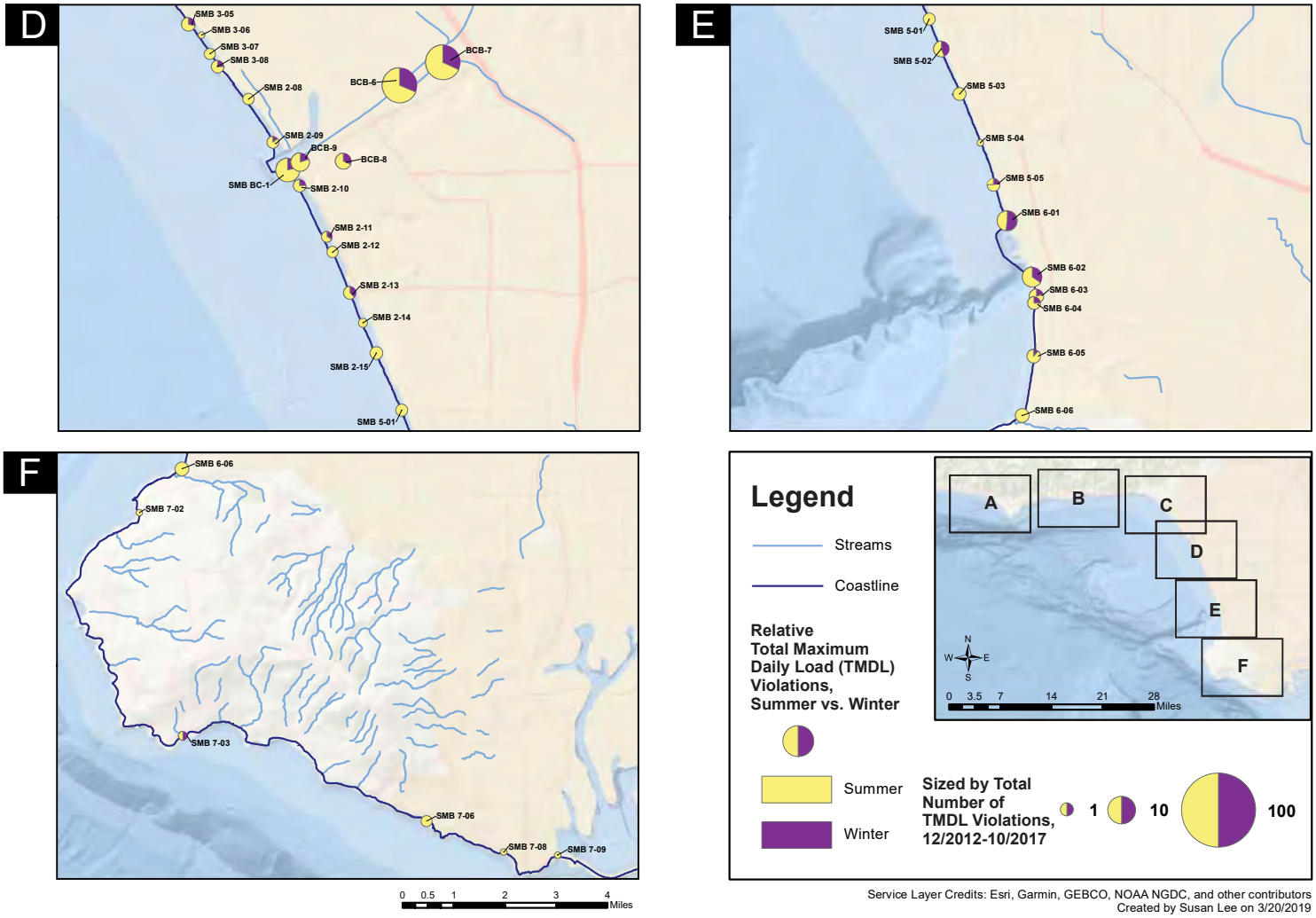
LEGEND FOR ENFORCEMENT ACTIONS: Enforcement Action Rescinded /Withdrawn Enforcement Action Partially Rescinded ACL Issued

Appendix III: Violations Maps and Details

Summer TMDL Violations vs. Winter TMDL Violations from December 2012 to October 2017



Service Layer Credits: Esri, Garmin, GEBCO, NOAA NGDC, and other contributors
Created by Susan Lee on 3/20/2019



Service Layer Credits: Esri, Garmin, GEBCO, NOAA NGDC, and other contributors
Created by Susan Lee on 3/20/2019

SMBB Bacterial TMDL Monitoring Stations Summary by Seasons

SMBB Total number of violations:	1265

WINTER - DRY EXCEEDANCE DAYS (Dec 2012 - Mar 2013)

Month	Year	1-01	1-03	1-04	1-05	1-06	1-07	1-08	1-09	1-10	1-11	1-12	1-13	1-14	1-15	1-16	1-17	1-18	2-01	2-02	2-03	2-04	2-05	2-06	2-07	2-08	2-09	2-10	2-11	2-12	2-13	2-14	2-15	3-01
DEC	2012	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
JAN	2013	0	0	1	0	0	0	1	0	0	0	2	1	1	0	0	0	3	0	1	0	0	0	0	1	0	0	1	0	0	0	0	0	0
FEB	2013	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	0	1	0	0	0	0	3	0	0	0	0	0	0	0	0	0
MAR	2013	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	6	0	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0
TOTAL EXCEEDANCES		0	0	1	0	0	0	1	1	0	0	2	1	1	0	0	0	13	0	2	0	0	0	0	5	0	0	1	0	0	1	0	0	0
ALLOWANCES		1	1	0	0	1	1	1	1	1	1	1	1	1	0	1	1	3	1	1	1	1	1	1	3	1	1	1	1	1	1	1	1	1
NUMBER OF VIOLATIONS		0	0	1	0	0	0	0	0	0	0	1	0	0	0	0	0	10	0	1	0	0	0	0	2	0	0	0	0	0	0	0	0	0

Month	Year	3-02	3-03	3-04	3-05	3-06	3-07	3-08	3-09	4-01	5-01	5-02	5-03	5-04	5-05	6-01	6-02	6-03	6-04	6-05	6-06	7-01	7-02	7-03	7-04	7-05	7-06	7-08	7-09	BC-1	MC-1	MC-2	MC-3	O-1	O-2
DEC	2012	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
JAN	2013	0	11	4	3	0	0	0	0	0	0	0	0	0	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	5	0	0	0
FEB	2013	0	6	2	1	0	0	0	0	0	0	1	0	0	0	2	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	8	0	0	0
MAR	2013	0	13	4	1	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	3	0	0	0
TOTAL EXCEEDANCES		0	30	10	5	0	0	0	0	0	0	1	0	0	0	9	0	0	1	0	0	0	0	0	0	0	0	0	0	3	0	16	0	0	0
ALLOWANCES		1	3	3	3	1	1	1	1	0	1	3	1	1	1	3	1	1	1	1	1	1	1	1	0	1	1	1	1	3	1	3	1	1	1
NUMBER OF VIOLATIONS		0	27	7	2	0	0	0	0	0	0	0	0	0	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	13	0	0	0

*Counting violations starting from December 29, 2012

SUMMER - DRY EXCEEDANCE DAYS (Apr 2013 - Oct 2013)

Month	Year	1-01	1-03	1-04	1-05	1-06	1-07	1-08	1-09	1-10	1-11	1-12	1-13	1-14	1-15	1-16	1-17	1-18	2-01	2-02	2-03	2-04	2-05	2-06	2-07	2-08	2-09	2-10	2-11	2-12	2-13	2-14	2-15	3-01
APR	2013	0	0	0	1	0	0	0	1	0	1	1	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MAY	2013	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0
JUN	2013	0	0	0	0	0	0	0	0	0	0	1	0	0	1	0	0	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0
JUL	2013	0	0	1	0	0	0	0	0	0	1	0	0	0	0	0	0	2	0	0	0	0	1	0	0	0	0	1	1	0	1	0	0	0
AUG	2013	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SEP	2013	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
OCT	2013	0	1	0	0	0	0	1	1	1	0	0	1	1	0	0	0	3	0	0	1	0	1	0	4	0	0	0	0	0	0	0	2	0
TOTAL EXCEEDANCES		0	1	1	1	0	0	1	2	1	2	4	3	1	2	0	1	8	0	0	1	0	2	0	7	0	0	1	1	0	1	0	2	0
ALLOWANCES		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NUMBER OF VIOLATIONS		0	1	1	1	0	0	1	2	1	2	4	3	1	2	0	1	8	0	0	1	0	2	0	7	0	0	1	1	0	1	0	2	0

Month	Year	3-02	3-03	3-04	3-05	3-06	3-07	3-08	3-09	4-01	5-01	5-02	5-03	5-04	5-05	6-01	6-02	6-03	6-04	6-05	6-06	7-01	7-02	7-03	7-04	7-05	7-06	7-08	7-09	BC-1	MC-1	MC-2	MC-3	O-1	O-2
APR	2013	0	11	2	0	0	0	0	0	0	0	1	0	0	0	2	0	0	1	0	0	0	0	0	0	0	0	0	0	1	0	4	1	0	0
MAY	2013	1	5	3	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	1	0	7	1	0	0
JUN	2013	0	8	1	1	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	4	0	5	3	0	1
JUL	2013	1	5	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	4	0	2	1	0	0
AUG	2013	0	5	1	2	0	1	0	0	0	0	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	4	0	0	2	0	0
SEP	2013	0	5	1	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	0	2	0	0	0
OCT	2013	0	10	2	2	0	0	0	0	0	0	2	0	0	0	1	1	0	1	0	0	0	0	0	0	0	0	0	0	4	0	0	0	0	0
TOTAL EXCEEDANCES		2	57	10	5	0	1	0	0	0	0	4	0	1	1	3	4	1	2	0	0	0	1	1	0	0	1	0	0	19	0	20	8	0	1
ALLOWANCES		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NUMBER OF VIOLATIONS		2	57	10	5	0	1	0	0	0	0	4	0	1	1	3	4	1	2	0	0	0	1	1	0	0	1	0	0	19	0	20	8	0	1

WINTER - DRY EXCEEDANCE DAYS (Nov 2013 - Mar 2014)

Month	Year	1-01	1-03	1-04	1-05	1-06	1-07	1-08	1-09	1-10	1-11	1-12	1-13	1-14	1-15	1-16	1-17	1-18	2-01	2-02	2-03	2-04	2-05	2-06	2-07	2-08	2-09	2-10	2-11	2-12	2-13	2-14	2-15	3-01
NOV	2013	0	0	0	1	0	3	0	0	0	1	1	0	2	1	0	0	5	0	0	0	0	0	0	3	1	0	0	0	0	1	0	0	1
DEC	2013	1	0	0	0	0	2	1	1	0	0	1	0	0	1	0	0	2	0	1	0	0	0	0	5	0	1	0	0	0	0	0	0	0
JAN	2014	0	0	2	0	1	1	0	1	0	0	0	1	0	1	0	0	3	0	1	0	0	0	0	3	0	1	1	1	0	1	1	1	0
FEB	2014	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	2	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0
MAR	2014	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	5	0	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0
TOTAL EXCEEDANCES		1	0	2	1	1	6	1	2	0	1	4	1	3	3	0	0	17	0	3	0	0	0	0	14	1	2	1	1	0	2	1	1	1
ALLOWANCES		1	1	0	0	1	1	1	1	1	1	1	1	1	0	1	1	3	1	1	1	1	1	1	3	1	1	1	1	1	1	1	1	1
NUMBER OF VIOLATIONS		0	0	2	1	0	5	0	1	0	0	3	0	2	3	0	0	14	0	2	0	0	0	0	11	0	1	0	0	0	1	0	0	0

Month	Year	3-02	3-03	3-04	3-05	3-06	3-07	3-08	3-09	4-01	5-01	5-02	5-03	5-04	5-05	6-01	6-02	6-03	6-04	6-05	6-06	7-01	7-02	7-03	7-04	7-05	7-06	7-08	7-09	BC-1	MC-1	MC-2	MC-3	O-1	O-2
NOV	2013	2	10	3	0	0	0	0	0	0	0	1	0	0	0	2	0	1	0	0	0	0	0	1	0	0	1	0	0	1	0	1	1	0	0
DEC	2013	0	11	2	1	1	1	0	2	1	0	1	1	0	0	4	2	0	0	0	0	0	0	1	0	0	0	0	0	3	0	1	0	1	0
JAN	2014	0	13	4	2	0	0	0	1	0	0	2	0	0	0	1	1	0	1	0	0	0	0	0	0	0	0	0	0	3	0	9	2	1	0
FEB	2014	0	4	3	0	0	0	0	0	0	0	3	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	3	0	8	1	0	1
MAR	2014	1	13	2	2	0	0	0	0	0	0	4	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	2	0	7	1	0	0
TOTAL EXCEEDANCES		3	51	14	5	1	1	0	3	1	0	11	1	0	0	9	5	1	1	0	0	0	0	2	0	0	1	0	0	12	0	26	5	2	1
ALLOWANCES		1	3	3	3	1	1	1	1	0	1	3	1	1	1	3	1	1	1	1	1	1	1	1	0	1	1	1	1	3	1	3	1	1	1
NUMBER OF VIOLATIONS		2	48	11	2	0	0	0	2	1	0	8	0	0	0	6	4	0	0	0	0	0	0	1	0	0	0	0	0	9	0	23	4	1	0

SUMMER - DRY EXCEEDANCE DAYS (Apr 2014 - Oct 2014)

Month	Year	1-01	1-03	1-04	1-05	1-06	1-07	1-08	1-09	1-10	1-11	1-12	1-13	1-14	1-15	1-16	1-17	1-18	2-01	2-02	2-03	2-04	2-05	2-06	2-07	2-08	2-09	2-10	2-11	2-12	2-13	2-14	2-15	3-01
APR	2014	0	0	0	0	0	0	0	0	1	0	1	0	0	0	0	0	2	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0
MAY	2014	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
JUN	2014	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	2	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	1
JUL	2014	0	0	0	0	0	0	0	0	0	0	1	0	0	1	0	0	2	0	0	0	0	2	0	0	0	1	0	0	0	0	1	1	1
AUG	2014	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	2
SEP	2014	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	1	0	0	0	0	1	0	0	0	0
OCT	2014	0	1	0	0	0	0	1	0	0	0	3	0	0	1	0	0	3	0	0	0	1	0	0	2	0	0	0	1	0	0	0	0	0
TOTAL EXCEEDANCES		0	1	0	0	0	0	1	0	1	0	8	0	0	2	0	0	10	0	0	0	1	4	1	5	0	1	0	1	1	0	1	1	4
ALLOWANCES		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NUMBER OF VIOLATIONS		0	1	0	0	0	0	1	0	1	0	8	0	0	2	0	0	10	0	0	0	1	4	1	5	0	1	0	1	1	0	1	1	4

Month	Year	3-02	3-03	3-04	3-05	3-06	3-07	3-08	3-09	4-01	5-01	5-02	5-03	5-04	5-05	6-01	6-02	6-03	6-04	6-05	6-06	7-01	7-02	7-03	7-04	7-05	7-06	7-08	7-09	BC-1	MC-1	MC-2	MC-3	O-1	O-2
APR	2014	0	10	2	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	0	0	0
MAY	2014	0	10	6	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	1	0	0
JUN	2014	1	7	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	2	0	0	0
JUL	2014	0	16	0	0	0	0	0	1	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	7	0	0	0	0	0
AUG	2014	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	4	0	1	0	1	0
SEP	2014	1	2	1	0	0	1	1	0	0	0	0	0	0	0	0	3	2	1	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0
OCT	2014	1	3	1	2	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1	0	0	1
TOTAL EXCEEDANCES		3	53	10	2	1	1	2	1	0	1	1	0	0	0	4	4	2	1	0	1	0	0	0	0	0	1	0	0	14	0	9	2	1	1
ALLOWANCES		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NUMBER OF VIOLATIONS		3	53	10	2	1	1	2	1	0	1	1	0	0	0	4	4	2	1	0	1	0	0	0	0	0	1	0	0	14	0	9	2	1	1

WINTER - DRY EXCEEDANCE DAYS (Nov 2014 - Mar 2015)

Month	Year	1-01	1-03	1-04	1-05	1-06	1-07	1-08	1-09	1-10	1-11	1-12	1-13	1-14	1-15	1-16	1-17	1-18	2-01	2-02	2-03	2-04	2-05	2-06	2-07	2-08	2-09	2-10	2-11	2-12	2-13	2-14	2-15	3-01
NOV	2014	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	4	0	0	0	0	0	0	0	0	0
DEC	2014	0	1	0	0	0	1	0	2	0	0	0	1	0	0	0	0	2	0	0	0	0	0	0	1	1	0	1	1	0	0	0	0	0
JAN	2015	0	0	0	1	1	1	0	1	1	1	2	1	1	0	0	0	8	1	1	0	0	0	1	8	1	1	0	0	1	1	1	1	2
FEB	2015	0	0	0	0	0	0	0	0	1	0	1	1	0	0	0	0	4	0	0	0	0	0	1	1	0	0	2	0	0	0	0	0	0
MAR	2015	0	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	7	0	0	0	1	0	0	4	0	0	0	0	0	1	1	1	0
TOTAL EXCEEDANCES		0	2	0	1	2	2	0	3	2	2	3	3	1	0	0	0	22	1	1	0	1	0	2	18	2	1	3	1	1	2	2	2	2
ALLOWANCES		2	1	2	2	2	2	2	2	1	2	2	2	1	2	1	1	9	2	2	2	2	2	2	9	2	2	2	2	2	2	2	2	2
NUMBER OF VIOLATIONS		0	1	0	0	0	0	0	1	1	0	1	1	0	0	0	0	13	0	0	0	0	0	0	9	0	0	1	1	0	1	0	0	0

Month	Year	3-02	3-03	3-04	3-05	3-06	3-07	3-08	3-09	4-01	5-01	5-02	5-03	5-04	5-05	6-01	6-02	6-03	6-04	6-05	6-06	7-01	7-02	7-03	7-04	7-05	7-06	7-08	7-09	BC-1	MC-1	MC-2	MC-3	O-1	O-2
NOV	2014	1	6	6	3	0	0	1	0	0	0	0	0	0	0	5	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0
DEC	2014	1	2	2	0	0	0	1	1	0	0	0	0	0	0	2	2	1	0	0	0	0	0	0	0	0	0	0	0	0	0	3	0	2	0
JAN	2015	2	8	6	4	0	1	1	0	1	0	1	0	1	0	3	0	0	1	0	0	0	0	0	0	0	1	1	0	0	0	12	1	1	1
FEB	2015	1	6	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	1	12	2	1	0
MAR	2015	0	6	0	1	0	0	1	0	0	0	1	0	0	2	2	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	9	0	1	0
TOTAL EXCEEDANCES		5	28	18	8	0	1	4	1	1	0	2	0	1	2	12	4	3	4	0	0	0	0	0	0	0	1	1	0	0	1	38	3	5	1
ALLOWANCES		2	9	9	9	1	2	2	2	1	1	9	1	1	1	9	1	1	2	1	1	1	1	1	0	1	1	1	1	3	2	9	2	2	0
NUMBER OF VIOLATIONS		3	19	9	0	0	0	2	0	0	0	0	0	0	1	3	3	2	2	0	0	0	0	0	0	0	0	0	0	0	0	29	1	3	1

SUMMER - DRY EXCEEDANCE DAYS (Apr 2015 - Oct 2015)

Month	Year	1-01	1-03	1-04	1-05	1-06	1-07	1-08	1-09	1-10	1-11	1-12	1-13	1-14	1-15	1-16	1-17	1-18	2-01	2-02	2-03	2-04	2-05	2-06	2-07	2-08	2-09	2-10	2-11	2-12	2-13	2-14	2-15	3-01
APR	2015	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	2	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0
MAY	2015	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0
JUN	2015	0	0	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	0	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0
JUL	2015	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	2
AUG	2015	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	0
SEP	2015	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	2	0	0	0	0	1	1	1	1	1
OCT	2015	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0
TOTAL EXCEEDANCES		2	0	1	0	0	1	0	0	0	0	2	0	0	1	1	0	6	0	2	0	1	1	0	5	1	2	0	0	1	1	1	1	3
ALLOWANCES		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NUMBER OF VIOLATIONS		2	0	1	0	0	1	0	0	0	0	2	0	0	1	1	0	6	0	2	0	1	1	0	5	1	2	0	0	1	1	1	1	3

Month	Year	3-02	3-03	3-04	3-05	3-06	3-07	3-08	3-09	4-01	5-01	5-02	5-03	5-04	5-05	6-01	6-02	6-03	6-04	6-05	6-06	7-01	7-02	7-03	7-04	7-05	7-06	7-08	7-09	BC-1	MC-1	MC-2	MC-3	O-1	O-2
APR	2015	0	7	3	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	5	0	0	1
MAY	2015	1	8	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0
JUN	2015	0	8	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0
JUL	2015	0	8	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AUG	2015	0	5	0	0	0	1	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	2	0	0
SEP	2015	2	7	3	0	0	0	1	0	0	0	0	0	0	0	1	2	2	0	2	1	0	0	0	0	0	0	0	0	0	0	1	0	0	0
OCT	2015	0	5	0	1	0	1	1	0	0	3	0	4	0	1	0	3	2	0	3	3	0	0	0	0	0	1	0	1	0	0	0	0	0	0
TOTAL EXCEEDANCES		3	52	10	2	0	2	4	0	0	4	0	4	0	1	2	5	4	0	5	5	0	0	0	0	0	1	1	1	0	0	8	3	1	1
ALLOWANCES		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NUMBER OF VIOLATIONS		3	52	10	2	0	2	4	0	0	4	0	4	0	1	2	5	4	0	5	5	0	0	0	0	0	1	1	1	0	0	8	3	1	1

WINTER - DRY EXCEEDANCE DAYS (Nov 2015 - Mar 2016)

Month	Year	1-01	1-03	1-04	1-05	1-06	1-07	1-08	1-09	1-10	1-11	1-12	1-13	1-14	1-15	1-16	1-17	1-18	2-01	2-02	2-03	2-04	2-05	2-06	2-07	2-08	2-09	2-10	2-11	2-12	2-13	2-14	2-15	3-01
NOV	2015	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	2	0	0	1	0	0	0	0	1	0	0	1	0	0	0
DEC	2015	1	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	2	0	1	0	0	0	0	2	0	0	0	0	0	0	0	0	0
JAN	2016	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	2	0	0	0	0	0	0	3	0	0	1	0	0	0	0	0	0
FEB	2016	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	2	0	0	0	0	0	0	0	0	0
MAR	2016	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	8	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0
TOTAL EXCEEDANCES		1	0	1	0	1	1	0	0	0	0	1	1	2	1	0	0	12	1	4	0	0	1	0	7	0	0	2	0	0	2	0	0	0
ALLOWANCES		2	1	2	2	2	2	2	2	1	2	2	2	1	2	1	1	9	2	2	2	2	2	2	9	2	2	2	0	2	1	2	2	2
NUMBER OF VIOLATIONS		0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	3	0	2	0	0	0	0	0	0	0	0	0	0	1	0	0	0

Month	Year	3-02	3-03	3-04	3-05	3-06	3-07	3-08	3-09	4-01	5-01	5-02	5-03	5-04	5-05	6-01	6-02	6-03	6-04	6-05	6-06	7-01	7-02	7-03	7-04	7-05	7-06	7-08	7-09	BC-1	MC-1	MC-2	MC-3	O-1	O-2
NOV	2015	0	5	10	1	0	0	2	0	0	0	0	0	0	0	1	2	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0
DEC	2015	0	10	5	4	0	0	0	0	0	0	1	0	0	0	3	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	0	0	0
JAN	2016	0	6	1	0	0	0	0	0	0	0	1	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	0	0	0
FEB	2016	0	11	1	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	7	0	0	0
MAR	2016	0	10	3	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	10	0	0	0
TOTAL EXCEEDANCES		0	46	20	5	0	0	3	0	0	0	2	0	0	0	6	4	0	0	2	0	0	0	0	0	0	0	0	0	0	0	33	0	0	0
ALLOWANCES		2	9	9	9	1	2	2	2	1	1	9	1	1	1	9	1	1	2	1	1	1	1	1	0	1	1	1	1	3	2	9	2	2	0
NUMBER OF VIOLATIONS		0	37	11	0	0	0	1	0	0	0	0	0	0	0	0	3	0	0	1	0	0	0	0	0	0	0	0	0	0	0	24	0	0	0

SUMMER - DRY EXCEEDANCE DAYS (Apr 2016 - Oct 2016)

Month	Year	1-01	1-03	1-04	1-05	1-06	1-07	1-08	1-09	1-10	1-11	1-12	1-13	1-14	1-15	1-16	1-17	1-18	2-01	2-02	2-03	2-04	2-05	2-06	2-07	2-08	2-09	2-10	2-11	2-12	2-13	2-14	2-15	3-01
APR	2016	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0
MAY	2016	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	1	0	0	0
JUN	2016	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	2	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
JUL	2016	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AUG	2016	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	0
SEP	2016	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	1
OCT	2016	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	1	0	1	0	0	1	0	1	0	0	0	0
TOTAL EXCEEDANCES		0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	15	1	2	0	1	2	0	2	1	1	1	0	1	1	0	0	2
ALLOWANCES		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NUMBER OF VIOLATIONS		0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	15	1	2	0	1	2	0	2	1	1	1	0	1	1	0	0	2

Month	Year	3-02	3-03	3-04	3-05	3-06	3-07	3-08	3-09	4-01	5-01	5-02	5-03	5-04	5-05	6-01	6-02	6-03	6-04	6-05	6-06	7-01	7-02	7-03	7-04	7-05	7-06	7-08	7-09	BC-1	MC-1	MC-2	MC-3	O-1	O-2
APR	2016	0	11	2	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	0	0	0
MAY	2016	0	10	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
JUN	2016	0	7	1	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
JUL	2016	0	5	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AUG	2016	0	10	1	0	0	0	0	0	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0
SEP	2016	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
OCT	2016	0	11	2	0	0	0	0	0	0	0	1	0	0	0	2	2	1	2	1	1	0	0	0	0	0	0	0	0	0	0	1	0	0	0
TOTAL EXCEEDANCES		0	64	8	1	0	0	0	0	0	1	3	0	0	1	3	4	1	2	1	1	0	0	0	0	0	0	0	0	0	0	6	0	1	0
ALLOWANCES		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NUMBER OF VIOLATIONS		0	64	8	1	0	0	0	0	0	1	3	0	0	1	3	4	1	2	1	1	0	0	0	0	0	0	0	0	0	0	6	0	1	0

WINTER - DRY EXCEEDANCE DAYS (Nov 2016 - Mar 2017)

Month	Year	1-01	1-03	1-04	1-05	1-06	1-07	1-08	1-09	1-10	1-11	1-12	1-13	1-14	1-15	1-16	1-17	1-18	2-01	2-02	2-03	2-04	2-05	2-06	2-07	2-08	2-09	2-10	2-11	2-12	2-13	2-14	2-15	3-01
NOV	2016	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0
DEC	2016	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0
JAN	2017	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0
FEB	2017	0	0	1	1	1	1	0	1	0	1	1	0	0	2	0	0	5	1	0	0	1	1	1	5	0	0	0	0	2	0	0	0	1
MAR	2017	0	0	0	0	0	1	0	0	0	0	0	0	1	0	0	0	14	0	0	0	0	0	0	3	0	0	0	0	0	0	0	0	1
TOTAL EXCEEDANCES		0	0	1	1	1	2	0	1	1	1	1	0	1	2	0	0	23	2	0	0	1	1	1	10	1	0	0	0	2	0	0	0	2
ALLOWANCES		2	1	2	2	2	2	2	2	1	2	2	2	1	2	1	1	9	2	2	2	2	2	2	9	2	2	2	0	2	1	2	2	2
NUMBER OF VIOLATIONS		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	14	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0

Month	Year	3-02	3-03	3-04	3-05	3-06	3-07	3-08	3-09	4-01	5-01	5-02	5-03	5-04	5-05	6-01	6-02	6-03	6-04	6-05	6-06	7-01	7-02	7-03	7-04	7-05	7-06	7-08	7-09	BC-1	MC-1	MC-2	MC-3	O-1	O-2
NOV	2016	0	8	1	0	0	0	0	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	0
DEC	2016	0	10	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	0	0	0
JAN	2017	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0
FEB	2017	1	6	3	1	0	0	0	1	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	0	0	0
MAR	2017	1	17	1	0	0	0	0	0	0	0	2	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	9	0	0	0
TOTAL EXCEEDANCES		2	44	6	1	0	0	0	2	0	0	3	0	0	0	4	0	1	0	0	0	0	0	0	0	0	1	1	0	0	0	20	0	0	0
ALLOWANCES		2	9	9	9	1	2	2	2	1	1	9	1	1	1	9	1	1	2	1	1	1	1	1	0	1	1	1	1	3	2	9	2	2	0
NUMBER OF VIOLATIONS		0	35	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	0	0	0

SUMMER - DRY EXCEEDANCE DAYS (Apr 2017 - Oct 2017)

Month	Year	1-01	1-03	1-04	1-05	1-06	1-07	1-08	1-09	1-10	1-11	1-12	1-13	1-14	1-15	1-16	1-17	1-18	2-01	2-02	2-03	2-04	2-05	2-06	2-07	2-08	2-09	2-10	2-11	2-12	2-13	2-14	2-15	3-01
APR	2017	1	0	1	0	0	0	0	0	0	1	0	0	0	0	0	0	10	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0
MAY	2017	1	0	0	0	0	1	0	1	0	1	0	0	1	0	0	0	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
JUN	2017	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
JUL	2017	0	0	0	0	0	0	0	1	0	1	1	0	0	0	0	0	0	0	0	0	0	2	1	0	0	0	0	0	0	0	0	0	0
AUG	2017	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
SEP	2017	0	0	0	0	0	0	0	1	0	0	1	0	0	0	0	0	0	0	1	1	0	1	1	1	1	1	1	0	0	1	0	0	1
OCT	2017	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0
TOTAL EXCEEDANCES		2	0	1	0	0	2	0	3	0	3	2	0	1	0	0	0	21	0	1	1	1	3	2	2	1	2	1	0	0	2	0	0	4
ALLOWANCES		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NUMBER OF VIOLATIONS		2	0	1	0	0	2	0	3	0	3	2	0	1	0	0	0	21	0	1	1	1	3	2	2	1	2	1	0	0	2	0	0	4

Month	Year	3-02	3-03	3-04	3-05	3-06	3-07	3-08	3-09	4-01	5-01	5-02	5-03	5-04	5-05	6-01	6-02	6-03	6-04	6-05	6-06	7-01	7-02	7-03	7-04	7-05	7-06	7-08	7-09	BC-1	MC-1	MC-2	MC-3	O-1	O-2
APR	2017	0	12	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	0	1	0
MAY	2017	0	11	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	0	0	0
JUN	2017	0	11	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0
JUL	2017	0	7	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0
AUG	2017	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0
SEP	2017	0	8	0	0	0	1	1	0	0	1	0	0	0	0	0	1	0	0	2	1	0	0	0	0	0	0	0	0	0	0		0	1	
OCT	2017	0	8	0	0	0	0	2	0	0	0	1	0	0	0	2	1	0	1	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	0
TOTAL EXCEEDANCES		0	63	2	0	0	2	3	0	0	1	2	0	0	0	2	2	0	1	2	2	0	0	0	0	0	0	0	0	0	1	8	0	5	0
ALLOWANCES		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NUMBER OF VIOLATIONS		0	63	2	0	0	2	3	0	0	1	2	0	0	0	2	2	0	1	2	2	0	0	0	0	0	0	0	0	0	1	8	0	5	0

	1-01	1-03	1-04	1-05	1-06	1-07	1-08	1-09	1-10	1-11	1-12	1-13	1-14	1-15	1-16	1-17	1-18	2-01	2-02	2-03	2-04	2-05	2-06	2-07	2-08	2-09	2-10	2-11	2-12	2-13	2-14	2-15	3-01
Total number of violations (Dec 2013 - Oct 2017)	4	3	6	2	0	9	2	7	3	5	21	4	5	8	1	1	114	1	10	2	4	12	3	44	3	7	4	3	3	8	2	4	13

	3-02	3-03	3-04	3-05	3-06	3-07	3-08	3-09	4-01	5-01	5-02	5-03	5-04	5-05	6-01	6-02	6-03	6-04	6-05	6-06	7-01	7-02	7-03	7-04	7-05	7-06	7-08	7-09	BC-1	MC-1	MC-2	MC-3	O-1	O-2
Total number of violations (Dec 2013 - Oct 2017)	13	455	78	14	1	6	12	3	1	7	18	4	1	4	29	29	10	8	9	9	0	1	2	0	0	3	1	1	42	1	151	18	12	4

BCB Bacterial TMDL Monitoring Stations Summary by Seasons

BCB Total number of violations:	449

SUMMER - DRY EXCEEDANCE DAYS (Apr 2013 - Oct 2013)

Month	Year	BCB-1	BCB-2	BCB-3	BCB-4	BCB-5
APR	2013	0	0	0	0	0
MAY	2013	0	1	0	3	2
JUN	2013	1	1	3	4	2
JUL	2013	2	4	2	4	3
AUG	2013	0	3	4	5	3
SEP	2013	2	4	2	4	3
OCT	2013	1	3	2	5	2
TOTAL EXCEEDANCES		6	16	13	25	15
ALLOWANCES		0	1	1	1	1
NUMBER OF VIOLATIONS		6	15	12	24	14

DRY EXCEEDANCE DAYS (Nov 2013 - Oct 2014)

Month	Year	BCB-1	BCB-2	BCB-3	BCB-4	BCB-5
NOV	2013	0	2	2	3	1
DEC	2013	0	2	3	3	1
JAN	2014	0	3	1	5	2
FEB	2014	0	1	0	3	0
MAR	2014	0	3	3	4	2
APR	2014	0	2	1	2	1
MAY	2014	0	3	3	4	3
JUN	2014	0	0	3	4	2
JUL	2014	0	4	5	4	3
AUG	2014	0	4	3	4	4
SEP	2014	1	4	4	4	2
OCT	2014	0	4	3	5	2
TOTAL EXCEEDANCES		1	32	31	45	23
ALLOWANCES		0	1	1	1	1
NUMBER OF VIOLATIONS		1	31	30	44	22

DRY EXCEEDANCE DAYS (Nov 2014 - May 13, 2015)

Month	Year	BCB-1	BCB-2	BCB-3	BCB-4	BCB-5
NOV	2014	0	2	2	4	2
DEC	2014	0	1	2	2	1
JAN	2015	0	1	1	4	0
FEB	2015	0	1	0	2	0
MAR	2015	0	0	0	3	2
APR	2015	0	0	0	3	0
13-May	2015	0	0	0	1	0
TOTAL EXCEEDANCES		0	5	5	19	5
ALLOWANCES		0	1	1	1	1
NUMBER OF VIOLATIONS		0	4	4	18	4

DRY EXCEEDANCE DAYS (May 14, 2015 - Oct 2015)

Month	Year	BCB-1	BCB-2	BCB-3	BCB-4	BCB-5
14-May	2015	0	0	2	2	1
JUN	2015	1	1	3	4	0
JUL	2015	0	2	3	4	3
AUG	2015	0	1	1	4	1
SEP	2015	0	2	0	2	1
OCT	2015	0	1	3	4	2
TOTAL EXCEEDANCES		1	7	12	20	8
ALLOWANCES		5	13	13	22	11
NUMBER OF VIOLATIONS		0	0	0	0	0

DRY EXCEEDANCE DAYS (Nov 2015 - Oct 2016)

Month	Year	BCB-1	BCB-2	BCB-3	BCB-4	BCB-5
NOV	2015	1	0	1	3	1
DEC	2015	0	0	3	3	2
JAN	2016	0	0	0	2	0
FEB	2016	0	0	1	1	0
MAR	2016	0	0	1	1	1
APR	2016	0	0	1	2	0
MAY	2016	0	0	1	4	0
JUN	2016	0	0	0	4	2
JUL	2016	0	0	2	4	1
AUG	2016	0	0	1	4	2
SEP	2016	1	0	1	5	3
OCT	2016	2	0	3	3	2
TOTAL EXCEEDANCES		4	0	15	36	14
ALLOWANCES		12	30	30	48	26
NUMBER OF VIOLATIONS		0	0	0	0	0

DRY EXCEEDANCE DAYS (Nov 2016 - Oct 2017)

Month	Year	BCB-1	BCB-2	BCB-3	BCB-4	BCB-5
NOV	2016	0	0	0	3	0
DEC	2016	0	0	0	0	2
JAN	2017	0	0	0	0	0
FEB	2017	0	0	0	0	0
MAR	2017	0	0	2	4	1
APR	2017	0	0	3	3	2
MAY	2017	0	0	0	3	2
JUN	2017	0	0	5	5	2
JUL	2017	1	0	2	3	2
AUG	2017	0	0	3	5	5
SEP	2017	1	0	3	4	3
OCT	2017	1	0	2	4	1
TOTAL EXCEEDANCES		3	0	20	34	20
ALLOWANCES		12	30	30	48	26
NUMBER OF VIOLATIONS		0	0	0	0	0

Total number of violations (Apr 2013 - Oct 2017)	7	50	46	86	40

SUMMER - DRY EXCEEDANCE DAYS (Apr 2013 - Oct 2013)

Month	Year	BCB-6	BCB-7	BCB-8	BCB-9
APR	2013	0	0	0	0
MAY	2013	4	4	2	1
JUN	2013	4	4	0	2
JUL	2013	4	4	2	2
AUG	2013	5	5	1	1
SEP	2013	4	4	0	0
OCT	2013	5	5	1	2
TOTAL EXCEEDANCES		26	26	6	8
ALLOWANCES		0	0	0	0
NUMBER OF VIOLATIONS		26	26	6	8

WINTER - DRY EXCEEDANCE DAYS (Nov 2013 - Mar 2014)

Month	Year	BCB-6	BCB-7	BCB-8	BCB-9
NOV	2013	3	3	2	0
DEC	2013	3	3	0	0
JAN	2014	5	5	0	1
FEB	2014	3	2	0	0
MAR	2014	4	4	2	2
TOTAL EXCEEDANCES		18	17	4	3
ALLOWANCES		2	2	2	2
NUMBER OF VIOLATIONS		16	15	2	1

SUMMER - DRY EXCEEDANCE DAYS (Apr 2014 - Oct 2014)

Month	Year	BCB-6	BCB-7	BCB-8	BCB-9
APR	2014	3	3	0	1
MAY	2014	5	5	1	0
JUN	2014	4	4	1	0
JUL	2014	5	5	2	0
AUG	2014	4	4	1	0
SEP	2014	4	4	1	1
OCT	2014	5	5	0	0
TOTAL EXCEEDANCES		30	30	6	2
ALLOWANCES		0	0	0	0
NUMBER OF VIOLATIONS		30	30	6	2

WINTER - DRY EXCEEDANCE DAYS (Nov 2014 - Mar 2015)

Month	Year	BCB-6	BCB-7	BCB-8	BCB-9
NOV	2014	4	4	0	0
DEC	2014	2	1	1	1
JAN	2015	2	4	2	0
FEB	2015	3	3	2	1
MAR	2015	3	3	1	1
TOTAL EXCEEDANCES		14	15	6	3
ALLOWANCES		2	2	2	2
NUMBER OF VIOLATIONS		12	13	4	1

SUMMER - DRY EXCEEDANCE DAYS (Apr 2015 - May 13, 2015)

Month	Year	BCB-6	BCB-7	BCB-8	BCB-9
APR	2015	4	3	1	0
13-May	2015	1	1	0	0
TOTAL EXCEEDANCES		5	4	1	0
ALLOWANCES		0	0	0	0
NUMBER OF VIOLATIONS		5	4	1	0

SUMMER - DRY EXCEEDANCE DAYS (May 14, 2015 - Oct 2015)

Month	Year	BCB-6	BCB-7	BCB-8	BCB-9
14-May	2015	2	2	1	0
JUN	2015	3	4	0	0
JUL	2015	5	5	2	2
AUG	2015	4	4	0	1
SEP	2015	3	3	0	0
OCT	2015	4	4	1	0
TOTAL EXCEEDANCES		21	22	4	3
ALLOWANCES		25	26	6	0
NUMBER OF VIOLATIONS		0	0	0	3

WINTER - DRY EXCEEDANCE DAYS (Nov 2015 - Mar 2016)

Month	Year	BCB-6	BCB-7	BCB-8	BCB-9
NOV	2015	4	4	3	0
DEC	2015	4	5	2	2
JAN	2016	3	1	0	1
FEB	2016	2	2	1	1
MAR	2016	3	4	0	0
TOTAL EXCEEDANCES		16	16	6	4
ALLOWANCES		19	18	6	2
NUMBER OF VIOLATIONS		0	0	0	2

SUMMER - DRY EXCEEDANCE DAYS (Apr 2016 - Oct 2016)

Month	Year	BCB-6	BCB-7	BCB-8	BCB-9
APR	2016	4	3	1	0
MAY	2016	4	4	0	1
JUN	2016	5	5	0	1
JUL	2016	4	4	0	2
AUG	2016	4	4	0	1
SEP	2016	5	5	0	1
OCT	2016	3	3	1	0
TOTAL EXCEEDANCES		29	28	2	6
ALLOWANCES		33	36	8	0
NUMBER OF VIOLATIONS		0	0	0	6

WINTER - DRY EXCEEDANCE DAYS (Nov 2016 - Mar 2017)

Month	Year	BCB-6	BCB-7	BCB-8	BCB-9
NOV	2016	2	3	1	0
DEC	2016	3	3	0	0
JAN	2017	3	3	0	0
FEB	2017	0	0	0	0
MAR	2017	3	5	1	0
TOTAL EXCEEDANCES		11	14	2	0
ALLOWANCES		19	18	6	2
NUMBER OF VIOLATIONS		0	0	0	0

SUMMER - DRY EXCEEDANCE DAYS (Apr 2017 - Oct 2017)

Month	Year	BCB-6	BCB-7	BCB-8	BCB-9
APR	2017	3	4	0	0
MAY	2017	4	4	1	0
JUN	2017	5	5	0	1
JUL	2017	4	4	1	0
AUG	2017	5	5	0	0
SEP	2017	4	4	0	0
OCT	2017	4	4	0	0
TOTAL EXCEEDANCES		29	30	2	1
ALLOWANCES		33	36	8	0
NUMBER OF VIOLATIONS		0	0	0	1

Total number of violations (Apr 2013 - Oct 2017)	89	88	19	24

MCW Bacterial TMDL Monitoring Stations Summary by Seasons

MCW Total number of violations:	365

WINTER - DRY EXCEEDANCE DAYS (Jan 2013 - Mar 2013)

Month	Year	MCW-1
JAN**	2013	0
FEB	2013	3
MAR	2013	1
TOTAL EXCEEDANCES		4
ALLOWANCES		2
NUMBER OF VIOLATIONS		2

**Started collecting data in 12/29/2012

SUMMER - DRY EXCEEDANCE DAYS (Apr 2013 - Oct 2013)

Month	Year	MCW-1
APR	2013	1
MAY	2013	1
JUN	2013	0
JUL	2013	1
AUG	2013	0
SEP	2013	0
OCT	2013	0
TOTAL EXCEEDANCES		3
ALLOWANCES		0
NUMBER OF VIOLATIONS		3

WINTER - DRY EXCEEDANCE DAYS (Nov 2013 - Mar 2014)

Month	Year	MCW-1
NOV	2013	1
DEC	2013	1
JAN	2014	1
FEB	2014	0
MAR	2014	1
TOTAL EXCEEDANCES		4
ALLOWANCES		2
NUMBER OF VIOLATIONS		2

SUMMER - DRY EXCEEDANCE DAYS (Apr 2014 - Oct 2014)

Month	Year	MCW-1
APR	2014	1
MAY	2014	0
JUN	2014	0
JUL	2014	0
AUG	2014	0
SEP	2014	1
OCT	2014	1
TOTAL		3
ALLOWANCES		0
NUMBER OF VIOLATIONS		3

WINTER - DRY EXCEEDANCE DAYS (Nov 2014 - Mar 2015)

Month	Year	MCW-1
NOV	2014	1
DEC	2014	3
JAN	2015	2
FEB	2015	2
MAR	2015	3
TOTAL		11
ALLOWANCES		2
NUMBER OF VIOLATIONS		9

SUMMER - DRY EXCEEDANCE DAYS (Apr 2015 - Oct 2015)

Month	Year	MCW-1
APR	2015	1
MAY	2015	0
JUN	2015	0
JUL	2015	0
AUG	2015	0
SEP	2015	0
OCT	2015	1
TOTAL		2
ALLOWANCES		0
NUMBER OF VIOLATIONS		2

WINTER - DRY EXCEEDANCE DAYS (Nov 2015 - Mar 2016)

Month	Year	MCW-1
NOV	2015	0
DEC	2015	2
JAN	2016	2
FEB	2016	2
MAR	2016	1
TOTAL		7
ALLOWANCES		2
NUMBER OF VIOLATIONS		5

DRY EXCCEDANCE DAYS (Jan 2013 - Oct 2013)

Month	Year	MCW-2	MCW-3	MCW-4	MCW-5	MCW-6	MCW-7	MCW-10	MCW-11	MCW-13	MCW-16
JAN**	2013	0	0	0	0	0	0	1	0	2	0
FEB	2013	0	0	0	0	0	0	1	0	1	0
MAR	2013	0	0	1	0	0	0	2	0	3	0
APR*	2013	0	0	1	0	0	0	4	0	5	0
MAY	2013	0	0	0	0	0	2	3	0	3	0
JUN	2013	0	1	0	0	0	1	4	0	4	0
JUL	2013	0	0	0	0	0	1	5	1	4	0
AUG	2013	0	0	0	0	0	2	4	2	4	0
SEP	2013	0	0	0	0	0	2	4	1	4	0
OCT	2013	0	0	0	0	0	1	4	1	5	0
TOTAL EXCEEDANCES		0	1	2	0	0	9	32	5	35	0
ALLOWANCES		1	1	1	1	1	1	1	1	1	1
NUMBER OF VIOLATIONS		0	0	1	0	0	8	31	4	34	0

DRY EXCCEDANCE DAYS (Nov 2013 - Oct 2014)

Month	Year	MCW-2	MCW-3	MCW-4	MCW-5	MCW-6	MCW-7	MCW-10	MCW-11	MCW-13	MCW-16
NOV	2013	0	0	0	0	0	2	2	0	4	0
DEC	2013	0	0	0	0	0	1	2	0	5	0
JAN	2014	0	0	0	0	0	0	0	0	4	0
FEB	2014	0	0	0	0	0	0	1	0	3	0
MAR	2014	1	0	1	0	0	0	3	0	3	0
APR*	2014	0	0	0	1	0	0	5	0	5	0
MAY	2014	0	0	0	0	0	0	4	0	4	0
JUN	2014	0	0	0	0	0	0	3	0	4	0
JUL	2014	0	1	0	0	0	3	5	2	5	0
AUG	2014	0	0	0	0	0	0	4	0	4	0
SEP	2014	0	0	0	0	0	0	5	0	4	0
OCT	2014	0	0	0	0	0	0	4	0	2	0
TOTAL		1	1	1	1	0	6	38	2	47	0
ALLOWANCES		1	1	1	1	1	1	1	1	1	1
NUMBER OF VIOLATIONS		0	0	0	0	0	5	37	1	46	0

DRY EXCCEDANCE DAYS (Nov 2014 - Oct 2015)

Month	Year	MCW-2	MCW-3	MCW-4	MCW-5	MCW-6	MCW-7	MCW-10	MCW-11	MCW-13	MCW-16
NOV	2014	0	0	0	0	0	0	2	0	2	0
DEC	2014	0	0	1	0	0	2	2	1	2	0
JAN	2015	0	1	0	0	1	1	1	0	2	0
FEB	2015	0	0	0	0	0	0	1	0	2	0
MAR	2015	0	0	0	0	0	0	1	0	4	0
APR*	2015	0	0	0	0	0	0	2	1	1	0
MAY	2015	0	0	0	0	0	0	1	0	2	0
JUN	2015	0	1	0	0	0	1	5	0	5	0
JUL	2015	0	1	0	0	0	0	3	1	4	0
AUG	2015	0	1	0	0	0	0	4	0	4	0
SEP	2015	0	0	0	0	0	1	4	0	4	0
OCT	2015	0	0	0	0	0	1	4	0	4	0
TOTAL		0	4	1	0	1	6	30	3	36	0
ALLOWANCES		1	1	1	1	1	1	1	1	1	1
NUMBER OF VIOLATIONS		0	3	0	0	0	5	29	2	35	0

DRY EXCCEDANCE DAYS (Nov 2015 - Oct 2016)

*CIMP STATIONS AS OF JULY 2016		CIMP 1	CIMP 3	CIMP 4	CIMP 5	CIMP 6	CIMP 7	CIMP 9	CIMP 10	CIMP 11	CIMP 12
Month	Year	MCW-2	MCW-3	MCW-4	MCW-5	MCW-6	MCW-7	MCW-10	MCW-11	MCW-13	MCW-16
NOV	2015	0	0	0	0	0	1	3	1	4	0
DEC	2015	0	0	0	0	0	0	2	0	4	0
JAN	2016	0	0	0	0	0	0	0	0	2	0
FEB	2016	1	1	1	1	0	1	0	0	3	0
MAR	2016	0	0	0	1	0	0	1	0	3	0
APR	2016	0	0	0	0	0	0	3	0	4	0
MAY	2016	0	0	0	0	0	0	4	0	3	0
JUN	2016	0	0	0	0	0	2	3	0	1	0
JUL*	2016	0	1	0	0	0	1	2	0	1	0
AUG	2016	0	0	0	0	0	1	2	0	0	0
SEP	2016	0	0	0	0	0	0	0	0	1	0
OCT	2016	0	0	0	0	0	0	3	0	1	0
TOTAL		1	2	1	2	0	6	23	1	27	0
ALLOWANCES		1	1	1	1	1	1	1	1	1	1
NUMBER OF VIOLATIONS		0	1	0	1	0	5	22	0	26	0

DRY EXCCEDANCE DAYS (Nov 2016 - Oct 2017)

*CIMP STATIONS AS OF JULY 2016		CIMP 1	CIMP 3	CIMP 4	CIMP 5	CIMP 6	CIMP 7	CIMP 9	CIMP 10	CIMP 11	CIMP 12
Month	Year	MCW-2	MCW-3	MCW-4	MCW-5	MCW-6	MCW-7	MCW-10	MCW-11	MCW-13	MCW-16
NOV	2016	0	0	0	0	0	0	1	0	1	0
DEC	2016	0	0	0	0	0	0	1	0	2	0
JAN	2017	0	0	1	0	0	1	0	1	0	1
FEB	2017	0	0	0	0	0	0	0	1	0	1
MAR	2017	0	1	0	0	0	0	0	0	3	0
APR*	2017	0	0	0	0	0	0	1	0	2	0
MAY	2017	0	0	0	1	0	1	1	1	2	1
JUN	2017	0	0	0	0	0	0	0	1	1	1
JUL	2017	0	0	0	0	0	0	2	0	2	0
AUG	2017	0	1	0	1	0	0	1	0	1	0
SEP	2017	0	0	0	0	0	0	1	0	1	0
OCT	2017	0	0	0	0	0	0	0	0	0	0
TOTAL		0	2	1	2	0	2	8	4	15	4
ALLOWANCES		1	1	1	1	1	1	1	1	1	1
NUMBER OF VIOLATIONS		0	1	0	1	0	1	7	3	14	3

Total number of violations (Dec 2013 - Oct 2017)	0	5	1	2	0	24	126	10	155	3

SUMMER - DRY EXCEEDANCE DAYS (Apr 2016 - Oct 2016)		
Month	Year	MCW-1
APR	2016	2
MAY	2016	0
JUN	2016	0
JUL	2016	0
AUG	2016	0
SEP	2016	0
OCT	2016	0
TOTAL		2
ALLOWANCES		0
NUMBER OF VIOLATIONS		2

WINTER - DRY EXCEEDANCE DAYS (Nov 2016 - Mar 2017)		
Month	Year	MCW-1
NOV	2016	0
DEC	2016	0
JAN	2017	2
FEB	2017	2
MAR	2017	0
TOTAL		4
ALLOWANCES		2
NUMBER OF VIOLATIONS		2

SUMMER - DRY EXCEEDANCE DAYS (Apr 2017 - Oct 2017)		
Month	Year	MCW-1
APR	2017	0
MAY	2017	2
JUN	2017	0
JUL	2017	0
AUG	2017	1
SEP	2017	1
OCT	2017	5
TOTAL		9
ALLOWANCES		0
NUMBER OF VIOLATIONS		9

Total number of violations	**39**

ENDNOTES

1 Santa Monica recently unveiled its Clean Beaches Project to help address runoff-related pollution at this site. Santa Monica Public Works, Clean Beaches Project (2018), https://www.smgov.net/Departments/PublicWorks/ContentCivEng.aspx?id=54194. NRDC's blog highlighting the project can be accessed here: https://www.nrdc.org/experts/ellen-lee/measure-w-dirty-stormwater-clean-beaches.

2 SWRCB, About Us, https://www.waterboards.ca.gov/about_us/.

3 SWRCB, mission statement (January 2018), https://www.waterboards.ca.gov/about_us/water_boards_structure/mission.html.

4 SWRCB, Water Boards Structure, "What the State Water Resources Control Board Does," https://www.waterboards.ca.gov/northcoast/about_us/water_boards_structure/.

5 *Id.*

6 SWRCB, Los Angeles Regional Water Board Fact Sheet (June 2012), http://www.waterboards.ca.gov/publications_forms/publications/factsheets/docs/r4_factsheet.pdf.

7 United States Census Bureau, Population of Counties by Decennial Census

(March 27, 1995), https://www.census.gov/population/www/censusdata/cencounts/files/ca190090.txt.

8 United States Census Bureau, QuickFacts Los Angeles, (accessed February 5, 2019) https://www.census.gov/quickfacts/fact/table/losangelescountycalifornia,US/PST045218.

9 *Id.*

10 *See* Jesdale and Morello-Frosch, Metrics for Climate Change, Tree Canopy and Impervious Surface, PowerPoint presentation slide 8, https://dornsife.usc.edu/assets/sites/242/docs/Metrics_Climate_Change_Jesdale_Morello-Frosch.pdf.

11 Martin Macias Jr, "Environmentalists Win Ruling on Storm Channel Runoff in Los Angeles," December 27, 2018, https://www.courthousenews.com/appeals-court-orders-deeper-look-at-socal-stormwater-permits/.

12 Los Angeles Regional Water Quality Control Board [hereinafter LARWQCB], Water Quality Control Plan: Los Angeles Region at 1-3, 1-4 (September 11, 2014) [hereinafter Basin Plan] http://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/electronics_documents/FinalRevisedChapter1Text.pdf.

13 Cal. Water Code § 13300 *et seq*.

14 LARWQCB, Order No. R4-2012-0175 as amended by Order WQ 2015-0075 and Order R4-2012-0175-A01, NPDES Permit No. CAS004001, Attachment F – Fact Sheet at F-7 (September 8, 2016) [hereinafter 2012 LA MS4 Permit] http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/los_angeles_ms4/2016/R4-2012-0175-Att_F_amended.pdf.

15 The Public Records Act is a California law that grants the public access to public records by submitting a request to the relevant agency. The documents we received through these requests are public records; however, they are not readily available to the public without such a request.

16 *See* Jesdale and Morello-Frosch, Metrics for Climate Change, Tree Canopy and Impervious Surface, PowerPoint presentation slide 8, https://dornsife.usc.edu/assets/sites/242/docs/Metrics_Climate_Change_Jesdale_Morello-Frosch.pdf.

17 Despite the distinction between dry and wet weather runoff, in common parlance, "stormwater" and "urban runoff" are often used interchangeably.

18 U.S. General Accounting Office, Water Quality: Urban Runoff Programs, Report No. GAO-01- 679 at 37 (June 2001), http://www.gao.gov/new.items/d01679.pdf.

19 Haan-Fawn Chau, *Green Infrastructure for Los Angeles: Addressing Urban Runoff and Water Supply Through Low Impact Development* at 50 (April 17, 2009), http://www.waterboards.ca.gov/water_issues/programs/climate/docs/resources/la_green_infrastructure.pdf, citing City of Los Angeles Department of Public Works, Bureau of Sanitation, "Water Quality Compliance Master Plan for Urban Runoff," Draft, (December 4, 2007).

20 Haile, Alamillo, Barret, Cressey, Dermond, Ervin, Glasse, Harawa, Harmon, Harper, McGee, Millikan, Nides, and Witte, *An Epidemiological Study of Possible Adverse Health Effects of Swimming in Santa Monica Bay*, Santa Monica Bay Restoration Project (October 1996), https://ecomalibu.org/studies/1996%20Epi%20Study/Epidemiological%20study%20part%201.pdf; *See also* Nobel, Weisberg, Leecaster, McGee, Dorsey, Vainik, and Orozco-Borbon; *Storm Effects on Regional Beach Water Quality Along the Southern California Shoreline*, Journal of Water and Health 23, 23 (2003), http://www.sld.cu/galerias/pdf/sitios/rehabilitacion-bal/storm_effects_on_regional_beach_water_qaulity.pdf.

21 Haile, Witte, Gold, Cressey, McGee, Millikan, Glasser, Harawa, Ervin, Harmon, Harper, Dermand, Alamillo, Barrett, Nides, and Wang, *The Health Effects of Swimming in Ocean Water Contaminated by Storm Drain Runoff*, Epidemiology 355, 358 (July 4, 1999) [hereinafter Health Effects of Swimming in Contaminated Runoff], https://www.ncbi.nlm.nih.gov/pubmed/10401868.

22 Given, Pendleton, and Boehm; *Regional Public Health Cost Estimates of Contaminated Coastal Waters: A Case Study of Gastroenteritis at Southern California Beaches*, Environmental Science & Technology at 4851, 4856 (2006), http://pubs.acs.org/doi/pdf/10.1021/es060679s, citing Rabinovici, Bernknopf, Wein, Coursey, and Whitman; *Economic and health risk tradeoffs of swim closures at a Lake Michigan Beach*. Environ. Sci. Technol. 2004, 38, 2742-2750. The public health cost figure is calculated using the Given et al.'s estimate of 993,000 GI cases in LA County annually, multiplied by Rabinovici et al.'s cost of $280 per illness.

23 LARWQCB, 2012 LA Permit Fact Sheet at F-7.

24 33 U.S.C. § 1342.

25 *Id.* § 1362(14).

26 *See* 33 U.S.C. § 1342(p).

27 33 U.S.C. § 1313(c)(2)(A).

28 *See* LARWQCB, Basin Plan, 2-2, https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/electronics_documents/Chapter2Text.pdf.

29 33 U.S.C. § 1313(d).

30 *Id.* at (d)(1)(C).

31 40 C.F.R. § 122.44(d)(1)(vii)(B).

32 LARWQCB, 2012 LA MS4 Permit at 1.

33 Cal. Water Code § 13001.

34 *Id.* § 13300 *et seq*.

35 *See* SWRCB, Water Quality Enforcement Policy at 1, (April 4, 2017) https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2017/040417_9_final%20adopted%20policy.pdf [hereinafter Enforcement Policy].

36 U.S. EPA, NPDES Memorandum of Agreement Between the U.S. EPA and the California State Water Resources Control Board (1989) at 1 [hereinafter MOA], https://www.epa.gov/sites/production/files/2013-08/documents/ca-moa-npdes_0.pdf.

37 *Id.* at 39.

38 *Id.* at 6.

39 These circumstances include when the State Board is responding to petitions that allege ineffective enforcement action by a Regional Water Board; the enforcement of statewide or multi-regional general permits; circumstances where the matter involves multi-regional permittees; and/or circumstances where the violations cause harm in more than one region; for example. SWRCB, Enforcement Policy at 8.

40 *See id.* at 1, 5, and 7.

41 *Id.* at 1.

42 *Id.* at Appendix A, 1.

43 *Id.*

44 *Id.* at 5.

45 SWRCB, Enforcement Policy, Appendix A, 1.

46 *Id.*

47 *Id. emphasis added.*

48 *Id.* at Appendix A, 2.

49 Cal. Water Code § 13399.1(c).

50 *Id.* at § 13399.1.

51 *Id.* at §§ 13267(b), 13383.

52 SWRCB, Enforcement Policy, Appendix A, 4.

53 *Id. See also* Cal. Water Code § 13300.

54 *Id.* Appendix A, 4.

55 *Id.* Appendix A, 5.

56 *Id.* at 5-6.

57 Cal. Water Code § 13385(h)(1).

58 Pursuant to Water Code § 13385(h)(2), a serious violation is any waste discharge that exceeds the effluent limitation for a Group I pollutant, as defined by Appendix A to 40 C.F.R. § 123.45, by forty percent or more, or a Group II pollutant, as defined by Appendix A to 40 C.F.R. § 123.45, by twenty percent or more. Group I pollutants include constituents like solids, oil and grease, metals, and nutrients. Group II pollutants include organics and metals not listed under Group I.

59 Cal. Water Code § 13385.1(a)(1).

60 *Chronic* means occurring four or more times during any 180-day period (although the first three violations do not count towards calculation of the penalties). *Id.* § 13385(i)(1).

61 *Id.* § 13385(i)(1)(A)-(B). Other instances include (c) Files an incomplete report of waste discharge pursuant to California Water Code section 13260; or, (d) Violates a whole effluent toxicity effluent limitation where the WDRs do not contain pollutant-specific effluent limitations for any toxic pollutants.

62 2012 LA MS4 Permit at 1, §II H.

63 *See, id.* Attachment M.

64 *See id.* at VI A. 13 (f), (g). The Board also recognizes the stormwater program is subject to MMPs in the following documents: LA MS4 Permit at §§ IV A. 2 and LARWQCB TSO No. R4-2015-0108 ¶ 48 (May 14, 2015).

65 There are various MS4 permit terms that can be violated (and therefore for which enforcement can be sought), for example, by violating water quality standards or water quality objectives, or for failure to submit a monitoring report. These standards and objectives are contained in various documents such as the California Ocean Plan, the California Toxics Rule, and the Basin Plan, to name a few.

66 SWRCB, California Integrated Water Quality System Project [hereinafter CIWQS Database] (November 5, 2018),

https://www.waterboards.ca.gov/water_issues/programs/ciwqs/.

67 This number does not include sixty-six 13383 Orders reminding permittees to submit a "method to comply with statewide trash provisions" (issued on August 18, 2017), and 84 Notifications of Requirements to Implement an Industrial/Commercial Facilities Program, warning permittees that the Board would be performing audits of select permittees (issued from February 28 to May 25, 2017). These were excluded because these were merely reminders to comply with upcoming deadlines. This total also does not include follow-up, 2nd or 3rd Notices of Violation, of which 23 were issued.

68 LARWQCB TSO No. R4-2014-0023 (February 6, 2014), LARWQCB TSO No. R4-2014-0142 (July 10, 2014), and LARWQCB TSO No. R4-2015-0108 (May 14, 2015).

69 When the Regional Board issued one Enforcement Action against several permittees, the action was counted as a single action. This is consistent with the way actions are categorized in the CIWQS database. The totals reflect the documents we received in response to our PRA Requests unless otherwise noted.

70 These actions were found via the CIWQS database.

71 These include what the Board calls "Requests for Information," "Request for Investigation," "Requirement to Submit Information," "Requirement to Provide Information," or "Investigative Order."

72 When these Requests were sent simultaneously with NOVs, we did not count the NOV as a separate action.

73 An additional three were partially rescinded. One progressed to an ACL which was later rescinded- this rescission is accounted for in the ACL tally and not here.

74 The first Los Angeles MS4 permit was issued on June 8, 1990 and the most recent MS4 permit took effect on December 29, 2012, for a total of 22.58 years.

75 Because the 2012 permit took effect at the end of the year, on December 29th, we examined enforcement actions starting in 2013.

76 These four actions are classified as informal actions because the Requests did not cite § 13267 or § 13383 (for "Request for Technical Reports & Investigation").

77 All these TSOs granted permittees *more time* to comply with the permit after more time was requested from the Board. These are categorized as "enforcement actions" in name only, as they relax enforcement timelines.

78 This range includes January 2013–March 2018, or 5.25 years.

79 Haile et al., (1999) at 359.

80 A "safe harbor" is present when "compliance with certain provisions [ ] forgive[s] noncompliance with the discharge prohibitions." *NRDC v. County of Los Angeles et al.*, 673 F.3d 880, 897 (9th Cir. 2011), rev'd on other grounds, 568 U.S. 78 (2013).

81 The 2012 LA MS4 Permit § VI. C. 3. c. requires compliance with receiving water limitations with final compliance deadlines that occur prior to approval of a WMP or EWMP. WMP and EWMP approval deadlines were April 2015 and April 2016, respectively.

82 Public Records Act Requests were sent in January and April of 2018. Responsive data came in different formats including Excel spreadsheets and PDFs, making extracting and analyzing the data difficult. Relatedly, our analysis revealed several instances of permittees misreporting the number of allowable exceedance days; this occurred as both under and over reported exceedance days.

83 *See NRDC v. County of Los Angeles et al.*, 673 F.3d 880 (9th Cir. 2011), rev'd on other grounds, 568 U.S. 78 (2013), regarding widespread unaddressed violations of the 2001 MS4 permit. In 2008, NRDC filed a case against the County of Los Angeles for exceedances of water quality standards in the 2001 MS4 permit; undisputed monitoring data showed that there were hundreds of separate exceedances in the Los Angeles and San Gabriel Rivers. Just as we found in our current analysis, these widespread violations of the 2001 permit went unaddressed by the Regional Board. In 2010, the 9th Circuit Court of Appeals ruled that the County and Flood Control District were liable for these exceedances in the Los Angeles and San Gabriel Rivers.

84 Waste load allocations are expressed as the allowable number of days that the receiving waters may exceed the TMDL's water quality objectives for protection of those waters' beneficial uses. LARWQCB, 2012 LA MS4 Permit § II K (1).

85 Wet weather days for the stations operated by the Los Angeles County Sanitation District were obtained using the station-specific rainfall data provided in the County's shoreline monitoring data. Wet weather days for all other stations were obtained from the City's monthly monitoring reports (which use a single rainfall gauge located at the University of Southern California) or from Los Angeles International Airport rain gauge data.

86 Because the Los Angeles County Permit became effective on December 29, 2012, and only requires compliance as of the effective date of the permit, NRDC calculated Santa Monica Bay Beaches and Malibu Creek bacteria TMDLs violations starting December 29, 2012 – even though these two TMDLs set compliance deadlines for allowable dry weather exceedance days *prior to* the effective date of the permit. The Ballona Creek bacteria TMDL, on the other hand, sets a compliance deadline of April 27, 2013 for dry weather. For this reason, NRDC calculated violations for the Ballona Creek bacteria TMDL starting April 27, 2013.

87 Santa Monica recently unveiled its Clean Beaches Project to help address runoff-related pollution at this site. Santa Monica Public Works, Clean Beaches Project (2018), https://www.smgov.net/Departments/PublicWorks/ContentCivEng.aspx?id=54194. NRDC's blog highlighting the project can be accessed here: https://www.nrdc.org/experts/ellen-lee/measure-w-dirty-stormwater-clean-beaches.

88 *See* City and County of Los Angeles, Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan at 1-1 (revised April 7, 2004), http://www.waterboards.ca.gov/losangeles/board_decisions/basin_plan_amendments/technical_documents/2002-022/04_0407/SMBBB%20TMDLs%20CSMP.pdf.

89 40 C.F.R. § 130.7(c).

90 LARWQCB, Basin Plan at 7-25, https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/electronics_documents/CH7_R11-013_RBBPA.pdf.

91 *See* Santa Monica Bay Jurisdictional Group 2 and 3 Enhanced Watershed Management Plan; Revised for 2018 Time Extension, xvii (November 2, 2018), https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/santa_monica/EWMPSMBJ2&3revisedfortimeextension110218.pdf; citing Resolution No. R12-007 (June 7, 2012). Interestingly, permittees applied these larger allowable exceedance numbers retroactively in their October 2014 report. Exceedances that were violations when they originally occurred and were reported to the Board were included in our total number of exceedances.

92 LARWQCB, Basin Plan at 7-25.

93 *See* LARWQCB, Time Schedule Order No. R4-2015-0108 at 3 (May 14, 2015), https://www.waterboards.ca.gov/rwqcb4/water_issues/programs/stormwater/municipal/la_ms4/R4-2015-XXXX/TSOR4-2015-0108.pdf.

94 *See id.*

95 LARWQCB, Basin Plan at 7-239.

96 LARWQCB, Basin Plan Amendment 1 (January 3, 2013) https://www.waterboards.ca.gov/losangeles/water_issues/programs/tmdl/docs/R12-008_RB_BPA.pdf.

97 Letter from Jane Diamond, Director, Water Division, USEPA Region IX, to Samuel Unger, Executive Officer, LARWQCB (July 2, 2014) https://www.waterboards.ca.gov/losangeles/water_issues/programs/tmdl/docs/R12-009_EPA_APV.pdf.

98 LARWQCB, Basin Plan Amendment (January 3, 2013) https://www.waterboards.ca.gov/losangeles/water_issues/programs/tmdl/docs/R12-008_RB_BPA.pdf.

99 *See* LARWQCB, Time Schedule Order No. R4-2015-0108, 14-15 (May 14, 2015), https://www.waterboards.ca.gov/rwqcb4/water_issues/programs/stormwater/municipal/la_ms4/R4-2015-XXXX/TSOR4-2015-0108.pdf.

100 *Id.*

101 LARWQCB, Basin Plan at 7-243; and LARWQCB, Time Schedule Order No. R4-2015-0108, 7, 15, and fn. 5 (May 14, 2015), https://www.waterboards.ca.gov/rwqcb4/water_issues/programs/stormwater/municipal/la_ms4/R4-2015-XXXX/TSOR4-2015-0108.pdf. Until May 14, 2015, ten percent of the samples for BCB-1 could exceed the limit during any thirty-day period before a violation is triggered; because sampling is conducted weekly at this site, this translated to zero allowable exceedances at BCB-1.

102 Until November 2014, the permittee was misreporting BCB-1 through BCB5 in summer dry, winter dry periods. The permittee also mis-quantified the ratio exceedance for BCB-1, resulting in the reporting of additional allowable exceedance days during this period, and thereby reducing the number of reported violations.

103 We split this reporting season in May 2015 due to an increase in the number of allowable exceedances for BCB-1 through BCB-5. The May 14, 2015 TSO increased the number of allowable exceedances for several Ballona monitoring sites. The Board granted this increase because permittees anticipated that additional time was necessary to comply with the TMDL.

104 *Id.*

105 See County of Los Angeles Department of Public Works, Malibu Creek, and Lagoon Bacteria TMDL Compliance Monitoring Plan at 3 (revised Feb. 25, 2008), http://www.cityofcalabasas.com/pdf/documents/environmental-services/malibu-creek-watershed-bacteria/appendix-C.pdf.

106 LARWQCB, Attachment A to Resolution No. R12-009 at 1 (June 7, 2012) [hereinafter Malibu Creek TMDL], https://www.waterboards.ca.gov/rwqcb4/water_issues/programs/tmdl/docs/R12-009_RB_BPA.pdf.

107 *Id.*

108 Letter from Jane Diamond, Director, Water Division, USEPA Region IX, to Samuel Unger, Executive Officer, LARWQCB (July 2, 2014) https://www.waterboards.ca.gov/losangeles/water_issues/programs/tmdl/docs/R12-009_EPA_APV.pdf.

109 LARWQCB, Malibu Creek TMDL at 2.

110 U.S. EPA, MOA at 39.

111 NRDC found only four instances where the Regional Board issued ACL complaints which resulted in the payment of fines by a discharger.

112 SWRCB, Enforcement Policy at 1.

113 *Id.* Attachment A, 1. *Emphasis added.*

114 SWRQB, Supplemental Environmental Projects (SEPs) Overview,

https://www.waterboards.ca.gov/water_issues/programs/enforcement/sep.html.

115 *See* Safe, Clear Water LA, Program Details (accessed February 11, 2019) https://safecleanwaterla.org/scw-program-details/.

116 SWRCB, mission statement (January 2018), https://www.waterboards.ca.gov/about_us/water_boards_structure/mission.html.

117 33 U.S.C § 1342.

118 *Id.* § 1362(14); 40 C.F.R. § 122.2.

119 In 1973, EPA issued its first stormwater regulations which exempted stormwater runoff uncontaminated by any industrial or commercial activity from the NPDES permitting requirements. The U.S. Court of Appeals for the District of Columbia affirmed a lower-court decision to overturn these regulations, concluding that EPA did not have the authority to exclude any classes of point sources from the NPDES program. *NRDC v. Costle*, 568 F.2d 1369 (D.C. Cir. 1977). Following the 1977 decision, EPA issued a series of proposed and final stormwater regulations.

120 33 U.S.C § 1342(p).

121 *Id.*

122 U.S. EPA, *NPDES: Stormwater Discharges from Municipal Sources*, https://www.epa.gov/npdes/stormwater-discharges-municipal-sources (last updated November 4, 2018).

123 33 U.S.C. § 1342(b)(1)(B).

124 *Id.* § 1342(b).

125 U.S. EPA, NPDES State Program Information, https://www.epa.gov/npdes/npdes-state-program-information under "Authority" tab (last updated December 11, 2018).

126 U.S. EPA, NPDES Memorandum of Agreement Between the U.S. Environmental Protection Agency and the California State Water Resources Control Board (1989), https://www.epa.gov/sites/production/files/2013-08/documents/ca-moa-npdes_0.pdf.

127 Cal. Water Code §§ 13001, 13140, 13370, and 13377.

128 33 U.S.C. § 1313(c)(2)(A).

129 LARWQCB, Basin Plan 2-2 (November 10, 2011), https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/electronics_documents/Chapter2Text.pdf.

130 33 U.S.C. § 1313(d).

131 40 C.F.R § 130.2(i).

132 *Id.* § 130.2(h).

133 *Id.* § 122.44(d)(1)(vii)(B).

134 *See* U.S. EPA, *Impaired Waters and TMDLs: Overview* (last updated September 13, 2018), https://www.epa.gov/tmdl/program-overview-total-maximum-daily-loads-tmdl.

135 *See* LARWQCB, Order No. R4-2012-0175 as amended by Order WQ 2015-0075 and Order R4-2012-0175-A01, NPDES Permit No. CAS004001 at 10 (September 8, 2016) [hereinafter 2012 LA Permit], http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/los_angeles_ms4/2016/OrderR4-2012-0175_corrected_120216.pdf.

136 LARWQCB, Order No. 01-182, NPDES Permit No. CAS004001 (December 13, 2001), http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/ms4_permits/los_angeles/01-182_LosAnglelesMS4Permit.pdf and *Id.* at 1.

137 While this extension was granted pursuant to federal regulations, a six-year extension is quite lengthy, as it is one year longer than the entire five year term of an MS4 permit.

138 On September 14, 2006, the 2001 LA Permit was amended by Order No. R4-2006-0074 to incorporate requirements to implement the Santa Monica Bay Beaches summer dry weather bacteria TMDL. On August 9, 2007, the 2001 Permit was amended by Order No. R4-2007-0042 to incorporate provisions consistent with the Marina del Rey Harbor Mothers' Beach and Back Basins bacteria TMDL. Lastly, the 2001 Permit was amended on December 10, 2009 to implement requirements of the Los Angeles River Watershed Trash TMDL. LA 2012 MS4 Permit at 11.

139 The Los Angeles County Superior Court found that, "the permit proceeding at which Order No. R4-2006-0074 was adopted was procedurally deficient. The Court did not address the substantive merits of the amendments...and thus made no determination about the substantive validity of Order No. R4-2006-0074." In compliance with the writ of mandate, the Regional Board voided and set aside the amendments adopted through Order No. R4-2006-0074. LA 2012 MS4 Permit at 11.

140 *See, for example,* LA 2012 MS4 Permit at 12.

141 LARWQCB, Order No. R4-2012-0175-A01 amending Order No. R4-2012-0175 as amended by Order WQ 2015-0075, NPDES Permit No. CAS004001 at 2 (September 8, 2016), http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/los_angeles_ms4/2016/R4-2012-0175-A01.pdf.

142 The Regional Board regulated discharges from the City of Long Beach's MS4 from 1990 through 1999 under the Los Angeles County MS4 Permit that was issued in 1990 and 1996. *See* LARWQCB, Order No. R4-2014-0024 as amended by Order R4-2014-0024-A01, NPDES Permit No. CAS004003 at 10 (September 8, 2016) [hereinafter 2014 Long Beach Permit], https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/ms4_permits/long_beach/2016/8052_R4-2014-0024_WDR_PKG_amd.pdf.

143 *See* LARWQCB, Order No. 99-060, NPDES Permit No. CAS004003 (June 30, 1999), http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/ms4_permits/long_beach/99-060_LongBeachMS4Permit.pdf.

144 *See* 2014 Long Beach Permit at 10.

145 *Id.*

146 *See* LARWQCB, Order No. R4-2010-0108, NPDES Permit No. CAS004002, at 1, (July 8, 2010) http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/ventura_ms4/AdoptedVenturaCountyms4/Order.pdf.

147 *Id.* at 1.

148 *Id.* at 1,2.

149 Cal. Water Code § 13001.

150 *Id.* § 13300 et seq.

151 *See* SWRCB, Water Quality Enforcement Policy at 1 (October 2017) [hereinafter Enforcement Policy], https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2017/040417_9_final%20adopted%20policy.pdf.

152 U.S. EPA, NPDES Memorandum of Agreement Between the U.S. Environmental Protection Agency and the California State Water Resources Control Board (1989), https://www.epa.gov/sites/production/files/2013-08/documents/ca-moa-npdes_0.pdf.

153 *Id.* at 39.

154 *Id.* at 6.

155 SWRCB, Enforcement Policy at 2. Informal enforcement actions (oral, written, and electronic communications) cannot be petitioned.

156 These circumstances include when the State Board is responding to petitions that allege ineffective enforcement action by a Regional Water Board; the enforcement of statewide or multi-regional general permits; and circumstances where the matter involves multi-regional permittees; circumstances where the violations cause harm in more than one region; for example. *Id.* at 8.

157 *See, for example, id.* at 1, 5, and 7.

158 SWRCB, Deconstructing Enforcement: A Primer on Water Quality Enforcement at 1 (August 2010), http://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/deconstructing_enforce2010aug.pdf.

159 *Id.* at 2.

160 SWRCB, Enforcement Policy at 1.

161 *Id.*

162 *Id.* at 3.

163 *Id.*

164 The Water Boards have discretion to take enforcement actions pursuant to various provisions of the Porter-Cologne Act; nonetheless, "[i]t is the policy of the State Water Board that every violation results in the appropriate enforcement response consistent with the priority of the violation established in accordance with [the Enforcement] Policy]." *Id.* at 5. Enforcement prioritization involves a two-step process: first, violations are ranked as either Class A or Class B, as defined in the Enforcement Policy. Second, individual cases are prioritized for formal discretionary enforcement based on a set of non-exclusive factors. *Id.* at 5-7.

165 SWRCB, Enforcement Policy, Appendix A at 1.

166 *Id.*

167 *Id. emphasis added.*

168 *Id.,* Appendix A at 2.

169 *Id.* The enforcement database, known as the California Integrated Water Quality System (CIWQS), is a web database that allows the Water Boards to track the regulated community's compliance with water quality laws, and to document and manage violations and enforcement activities. The database is available here: https://www.waterboards.ca.gov/water_issues/programs/ciwqs/.

170 SWRCB, Enforcement Policy at 2.

171 *Id.*

172 SWRCB, Enforcement Policy, Appendix A at 2.

173 *Id.*

174 *Id.*

175 *Id.*

176 Cal. Water Code § 13399 (e) and (f).

177 *Id.* § 13399.1 (c).

178 *Id.* § 13399.2 (k).

179 *Id.* § 13267 (b)(1).

180 *Id.* §§13268, 13385.

181 Cal. Water Code § 13304; SWRCB, Enforcement Policy, Appendix A at 4.

182 *Id.*

183 "Nuisance" is defined to mean anything that is "[i]njurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property," "[a]ffects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal," and "[o]ccurs during, or as a result of, the treatment or disposal of wastes." Cal. Water Code § 13050 (m).

184 SWRCB, Enforcement Policy, Appendix A at 4.

185 *Id.*

186 *Id.*

187 *Id.*

188 *Id.*

189 *Id.* at 5.

190 SWRCB, Enforcement Policy, Appendix A at 5.

191 *See, for example,* Cal. Water Code §§ 13261, 13265, 13268, 13308, and 13385.

192 SWRCB, Enforcement Policy at 9-10.

193 *Id.*

194 Cal. Water Code § 13323 (b), (c).

195 *Id.* § 13323 (b).

196 SWRCB, Enforcement Policy at 9-23.

197 Cal. Water Code § 13385 (h)(1).

198 Pursuant to Water Code § 13385 (h)(2), a serious violation is any waste discharge that exceeds the effluent limitation for a Group I pollutant, as defined by Appendix A to 40 C.F.R. § 123.45, by 40 percent or more, or a Group II pollutant, as defined by Appendix A to 40 C.F.R. § 123.45, by 20 percent or more. Pursuant to Water Code § 13385.1, a serious violation also means a failure to file a discharge monitoring report pursuant to § 13383 for a complete period of 30 days.

Group I pollutants include constituents like solids, oil and grease, metals, and nutrients. Group II pollutants include organics and metals not listed under Group I.

199 Cal. Water Code § 13385.1 (a)(1).

200 *Id.* § 13385(i)(1)(A)-(D).

201 *Id.* § 13385(i)(1).

202 2012 LA MS4 Permit at 1, §II H.

203 *See id.* at §§ IV A. 2, VI A. 13 (f), (g); and LARWQCB, TSO No. R4-2015-0108 (May 14, 2015) ¶ 48.

204 LARWQCB, Complaint No. 98-025, Administrative Civil Liability for Violations of the California Water Code and Waste Discharge Requirements for Municipal Storm Water and Urban Runoff Discharges Within the County of Los Angeles (Order No. 96-054 NPDES No. CAS614001) (April 2, 1998).

205 *Id.* This Notice of Noncompliance is not accounted for in the Enforcement Action tables or total. This is because it is not listed in the CIWQS database, was not included in the Regional Board's response to our PRA Request, and because it was unclear how to categorize a "Notice of Noncompliance" among the enforcement actions typically taken.

206 *Id.*

207 *Id.*

208 Email from Ivar Ridgeway, Senior Environmental Scientist, Regional Board, to Corinne Bell, July 9, 2018, attaching a spreadsheet of ACL penalties.

209 LARWQCB, Complaint No. R4-2003-0071, Administrative Civil Liability for Violations of the California Water Code and Board Order No. 01-182 (NPDES Permit No. CAS004001) (September 24, 2003) [hereinafter City of LA ACL].

210 This Notice of Violation is accounted for in the Enforcement Action tables; however, it could not be located in the CIWQS database and was not included in the Regional Board's response to our PRA Request.

211 *Id.* A Supplemental Environmental Project is an environmentally beneficial project that an alleged violator can agree to undertake as part of the settlement of an enforcement action in exchange for penalty reduction. Cal. EPA, Supplemental Environmental Projects (visited March 6, 2018), https://calepa.ca.gov/supplemental-environmental-projects/.

212 *Id.*

213 Email from Ivar Ridgeway, Senior Environmental Scientist, Regional Board, to Corinne Bell, July 9, 2018, attaching a spreadsheet of ACL penalties.

214 LARWQCB, Complaint No. R4-2010-0028, Administrative Civil Liability for Violations of California Water Code § 13376 and Order No. 01-182, amended by Orders Nos. R4-2006-0074, R4-2007-0042, and R4-2009-0130 (NPDES Permit No. CAS004001) (February 18, 2010).

215 Email from Ivar Ridgeway, Senior Environmental Scientist, Regional Board to Corinne Bell, July 9, 2018, attaching a spreadsheet of ACL penalties.

216 LARWQCB, Complaint No. R4-2009-0001, Administrative Civil Liability Pursuant to California Water Code § 13385 (NPDES Permit No. CAS004001) (January 30, 2009), https://www.waterboards.ca.gov/losangeles/water_issues/programs/enforcement/acl_docs/R4-2009-0001.pdf

217 *Id.* at 2, 3. These two follow-up NOVs are not accounted for in the Enforcement Actions total.

218 *Id.* at 6, 9.

219 LARWQCB, Settlement Agreement and Mutual Release, Administrative Civil Liability Complaint No. R4-2009-0001 (December 9, 2009).

220 *Id.*

221 Email from Ivar Ridgeway, Senior Environmental Scientist, Regional Board, to Corinne Bell, July 9, 2018, attaching a spreadsheet of ACL penalties.

222 Letter from LARWQCB to Anthony Ybarra, City Manager, South El Monte (July 29, 2016). Like Torrance, South El Monte received at least three Notices of Violation.

223 Letter from LARWQCB to Jennifer Vasquez, Interim City Manager, South El Monte (April 11, 2017).

224 Email from Ivar Ridgeway, Senior Environmental Scientist, Regional Board, to Corinne Bell, July 9, 2018, attaching a spreadsheet of ACL penalties.

225 City of LA ACL.

226 *Id.*

227 The September 28, 2006 Request for Information from Manhattan Beach was rescinded when the Board became aware of a reporting error and found that no exceedance actually occurred. LARWQCB, Rescission of Request for Information (October 13, 2006).

228 *See, for example,* LARWQCB Request for Information to Neal Shapiro, Santa Monica Environment and Public Works (July 17, 2006). The County often responded to the Regional Board by demanding that the agency supply a cost benefit analysis of providing the information requested. *See, for example,* Letter from Mark Pestrella, Los Angeles County Department of Public Works, to Jonathan Bishop, LARWQCB Executive Officer (August 3, 2006).

229 The Notices of Violation that were sent to the City of Los Angeles, Los Angeles County, and the Los Angeles County Flood Control District were issued for violations of *both* the Santa Monica Bay Beaches bacteria TMDL and the Marina del Rey Harbor Mothers' Beach and Back Basins bacteria TMDL.

230 *See, for example,* LARWQCB Notice of Violation to the County of Los Angeles (March 4, 2008) attaching an Order pursuant to California Water Code § 13383.

231 For example, the Regional Board concluded that the permittees' responses to the Investigative Order failed to (1) provide adequate information for the Board to determine that the exceedance did not result from the MS4, (2) provide adequate information for the Board to determine that the MS4 does not discharge dry weather flow into receiving waters of the Los Angeles region, (3) provide adequate information for the Board to determine that the summer dry weather flow is treated by the responsible permittee, and (4) demonstrate that the permittee has adequately documented a source investigation of the subwatershed, pursuant to protocols established under California Water Code § 13178, that bacterial sources originating within the jurisdiction of the permittee have not caused or contributed to the exceedance of the receiving water limit. *See for example,* LARWQCB Second Notice of Violation to the County of Los Angeles (October 15, 2009).

232 *See, for example, id.*

233 *See, for example, id.* at 6.

234 *See, for example, id.* at 8.

235 *See* LARWQCB, Order No. 01-182 (October 19, 2010) https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/los_angeles_ms4/order01-182/OrderNo.01-182.pdf.

236 LARWQCB, Investigative Order No. R4-2014-0164-A01 (August 11, 2014).

237 LARWQCB, Investigative Order No. R4-2014-0164-A01 (September 22, 2014).

238 *See* CIWQS Database *at: https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/CiwqsReportServlet?reportID=2183898&inCommand=drilldown&reportName=GeoEnfDetail&program=MNSTW1&region=4&enfType=NTC.*

239 LARWQCB letters to Rafael Fajardo, City Engineer, Rosemead; Chris Marcarello, Deputy City Manager, San Fernando; and Daren Grilley, Public Works Director, San Gabriel (June 10, 2016).

240 LARWCQB Letter to Daniel Rydberg, Public Works Director, Oxnard (June 10, 2016).

241 *See, for example,* LARWQCB, Notice of Violation for Failure to Submit Los Angeles Trash TMDL Compliance Report Due October 31, 2011 (February 8, 2012).

242 *See, for example, id.* at 3.

243 *See, for example, id.*

244 *See, for example,* LARWQCB, Rescission of Notice of Violation to City of Duarte (February 29, 2012).

245 Email from Ivar Ridgeway, Senior Environmental Scientist, Regional Board, to Corinne Bell (June 25, 2017).

246 *Id.*

247 *See, for example,* LARWQCB, Notice of Violation for Failure to Submit Los Angeles Trash TMDL Compliance Report Due October 31, 2011 (February 8, 2012).

Heal the Bay
1444 9th Street
Santa Monica, CA
90401
(310) 451-1500

May 13, 2021

Attention: Grace Komjakraphan-Tek
Los Angeles County Public Works
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

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

Re: Comments on the 2020 LA River Master Plan Draft Program Environmental Impact Report

Dear Grace Komjakraphan-Tek:

On behalf of Heal the Bay, we offer comments on the 2020 LA River Master Plan Draft Program Environmental Impact Report (DPEIR). Heal the Bay is an environmental organization with over 30 years of experience and 15,000 members dedicated to making the coastal waters and watersheds of greater Los Angeles safe, healthy, and clean. We would first like to recognize that we are on stolen Indigenous land. The main office of Heal the Bay in Santa Monica is on Tongva, Chumash, Kizh, and Acjachemen land.[1] We acknowledge and respect Tongva, Chumash, Kizh, and Acjachemen elders past, present, and emerging.

O18-1

Heal the Bay appreciated the opportunity to serve on the Steering Committee for the LA River Master Plan (LARMP) Update process. Through this process we became quite familiar with the LARMP. Heal the Bay has submitted numerous comment letters on the Master Plan throughout the entire 2-plus year process as well as on the Notice of Preparation for the DPEIR in August 2020. We appreciate that the County extended the deadline for comments on the DPEIR. However, we are concerned that the DPEIR is too limited in its analysis of projects and impacts; that the alternatives analysis is inadequate; that mitigation is too vague; and that the public participation was limited.

1. **The DPEIR needs to evaluate the impacts of all six elements in the Kit of Parts as possible projects.** The DPEIR only analyzed two typical projects that are considered to be the most likely to be proposed throughout the 51-mile corridor. The two typical projects are: Common Elements Typical Project and Multi-Use Trails and Access Gateway Typical Project. These two projects are likely to be some of the *least* impactful of the six elements in the Kit of Parts (KOP). It is explicitly stated that "the analysis of these Typical Projects assumes that no in-channel disturbance would occur under these Typical Projects" (page ES-6). Completely excluding any project impacts of in-channel disturbance is worrisome. Further justification is needed for the selection of these two Typical Projects. We are also concerned with this limited analysis because the impacts of the four other KOP elements are not analyzed at all. Heal the Bay, in addition to other groups, has routinely expressed concern over the platform parks KOP element and the potential for this design to have significant negative environmental impacts. Focusing the DPEIR 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 DPEIR but a range of potential impacts should be examined

O18-2

O18-3

[1] Native Land Digital. 2021. *Our home on native land*. Available at: Native-Land.ca | Our home on native land (native-land.ca)

Heal the Bay
1444 9th Street
Santa Monica, CA
90401
(310) 451-1500

O18-3 cont. for each of the six project types in the KOP. **We ask for a detailed evaluation of impacts for all six elements of the kit of the parts in the Final EIR, not merely a high-level analysis.**

O18-4 2. **The Alternatives Analysis is Inadequate.** It is unclear why only two alternatives were analyzed and how the two alternatives were chosen. The alternatives are: A) No Project, such that projects would follow 1996 Master Plan or B) Channel Avoidance Alternative, which includes 5 of the 6 KOP options and excludes KOP 2, Channel Modifications. It is also stated that Alternative B would not include implementation of the channel access design component under KOP Category 1. Why does the DPEIR conduct an alternatives analysis on only some of the Master Plan? This is confusing and unclear. To go through the time and money intensive process of the Master Plan Update, only to conduct an alternatives analysis which does not include the whole LARMP is utterly confounding. It is also very concerning that the KOP that is excluded from Alternative B includes projects where concrete removal and terracing of banks could occur; these are the types of projects that Heal the Bay is supportive of and that we would like to be included in the DPEIR, especially since they are considered in the Master Plan. **We request that an additional alternative be analyzed which includes all elements of the Master Plan, including all six KOP options and all components of the six KOP options.**

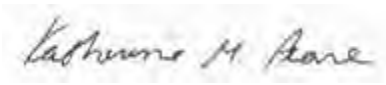
O18-5

O18-6 3. **Mitigation measures are too vague and are inadequate.** The DPEIR fails to adequately disclose, analyze, and mitigate the Project's significant adverse environmental impacts. It is concerning that the County plans to "encourage" the 17 cities along the Los Angeles River to adopt the EIR. Unfortunately, if these cities do not adopt the PEIR, and implement projects along the River, there could be adverse environmental impacts that are not disclosed in this DPEIR. Mitigation measures must be concrete and enforceable and there is no enforceability to the mitigation measures contained in the DPEIR.

O18-7 4. **Public participation was limited.** While we appreciate the extension of the comment period, the DPEIR document is incredibly lengthy and difficult for professionals, let along the average lay person, to digest. Further, the overlap of the comment period with the comment period for the LA River Master Plan did not promote public participation. Many community members that we interacted with were confused about the two processes and many had to choose which document to focus their limited time on. The DPEIR was only provided in English, limiting the audience for participation. We appreciate that a public meeting was held when the NOP was released and after the DPEIR was released, but these meetings were highly technical and inaccessible to many people without technological skills, access to a computer, or access to adequate internet service.

Thank you for the opportunity to provide comments. If you have any questions, please feel free to contact Katherine Pease at kpease@healthebay.org or (310) 451-1500 ext.141.

Sincerely,



Katherine Pease, PhD
Director of Science & Policy



May 13, 2021

ATTN: Grace Komjakraphan-Tek
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue, Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

Carolina Hernandez, LA County Public Works
Genevieve Osmena, LA County Public Works
Jessica Henson, The Olin Studio
Mark Hanna, Geosyntec Consultants

Via e-mail to: LARiverCEQA@pw.lacounty.gov, chernandez@dpw.lacounty.gov, gosmena@dpw.lacounty.gov, jhenson@theolinstudio.com, and mhanna@geosyntec.com, lariver@dwp.county.gov

Re: Comments on the Programmatic EIR and the Draft LA River Master Plan Update

Dear LA River Master Plan Team:

Thank you for the opportunity to provide comments on the 2020 *Los Angeles County River Master Plan and the Draft Programmatic Environmental Impact Report.* Sacred Places Institute for Indigenous Peoples (SPI) is a California Indigenous-led, grassroots environmental justice organization based in the unceded ancestral homelands of the Tongva people in what is now known as Los Angeles. Founded in 2012, our mission is to build the capacity of Native Nations and Indigenous Peoples to protect sacred lands, waters, and cultures.

Please note, these comments represent the perspective of Sacred Places Institute for Indigenous Peoples. While SPI has multiple staff and board members from the Native Nations through whose homelands the L.A. River flows and we strive to honor and respect and uplift the perspectives of the Native Nations on whose lands we live and work, we are a California-Indigenous led organization and not a sovereign Native American Tribe. To the extent that any of our comments are in conflict with the goals and desires of the California Native American Tribes through whose territories the River flows we defer to those Tribes as should the LA River Steering Committee and all decision-makers for the LA River.

O19-1

While we acknowledge and appreciate all of the time and effort that went into facilitating the Steering Committee and drafting this plan, we encourage the County and associated consultants Geosyntec, OLIN, Gehry PartnersArchitects, Street Level Advisors, and River LA to reflect on opportunities to uplift, rather than inadvertently perpetuate the erasure, of the first people to be in relationship with the **Paayme Paxaayt/Orit/Wanüt** and its tributaries (Los Angeles River in Tongva, Tataviam, and Tataviam Serano dialect)--the Tongva, Tataviam, Serrano, and Chumash Peoples.

We applaud the inclusion of Tataviam representation on the Steering Committee. However, we remain disappointed with the failure to include Tongva representation on the Committee. Furthermore, knowledge of the

lack of sufficient tribal representation was brought to our attention by BIPOC EJ allies alerting us to the existence of the Steering Committee meetings and was not initiated by the County or its consultants. As far as we are aware, aside from the appointment of a single Native American to the Steering Committee after the first round of Committee appointees and only as a result of tribal and ally demands that Indigenous voices be included, and a single two-hour event uplifting local tribal perspectives on the River in collaboration with the Autry and the Los Angeles City County Native American Commission in June 2019, little to no outreach, or engagement with, tribal governments, California Native Americans, or Indigenous community members occurred.

We call upon you to fund and support a continued planning effort that meaningfully addresses the significant shortcomings of the current LARMP, including developing a true plan that prioritizes California Native American tribal land return and access, uplifts the languages and place names designated by the California Native American Tribes with territories along the River, recognizes the River as a living being, outlines a clear vision and prioritized goals and metrics for the River; tackling issues that are critical for the implementation of such a plan, including a holistic governance structure; and reflects meaningful community engagement and input. Such an implementation plan could even be in the form of the County funding a People's Plan for the LA River that takes a more community-oriented approach to ensure that ecological and neighborhood health and resiliency are protected.

O19-1 cont.

Finally, we support the call of our colleagues on the LA River Steering Committee:

> **Rather than trying to correct the existing plan to make it something it clearly is not, we renew our call for Los Angeles County to build upon the excellent compilation of information included in the current Plan, and commit to fund, support and immediately embark on a continued planning effort that meaningfully addresses the significant shortcomings of the current LARMP**

Please see below for SPI's substantive comments on the 4,000 pages that make up the LARMP and the DEIR. Our comments include a summary of recommendations, reflections on particular overarching themes of importance, and more specific comments on various sections and appendices.

Thank you for the opportunity to provide our more detailed comments on the PEIR and the public draft of the LARMP. We look forward to working with the County to move forward with a Plan that prevents rather than perpetuates the erasure of California Native American Tribes and presents a clear and compelling vision for the River that will help safeguard our environment and communities.

Sincerely,



Angela Mooney D'Arcy
Executive Director & Founder
Sacred Places Institute for Indigenous Peoples

Introduction--Native Nations and Paayme Paxaayt/Orit/Wanüt

Please note, these comments represent the perspective of Sacred Places Institute for Indigenous Peoples. While SPI has multiple staff and board members from the Native Nations through whose homelands the L.A. River flows and we strive to honor and respect and uplift the perspectives of the Native Nations on whose lands we live and work, we are a California-Indigenous led organization and not a sovereign Native American Tribe. To the extent that any of our comments are in conflict with the goals and desires of the California Native American Tribes through whose territories the River flows we defer to those Tribes as should the LA River Steering Committee and all decision-makers for the LA River.

O19-2

California Native American Tribes are sovereign nations and there are multiple scenarios, including related to watershed management and river restoration, which require state and local agencies to engage in government-to-government consultation with Native American Tribes as part of the planning process. As a general comment, the LARMP should acknowledge and uplift this perspective on tribal sovereignty as it relates to urban planning and watershed management whenever possible throughout this document and all future related planning and implementation documents.

The term California Native American Tribe is utilized throughout this document in order to maintain consistency with the terminology utilized in California law and by state agencies. California Native American Tribe is defined in California Public Resources Code Section 21073 "California Native American tribe" means a Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission for the purposes of Chapter 905 of the Statutes of 2004.[1]

Historical & Contemporary Context

The Paayme Paxaayt/Orit/Wanüt has always been, and will always be, a place of significance to the Native American Tribes through whose ancestral homelands the River flows, including the Fernandeño Tataviam Band of Mission Indians, the Gabrieleno/Tongva San Gabriel Band of Mission Indians, and the Kitz Nation Gabrieleno Band of Mission Indians. There are dozens of Tongva and Tataviam villages along the River. Both communities' connection to land and water was disrupted with the establishment of the Spanish mission system. For the Tongva this disturbance arose in 1771 with the founding of the Mission San Gabriel. For the Tataviam, their Spanish period began in 1797 with the "recruitment and enslavement of Indians[2] to Misión del Señor San Fernando Rey de España (San Fernando Mission), the Seventeenth established mission in California."[3]

The current status of the Los Angeles River and Tributaries is first and foremost a result of colonialism and it is Native American Tribes and indigenous groups that have been most impacted by this. The State of California and County of Los Angeles share responsibility for the loss, trauma, and displacement experienced by tribal community members from the Native Nations through whose homelands the River flows.

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[1] California Native American Tribe is defined in California Public Resources Code Section 21073 "California Native American tribe" means a Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission for the purposes of Chapter 905 of the Statutes of 2004. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB52

[2] Julia Bogany, To Be Visible, available at http://www.tobevisible.org/timeline.html

[3] Fernandeño Tataviam Band of Mission Indians, Historical Timeline, available at https://www.tataviam-nsn.us/heritage/history/historical-timeline/

> "It is difficult to be Indian under any circumstances; think what it must be like to see a phenomenon like Los Angeles spreading over your meadows and valleys, diverting your rivers, building parking structures on your holy sites, transforming the land that nurtured your ancestors into something unrecognizable."[4]

Native American Tribes and indigenous groups in Los Angeles County are holders of both historical and practical experience and knowledge in dealing with the social and environmental issues the Plan is designed to address. They have confronted the environmental effects that accompanied the colonial waves in California and have been uniquely impacted by these environmental challenges. It is these very groups who have historically been on the front-line fighting for the protection of the River since the time of first contact.

Despite the realities of historical and contemporary acts of settler colonial violence, including violence to ancestral lands and waters, California Native American Tribes and tribal community members are resilient and continue to speak their languages, cultivate traditional medicines and foods, protect and restore lands and waters within their ancestral homelands, and assert their sovereignty in land use and water management planning within their traditional territories along the River.

Key Recommendations

- **Recognize the River as a Living Being**--Incorporate local Indigenous languages, theories and practices throughout the document to carry out the true spirit of revitalization. Native American Tribes and Indigenous Peoples around the world have adopted similar stances regarding Rivers, Mountains and other land and water entities within their ancestral homelands. Most recently the Yurok Tribe in California adopted a resolution recognizing legal rights for the river.[5] O19-3

- **Prioritize Health of the River--**The LARMP and associated PEIR appear to be based on a model of economic restoration rather than ecological restoration. Tribal citizens and Indigenous community members who spoke at the June 2019 Native American Community event spoke clearly about the importance of prioritizing the health of the river. This is not reflected in either document. SPI recommends utilizing the standards set by the State Water Resources Control Board in the Tribal Beneficial Uses-Cultural Uses of Water report as a baseline for the health and cleanliness of the water.[6] O19-4

- **Land and Water Return: Indigenous Access for Cultural and Ceremonial Purposes**--the Plan should articulate the importance of prioritizing spaces for tribal cultural and ceremonial use along the River and Tributaries in all future projects. Consultation with Native American Tribes O19-5

[4] L. Frank Manriquez and Kim Hogeland, First Families-A photographic History of California Indians (Berkeley: Heyday Books, 2007), 93, as quoted in AnMarie Mendoza, The Aqueduct Between Us: Inserting and Asserting an Indigenous California Indian Perspective about Los Angeles Water (2019).

[5] Anna V. Smith, The Klamath River now has the legal rights of a person: A Yurok Tribe resolution allows cases to be brought on behalf of the river as a person in tribal court, High Country News, September 24, 2019, available at https://www.hcn.org/issues/51.18/tribal-affairs-the-klamath-river-now-has-the-legal-rights-of-a-perso

[6] State Water Resources Control Board, Tribal Beneficial Uses-Cultural Uses of Water, available at https://www.waterboards.ca.gov/tribal_affairs/beneficial_uses.html#:~:text=What%20is%20the%20Purpose%20for,relate%20to%20Native%20American%20cultures

to determine preferred places for cultural and ceremonial use should be mandated prior to any project approval.

Various State and International agencies have begun to take seriously the notion of Indigenous land return. The LARMP and associated PEIR should aim to be in alignment with state, federal and international efforts to return Indigenous lands and waters and therefore list land and water return and tribal co-management as viable options for future projects along the River.

O19-5 cont.

Multiple types of access, including trails accessible by Elders and differently abled community members, plans for spaces that are accessible by public transportation, and plans for spaces where tribal community members can gather clean, safe, pesticide-free plant materials without fear of harassment from private security, local homeowners or police should be included.

- **Tribal Sovereignty, Free, Prior Informed Consent, and Meaningful Relationship-Building**--The final plan should include a list of all the relevant state, federal, and international laws related to tribal self determination, sovereignty, and government-to-government consultation that may be relevant in future planning for the River. California Native American Tribes are sovereign nations and there are multiple scenarios, including related to watershed management and river restoration, which require state and local agencies to engage in government-to-government consultation with Native American Tribes as part of the planning process. It is critical that local governments and agencies include government-to-government consultation as a highest priority for all projects proposed and implemented along the River.

O19-6

- **Tribal Territories and Indigenous Language Place Names**--Tribal territories should be visibly demonstrated on all maps and associated materials so that agencies, organizations, and individuals utilizing the Plan in the future all have a shared understanding of the lands and waters within the Plan's boundaries as within the ancestral homelands of the Tongva and Tataviam Tribes. Proposed projects that include the use of Indigenous Place Names should be prioritized. The Tongva and Tataviam Tribes should be consulted directly for recommendations regarding, and consent to use, specific territorial maps and Indigenous place names within the Plan.

- **California Native American Tribes and Traditional Ecological Knowledge (TEK)**--the value of TEK in land and watershed planning should be uplifted in the Plan. "Traditional Ecological Knowledge (or TEK) refers to the evolving knowledge acquired by indigenous and local peoples over hundreds or thousands of years through direct contact with the environment….TEK is an accumulating body of knowledge, practice, and belief, that encompasses the world view of indigenous people which includes ecology, spirituality, human and animal relationships, and more." The Plan should cite California Landscape Conservation Partnerships Traditional Ecological Knowledge Resources page for additional information related to California Native American Tribes and TEK.

O19-7

- **Include Tribal Representation on all Governance and Advisory Bodies**--Representation from all tribes along the River and on all future governance and advisory bodies created as a result of the Plan should be mandatory.

O19-8

Detailed Comments

Recognize the River as a Living Being

SPI strongly recommends that L.A County Public Works acknowledges that the L.A. River watershed (with all its tributaries, channels and streams) is a living entity with legal rights and that it be governed, protected and shepherded by either a local Indigenous led council, advisory committee, or both. The mission, scope, and powers of this Advisory Council or Committee should be determined and defined by the California Native American Tribes with territories along the River. The council or advisory committee should have full decision-making authority on any and all matters related to the L.A. River Master Plan and any projects related to it.

".... treating the river as a living entity is the correct way to approach it, as in indivisible whole, instead of the traditional model for the last 100 years of treating it from a perspective of ownership and management."

Since time immemorial Indigenous communities throughout the world have cared for the land and water and continue to share and practice a common fundamental principle that Indigenous lives are inextricably tied to the land and and water and that it is our responsibility to continue to nurture a symbiotic relationship with the land and water. Recognizing the significance of these ties, Indigenous communities have been at the forefront of
O19-9 advocating for land and water to be recognized as a living entity. Recent examples include the Mauri people of New Zealand, who in 2017 adopted a national-level legislation granting **legal personality** to specific areas of cultural and environmental significance : *Te Urewera, comprising Lake Waikaremoana and surrounding land and forests, as can be inferred from the Te Urewera Act (New Zealand, 2014): and Te Awa Tupua, which encompasses 'the Whanganui River from the mountains to the sea, incorporating all its physical and metaphysical elements' (New Zealand, 2017, Section 12).* While varying examples exist of Governance of the river, based on the specificities of local and historical context, generally rivers as a living entity are cared for by either councils or advisories that are represented by the Te Urewera Board and two guardians known as Te You Tupua, respectively. Both acts **implement** the deeds of settlement of historical claims by the Mauri people.

Countless examples exist of Indigenous communities spearheading efforts to grant rivers as living entities, many of which work off of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) universal framework that was adopted in 2007 at the 107th Plenary Meeting by General Assembly on 9/13/2007. Due to the collective efforts of concerned Indigenous communities from throughout the world regarding the intersections between human rights and climate change, the UNDRIP provides a universal framework "for the survival, dignity and well-being of the indigenous peoples of the world". This comprehensive framework is a key tool that is utilized to help mitigate the impact of climate change on Indigenous communities.

In addition, recognizing the detrimental impacts that U.S. agricultural business and hyper-industrialization has had on the natural environment and surrounding communities, since 2006 over 40 states have either introduced or adopted municipal ordinances granting personhood to rivers or nature. Despite the extreme environmental devastation caused by irresponsible land stewardship, still some states and local municipalities unabashedly choose to pushback against these transformative measures to grant and treat the rivers as living entities as is the 2017 case (*2017-Colorado River Ecosystem/Deep Green Resistance et al.v. State of Colorado*) in Colorado where

the Attorney General considered the request "frivolous". Our vision is that LA County prioritize adopting such transformative measures as a critical step to addressing the ecological health of the LA River.[7]

O19-9 cont.

Prioritize Health of the River--The LARMP and associated PEIR appear to be based on a model of economic restoration rather than ecological restoration. Tribal citizens and Indigenous community members who spoke at the June 2019 Native American Community event, the April 28 Tribal Listening Session, the ULART Revitalization Plan Tribal Listening session, and in other venues, spoke clearly about the importance of prioritizing the health of the river. This is not reflected in either document. SPI recommends utilizing the standards set by the State Water Resources Control Board in the Tribal Beneficial Uses-Cultural Uses of Water report as a baseline for the health and cleanliness of the water.[8]

O19-10

> "California Native American Tribes use California's surface waters in a manner unique to tribal culture, tradition, ceremonies, and lifeways. Tribal Beneficial Uses provide a way to adequately protect certain uses of water that directly relate to Native American cultures. In some cases, the levels of waste allowed to be released into California waters (discharge requirements) or existing water quality standards may not adequately protect Tribal Beneficial Uses. To account for this, in 2017 the State Water Board identified and described beneficial uses unique to California Native American Tribes, in addition to subsistence fishing by other cultures or individuals."[9]

While the Plan states that it utilizes a watershed approach in its research and analysis, the focus on the main stem of the LA River precludes the inclusion of systematic, nature-based and Indigenous knowledge-based[10] solutions that would allow for a more naturalized, resilient, and multi-beneficial River. If we do not look at the entire watershed, tributaries included, we cannot make informed decisions about how best to protect residents from flooding and where a more naturalized River may be possible. Only by examining the entire watershed will we be able to understand where we can make targeted and strategic improvements that will support all communities.

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[7] Gabriel Eckstein, Ariella D' Andrea, Virginia Marshall, Erin O'Donnell and Julia Talbot-Jones, Deborah Curran & Katie O'Bryan, available at https://scholarship.law.tamu.edu/facscholar/1321

[8] State Water Resources Control Board, Tribal Beneficial Uses-Cultural Uses of Water, available at https://www.waterboards.ca.gov/tribal_affairs/beneficial_uses.html#:~:text=What%20is%20the%20Purpose%20for,relate%20to%20Native%20American%20cultures

[9] Ibid.

[10] U.S. Fish & Wildlife Service, Traditional Ecological Knowledge Fact Sheet, February 2011. "Traditional Ecological Knowledge, also called by other names including Indigenous Knowledge or Native Science, (hereafter, TEK) refers to the evolving knowledge acquired by indigenous and local peoples over hundreds or thousands of years through direct contact with the environment. This knowledge is specific to a location and includes the relationships between plants, animals, natural phenomena, landscapes and timing of events that are used for lifeways, including but not limited to hunting, fishing, trapping, agriculture, and forestry. TEK is an accumulating body of knowledge, practice, and belief, evolving by adaptive processes and handed down through generations by cultural transmission, about the relationship of living beings (human and non-human) with one another and with the environment. It encompasses the world view of indigenous people which includes ecology, spirituality, human and animal relationships, and more."

Land and Water Return: Indigenous Access for Cultural and Ceremonial Purposes--the Plan should articulate the importance of prioritizing spaces for tribal cultural and ceremonial use along the River and Tributaries in all future projects. Consultation with Native American Tribes to determine preferred places for cultural and ceremonial use should be mandated prior to any project approval.

Various State and International agencies have begun to take seriously the notion of Indigenous land return. The LARMP and associated PEIR should aim to be in alignment with state, federal and international efforts to return Indigenous lands and waters and therefore list land and water return and tribal co-management as viable options for future projects along the River.

UNDRIP LAND BACK PROVISIONS
Article 10
Indigenous peoples shall not be forcibly removed from their lands or territories. No relocation shall take place without the free, prior and informed consent of the indigenous peoples concerned and after agreement on just and fair compensation and, where possible, with the option of return.

O19-11

Article 11, Section 2
States shall provide redress through effective mechanisms, which may include restitution, developed in conjunction with indigenous peoples, with respect to their cultural, intellectual, religious and spiritual property taken without their free, prior and informed consent or in violation of their laws, traditions and customs.

Article 25
Indigenous peoples have the right to maintain and strengthen their distinctive spiritual relationship with their traditionally owned or otherwise occupied and used lands, territories, waters and coastal seas and other resources and to uphold their responsibilities to future generations in this regard.

CA LAND BACK PROVISIONS--In 2020, Governor Newsom memorialized his administration's commitment to ancestral land return via the Statement of Administrative Policy adopted on September 25, 2020:

> Consistent with the goals of such Executive Orders, and in the spirit of truth and healing in recognition of past harms done to California Native American communities, it is the policy of this administration to encourage every State agency, department, board and commission (collectively, "entities") subject to my executive control to seek opportunities to support California tribes' co-management of and access to natural lands that are within a California tribe's ancestral land and under the ownership or control of the State of California, and to work cooperatively with California tribes that are interested in acquiring natural lands in excess of State needs.

Finally, multiple types of access, including trails accessible by Elders and differently abled community members, plans for spaces that are accessible by public transportation, and plans for spaces where tribal community members can gather clean, safe, pesticide-free plant materials without fear of harassment from private security, local homeowners or police should be included.

Tribal Sovereignty, Free, Prior Informed Consent, and Meaningful Relationship-Building--The final plan should include a list of all the relevant state, federal, and international laws related to tribal self determination, sovereignty, and government-to-government consultation that may be relevant in future planning for the River. California Native American Tribes are sovereign nations and there are multiple scenarios, including related to watershed management and river restoration, which require state and local agencies to engage in government-to-government consultation with Native American Tribes as part of the planning process. It is critical that local governments and agencies include government-to-government consultation as a highest priority for all projects proposed and implemented along the River.

The United Nations Declaration on the Rights of Indigenous Peoples, adopted by the UN General Assembly in 2007, supported by the United States in 2010, adopted by California Assembly Joint Resolution 42 in 2014, and ratified by the Organization of American States in 2016, uplifts the concept of Free, Prior and Informed Consent in Article 32[11], Section 2:

> "States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources."

O19-12

Future decision-making and planning for the LA River should adopt a consent-based model of engagement with the California Native American Tribes through whose ancestral lands the River flows to better align with state, federal and international standards of engagement with Indigenous Peoples.

We would also like to highlight that the PEIR's analysis of due diligence regarding invitations to California Native American tribes with territories along the river to engage in government-to-government consultation is likely inadequate and may not be in compliance with E.O. N-54-20 which was extended by E.O. N-80-20. Due to the recognized heightened impacts of the Covid-19 pandemic on Native American communities, Executive Order N-54-20 Covid-19 4-22-20[12] temporarily suspended the timeframes set forth in Public Resources Code sections 21080.3.1 and 21082.3, within which a California Native American tribe must request consultation and the lead agency must begin the consultation process relating to an Environmental Impact Report, Negative Declaration, or Mitigated Negative Declaration under the California Environmental Quality Act. Although E.O. N-54-20 only suspended the comment deadline for 60 days, it was extended by E.O. N-80-20 in September 2020. Given the State's recognition of the extreme harms wrought by this pandemic on California Native American Tribes, it is highly unlikely that the efforts made by the lead agency to engage with California Native American Tribes rise to the level of meaningful engagement from either a legal or ethical perspective.

The LA Watershed abides by geography, not governance. Recognizing that the River is part of a larger system, the Plan should consider more creative governance models that include representation from all of the California Native American Tribes[13] with territories along the river to establish cohesive management over the watershed.

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[11] UNDRIP Article 32, 1. Indigenous peoples have the right to determine and develop priorities and strategies for the development or use of their lands or territories and other resources. 2. States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.

[12] California Native American Heritage Commission, Executive Order N-54-20: Extension of AB 52 Tribal Consultation Timelines, available at http://nahc.ca.gov/2020/04/executive-order-n-54-20-extension-of-ab-52-tribal-consultation-timelines/

[13] California Native American Tribe is defined in California Public Resources Code Section 21073 "California Native American tribe" means a Native American tribe located in California that is on the contact list maintained by the Native

Additional Recommendations Articulated at the LA River Native Community Discussion June 1, 2019

- Think of the River as a relative
- Heal the River and work together to heal the water and the land. The River is a reflection of who we are.
- Without the River there is no Los Angeles
- We need to live in a symbiotic relationship with water and ask how are you serving that river when it serves you
- Land Back along the River
- Healthy and Accessible Waters
- Harvesting permits for tribal citizens
- Think bigger about the concept of access--our cultures and ceremonies have been and continue to be fed and nourished by the LA River. Stop thinking of us as separate entities.

O19-13

- Three Rs--Respect, Responsibility and Recognition
- Meaningful Access is Dependent on a Healthy River and Healthy Ecosystems
- California Native American Tribes with cultural ties to the River need places to create, store, and launch tule boats.
- Bring Back Native Plants
- Provide support for local tribes to develop curriculum about the River for use in Los Angeles schools.
- Don't criminalize cultural practices such as gathering and harvesting.
- Reconnect the River to the Wetlands as a mechanism to combat climate change
- Commit to making the River navigable for tule boats and tribal community member use
- Recognize the River as a living being

American Heritage Commission for the purposes of Chapter 905 of the Statutes of 2004.
https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB52

RESOURCE CONSERVATION DISTRICT OF THE SANTA MONICA MOUNTAINS

818.597.8627 phone
818.597.8630 fax
info@rcdsmm.org

540 South Topanga Canyon Boulevard
Topanga, California 90290

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May 13, 2021

Grace Komjakraphan-Tek
Los Angeles County Public Works, Stormwater Quality Division
900 South Fremont Avenue
Alhambra, CA 91803

Via E-Mail: LARiverCEQA@pw.lacounty.gov

Re: 2020 LA River Master Plan PEIR Comments

,

Dear Grace Komjakraphan-Tek,

The Resource Conservation District of the Santa Monica Mountains (RCD) appreciates the opportunity to provide comment on the proposed LA River Master Plan PEIR. We are a 60-year conservation organization that has conducted research, watershed planning and habitat restoration in the upper LA river tributaries, as well as species assessment and monitoring in the main stem. Overall we support the nine objectives identified by the Plan, and appreciate the use of geographically defined planning frames to address more site-specific needs and to assist the 18 jurisdictions within the project area to coordinate restoration efforts. As watershed planners ourselves, we recognize that the Document clearly represents a great deal of thought, a thorough community-based process, and has sensitively developed many unique proposals for this massive and complex project through one of the largest cities in the world. The approach to understanding the River, and coordinating a language for a consistent and actionable implementation is sophisticated and beautifully presented. In particular, the use of Kit of parts (KOP) to standardize design components for trails and access gateways, channel modifications, crossings and platforms, diversions, floodplain reclamation and off-channel land assets provides opportunity for greater coordination of river enhancements. Nevertheless, the application of any given element needs not only careful site-specific evaluation in a manner that has not yet been as fully defined in the plan as the “Parts” themselves, but also and more importantly a fuller consideration of the “Whole” that these Parts are intended to catalyze.

O20-1

So, while we acknowledge that much is to be applauded in the PEIR, our task here is to offer recommendations for revisions, rather than to list all that is worthy in the documents. So we ask that a revision be undertaken to address some important missed opportunities and gaps in the approach.

In particular, we are concerned about the potential impacts of implementing some of these design elements, particularly those that add more concrete (e.g.: channel modifications, crossings and platforms) in or adjacent to the existing river channel. In order to achieve the nine objectives, especially objective #3 (Support healthy connected ecosystems), replacement of concrete and other built elements should prioritize implementation of green solutions that

O20-2

O20-2 cont. minimize hardscape and maximize more nature-based and multi-functional landscape designs. Beyond the importance of increasing permeability in the watershed, the amount of hardscape generally correlates inversely with functional habitat value. We also propose that in the compendium of urban greening approaches, we can locate "Park" with lesser habitat value at one end, and true "Habitat" emphasis at the other. At the KOP level, a Habitat Part would be designed differently than a Park Part. We would like to see Habitat Parts developed and included in a Master Plan revision, but more importantly an expanded investigation of the conditions outside of the "Frames" that could enhance not only the ecological functionality of the River parts addressed in this plan, but the functionality of the greater local and regional ecosystems of which they are a part.

O20-3 While at one level it is only a name, the "Kit of Parts" in some ways acknowledges a fragmented approach- the "Part" after all is a fragment of a Whole. The Master Plan as written has not defined the greater potential Whole, other than by naming the Whole as the "LA River". We ask the Parts be at service to a new Whole that we would like to see better defined and envisioned; we propose that this Whole should be defined by collective local and regional habitat potential and goals. Not only would achieving the maximum possible overall habitat value in the Master Plan require the design of some new Parts, the method and pattern of assembly would also necessarily change- as would the "nature" of the resulting (or required) community and recreational use- from place to place.

O20-4 Achieving the greatest potential Habitat enhancement would be determined not only by the potential of the immediate location, but also in composition or pattern with other nearby River and Non-River habitat elements- such as other regional parks, school yards, golf courses, current or future street trees with enhanced insect support capacity (see the work of the RCD and Travis Longcore here). Consideration of the Whole would suggest assembly of and creation of new KOPs in a different manner than the Master Plan describes.

O20-5 The design approach, site selection, and phasing of the LA River Master Plan provides an opportunity to link disparate and discontiguous habitats to enhance species richness despite physical discontinuity, particularly bird and pollinator species. However, this can only happen if this patchwork of greening opportunities within the river and its larger ecological-context is viewed as a potential interconnected habitat system, and understood in an overall composition that includes other River and non-river habitat potentials. While the KOP approach does not in and of itself guarantee that the Habitat Whole will in the end be greater than the sum of its Parts.

O20-6 To create the greater Whole, we would like to see a greater emphasis in a revised Master Plan on the potential of the overall composition of habitats. We note that although listed as Objective 3, over 50% of community participants identified protection of vulnerable plants and animals as the most important issue (pg 1-5). While it can be very challenging to integrate natural processes, the long term benefits of such efforts to improve ecological function, as well as address aesthetic, accessibility, flood control and water quality concerns warrants a more robust role in the design palette. This could substantially reduce the potential for significant impacts and need for extensive mitigation measures as listed in table ES-2.

O20-7

We are concerned that the environmental impact 3.13(b) identifies all Plan elements as having less than significant impacts on number of existing people or housing, with no mitigation required. One of the major concerns about the implementation of this Plan expressed by conservation agencies involved in river restoration planning and acquisition is the evident upward pressure on perceived land values underlying existing low cost housing adjacent to the River. Already, we understand that speculative private purchases are driving up costs. The probability of resulting gentrification and displacement of these communities is in direct contrast to Plan Objectives 2, 4, 5, 6, and 7. A clear program to prevent this type of community conversion should be incorporated into the plan as is noted on pg 1-6. Investment in river-adjacent parcels could be tied to local community protection measures, perhaps including incentives and or prioritization of public investment for landowners whose future plans to redevelop are then incentivized to address community displacement. While the mitigation measures identified for impact 3.16(b) (pg ES-126) appear to address VMT, that is the only metric described, and assumes therefore that community dislocation is a potential outcome.

O20-8

O20-9

The notoriety the LA River Master Plan generated by its successful marketing has raised awareness not only among real estate speculators, but also among new and historically ecologically underserved communities. Therefore the opportunity is great to generate widespread support for future urban habitat enhancement. However, the support of these communities and their elected representatives may be limited at present by concern for the potential impacts in cost of living and potential economic displacement. So it is critical not only to the LA River and its communities that social enhancement be achieved along with the ecological, but also to any and all future urban habitat restoration projects. If post-project analysis of the LA River work results in a widespread belief that urban ecological enhancement is necessarily in competition with community stability and enhancement, then all such projects will be more difficult to accomplish in the future. So we would like to see these valid community concerns better addressed in a revised document.

The Resource Conservation District of the Santa Monica Mountains shares similar concerns with other local resource agencies, and we ask that the LA River Master Plan be revised to incorporate the most up-to-date, science-based, and data-driven guidelines. We ask that as a similar level of creative energy and talent that created the Parts of the LA River Master Plan, be engaged to incorporate the watershed's critical ecological and social contexts within a better defined and more inclusive Whole.

Respectfully submitted,

Clark Stevens, Architect
Executive Officer

Rosi Dagit
Senior Conservation Biologist

CENTER for BIOLOGICAL DIVERSITY Because life is good.

March 1, 2021

Sent via email

Grace Komjakraphan-Tek
Los Angeles County Public Works
Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, California 91803
LARiverCEQA@pw.lacounty.gov

Re: Request for a 60-Day Comment Deadline Extension on the 2021 LA River Master Plan Draft Program Environmental Impact Report

Dear Ms. Komjakraphan-Tek:

O21-1

The Center for Biological Diversity respectfully requests an extension of the comment period for the Draft Environmental Impact Report for the 2021 LA River Master Plan Draft Program Environmental Impact Report. The current 45-day comment period imposes a deadline of March 18, 2021, and is inadequate to allow full review of (1) the Draft EIR which covers complex issues in its 1992 pages plus nineteen appendices and (2) the Public Review Draft of the Master Plan, which is 494 pages and includes a technical appendix.

It is simply not possible for the public to meaningfully review and comment on these documents in such a short timeframe. Due to the sheer volume and complexity of the materials, we believe an additional 60 days is required. Extending the deadline to May 17, 2021 would allow for a more comprehensive review and more useful comments. We therefore respectfully request that you consider extending the comment period an additional 60 days.

Thank you for your attention to this matter.

Sincerely,

J.P. Rose
Staff Attorney
Center for Biological Diversity
660 S. Figueroa Street, Suite 1000
Los Angeles, California, 90017
jrose@biologicaldiversity.org

CENTER for BIOLOGICAL DIVERSITY Because life is good.

May 13, 2021

Sent via email

Grace Komjakraphan-Tek
Los Angeles County Public Works
Stormwater Quality Division
900 South Fremont Avenue, 11th Floor
Alhambra, California 91803
LARiverCEQA@pw.lacounty.gov

Re: 2021 LA River Master Plan Draft Program Environmental Impact Report

Dear Ms. Komjakraphan-Tek:

These comments are submitted on behalf of the Center for Biological Diversity ("Center") on the Draft of a CEQA Program Environmental Impact Report ("EIR" or "DEIR") for the 2020 LA River Master Plan. These comments are submitted to assist the Department of Public Works ("DPW") in review and approval of these environmental documents.

O22-1 As the EIR 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

O22-2 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

O22-3 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.

O22-3 cont.

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. General Comments

The Center is supportive of the 2020 LA River Master Plan nine objectives that promote the protection and enhancement of the river's natural and cultural resources. These goals reflect the multi-benefit opportunities that exist along the river and if achieved, could transform this central area into a community hub for both people and wildlife. However, achieving these goals will require a clearly defined and articulated vision that includes specific guidelines for all future projects. Unfortunately, the DEIR does not provide that framework.

O22-4

Below we outline the inconsistencies present in the DEIR as compared with the stated objectives and we provide additions that we believe will make the Master Plan significantly more successful at achieving ecosystem and community health for all Angelinos. A summary of our recommendations for the DEIR are as follows:

3.3.2.1 Geography

- Enhance habitat connectivity for both large ranging and small ranging species in the San Gabriel, Santa Monica, and Santa Susana Mountains at the headwaters near Canoga Park, as well as the stated corridor between Griffith Park and the Verdugo Mountains at the Glendale Narrows [Figure 3.3-25; Wildlife Movement and Connectivity 3.3-36].

O22-5

3.3.3.3 Impacts and Mitigation Measures

- Implement a minimum 300-foot setback from all perennial and intermittent streams and wetlands (including vernal pools) [Mitigation Measure BIO-4: Identify Work Areas and Environmentally Sensitive Areas].

O22-6

- Develop a comprehensive invasive plant, insect and animal management plan that includes non-toxic methods of control [Mitigation Measure BIO-5: Prepare and Implement Weed Abatement Plan].

O22-7

O22-8

- Re-assess the cumulative effects analysis of the proposed kits of parts for biological resources, as described under CEQA Guidelines section 15130.

In addition to the amendments listed above, these additional analyses should be added to the Impacts and Mitigation Measures Section of the EIR.

O22-9

- Replace all non-native trees removed as a result of the proposed work activities with at least a 1:1 ratio with native trees and replacing native trees at least a 3:1 ratio with a combination of native trees and/or appropriate understory and lower canopy plantings.

O22-10

- Conduct 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 and discuss possible conflicts and mitigation measures to reduce these conflicts.

IV. Section 2: Project Description

Overall, the project, as described in the DEIR, does not provide the specifics necessary to accurately assess impacts. The project description includes a menu of options, but no clear definition or even priority of how these options would be implemented. In addition, there is no project or location-specific information when we know that location, type and number of projects greatly influences environmental impact, and with no specifics, the project scope is incomplete.

The Department of Public Work's use of a program EIR, as opposed to a project-specific EIR, does not excuse the obligation to provide clear and detailed information to the public. "The ultimate inquiry . . . is whether the EIR includes enough detail 'to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.'" (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 516.) As circulated, the DEIR does not include the requisite detail.

O22-11

The Court of Appeal has provided guidance about the distinctions between program and project EIRs:

> Designating an EIR as a program EIR . . . does not by itself decrease the level of analysis otherwise required in the EIR. [I]n considering a challenge to a program EIR, 'it is unconstructive to ask whether the EIR provided 'project-level' as opposed to 'program-level' detail and analysis. Instead, we focus on whether the EIR provided 'decisionmakers with sufficient analysis to intelligently consider the environmental consequences of [the] project.'

(*Cleveland National Forest Foundation v. SANDAG* (2017) 17 Cal.App.5th 413, 426.). Even if more precise information may be available during project-specific review, the DPW "must still provide reasonably obtainable information, or explain (supported by substantial evidence) why it

cannot do so. '[I]f known impacts are not analyzed and addressed in a program EIR, they may potentially escape analysis in a later-tier EIR.' (17 Cal.App.5th at p. 440.)

The menu based approach that the DEIR takes in its description of the program does not lend itself to accurate assessment and threatens to not account for significant environmental impacts by relying on later-tier EIR analysis. This oversight could be detrimental to the region as this program is described as covering the entire 51-miles of the Los Angeles River. To not accurately assess the potential impacts and provide clear and specific guidance to all future projects upfront ensures that the nine objectives will not be met.

O22-11 cont.

An example of this conflict appears in the description of the platform parks (22 acres decked at Rio Hondo confluence), which is language obviously informed by Gehry programming and planning, but the Gehry-proposed projects are absent from the analysis. If the DPW is serious about meeting its objectives, this DEIR needs to be significantly revised to direct all future projects to ensure that their individual and cumulative impact not only does "not significantly impact the environment," but that their project positively contributes to the achievement of one or more of the stated objectives and has an at least neutral impact to all other objectives.

V. Section 3.3: Biological Resources

a. 3.3.2.1 Geography

i. Figure 3.3-25; Wildlife Movement and Connectivity 3.3-36

Roads and development create barriers that lead to habitat loss and fragmentation, which harms native wildlife, plants, and people. As barriers to wildlife movement, poorly-planned development and roads can affect an animal's behavior, movement patterns, reproductive success, and physiological state, which can lead to significant impacts on individual wildlife, populations, communities, landscapes, and ecosystem function (Mitsch and Wilson 1996; Trombulak and Frissell 2000; van der Ree et al. 2011; Brehme et al. 2013; Haddad et al. 2015; Marsh and Jaeger 2015; Ceia-Hasse et al. 2018).

O22-12

Habitat fragmentation from roads and development has been shown to cause mortalities and harmful genetic isolation in mountain lions in southern California (Ernest et al. 2014; Riley et al. 2014; Vickers et al. 2015), increase local extinction risk in amphibians and reptiles (Cushman 2006; Brehme et al. 2018), cause high levels of avoidance behavior and mortality in birds and insects (Benítez-López et al. 2010; Loss et al. 2014; Kantola et al. 2019), and alter pollinator behavior and degrade habitats (Trombulak and Frissell 2000; Goverde et al. 2002; Aguilar et al. 2008).

Habitat fragmentation also severely impacts plant communities. An 18-year study found that reconnected landscapes had nearly 14% more plant species compared to fragmented habitats, and that number is likely to continue to rise as time passes (Damschen et al. 2019). The authors conclude that efforts to preserve and enhance connectivity will pay off over the long-term (Damschen et al. 2019). In addition, connectivity between high quality habitat areas in

O22-13

O22-13 cont.

heterogeneous landscapes is important to allow for range shifts and species migrations as climate changes (Heller and Zavaleta 2009; Cushman et al. 2outl013; Krosby et al. 2018). Loss of wildlife connectivity decreases biodiversity and degrades ecosystems.

O22-14

Edge effects of development in and adjacent to open space will likely impact key, wide-ranging predators, such as mountain lions and bobcats (Crooks 2002; Riley et al. 2006; Delaney et al. 2010; Lee et al. 2012; Smith et al. 2015; Vickers et al. 2015; Smith et al. 2017; Wang et al. 2017), as well as smaller species with poor dispersal abilities, such as song birds, small mammals, and herpetofauna (Cushman 2006; Slabbekoorn and Ripmeester 2008; Benítez-López et al. 2010; Kociolek et al. 2011). Limiting movement and dispersal can affect species' ability to find food, shelter, mates, and refugia after disturbances like fires or floods. Individuals can die off, populations can become isolated, sensitive species can become locally extinct, and important ecological processes like plant pollination and nutrient cycling can be lost. Negative edge effects from human activity, such as traffic, lighting, noise, domestic pets, pollutants, invasive weeds, and increased fire frequency, have been found to be biologically significant up to 300 meters (~1000 feet) away from anthropogenic features in terrestrial systems (Environmental Law Institute 2003)

O22-15

It is important that the EIR consider corridor redundancy (*i.e*. the availability of alternative pathways for movement) because it allows for improved functional connectivity and resilience. Compared to a single pathway, multiple connections between habitat patches increase the probability of movement across landscapes by a wider variety of species, and they provide more habitat for low-mobility species while still allowing for their dispersal (Mcrae et al., 2012; Olson & Burnett, 2008; Pinto & Keitt, 2008). In addition, corridor redundancy provides resilience to uncertainty, impacts of climate change, and extreme events, like flooding or wildfires, by providing alternate escape routes or refugia for animals seeking safety (Cushman et al., 2013; Mcrae et al., 2008; Mcrae et al., 2012; Olson & Burnett, 2008; Pinto & Keitt, 2008). It is widely recognized that the continuing fragmentation of habitat by humans threatens biodiversity and diminishes our (humans, plants, and animals) ability to adapt to climate change. Genes are changing, species' physiology and physical features such as body size are changing, species are moving to try to keep pace with suitable climate space, species are shifting their timing of breeding and migration, and entire ecosystems are under stress (Parmesan and Yohe 2003; Root et al. 2003; Parmesan 2006; Chen et al. 2011; Maclean and Wilson 2011; Warren et al. 2011; Cahill et al. 2012). In a report for the International Union for Conservation of Nature (IUCN), world-renown scientists from around the world stated that "[s]cience overwhelmingly shows that interconnected protected areas and other areas for biological diversity conservation are much more effective than disconnected areas in human-dominated systems, especially in the face of climate change" and "[i]t is imperative that the world moves toward a coherent global approach for ecological connectivity conservation, and begins to measure and monitor the effectiveness of efforts to protect connectivity and thereby achieve functional ecological networks" (Hilty et al. 2020).

O22-16

When assessing impacts to wildlife movement and habitat connectivity, DPW must analyze the Project's potential impacts to riparian corridors. Riparian ecosystems have long been recognized as biodiversity hotspots performing important ecological functions in a transition zone between freshwater systems and upland habitats. Many species that rely on these aquatic

habitats also rely on the adjacent upland habitats (*e.g.*, riparian areas along streams, and grassland habitat adjacent to wetlands). In fact, 60% of amphibian species, 16% of reptiles, 34% of birds and 12% of mammals in the Pacific Coast ecoregion depend on riparian-stream systems for survival (Kelsey and West 1998). Many other species, including mountain lions and bobcats, often use riparian areas and natural ridgelines as migration corridors or foraging habitat (Dickson et al, 2005; Hilty & Merenlender, 2004; Jennings & Lewison, 2013; Jennings & Zeller, 2017). Additionally, fish rely on healthy upland areas to influence suitable spawning habitat (Lohse et al. 2008), and agricultural encroachment on these habitats and over-aggressive removal of riparian areas have been identified as a major driver of declines in freshwater and anadromous fish (e.g., Stillwater Sciences 2002; Lohse et al. 2008; Moyle et al. 2011). Therefore, buffers that allow for connectivity between the aquatic resource and upland habitat is vital for many species to persist.

O22-16 cont.

In order to preserve and protect Los Angeles' native wildlife against climate change and development, the Kit of Parts should also be implemented with an eye towards **enhancing and interconnecting larger habitat areas in the San Gabriel, Santa Monica, and Santa Susana Mountains at the headwaters near Canoga Park,** as well as the stated corridor 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. In addition to these known habitat corridors, it is imperative that standards are set across all projects to ensure wildlife movement is possible, even in the more urbanized areas. These standards should include best practices for different taxa, such as mammals (large, medium and small), reptiles and amphibians, birds, insects and fish. Smaller species with poor dispersal abilities, like rodents and herpetofauna, would require more frequent intervals of crossings compared to larger wide-ranging species, like mountain lions or coyotes, to increase their chances of finding a crossing. Gunson et al. (2016) recommend that crossing structures generally be spaced about 300m (~0.19mi) apart for small animals when transportation infrastructure bisects large expanses of continuous habitat, though they recognize that some amphibians may need more frequent crossings no more than 50m (~0.03mi) apart. And for many amphibian and reptile species, undercrossings should have grated tops so that the light and moisture inside the crossings are similar to that of the ambient environment. Therefore, multiple crossings designed for different target species may be required**. In-depth analyses that include on-the-ground movement studies of which species are moving in the area and their home range area, habitat use, and patterns of movement are needed to determine how to best implement such crossings.** In addition, associated crossing infrastructure (*e.g.*, exclusionary fencing appropriate for target species, berms to buffer crossings from sound and light) should be included to improve chances of wildlife using crossings, and such crossings and associated infrastructure should be designed and built in consultation with local and regional experts, including agency biologists (Shilling 2020; Vickers 2020).

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O22-18

b. 3.3.3.3 Impacts and Mitigation Measures

i. Special Status Plan and Wildlife Species

The LA River watershed sits within one of the world's most diverse Mediterranean biodiversity hotspots. Today, the entire 52-mile river is designated as warm freshwater habitat,

O22-19

while the upper portion of the river and mouth are designated as wildlife habitat, used by rare, threatened, or endangered species. These species range from large mammals to small reptiles and fish as well as important pollinators, all with different habitat and environmental needs. To preserve the native biodiversity that for so long has defined our region, comprehensive assessment and strategic restoration plans have to be implemented that reflect the diverse needs of our native species.

O22-19 cont.

For those species with the largest ranges and least tolerance for urban development, such as the mountain lion (*Puma concolor*), conservation depends on maintenance of the connections between and within the regional system of large reserves. Use of such wildlife corridors through the urban-wildland interface may depend on the quality of the habitat in the linkage, but also on the absence of artificial lighting. Pumas will avoid nocturnal movement through lighted areas and may miss landscape linkages because of this tendency. Conservation strategies for native small mammal diversity on the other hand, should concentrate less on connectivity across marginal habitats and more on habitat quality and size as well as exotic species (Longcore 2006).

O22-20

For birds, providing habitat blocks with minimized edge effects as well as habitat blocks for human-intolerant species is essential. Raptors can accommodate dispersed habitat elements that cumulatively support their needs within an urban matrix as long as there are trees to connect reserve areas. However, for more sensitive species, specialized habitats, such as wetlands, oak woodlands, grasslands, and sage scrub are critical and minimizing human recreation these parts of natural areas will allow disturbance-intolerant species to persist. Finally, songbird biodiversity is dependent on the effective management of populations of feral cats as well as programs to minimize bird collisions with windows and vehicles. In order to minimize impact, 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 (Longcore 2006).

O22-21

Reptiles and amphibians often require corridors between different habitat types because of their different life cycles. Specifically, wide corridors are needed around riparian zones for species like turtles, that have nest sites up to 400m away from streams (Spinks et al. 2003). While alligator lizards and fence lizards are considered urban tolerant species, most snakes, legless lizards, and horned lizards, are urban intolerant and have been impacted by a combination of direct habitat destruction and edge effects. For example, horned lizards, which once were common in the San Fernando Valley, have all but disappeared because of the loss of their preferred prey item, harvester ants (Suarez et al. 2000) that were displaced by invasive Argentine ants (Erickson 1971; Holway 1998a, 1998b; Human et al. 1998). Finally, native soils should be protected for burrowing species (e.g., legless lizard) (Longcore 2006).

O22-22

Virtually no native fish remain in the upper Los Angeles River watershed. Speckled dace, arroyo chub, Pacific lamprey, unarmored threespine stickleback, Santa Ana sucker, and southern steelhead have all been extirpated. Restoration of elements of the former hydrology of the Los Angeles River and its tributaries, combined with massive pollution control, would be necessary for recovery of these species. A conservation strategy leading in that direction under current conditions would be to increase infiltration in the watershed so that peak flows in the main stem

O22-23

O22-23 cont. are reduced and future projects will have a margin of safety to engineer a solution (Longcore 2006).

O22-24 Insects and other arthropods constitute the majority of earth's biodiversity and exist across many different habitat types. Thus, protecting diverse ecosystems, especially encompassing diversity in soil and natural disturbance regimes is critical to maintaining insect diversity. Insects also benefit from networks of small reserves in urban areas to complement large reserves in the urban wildland area. Such small habitats, while fragmented, help support rare butterflies move through the urban core. However, it should be noted that more species are found in large fragments than small, so protecting both is critical. Finally, providing suitable habitat elements outside of reserves through the use of native landscaping provides stepping-stones for these species to move between the larger reserves (Longcore 2006).

O22-25 Plant communities have been heavily degraded from development and invasion of non-native species. Research on the vegetation condition of remnant urban vegetation in a similar environment to Los Angeles (Perth, Australia) showed that small reserves were highly fragmented and infested by exotic weeds, but that these reserves should be preserved and managed because "they are highly valuable for representing the vegetation types that once occurred there" (Longcore 2006). Thus, native plant communities require a heavy investment in management, but that this investment is worth it for the long-term preservation of these native ecosystems. To address these issues, **the DEIR should include a comprehensive invasive plant, insect and animal management plan that includes non-toxic methods of control** in the Mitigation Measure BIO-5: Prepare and Implement Weed Abatement Plan section. In addition, **we recommend replacing all non-native trees removed as a result of the proposed work activities with at least a 1:1 ratio with native trees and replacing native trees at least a 3:1 ratio with a combination of native trees and/or appropriate understory and lower canopy plantings.**

O22-26 Plants also depend on mutualisms wherein animals disperse and "plant" seeds. These relationships range from ants to scrub jays. Elimination of large seed dispersing ants by invasive Argentine ants has negative consequences for those plants whose seeds are dispersed by the native ants. Invasion of exotic insects can alter the dominance of the plant community away from large-seeded species favored by ants. Vegetation communities, therefore, depend on protection of the wildlife communities that inhabit them for well known services such as pollination, and lesser known functions such as seed dispersal (Longcore 2006).

O22-27 Effective conservation efforts must account for the interdependencies between and within species in these groups. Ecosystems are characterized by complex food webs, which are networks of energy transfer that connect even peripherally related species. They are also characterized by many groups not discussed here that play integral roles in ecosystem function — lichens, mosses, soil microorganisms, bacteria, algae, viruses, and an almost incomprehensible array of other species. Urban conservation must strike a balance between the desire to protect intact ecosystems and the demonstrated benefits of smaller fragments to the overall maintenance of biodiversity (Longcore 2006).

ii. Mitigation Measure BIO-4: Identify Work Areas and Environmentally Sensitive Areas

As of 1989 (over 30 years ago), Southern California had already lost between 95 and 97 percent of riparian habitat in floodplain areas (Faber, et al. 1989). These areas that have historically defined our region, continue to provide habitat for a variety of native species as well as support the health and resilience of our local water supply.

O22-28 To protect what remains of these important habitats adequate buffers throughout the watershed is the most effective strategy to reducing pollutants and sedimentation (Norris 1993). Larger buffer zones along streams and wetlands can provide more stream bank stabilization, water quality protection, groundwater recharge, and flood control both locally and throughout the watershed (Sabater et al. 2000). They would also protect surrounding communities from impacts due to climate change by buffering them from storms, minimizing impacts of floods, and providing water storage during drought.

Because of these benefits to ecosystem and community health, other municipalities have implemented setback requirements, including in the San Francisco Bay Area, where stream setbacks range between 30 – 200 feet, depending on the type of land use (*i.e.*, urban versus
O22-29 rural), or the quality or type of existing habitat. For example, Sonoma County implements some of the more stringent setbacks, with requirements for a 200-foot buffer in the Russian River Riparian Corridor, a 100-foot buffer for flatland riparian stream corridors, and a 50-foot buffer for other riparian stream corridors.[1]

Although smaller buffers may be locally adequate to alleviate water quality concerns in the short-term, they are often insufficient for wildlife (Kilgo et al. 1998). Streams (perennial and intermittent), wetlands (including vernal pools and salt marshes), and reservoirs throughout the County support numerous special-status flora and fauna, including Southern California steelhead and California red-legged frog. Many species that rely on these aquatic habitats also rely on the adjacent upland habitats (*e.g.*, riparian areas along streams, and grassland habitat adjacent to wetlands). In fact, 60% of amphibian species, 16% of reptiles, 34% of birds and 12% of mammals in the Pacific Coast ecoregion depend on riparian-stream systems for survival. Many
O22-30 other species, including mountain lions and bobcats, often use riparian areas and natural ridgelines as migration corridors or foraging habitat (Dickson et al. 2005). Additionally, fish rely on healthy upland areas to influence suitable spawning habitat,[2] and agricultural encroachment on these habitats and over-aggressive removal of riparian areas have been identified as a major driver of declines in freshwater and anadromous fish (Moyle et al. 2011). Loss of biodiversity due to lack of habitat contributes to ecosystem degradation, which will diminish a multitude of ecosystem services in the long-term. Thus, to preserve Los Angeles County's valuable biodiversity in these habitats, it is important to develop and implement effective buffer widths informed by the best available science.

[1] County of Sonoma (2008) General Plan 2020. Available at: https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/General-Plan/

[2] Lohse KA, Newburn DA, Opperman JJ, Merenlender AM (2008) Forecasting relative impacts of land use on anadromous fish habitat to guide conservation planning. Ecol Appl 18:467–482 . doi: 10.1890/07-0354.1.

A literature review found that recommended buffers for wildlife often far exceeded 100 meters (~325 feet), well beyond the largest buffers implemented in practice. For example, Kilgo et al. (1998) recommend more than 1,600 feet of riparian buffer to sustain bird diversity. In addition, amphibians, which are considered environmental health indicators, have been found to migrate over 1,000 feet between aquatic and terrestrial habitats through multiple life stages (Semlitsch and Bodie 2003). Specifically, the California red-legged frog, a threatened species that occurs and has designated critical habitat within Los Angeles County, was found to migrate about 600 feet between breeding ponds and non-breeding upland habitat and streams, with some individuals roaming over 4,500 feet from the water (Fellers and Kleeman 2007). Other sensitive species known to occur in Los Angeles County, such as western pond turtles (*Actinemys marmorata*, a candidate species under the Endangered Species Act) have been found to migrate over 1,300 feet from breeding ponds and streams (Trenham and Shaffer 2005). Accommodating the more long-range dispersers is vital for continued survival of species populations and/or recolonization following a local extinction (Cushman 2006). In addition, more extensive buffers provide resiliency in the face of climate change-driven alterations to these habitats, which will cause shifts in species ranges and distributions (Cushman et al. 2013). This emphasizes the need for sizeable riparian and upland buffers around streams and wetlands in Los Angeles County, as well as connectivity corridors between heterogeneous habitats.

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To protect Los Angeles County's highly diverse ecosystems and the services they provide, the **LA River Master Plan EIR should implement a minimum 300-foot setback** from all perennial and intermittent streams and wetlands (including vernal pools) that are within designated critical habitat, support or have the potential to support special-status and/or sensitive species, or provide connectivity and linkages to support multiple species. If the streams or wetlands are not located within designated critical habitat, do not support or have the potential to support special-status or sensitive species, and do not provide essential habitat connectivity, as determined by a qualified biologist, then a minimum 200-foot buffer should be required. The EIR should also include measures to **protect these riparian areas from direct and indirect negative impacts in perpetuity**.

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c. Cumulative Impacts

The **cumulative effects analysis, as described under CEQA Guidelines section 15130, needs to be re-assessed.** The conclusion stated in the DEIR that **"**implementation of the 2020 LA River Master Plan would not result in a cumulatively considerable contribution to biological impacts," but rather "would increase habitat" assumes that because preserving biological resources is a listed objective, that the net impact across all projects and project areas will be positive. However, of the listed project potentials in the kit of parts, only nine out of 68 would prioritize biological resources and given that this is a menu based approach, there is no guarantee that those nine will all be implemented.

O22-33

Ecological systems have tipping points and when there are multiple affronts from multiple projects, the cumulative effect can be significantly greater than expected, unless the interactions of such projects are accounted for beforehand. To meet the stated goal of "healthy connected ecosystems," the EIR must conduct a cumulative effects analysis that considers the possible impact of all kit of parts that do not prioritize biological resources. This would

O22-34

O22-34 cont. determine the true scope and scale of significant environmental impact on the biological resources of the region and provide an **avenue for implementation of the common elements and kit of parts that maximizes benefits for biological resources**.

d. Recommendations

O22-35 In addition to the recommendations listed above, we urge the county to **complete 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 EIR.

VI. Section 3.9: Hydrology and Water Quality

a. The DEIR Should Adequately Analyze and Mitigate Potential Impacts on Water Quality.

O22-36 Preserving regional water quality is essential to environmental and public health, especially as the City and County pivot towards 100% local water supply. To ensure this natural resource is protected, 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.[3] **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**.

O22-37 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.

b. The DEIR Must Assess Water Supply Impacts.

O22-38 Understanding the impacts of the LARMP on the region's water supply must be a priority, as it needs to be integrated into planning policies before implementation to ensure that the cumulative impact does not threaten our region's ability to achieve water independence from external sources. The EIR should consider the benefits from increased groundwater replenishment and 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.

O22-39 Project-related changes in drainage patterns, runoff, and sedimentation should be included and evaluated in the EIR as well. As part of the LSA Notification process, CDFW requests a hydrological evaluation of the 100-, 50-, 25-, 10-, 5-, and 2-year frequency storm

[3] Los Angeles River Revitalization Master Plan (2007), available at: http://boe.lacity.org/lariverrmp/CommunityOutreach/pdf/04Chapter3-IssuesAffectingthePlan42407.pdf.

O22-39 cont.

event for existing and proposed conditions. CDFW recommends the DEIR evaluate the results and address avoidance, minimization, and/or mitigation measures that may be necessary to reduce potential significant impacts.

VII. Section 3.10: Land Use and Planning

CEQA requires an EIR to discuss any inconsistencies with applicable land use plans, not just whether it is generally consistent with these plans. (Guidelines § 15125, subd. (d); *Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 356 ["*Napa Citizens*"].) Failure to disclose any such inconsistencies violates CEQA's information disclosure mandate, constituting a failure to "proceed in 'a manner required by law'." (*Napa Citizens*, *supra*, 91 Cal.App.4th at 386; *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 510, 514–16.)

O22-40

Here, the DEIR fails to provide any analysis of the 2020 LA River Master Plan's consistency or lack of consistency with a number of relevant and applicable land use plans. The DEIR includes a section entitled "Relevant Land Use Plans and Policies (Non-Regulatory)" that only briefly summarizes these relevant plans, but does not provide any analysis of the Project's consistency or inconsistency with these plans and their respective goals and policies. (See DEIR at 3.10-2.) This is impermissible under CEQA, which does not contain an exemption from this requirement for "non-regulatory" but nonetheless "relevant" plans. Instead, the Guidelines specifically note that this requirement extends to regional transportation plans, habitat conservation plans, and plans for the reduction of greenhouse gases, among others.

For instance, the DEIR must include a detailed analysis of any inconsistencies with the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS") adopted by the Southern California Association of Governments' ("SCAG"). Currently, the EIR includes only a single half-page chart that concludes without analysis that the Project is consistent with ten broad goals in the RTP/SCS. Here, it is unclear how the Plan will "[p]romote conservation of natural and agricultural lands and restoration of habitats" (see DEIR at 3.10-50) when the Project proposes to simply leave-in place the channelization that has degraded the LA River, and the Project fails to adopt a broader watershed restoration approach.

O22-41

Moreover, the RTP/SCS has numerous other goals that are not discussed at all in the DEIR, with which the Project is likely inconsistent. The RTP/SCS includes goals to "Preserve, enhance and restore regional wildlife connectivity . . ."[4] (RTP/SCS at 49.) As discussed above, the Project will not promote this goal, and potentially will undermine it through new development in sensitive areas. Moreover, the Program EIR Addendum[5] for the RTP/SCS contains numerous proposed mitigation measures to reduce impacts on wildlife movement. (See PMM Bio-4 at 4.0-15). The EIR should analyze consistency with these measures and require them as mitigation measures for the Project.

[4] Connect SoCal Plan (Sept. 2020), available at https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176

[5] Connect SoCal Program Environmental Impact Report Addendum #1 (Sept. 2020), available at https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocal_addendum_complete.pdf?1606004379.

O22-42 Likewise, the DEIR contains virtually no analysis of the Project's consistency with the Los Angeles River Revitalization Master Plan, or Lower Los Angeles River Revitalization Plan (see DEIR at 3.10-50.) Nor does the DEIR contain any analysis of whether the Project is consistent with the goals and policies of applicable climate action plans, including the Los Angeles County Community Climate Action Plan and L.A.'s Green New Deal Sustainability Plan, among others.

O22-43 Perhaps most unfortunately, the DEIR does not even mention, let alone analyze consistency with, the Los Angeles Countywide Sustainability Plan.[6] The Sustainability Plan contains numerous policies that should be applied to the Project, but are not even considered in the DEIR. For instance, Action 36 in the Sustainability Plan states "Evaluate and implement mechanisms, such as a stream protection ordinance, for the protection, preservation, and restoration of natural buffers to waterbodies, such as floodplains, streams, and wetlands" and "PW" or "Public Works" is listed as a partner. (Sustainability Plan at 58.) In order to be consistent with the Sustainability Plan, the DEIR must disclose whether and/or how the Project is meeting these goals. Action 73 contains similar requirements of "implementing a strategy to preserve and protect priority ecological sites . . . []including but not limited to . . . terrestrial streams, wetlands, and aquatic habitats." (Sustainability Plan at 92.) It is also unclear how the Project meets Goal 6 of the Sustainability Plan: "Accessible parks, beaches, recreational waters, public lands, and public spaces that create opportunities for respite, recreation, ecological discovery, and cultural activities."

O22-44 Impact 3.10(b) in the DEIR considers whether the Project would cause a significant environmental impact due to a conflict with any applicable land use plan or policy. (DEIR at 3.10-35.) The DEIR concludes that impacts would be less than significant and that no mitigation is required for most of the "Kit of Part" categories. However, because the DEIR fails to include adequate analysis of the Project's consistency or lack of consistency with various plans, it cannot credibly reach a conclusion on Impact 3.10(b). (See *Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935 [conclusory claims are insufficient under CEQA's informational mandate, which requires an EIR to "contain facts and analysis, not just the agency's bare conclusions or opinions].)

O22-45 For other areas of the "Kit of Parts" such as "KOP Category 6," the DEIR concludes that impacts would be significant and unavoidable. (DEIR at 3.10-44.) The DEIR also quite confusingly compares the Project to the goals of the Project in its land use plan analysis, and concludes that projects under KOP Category 6 "could encroach on existing residential neighborhoods and result in a significant environmental impact." (DEIR at 3.10-45.) The DEIR then states that the Project "potentially" is ***not*** consistent with the Project's goal of "protection of existing residential neighborhoods from encroachment." (*Id*.) At a minimum it is extremely confusing that the DEIR suggests that the Project is inconsistent with itself. The DEIR's confusing analysis does not contribute to informed decision-making and public participation.

[6] Los Angeles County Sustainability Plan, available at https://ourcountyla.lacounty.gov/wp-content/uploads/2019/07/OurCounty-Final-Plan.pdf

O22-46 In addition, it is difficult to even assess whether the Project is consistent or inconsistent with the above-mentioned land use plans and their goals and policies because what actually constitutes the Project is extremely confusing and not properly described in the EIR.

VIII. Section 3.15: Recreation

a. The DEIR Should Prioritize Equitable Access For All Communities Along the LA River.

O22-47 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 destinations 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.)[7] 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.

IX. Section 5: Alternatives

O22-48 CEQA requires that an EIR adequately analyze alternatives to the proposed project. The alternatives analysis is the "core of an EIR." (C*itizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 564 ("*Citizens II*").) An EIR is required to analyze a range of alternatives that "would avoid or substantially lessen" any of the significant effects of the project in order to "ensure that all reasonable alternatives to proposed projects are thoroughly assessed by the responsible official." (Pub. Resources Code § 21002, 21002.1; CEQA Guidelines § 15126.6, subd. (a).) Reasonable alternatives are feasible and must "attain most of the basic objectives" of the Project. (Pub. Resources Code § 21061.1; Guidelines § 15126.6 (a).) The reasonableness of alternatives is considered in light of the nature of the project and the nature and extent of the project's impacts. (*San Bernardino Valley Audubon Society v. County of San Bernardino* (1984) 155 Cal.App.3d 738, 750–51.) Reasonable alternatives should only be eliminated from consideration in the EIR if the alternative would not meet most of the basic project objectives, is infeasible, or would not reduce significant environmental impacts. (Guidelines § 15126.6(c); *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1457.)

Prior to release of the DEIR, numerous groups including the Center urged DPW to consider and adopt a Watershed Restoration Alternative. (See e.g., letter of August 4, 2020 from Los Angeles Waterkeeper, Center for Biological Diversity, Friends of the LA River, and Heal the Bay.) The letter explained that such an 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

[7] 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.

ecosystems" and "promote healthy, safe, clean water") a system-wide approach is critical. The Center also submitted a separate letter urging adoption of the Watershed Restoration Alternative. (See letter of August 6, 2020.)

Nonetheless, the DEIR summarily dismisses the Watershed Restoration Alternative, claiming that "none of the impacts of the proposed Project would be reduced or avoided" with this alternative. (DEIR at 5-9.) This is false. The whole purpose of this alternative would be to *restore* the watershed and river, thus minimizing impacts and actually providing a net benefit to the watershed and environment. The DEIR does, however, acknowledge that the Watershed Restoration Alternative "would help meet many of the objectives of the proposed Project and specifically further the objectives of connected ecosystems and provision of equitable, inclusive, and safe parks, open space, and trails." (*Id*.) Indeed, the DEIR fails to mention a single project objective that the Watershed Restoration Alternative would not further. Because the Watershed Restoration Alternative would *reduce* impacts and further the project's objectives, it should have been considered and adopted by the DEIR as the preferred alternative. Based on the authorities cited above, the DEIR's failure to even consider this alternative violates CEQA.

O22-48 cont.

X. Conclusion

The Center appreciates the opportunity to submit comments on the Master Plan. Please do not hesitate to contact us with any questions.

Sincerely,



J.P. Rose
Senior Attorney
Center for Biological Diversity
660 S. Figueroa Street, Suite 1000
Los Angeles, California, 90017
jrose@biologicaldiversity.org



Elizabeth Reid-Wainscoat
Urban Wildlands Campaigner
Center for Biological Diversity
660 S. Figueroa Street #1000
Los Angeles, CA 90017
Tel: (831) 428-3312
ereidwainscoat@biologicaldiversity.org

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Elected Officials

Committee on Appropriations
Homeland Security, Chairwoman
Labor, Health and Human Services, and Education, Vice Chairwoman

Leader's Council

Congressional Hispanic Caucus

Smithsonian Institution, Board of Regents

LUCILLE ROYBAL-ALLARD
40TH DISTRICT, CALIFORNIA

WASHINGTON, DC OFFICE
2083 Rayburn House Office Building
Washington, DC 20515-0540
Telephone: (202) 225-1766
Fax: (202) 226-0350

DISTRICT OFFICE
500 Citadel Drive, Suite 320
Commerce, CA 90040-1572
Telephone: (323) 721-8790
Fax: (323) 721-8789

roybal-allard.house.gov

May 13, 2021

Grace Komjakraphan-Tek
Department of Public Works
Los Angeles County
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

Dear Ms. Komjakraphan-Tek:

Thank you for allowing the community to give input on the 2020 Los Angeles River Master Plan Program Environmental Impact Report (PEIR). I am writing to provide my own comments on the Report.

I also want to thank the Los Angeles County Board of Supervisors for supporting this project, and the Public Works Staff and the community stakeholders for their dedication and countless hours to review and revise this very comprehensive plan. As we move forward with the plan and future individual projects, I look forward to Public Works continuing its partnership with community stakeholders.

EO1-1 First, ensuring that the community has access to the river and river-related sites such as parks is important. As projects are being created, designs and plans should always be done with the thought of how people can enter the site, bike path and other Los Angeles River-related locations. Good signage should also be included in all plans.

EO1-2 Community meeting centers should also be considered as part of the master plan. I am aware that there is support for the South East Los Angeles (SELA) Cultural Center; we should consider similar centers in other communities so that people in other areas have access to like facilities. The centers could even be smaller versions of the SELA Cultural Center. Regardless, there should be public buildings where the public can meet and/or have a variety of classes. The buildings could be run and maintained by local governments or perhaps an educational institution.

EO1-3 As we all know, Southeast Los Angeles is one of the most densely populated areas in Los Angeles County and the state of California. Due to the many freeways that run through the region, residents also live in an area that has some of the highest rates of vehicle exhaust pollution resulting in very poor air quality year round, often with summer air quality being the worst in the nation.

Given these logistics, local Southeast Los Angeles residents would benefit greatly from the creation of well-maintained open space (i.e. hiking, biking and horse trails) and open green space as much as possible. According to the U.S. Environmental Protection Agency, "Community open, green space is socially valuable. Walkable neighborhoods, parks, and open

EO1-3 cont.

green spaces draw people outside and foster social interactions. Green streets integrate nature into the urban environment and provide a revitalizing contrast to the harsh shape, color, and texture of buildings, and stimulate the senses with their simple color, sound, smell, and motions."

EO1-4

I am also concerned about housing, and in particular, affordable housing, including housing for people who meet the moderate-income standards. Housing costs are currently a problem for many residents in Southeast Los Angeles. Unless we develop a comprehensive plan to deal with this situation, when individual LAR projects become a reality, and as other projects such as the Rail to River, and West Santa Ana Branch (WSAB) light rail line come online housing costs will rise as it has with other similar projects in other transit oriented developments. This will have the result of many current and future residents who grew in the area being priced out of the market.

EO1-5

While the Southern California Association of Governments (SCAG) has their regional housing plan, and there have been discussions on matters such as land banking and community benefits agreements, we must develop a more comprehensive and detailed plan with all community stakeholders. In addition to the strategies mentioned in the Lower LA River Revitalization Plan and the transit-oriented development included in the WSAB project, the comprehensive affordable housing plan should also include more programs for individuals to address financial literacy, first time homebuyers, HUD certifications, and consumer awareness among others. Ideally, to minimize the number of people being defrauded, there should be one agency or a clearing house that can serve as an educational resource and a central point of contact.

This project would be a significant undertaking to accomplish, but the WSAB, the Rail to River project and the individual projects in the Los Angeles River Master Plan PEIR are being constructed for the residents who live in Southeast Los Angeles and South Los Angeles. We all want Southeast Angelenos to reap the benefits of their input and hard work, therefore we must do everything possible to ensure that they can continue to afford living in the region local to these projects.

Again, thank you for this opportunity to submit my comments on the Los Angeles River Master Plan PEIR. I look forward to learning about the community's comments and the responses from Public Works staff.

Sincerely,

Lucille Roybal-Allard

LUCILLE ROYBAL-ALLARD
Member of Congress

LRA:ktc

Individuals

Ariana Villanueva

From: Paul Rabinov <rabinov.paul@gmail.com>
Sent: Monday, February 1, 2021 8:29 AM
To: PW-LA River CEQA
Subject: Draft Master Plan Comment

CAUTION: External Email. Proceed Responsibly.

I1-1 In reviewing the DEIR, it does not appear to include any of the proposed study areas recommended by the Upper LA River and Tributaries Working Group. When will these be added?

Paul Rabinov
818-631-6132

Ariana Villanueva

From: Connie Elliot <conniebiff63@gmail.com>
Sent: Monday, February 1, 2021 11:30 AM
To: PW-LA River CEQA
Subject: LA River Master Plan

CAUTION: External Email. Proceed Responsibly.

I participated in meetings concerning this plan at various levels starting with the meetings downtown before Sheila Keuhl came to office. It is very hard for me to see details on your drawings on my computer. However, I keep seeing something that should be discarded in my neighborhood. I would be willing to meet with someone with masks and social distancing outdoors next to South Weddington Park to show you that connecting South and North Weddington parks with a bridge over the river would be folly. The street running next to the park is not a legal width. Fire trucks would not be able to get down that street. Also, Valleyheart, which is the only street out of this cul de sac, is very narrow and could not support a bike path along with two way traffic and parking. Taking park land from such a small park would be political folly. Please discard any idea like this. Vineland is the best and widest street to use for a bike path connecting to the river.

I2-1
I2-2
I2-3

Connie Elliot, 4061 Cartwright Ave; Studio City 91604
818-760-0926

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Connie Elliot
conniebiff63@gmail.com

Ariana Villanueva

From: Julia Borovay <jgborovay@verizon.net>
Sent: Tuesday, February 2, 2021 4:40 PM
To: PW-LA River CEQA
Subject: LARMP Draft PEIR Comments

CAUTION: External Email. Proceed Responsibly.

I3-1 I support returning as much as possible of the Los Angeles River to its natural state. Making the river more accessible for
I3-2 recreation, while maintaining flood control capabilities, is a good idea. I am not in favor of building concrete
I3-3 superstructures over the river channel to try to increase public space. Imposing more concrete over the already heavily cemented riverbed would be both unsightly and contrary to the spirit of restoring the river to ecological health.

Thank you for the opportunity to comment.

Julia Borovay

Ariana Villanueva

From: DAVID SWANSON <DavidRSw@msn.com>
Sent: Wednesday, February 3, 2021 2:47 PM
To: PW-LA River CEQA
Subject: LARiver EIR

CAUTION: External Email. Proceed Responsibly.

Please leave the LA River alone.
In the past 150 years it has been put into the current configuration. Leave it alone.
It is evil to put bureaucrats in a position to punish citizens. They will only "justify" their own existence by claiming doom and gloom. They will then demand money for their own spending without any guarantee that it will improve anything.
Fire the bureaucrats and leave the river alone.
I4-1 Bureaucrats want money to play with. Cancel the EIR and leave the river alone.
David Swanson
Glendale

Ariana Villanueva

From: Alina Zehnali <zehnali@yahoo.com>
Sent: Wednesday, February 3, 2021 7:11 PM
To: PW-LA River CEQA
Subject: Re: Draft Program

CAUTION: External Email. Proceed Responsibly.

Hi,

I apologize as I mixed the dates. Now these days months fly by. The meeting is in a month therefore we are give advance notice, however I would appreciate is you can tell me how this is going to affect residence on Markridge Rd in La Crescenta.

Thank you,
Alina

On Wednesday, February 3, 2021, 07:07:21 PM PST, Alina Zehnali <zehnali@yahoo.com> wrote:

I5-1

Hi,

I received a notice in mail regarding the Draft Program EIR and the meeting held online on March 3rd. I received this notice in the mail on March 3rd when I got home which was pass the meeting time. I don't understand why with something important like this, the public is not given an advance notice to understand what is impacting their everyday life.

How do we go about getting information about this project. We live on Markridge Rd in La Crescenta where in past may lacounty public work above Dukmejian Wilderness has impacted our everyday life. I like to find out what this project in tales and how much more dust, noise and possibly an environmental affect is going to impact the citizens. This may impact our decision to live in this area and I like to find out as soon as possible.

Thank you,
Alina

Ariana Villanueva

From: margarita darett <mdarett@sbcglobal.net>
Sent: Wednesday, February 3, 2021 10:33 PM
To: PW-LA River CEQA
Subject: Re: 2020 LA River Master Plan Draft PEIR Public Meeting - Registration Information

CAUTION: External Email. Proceed Responsibly.

Hi Ariana,

I6-1 Thank you for the information.

Respectfully,

Maggie Darett-Quiroz
323-788-1323

On Feb 3, 2021, at 5:42 PM, PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:

Good afternoon,

I spoke with you on the phone earlier today and am providing information on how to register for the public meeting for the 2020 LA River Master Plan Draft Program Environmental Impact Report (PEIR). The meeting will be held virtually on Zoom on March 3, 2021 from 6 to 8 pm.

Please click here to register for the public meeting on Eventbrite. Registration is not required to attend, but you will receive a registration confirmation and meeting notifications. If you would like to speak during the public meeting, we recommend pre-registering as registrants will be invited to make a comment in the order they registered, as meeting time allows.

Information on the Draft PEIR for the 2020 LA River Master Plan, including how to submit public comments, and the upcoming online public meeting, can be found on our website at https://pw.lacounty.gov/go/larmpceqa.

If you're interested in learning about the 2020 LA River Master Plan itself, please visit www.larivermasterplan.org for more information.

Thank you for your interest and we look forward to your participation at the public meeting!

Sincerely,

Ariana Villanueva
Environmental Engineering Specialist
Los Angeles County Public Works
LARiverCEQA@pw.lacounty.gov
833-993-1739

Ariana Villanueva

From: Naomi Turner <turnernaomi@hotmail.com>
Sent: Thursday, February 4, 2021 6:59 AM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan - Draft EIR comment

CAUTION: External Email. Proceed Responsibly.

I7-1 The 2020 LA River Master Plan must include bike paths so you can walk or ride all the way from Canoga Park to Long Beach along the LA River.

I7-2 Also a comprehensive plan to address homelessness/trash cleanup along the LA River. These things need to happen as soon as possible.

Thank you,

Naomi Turner, DVM
turnernaomi@hotmail.com
310-622-5846

Ariana Villanueva

From: peter cardenas <mesopete63@gmail.com>
Sent: Thursday, February 4, 2021 10:23 AM
To: PW-LA River CEQA
Subject: river pollution
Attachments: Mitigation (1).docx; Particalization of airborn contaniments .docx

CAUTION: External Email. Proceed Responsibly.

good morning Mrs Komjakraphan

I8-1 I am a sanitation worker for the city of L.A . while I was working for the city we began using reclaimed water in our sewer cleaning hydro units . I am not sure what was in the water . but the hydrogen sulfide level was very high while we were filling our trucks . we would use the water to clean the sewers and storm drains . when I checked to see where to water was coming from . the site stated a person only needed training to acquire the water . the training was on how to use the water . it was for irrigation only . the water could not be spilled on the sidewalk or run down the street and if you splashed the water the fines would be doubled .when I found out I attempted to stop my management . I called the EPA, county health board, state water board, fish and game and CWEA which I was a member of. We had also been using our sewer cleaning equipment in the storm drains and I asked if we could stop cross contamination of the storm system. We had been using the water to clean skid row . I have been trying to stop these practices I think this might be the origin of Covid-19 or at least .the spreading of the illness

Ariana Villanueva

From: Carrie Sutkin <carrie.evrnc@gmail.com>
Sent: Thursday, February 4, 2021 10:23 AM
To: PW-LA River CEQA
Subject: electronic format notice of Draft Program EIR
Attachments: CamScanner 02-03-2021 18.01.pdf

CAUTION: External Email. Proceed Responsibly.

I9-1 please send me an electronic version to post on my neighborhood council webpage and on the Alliance of River Communitie's facebook.

Thanks,
Carrie Sutkin

Ariana Villanueva

From: Kevin Greutert <kevingreutert@mac.com>
Sent: Thursday, February 4, 2021 7:41 PM
To: PW-LA River CEQA
Subject: LA River Draft PIER

CAUTION: External Email. Proceed Responsibly.

Greetings,

I10-1 Regarding the LA River master plan, I would strongly urge the county to focusing first on completing the section of the bike path that is currently blocked by Downtown Los Angeles. I believe this would be tremendously helpful to commuters and cyclists both north and south of Downtown, and would noticeably reduce commuter traffic going into the city. It is currently impossible to safely bike from the Valley to the lower portion of the LA River bike path.

Thanks,

Kevin Greutert

Ariana Villanueva

From: Brent Fischer <planetarymusic@hotmail.com>
Sent: Thursday, February 4, 2021 8:48 PM
To: PW-LA River CEQA
Subject: Draft PeIR comment

CAUTION: External Email. Proceed Responsibly.

I11-1

If you're going to do anything along the river, the tent cities need to be cleared first.

It's time for the county to insist that public lands be for the tax paying public, not squatters, many of whom are with drug and alcohol problems.

If any of them are truly homeless, meaning they want to be back in a home, there are plenty of social services and non-profits that can help them relocate to approved housing.

Don't beautify the river just so vagrants can proliferate there!

Regards,

Brent Fischer
Grammy®-winning Producer, Composer, Arranger www.BrentFischer.com
Director of the Clare Fischer Ensembles
www.ClareFischer.com
planetarymusic@hotmail.com
+1 818 634 4419

Masterclasses worldwide on Fischer harmonic and orchestration concepts via Zoom and Skype

Ariana Villanueva

From: Allen Escobedo <esco.allen@gmail.com>
Sent: Thursday, February 4, 2021 11:31 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

I12-1 The LA River Master Plan shows minor improvements in Frame 4, Bell, Maywood, Bell Gardens while much more significant improvements in other areas. Despite the densely populated residential areas of Frame 4, it appears that these gateway cities will once again be marginalized.

I12-2 Is it the intention of the County to again continue to under represent these communities? These are the areas in most need of parks and open areas, pavilions, cafes. It seems they will be lucky to get a lower tier shade pavilion.

Ariana Villanueva

From: Dean Scalia <dtscalia@gmail.com>
Sent: Monday, February 8, 2021 10:15 AM
To: PW-LA River CEQA
Cc: Damian and Jan Virant
Subject: Comment on Draft PEIR
Attachments: Putting the Sail into MetroRail.docx

CAUTION: External Email. Proceed Responsibly.

I13-1 Hello - we offer the attached for consideration on the 2020 LA River Master Plan.

Originally conceived in 1984, it was sent then to a number of local officials and acknowledged by some of them, but no action was taken. Most recently, as noted in the enclosed file, we pitched it to Elon Musk, but haven't heard from him, either.

We welcome your questions and comments. Thank you for your consideration.

Dean Scalia
3616 Kinney Circle
Los Angeles, CA 90065
DTScalia@gmail.com

Damian Virant
23625 Via Garfias
Mission Viejo, CA 92692
virantfamily@mac.com

Ariana Villanueva

From: Veta Gashgai (via Google Drive) <vcg0728@gmail.com>
Sent: Tuesday, February 9, 2021 8:59 PM
To: PW-LA River CEQA
Subject: The Needs of BH .pptx

CAUTION: External Email. Proceed Responsibly.

vcg0728@gmail.com has shared the following presentation:



I14-1 The Needs of BH .pptx



The LA River flowing again by our homes will be amazing please view this power point and help us with our trash issue and overflowing storm drains here In Boyle Heights. Please help us clean our storm drains be aware of our problem here in BH. How can we create some TV big new when we don't maintain basic city services here.

Open

This email grants access to this item without logging in. Only forward it to people you trust.

Google Drive: Have all your files within reach from any device.
Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA



Ariana Villanueva

From: armando8422@gmail.com
Sent: Tuesday, February 9, 2021 10:01 PM
To: PW-LA River CEQA
Subject: PUBLIC MEETING REGISTRATION LOCATION LINE SIGN UP 2020 LA RIVER MASTER PLAN... UP COMING MEETING

CAUTION: External Email. Proceed Responsibly.

To Whom it May Concern

I15-1 I Armando Simental where to sign up for Wednesday, March 3 2021 Time; 6pm to 8pm. 2010 LA River MasterPlan Not to sabi on computer knowledge, website unable to find registration site

Feel to email information for this meeting..

Sincerely
A.Simental

Sent from my iPhone

Ariana Villanueva

From: Ricardo Morelli <doctormorelli@yahoo.com>
Sent: Tuesday, February 16, 2021 3:30 PM
To: PW-LA River CEQA
Subject: Homelessness and the LA River

CAUTION: External Email. Proceed Responsibly.

I16-1 Is this elephant in the room being addressed?

Dr. Ricardo Morelli

This message contains privileged and confidential information intended for the above addressees only. If you receive this message in error please delete or destroy this message and/or attachments. The sender of this message will fully cooperate in the civil and criminal prosecution of any individual engaging in the unauthorized use of this message.

Ariana Villanueva

From: Jacqueline Teeter <jteeter@generalveneer.com>
Sent: Wednesday, February 17, 2021 9:06 AM
To: PW-LA River CEQA
Subject: "2020 LA River Master Plan PEIR Comments"

CAUTION: External Email. Proceed Responsibly.

I17-1 I was wondering if you would be able to give me any information on the transformation that will be taking place in Downey and South Gate river.

Thank you,
W.H. DeWitt
5485 Gardendale St.
South Gate, CA 90280
(310)994-3662

From: Flor Burrola
To: PW-LA River CEQA
Subject: Re: REMINDER - 2020 LA River Master Plan Draft PEIR Public Meeting 3/3/2021
Date: Thursday, February 18, 2021 10:12:30 AM

CAUTION: External Email. Proceed Responsibly.

Hello,

I18-1 Will this session be recorded and available to view after the meeting for those who are unable to attend? If so, where will the video be located and when will it be available?

Best,

On Tue, Feb 16, 2021 at 3:02 PM County of Los Angeles <lacounty@subscriptions.lacounty.gov> wrote:

2020 LA River Master Plan Draft PEIR Public Meeting 3/3/2021

If you're interested in learning more about the 2020 LA River Master Plan Draft PEIR, Los Angeles County Public Works is hosting an online public meeting.

DATE: Wednesday, March 3, 2021

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

THIS IS AN ONLINE EVENT

The public meeting will include a brief presentation with an overview of the Draft PEIR analysis, followed by submission of oral comments. Please Be Advised: Due to the high volume of registrants who have requested to make an oral comment at the online public meeting, there may not be enough time to hear from all registered speakers. We will make every concession to accommodate as many speakers as possible. All comments are weighted equally, whether received orally, electronically or in writing.

You can register for the public meeting at (Eventbrite link) and for more information on how to participate in the public meeting, please visit pw.lacounty.gov/go/larmpceqa.

As a reminder, the Draft PEIR is available for public comment. All written comments should be submitted by March 18, 2021, which marks the end of the 45-day comment period. Please send your written comments to the address or email

address shown below. For emails, please write “2020 LA River Master Plan Draft PEIR Comments” in the subject line, and include a return address or email address with a contact name with your comments:

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

We hope you can join us for the public meeting on March 3rd!

For any questions, don’t hesitate to reach out to us at LARiverCEQA@pw.lacounty.gov or at 833-993-1739.

Thank you.

LARMP LOGO

This email was sent using GovDelivery Communications Cloud to flor.i.burrola@gmail.com on behalf of: County of Los Angeles · 500 W. Temple St. · Los Angeles 90012

Ariana Villanueva

From: gloriarevive <gloriarevive@gmail.com>
Sent: Sunday, February 21, 2021 7:25 PM
To: PW-LA River CEQA
Subject: LA RIVER PROJECT

CAUTION: External Email. Proceed Responsibly.

Hello

I19-1 I am a resident of Long Beach and I was reviewing the project plans. However. I did not find the information pertaining to which properties along the river would be taken by eminent domain for the project.

Would you please provide me with that information?

Thank you

2021

Comment Letter I20

Dear Grace Konjakrephan-Tek,

I20-1 I'm not for the river project. more trash will be put in the river and it won't become better for wild things or humans.

Sincerely, Donna Thomas

Thomas
141 N. Kenwood St.
Burbank, CA
91505

FOREVER / USA

Public Works
Grace Yoakum
Los Angeles County Public Works
Stormwater Quality Division
900 South Fremont Ave.
Alhambra, CA
91803-1331

VASKEN HAGOPIAN
P.O.BOX 39582
LOS ANGELES, CA. 90039

FEBRUARY 6-2021

PUBLIC WORKS, LA. RIVER

ARE YOU PEOPLE ON CRACK???

THE CITY AND THE STATE IS TAXING US TO DEATH, AND YOU WANT TO SPEND MILLIONS OF DOLLARS OF OUR HARD EARNED TAX

liX .Qti.l'1:US 88.0IE.Ci.L.ir.—

I21-1 LA. RIVER IS CONTAMINATED WATERS, SO YOU REALLY THINK THE RIVER IS A GOOD INVESTMENT OF THE TAX PAYORS????

HOW MANY WILL GET SICK, AND GO TO THE HOSPITALS???

HOW ABOUT THAT STUPID BIDEN AND GRUESOME NEWSOM? LOWER OUT TAXES AND STOP WAISTING OUR MONEY.

WOW, IT SURE LOOKS GOOD IN THE PICTURE AND THESE IDIOT MENIALS WILL FALL FOR IT.

FROM A HARD WORKING, HEAVY TAX PAYING CITIZEN.

IDIOTS WANT TO SPEND MILLIONS OF $ FOR LA RIVER RECREATION USE — OUR TIMES EARNED TAX $$

Public Works
LOS ANGELES COUNTY

ATTN: GRACE KOMJAKRAPHAN-TEK
LA COUNTY PUBLIC WORKS, STORMWATER QUALITY DIVISION
900 SOUTH FREMONT AVENUE, 11TH FLOOR
ALHAMBRA, CA91803
LARIVERCEQA@PW.LACOUNTY.GOV

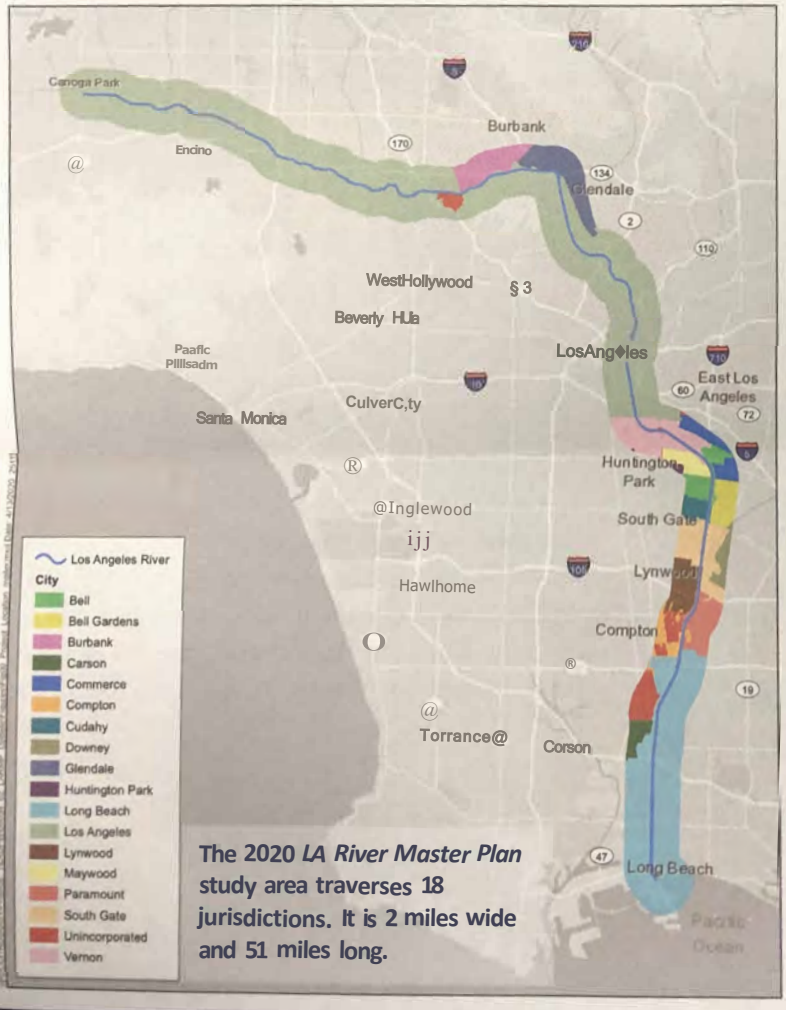
5-DIGIT 90039 661 163679
HAGOPIAN,VASKEN AND EVELYN TRS HAGOPIAN FAMILY TRUST
PO BOX 39582
LOS ANGELES, CA 90039-0582

LA RIVER MASTER PLAN

Draft Program EIR
PUBLIC MEETING







The 2020 *LA River Master Plan* study area traverses 18 jurisdictions. It is 2 miles wide and 51 miles long.

The County of Los Angeles has prepared a Draft Program Environmental \mpact Report lPE\R) to assess the potential environmental impacts o implementing the 2020 *LA River* Master Plan.

To access the Notice of Availability, and Draft PEIR and related documents, including the description of significant environmental effects and the identified hazardous waste sites within the study area, please visit pw.lacounty.gov/go/larmpceqa.

A public meeting on the Draft PEIR will be held to inform interested parties about the Draft PEIR's analysis of the Project and to gather input from interested persons and agencies on the content of the Draft PEIR.

Wednesday, March 3 2021
6 p.m. to 8 p.m.

Due to COVID-19, the public meeting will be held online. For registration and details, please visit pw.lacounty.gov/go/\armpceqa. Spanish translation will be provided.

Comments on the Draft PEIR are due March 18, 2020, which marks the end of the 45-day pub\ic review period. Please send comments in writing to the physical address or e-mail address shown below.

Grace Komjakraphan-Tek
Los Angeles County Public Works,
Stormwater Quality Division
900 South Fremont Avenue
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov



Mr. Vasken O. Hagopian
PO Box 39582
Los Angeles, CA 90039



EPD449

Stormwater
Quality

ATTN Grace K-TEK

L.A COUNTY PUBLIC WORKS
900 So. FREMONT AVE. 11th FLOOR
ALHAMBRA, CA. 91803

91803-133100

2/2021
I am objecting to the "online". I wish to attend in person
Please make that accomodation
Bruce Boyer

Public Works
LOS ANGELES COUNTY

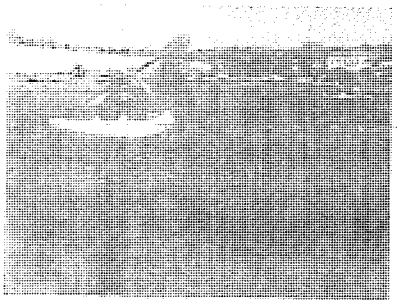
I22-1

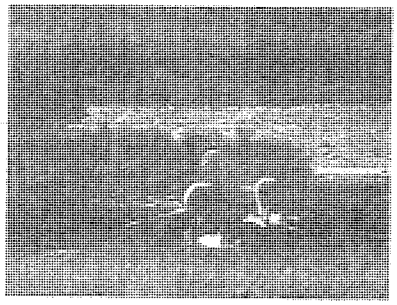
ATTN: GRACE KOMJAKRAPHAN-TEK
LA COUNTY PUBLIC WORKS, STORMWATER QUALITY DIVISION
900 SOUTH FREMONT AVENUE, 11TH FLOOR
ALHAMBRA, CA 91803
LARIVERCEQA@PW.LACOUNTY.GOV

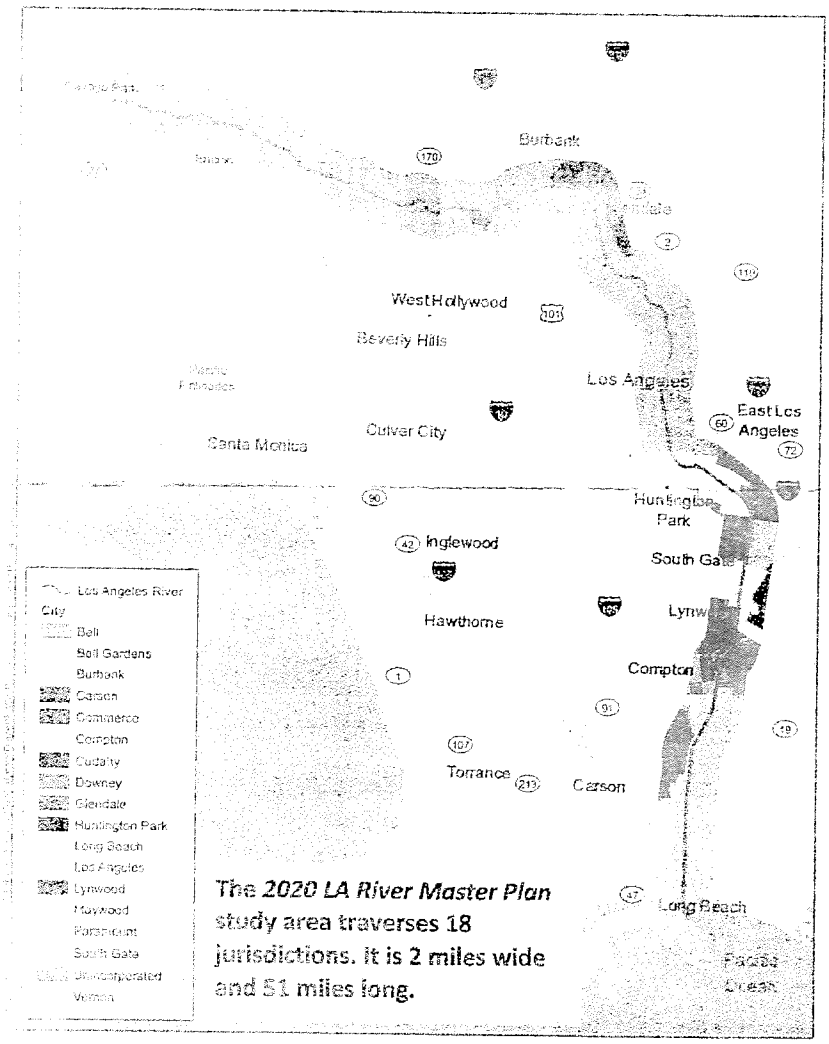
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BOYER,MARIANN A ET AL TRS M A BOYER TRUST C/O ERICKA BO
9450 ROWELL AVE
CHATSWORTH, CA 91311-7022

LA RIVER MASTER PLAN

Draft Program EIR
PUBLIC MEETING







The *2020 LA River Master Plan* study area traverses 18 jurisdictions. It is 2 miles wide and 51 miles long.

The County of Los Angeles has prepared a Draft Program Environmental Impact Report (PEIR) to assess the potential environmental impacts of implementing the *2020 LA River Master Plan*.

To access the Notice of Availability, and Draft PEIR and related documents, including the description of significant environmental effects and the identified hazardous waste sites within the study area, please visit pw.lacounty.gov/go/larmpceqa.

A public meeting on the Draft PEIR will be held to inform interested parties about the Draft PEIR's analysis of the Project and to gather input from interested persons and agencies on the content of the Draft PEIR.

Wednesday, March 3 2021
6 p.m. to 8 p.m.

Due to COVID-19, the public meeting will be held online. For registration and details, please visit pw.lacounty.gov/go/larmpceqa. Spanish translation will be provided.

Comments on the Draft PEIR are due March 18, 2020, which marks the end of the 45-day public review period. Please send comments in writing to the physical address or e-mail address shown below.

Grace Komjakraphan-Tek
Los Angeles County Public Works,
Stormwater Quality Division
900 South Fremont Avenue
Alhambra, CA 91803
LARiverCEQA@pw.lacounty.gov

LONE STAR
ALARM MONITORING
321 N. Maclay Avenue, Suite D
San Fernando, CA 91340

SANTA CLARITA CA 913
16 FEB 2021 PM 6 L



SWQD
464

LA County Public Works
Stormwater Quality Division
900 S. Fremont Ave 11th Floor
Alhambra, CA 91803

Attn: Grace Komjakva ~~Phone: 323-[illegible]~~

Ariana Villanueva

From: Robert Fox <xofbor@gmail.com>
Sent: Tuesday, March 2, 2021 3:55 PM
To: PW-LA River CEQA
Subject: "2020 LA River Master Plan PEIR Comments"

CAUTION: External Email. Proceed Responsibly.

To whom this may concern:

I live in Frame 8, right on the river in Vallheart Dr. in Studio City.

In Frame 8 I am concerned about the phrasing:

I23-1 The sections of the frame with a narrower right-of-way may require using the width of the channel **or *external land acquisition*** for projects of larger impact.

What does "external land acquisition" really mean?

Is LA County talking about eminent domain and purchasing people's homes to widen access to the river?

Ariana Villanueva

From: BRENT FISCHER <brentscfischer@me.com>
Sent: Tuesday, March 2, 2021 5:02 PM
To: PW-LA River CEQA
Subject: master plans

CAUTION: External Email. Proceed Responsibly.

I24-1 There's no sense on developing any part of the river if you don't remove vagrant tent cities first.

I live a half mile from the river and no one goes there because of the criminal element—these are not homeless, they are addicts who choose to take the supplies a gullible public gives to them, thinking they are helping get people back on their feet.

These tent cities are not going anywhere unless the city acts. Fail to act, and the number of tents will multiply exponentially.

Regards,

Brent Fischer
Grammy®-winning Producer, Composer, Arranger - www.BrentFischer.com
Director of the Clare Fischer Ensembles - www.ClareFischer.com
brentscfischer@me.com
+1 818 634 4419

Masterclasses available worldwide on Fischer harmonic and orchestration concepts via Zoom and Skype

Ariana Villanueva

From: teezegirl <teezegirl@aol.com>
Sent: Tuesday, March 2, 2021 6:07 PM
To: PW-LA River CEQA
Subject: Comments on the Draft PEIR—2020 LA River Master Plan

CAUTION: External Email. Proceed Responsibly.

Hi there,

I25-1 My name is Sheryl Avery and I live at 18109 Jaguar Court, Tarzana, CA 91335. My master bedroom and bathroom face city property, the Lindley Transfer Site, which is on the west side of Lindley Ave., about a block south of Victory Blvd. The LA River is immediately north of the Site.

I25-2 I am requesting that there be no changes to the area of the Site and wash, because any improvements would result in increased traffic on Lindley Ave., which is already extremely busy. In addition, there would be considerably more crime, debris, and noise for me and my neighbors.

I'm looking forward to the opportunity to make these comments at the online public meeting tomorrow night.

Sincerely,

Sheryl

Ariana Villanueva

From: Tilly (Good is Better) <tilly@goodisbetter.net>
Sent: Wednesday, March 3, 2021 6:27 PM
To: PW-LA River CEQA
Subject: PEIR vs Master Plan feedback?

CAUTION: External Email. Proceed Responsibly.

Hi there,

I26-1 Can you please explain the differences between commenting on the Master Plan in general and commenting on the PEIR? Who is the audience for each type of feedback? What are the conseuquence pathways for each? Which agencies/departments are responsible for each? What other comparisons/similarities are important for me to be aware of?

Thanks,
Tilly



Dr Tilly Hinton
Writer | Research Scholar | Floral Designer | Facilitator | Grants and Awards Wrangler | Cultural Producer | Impact Consultant

E tilly@goodisbetter.net **W** linktr.ee/tillyhinton
Us phone +1 323-536-7998
Au phone +61 7 5660 6759





Ariana Villanueva

From: teezegirl <teezegirl@aol.com>
Sent: Wednesday, March 3, 2021 6:54 PM
To: PW-LA River CEQA
Subject: Fw: Comments on the Draft PEIR—2020 LA River Master Plan

CAUTION: External Email. Proceed Responsibly.

I27-1 I've been on the virtual meeting, but I don't think I'll get a chance to speak. In addition to my comments below, I would like to see something done to reduce the flood risk from the LA River that's just north of my house. I've had to buy flood insurance for the 22 years that I've owned this house, because when it rains, the river sometimes fills up to the sides of the embankments. I'm sure that one of these days, it will overflow to my house.

Begin forwarded message:

On Tuesday, March 2, 2021, 6:06 PM, teezegirl <teezegirl@aol.com> wrote:

Hi there,

My name is Sheryl Avery and I live at 18109 Jaguar Court, Tarzana, CA 91335. My master bedroom and bathroom face city property, the Lindley Transfer Site, which is on the west side of Lindley Ave., about a block south of Victory Blvd. The LA River is immediately north of the Site.

I am requesting that there be no changes to the area of the Site and wash, because any improvements would result in increased traffic on Lindley Ave., which is already extremely busy. In addition, there would be considerably more crime, debris, and noise for me and my neighbors.

I'm looking forward to the opportunity to make these comments at the online public meeting tomorrow night.

Sincerely,

Sheryl

Ariana Villanueva

From: UTAW LAW <utawlaw@gmail.com>
Sent: Wednesday, March 3, 2021 9:12 PM
To: PW-LA River CEQA
Subject: LA River: More Plants, Less Concrete

CAUTION: External Email. Proceed Responsibly.

Hello,

I28-1 This comment is to voice support for returning the LA River area to a natural area.

Simply put, we al want more plants and nature and less concrete.

Thank you,

Greg Linton

Ariana Villanueva

From: Jessie Cowley <jessie.cowley.79@gmail.com>
Sent: Wednesday, March 3, 2021 9:41 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

Thank you for taking the time to make a plan to improve the LA River. I agree with the idea of making bike and pedestrian paths continuous all along the river.

The biggest priority for me would be to see the plan include the removal of the concrete at the bottom and sides of the river; make it into a real river again, please. It would be so much better for us to have a natural river in our city.

I29-1 My other priority is to see you take action to prevent low-income families from being displaced. Can you do something to prevent high-priced apartment buildings from going up all along the river? Can the river be made beautiful and accessible for the sake of the existing communities who live there? Don't let us be pushed out of our homes and communities by an over-abundance high-priced luxury housing, please.

Sincerely,

Jessie Cowley
6825 Alabama Ave #220
Canoga Park, CA 91303
(818) 416-6797

Ariana Villanueva

From: kikibo22 <kikibo22@gmail.com>
Sent: Wednesday, March 3, 2021 9:20 PM
To: PW-LA River CEQA
Subject: Regarding the important gentrification consideration

CAUTION: External Email. Proceed Responsibly.

I30-1

Great to see efforts to be more water independent, environmentally sustainable, etc. through storm water recapture, etc.

1 - ecological understanding of carrying capacity of good people to water ratio. I heard from YouTube video that LA is not just AT it's maximum hydrologic carrying capacity, but 1000% beyond!

2 - From E.S. 1.1.1 at the end regarding channelization, could include how the initial developments/properties were IN THE FLOODPLAIN to begin with, which is of course unfortunate and short-sighted. I'm not saying we can or should always predict Mother Nature's potentially undesirable actions on us, but when we CAN, like with better knowledge.. right?

Also, there's such an emphasis on indigenous voices being heard, which could effectively exclude technically/racially non-"indigenous", yet good, voices from being heard even though the latter voices are sometimes aligned with good (like environmentally sustainable) actions, which our collective consciousness tends to equate as always with "indigenous"

The FOLR website is a great resource, to learn more.

Good luck, in your challenging, often thankless position I imagine. Thank you 🙂

Environmental activist, urban-to-rural migration advocate,

Keshav Boddula

Ariana Villanueva

From: Ryan Conroy <ryanpconroy@gmail.com>
Sent: Thursday, March 4, 2021 9:38 AM
To: PW-LA River CEQA
Subject: LA River Master Plan Public Comments

CAUTION: External Email. Proceed Responsibly.

To whom it may concern:

I31-1

My name is Ryan Conroy, I am a resident of Los Angeles, near the Glendale Narrows portion of the Los Angeles River. I write in **enthusiastic support** of this Master Plan.

In my neighborhood, small interventions like benches, bike paths, and pedestrian bridges have allowed residents to appreciate the unique ecology of the Los Angeles River. Sunnynook Park, for example, is not a terribly large or expensive endeavor, but a treasured community resource nonetheless.

I am pleased to see that this proposal similarly celebrates the river for what it is today, and moves forward without attempting to undo the past. The platform parks, extending the usable recreation space over the channel itself, are an intelligent and efficient mode of natural engagement.

I applaud the restraint this team has shown in its design proposals, and the continual focus on the South LA community themselves.

I look forward to the adoption of this Master Plan and hope for its widespread implementation.

Ryan Conroy

Ariana Villanueva

From: Beachy 2004 <beachy2004@yahoo.com>
Sent: Thursday, March 4, 2021 10:05 AM
To: PW-LA River CEQA
Subject: public meeting

CAUTION: External Email. Proceed Responsibly.

I32-1 I want to complain about the Public Meeting held last night.
I can't believe thats many people who signed up did not show up to participate.
I was among the many who the moderator said was not there, when I WAS!!
I signed in as instructed, Neither my husband or I could even FIND a mute button.
I could not get the attention of the moderator to let her know I was there and wanted to speak.
I could not Raise My Hand!
There were countless names that were dismissed as I was- some Public Meeting It was not a matter of not having been to zoom meetings before- I have participated in many.
Sallie Neubauer

Ariana Villanueva

From: Richard Niederberg <ladesigners@gmail.com>
Sent: Thursday, March 4, 2021 11:16 AM
To: PW-LA River CEQA
Subject: River Master Plan

CAUTION: External Email. Proceed Responsibly.

I33-1 The most important element of the plan should be: unfettered access to all persons, whether they are pedestrians, cyclists or the unsheltered, but no portable housing or commercial enterprises allowed of any kind that could block the paths. Safe access for unpowered watercraft is also desirable as long as LA Public Works receives a fee and develops rules similar to the watercraft concession in Echo Park' lake and every vessel has a CA DMV-issued 'CF' number. All structural work should be performed with the advice and consent of the US Army Corps of Engineers.

/s/ Richard Niederberg
Studio City CA 91604
ladesigners@gmail.com

_____

Ariana Villanueva

From: John Samore, Jr <johnsamore@me.com>
Sent: Thursday, March 4, 2021 5:17 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

I34-1 Yesterday evening I spent two hours listening to the presentation and the comments. I found it most interesting. I raised my hand but was never selected. Therefore, near the end of the two hours I provided my comments via the "Chat". We were told by moderator that they would not be accepted. However, I left them anyway. She was super. I am glad we are being given this opportunity to provide our written comments.

I am a Certified Public Accountant (CPA) for over 45 years. I have been in LA and LA County all of my life. I grew up in South Central Los Angeles and went to public schools and graduated from USC. I worked for 32 years at Arthur Andersen, 11 as an employee and 22 as a partner.

There were comments about the risks and issues to consider. However, during the entire two hours, not one commenter raised the issue of cost and how it would be funded (e.g., local cities, county, CA and fed) and which individuals would pay for it (local cities, county, CA, and fed).

I think the 2020 LA River Master Plan is a good idea. It would make the area even more beautiful. However, the Plan needs to tell "We the People" the proposed cost over 25 years with along with all contingencies. A good example of contingencies is the "bullet train." It started off at $33 billion and is now at $70 billion. I did not vote for it because I did not think it was needed due to changes in business and social dealings resulting from technological changes such as "hoteling," telecommuting and others. Also, it was going to be even more expensive than the $33 billion as supported by the "Big Dig" in Boston. And how would the annual maintenance be paid for?

There are more issues regarding the "money" but I think "We the People" need to know and what their share of the costs will be.

Ariana Villanueva

From: Frias, Patricia <pxf4986@lausd.net>
Sent: Sunday, March 7, 2021 1:36 PM
To: PW-LA River CEQA
Subject: RE: 2020 LA River Master Plan Draft PEIR Comments

CAUTION: External Email. Proceed Responsibly.

I35-1 Good afternoon. My name is Patricia Frias (pxf4986@lausd.net) and I am one of the homeowners that will be dramatically impacted by the expansion of the 5 FWY through the LA River Master Plan; my home is on the map to be demolished (8703 Tweedy Lane, Downey, CA 90240.

I am not in favor of this plan for a majority of reasons, the most important one being that my house, that we have worked so hard to get, will be demolished!!!

I35-2 Secondly, I just previewed the "Environmental Report" and have many questions about it: 1) Why hasn't this report been sent out, emailed, and mailed to the homeowners that will be directly impacted by the expansion of the FWY 5 and FWY 605? Being on a website is NOT enough! This is not being transparent with the information and not equitable to the people that do not have Internet Access, technology skills, or do not speak English! How is this committee supposed to receive feedback from the people that this LA River Master Plan will be affected the most if information is not widely dispersed? But I guess that is the objective... to keep it in the down low so that people will not know about this. Do you believe that these residents are ignorant? Low to no education citizens? I will tell you right now, we are not! We are college level individuals who will fight for our home, our environment, and the air that we and our family's breath!

I35-3 Thirdly, the Environmental Report is incomplete! Where are the percentages of the scientists stating how much more air pollution will be added to the air with the expansion of the freeway? Where is the amount of greenhouse gas emissions that will be added to our community? The extra noise! And of course the most important topic of this report, "Land Use" and how many homes, including mine, will be destroyed in order to fulfill your objectives. Where was the information about all of this?

I35-4 Fourthly, the zoom ID and password were posted but not the day and time of the meeting? Was that just an oversite? C'mon! I'm sure that was not posted so that the community is not aware of this meeting. So when is the meeting? What time is the meeting? Why does Slide #6 say: "Involved Public Participation in the Planning Process" when you guys are not communicating to the community about these meetings?

I would like responses to all of my questions, especially about the "land use" required to accomplish these objectives. People are angry, they are upset, and they confused because they are ill-informed! And I don't blame them! Do your job... have a conscience, and inform the community that will be directly impacted by this Master Plan!

Sincerely,
Patricia Frias
pxf4986@lausd.net

Ariana Villanueva

From: e h <eloiselhess@gmail.com>
Sent: Sunday, March 7, 2021 1:58 PM
To: PW-LA River CEQA; Karen Barnett
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

Hi,

I36-1 My name's Eloise Hess and I am a tenant in Atwater Village and a member of Street Watch, a volunteer organization that connects housed and unhoused neighbors. I've been doing once or twice weekly resource distribution (meals, tents, tarps, sleeping bags, hygiene kits, harm reduction kits) and community power building with my unhoused neighbors living along the river since June. I was recently made aware of the LA River Master Plan and would like to submit my comment as an advocate for the houseless community living along the LA River, in particular those living in the Atwater Village area with whom I have gotten to develop close relationships. I am concerned by some of the language of the proposal. For instance, on page 197 it states, "the provision of permanent sanitation and hygiene facilities, coupled with a centralized set of guidelines for the management and clearing of encampments based on compassionate practices, when necessary, will ensure that the river corridor is a space where all people feel safe, have access to basic needs such as restrooms, and are treated with dignity." While permanent sanitation and hygiene facilities, if made accessible to the houseless, could benefit the houseless, across other city projects, such facilities have become sites of excessive policing and overall neglect. More concerningly, clearing encampments cannot be a compassionate practice. The shelter that is offered when an encampment is "cleared" is often overcrowded, unsafe, unsanitary, unsupportive, and riddled with punitive practices. Many who have been unhoused for a long time know this through experience and therefore do not accept such inadequate shelter when offered. So, clearing encampments typically leads to the loss of belongings (often irreplaceable belongings), the loss of community, separation from resources, and ultimately displacement to another location where they face being displaced again. How can clearing encampments be a compassionate practice? Moreover, the Gathering Pavillions on Los Feliz Blvd would necessitate "clearing" encampments, as at least 4 houseless folks currently live on the proposed sites. While some of the resources proposed, like restrooms, waste receptacles, water fountains, and charging stations have the potential to make the lives of the houseless significantly easier, the city should not assume what might benefit the houseless, they should ask them what resources they could benefit from. That is if anyone remains after this proposed "clearing". I would like the following questions to be addressed:

1. What does it mean to clear encampments based on compassionate practices?
2. What kind of shelter would be offered to a "cleared" community? By whom? What would be the consequences if someone does not accept the shelter offered?
3. What is your plan to seek public comment from the houseless community that would be affected? How will you implement their ideas and concerns? Will you work with any partner organizations to assist in this outreach?

Please email me with any questions.

Thank you,
Eloise

Ariana Villanueva

From: Lorna Paisley <lpaisley@sbcglobal.net>
Sent: Monday, March 8, 2021 9:39 AM
To: PW-LA River CEQA
Subject: 2020 LARiver Master Plan

CAUTION: External Email. Proceed Responsibly.

Dear Grace,

I37-1 I would like to voice support for the people who want gardens and plants and all things green along
the river.
I have been an environmentalist for years and know the importance of greenery and how it helps the
land, air, and soil. The plants should be native so we do not later have invasive species problems.
There are plants that take contaminants out of the soil like sunflowers that can be grown not only to
clean soil but feed and help birds and bees, and butterflies.
The earth is in serious trouble and the LA County public works needs to do everything it can to help
clean up and save the earth.
I heard one caller speak about all the garbage going down the river and ending up in the ocean. This is
a problem in the whole city and we need a new agency to catch those who litter/polluters and then fine them or better yet
make them pick up litter. I have talked to police about this and they claim to be too busy. I do not
believe that but arguing probably would get any of us no where. So make a new agency. I hear the fines for
not obeying this ordinance are large. The fines could pay for the agency possible.

Let's make LA County better. I came here from the Midwest 8 years ago and was amazed at the lack of care for
the environment and all the waste of water

Lorna Paisley
6952 Balboa Blvd
Lake Balboa, CA 91406
815-409-1187
Lpaisley@sbcglobal.net

Ariana Villanueva

From: Tilly (Good is Better) <tilly@goodisbetter.net>
Sent: Wednesday, March 10, 2021 2:22 PM
To: PW-LA River CEQA
Cc: Public Works-LA River; Grace Komjakraphan; firstdistrict@bos.lacounty.gov
Subject: 2020 LA River Master Plan PEIR

CAUTION: External Email. Proceed Responsibly.

Hi there,

I sent the below email a week ago and have not received a reply so I'm trying sending again. As I am currently preparing my comments for submission I would very much appreciate your assistance.

Also, some further questions:

I38-1
1. The hyperlinks don't work for me in the FAQ document: https://pw.lacounty.gov/swq/peir/doc/Updated-LARMP-PEIR-FAQs-en.pdf - could you send a version that has live links?

I38-2
2. What is the relationship between the Mater Plan and ARBOR/Alt 20? Is ARBOR still happening? If so, is it separate from the Plan, or do the few mentions of ARBOR initiatives in the plan mean that those elements are all that will remain?

I38-3
3. I note that "gentrification" is hardly mentioned in the Plan, it talks instead about displacement/housing affordability. Is there any background on that language use, is this a style preference in County documents or is there some other reason?

I38-4
4. What is the connection between Master Planning and the FEMA re-mapping of Atwater Village and surrounds flood risk that was being discussed pre-pandemic?

5. What procedural steps are followed for comments sent to the PEIR and the Master Plan? Does each written comment trigger a response from the County? Is this the case for both PEIR and the plan in general? Where are comments collated and are they public eventually? Is there any difference in the treatment by the County of Plan comments made via the website form, as compared to by email or letter or at one of the public meetings?
6. What happens if people submit the same comments to both comment processes (ie. or both the PEIR and the Plan itself)?

I38-5
7. It seems unusual to have triggered the CEQA process when the Master Plan is still in draft form. Is it usual to run both in parallel, and what happens if community input prompts an aspect of the Master Plan being dramatically reshaped? Or is this parallel processing mean that there will be no major changes made to the Draft Plan? Are there examples of other County planning documents going through CEQA whilst still in draft form?
8. And, repeating my question from March 3: Can you please explain the differences between commenting on the Master Plan in general and commenting on the PEIR? Who is the audience for each type of feedback? What are the consequence pathways for each? Which agencies/departments are responsible for each? What other comparisons/similarities are important for me to be aware of?

Thanks so much in anticipation of your guidance,
Tilly

From: Tilly (Good is Better) <tilly@goodisbetter.net>
Sent: Wednesday, March 3, 2021 6:27 PM
To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
Subject: PEIR vs Master Plan feedback?

Hi there,

Can you please explain the differences between commenting on the Master Plan in general and commenting on the PEIR? Who is the audience for each type of feedback? What are the consequence pathways for each? Which agencies/departments are responsible for each? What other comparisons/similarities are important for me to be aware of?

Thanks,
Tilly



Dr Tilly Hinton
Writer | Research Scholar | Floral Designer | Facilitator | Grants and Awards Wrangler | Cultural Producer | Impact Consultant

E tilly@goodisbetter.net **W** linktr.ee/tillyhinton
Us phone +1 323-536-7998
Au phone +61 7 5660 6759





Ariana Villanueva

From: Stephen F. Jones <sfjones@sfjones.com>
Sent: Thursday, March 11, 2021 1:19 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

To whom it may concern,

I have read through the report and while I am in agreement that the Master Plan needs to be updated since the 1996 Master plan and anticipate that after this is adopted it will probably be another 25 years until it is revisited to this extent, I believe there is a very important element that is missing in the report.

The comment I have is has there been any consideration for the air space above the river? And who is entitled to use it and how could it be used. I say this because since the river runs from the port of LA which is one of the largest in the west coast and runs through major metropolitan urban area as well as crossing major highways all the way to the valley, this would be a very good route for drone transportation. As the development of automated delivery systems, driverless cars and the like we must consider where air routes for package delivery via drones could occur in Los Angeles.

It seems to me that since 1 million people live within 1 mile of the river that it would be an ideal drone transportation route. It would be a relatively isolated drone flight paths that would otherwise occur over residential or commercial property that would have the potential of public objections for noise or the potential for dropped packages or disabled drones that would fall into the river as apposed to on property. Also the river drone path would be able to create helipad drop off sites along the river that could become an amenity to the rivers activity and potential business opportunities.

If this issue was not addressed in the report, then we will miss an opportunity for public comment for the next 25 years.

Thank you,

Stephen Jones

Stephen Francis Jones, AIA
Principal
SFJones Architects, Inc.
3105 Pacific Ave
Manhattan Beach, CA 90266
ph: 310 822 3822 x 150
cell:310-613-0111
www.sfjones.com

Ariana Villanueva

From: lang lrn <langlrn@yahoo.com>
Sent: Thursday, March 11, 2021 2:00 PM
To: PW-LA River CEQA
Subject: 2020 LA river Master PlanDraft+ PEIR Com-ments

CAUTION: External Email. Proceed Responsibly.

I40-1 I hope that Frank Ghery doesn't have anything to do with buildings on the LA River. I dislike his work intensely.

Please do not take decades complete the project.

Sincerely,

George Rubio
13602 Charlemagne Ave.
Bellflower, CA 90706

Ariana Villanueva

From: Avital Oehler <talyoehler@gmail.com>
Sent: Thursday, March 11, 2021 6:40 PM
To: PW-LA River CEQA
Subject: Draft LA River Master Plan - Comments

CAUTION: External Email. Proceed Responsibly.

The best part of the masterplan is that there is one! That plenty of resources and time and effort have been directed toward this landscape is wonderful.

I41-1 HOWEVER, In a recent zoom talk, Gehry said: "So, we thought if we can't get rid of the concrete, maybe we can cover it." But what isn't clear is why we can't get rid of the concrete. Is it possible that if we got rid of the concrete we wouldn't need to hire his firm and instead be consulting solely with ecologists, geologists and conservationists rather than architects? Also, in his plan he describes building platform parks "constructed on hulking concrete planks and enormous girders…" basically building parks and other structures on top of the river. I don't understand why we need to BUILD on top of a structure whose built-environment is THE PROBLEM! This is NOT a proper solution. It is a very expensive band-aid, at most! We need, instead, to focus on what is already there, and what has been stunted and drowned and caged by the concrete. We need to focus on the River, the water, the birds, and all of the people who live around it. We don't need massive platform parks and cultural centers that will only serve as the first signifier of gentrification that is sure to come from real estate opportunists. If we work to re-wild the river in parts that need it, and keep it wild in parts that already are, we are ensuring a future where the ecology of the wildlife and surrounding communities is the focus.

Just think of all the construction debris and toxic materials that will trickle (or maybe even be dumped) into the river while we build a massive park…

I think we have an incredible opportunity to truly change the course of history here, to atone for past sins of cultural and racial inequity. I urge you to please rethink this plan, and perhaps for once, truly shift the focus away from revenue and profit margins to a future that holds people and wildlife at its center.

Thank you for your time and I look forward to hearing more.

Return address:
Avital Oehler
620 N. Kenwood St., 209
Glendale, CA 91206

Avital Oehler
Website Instagram

Ariana Villanueva

From: glenn.claycomb@oselbooks.com
Sent: Friday, March 12, 2021 10:16 AM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

Please consider the following comments on the Draft 2020 LA River Master Plan PEIR:

I42-1 It appears that flood risk mapping has not been performed. The master plan and EIR cannot be considered complete until it has.

It appears that the well-being of adjacent impoverished communities is ignored in favor of increased development.

It appears that the intent of the plan is to use concrete to constrain the river to a particular channel and that a tunnel is proposed to shift flood risk from downtown to further downriver.

I42-2 It appears that serious consideration was not given to restoration of the floodplains through permeable surfaces, vegetation, and animal habitat.

There seem to be no anti-displacement measures to ensure protection for the impoverished communities currently living in the already at-risk floodplains.

Ariana Villanueva

From: Schuyler Johnson <production@pacificcanyonmedia.com>
Sent: Saturday, March 13, 2021 3:51 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan Comments

CAUTION: External Email. Proceed Responsibly.

Dear Grace Komjakraphan,

I think it's great that the County is interested in developing the LA river into a usable space for everyone to enjoy.

However...

I43-1 What I have seen with ALL projects around Los Angeles built to improve the lives of Angelinos and visitors is that they quickly become overrun by "the homeless". I live around the corner from the LA river bike path in Reseda. It is full of trash, broken glass, drug deals, and homeless people. I am a fit man and I feel nervous about being on the bike path because of the homeless. It's not surprising how few people in this densely populated area actually use this resource because of this. I would never allow any children or women in my family to traverse the area unaccompanied, even in the middle of the day. Venice beach is another perfect example of taxpayer money being spent on projects that are then taken over by the homeless. My friends and I used to go there regularly... now, never. It is just not enjoyable to deal with encampments, their garbage and other issues when I want to take my family or friends out for recreation.

The LA River project has the potential to become the world's largest homeless encampment. It just doesn't make any sense to start a project of this type until we have figured out some way to deal with the homeless issue, which, right now, is just getting worse and worse despite massive amounts of money being thrown at it.

I have lived in Los Angeles for over 35 years and I know real estate developers are foaming at the mouth with excitement over this plan that will bring vast riches to them and owners of land adjacent to this huge government project. I can just imagine the developer kick-backs to the government officials (as documented in the LA Times on other projects).
When it is done they will all be living in their gated communities, their children playing in private parks, counting their money while the rest of us try to figure out how to get the homeless encampments out of yet another public project so we can use it on our days off of work.

Bottom Line: LA is just not ready for this kind of project until the homeless crisis is solved. I hope it's become obvious by now, we can't "develop" our way out of the homeless crisis.

Schuyler Johnson
Reseda, CA

Ariana Villanueva

From: Monica Wyatt <monica.wyatt@verizon.net>
Sent: Thursday, March 18, 2021 4:41 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan Draft PEIR Comments

CAUTION: External Email. Proceed Responsibly.

I44-1 Thank you for the opportunity to comment on this LA River Master Plan. I would like to see the river left alone. It may be a concrete channel for much of its length, but it nourishes a whole lot of birds in the winter months. I birdwatch along the river from the 134 down to Fletcher; this has become a vibrant riparian area even if there is a lot of trash. I also birdwatch from Willow to 7th. The river is rather drab here, but there are lots and lots of birds. I'm not against park areas in the stretches where the birds don't congregate, but I don't want to see Frank Gehry anywhere near any LA River plan. I don't believe he has any understanding of Nature or regular folk.

And I don't want to hear anything about mitigation. Nature is way too complicated to mitigate. I challenge you to name one place that has been mitigated successfully. Take a look at Malibu Lagoon now; none of those so-called improvements are attractive now. And I don't think it's even been ten years since it was "restored." Estuaries are sort of mucky places; their job is to sustain wildlife not humans.

Please just leave the river alone.

Sincerely,
Monica Wyatt
2427 Centinela Ave. Apt. J
Santa Monica, CA 90405
(310) 450-8910

Ariana Villanueva

From: E L <emlacu@yahoo.com>
Sent: Friday, March 26, 2021 11:15 AM
To: PW-LA River CEQA
Subject: Information

CAUTION: External Email. Proceed Responsibly.

Hi LA River

I45-1 Is there a way to find out if my home is in the area for the project?
I've checked the map and it's not highlighted in color but is close to the small and big pink crosses.

Thanks
Elizabeth

Sent from my iPad

Ariana Villanueva

From: Shirley Otis-Green <Shirley@collaborativecaring.net>
Sent: Tuesday, March 30, 2021 6:38 PM
To: PW-LA River CEQA
Cc: samg5723@gmail.com
Subject: re: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Grace Komjakraphan-Tek

Thank you for the diligence with which you are addressing concerns that have been raised regarding the LA River Master Plan. I especially appreciated the recent webinar overview which gave us an opportunity to better understand the thoughtfulness with which you are exploring the various options for reconceptualizing our beloved river.

As homeowner near the river, avid equestrians, bike riders, bird watchers, and hikers – we are acutely conscious of the need to balance what can seem to be competing priorities in the reimagining of what the LA River might become. We so appreciate your understanding that horses need to be safely separated from other users and yet I believe that there is common ground, as most people indicated a wish for a beautiful and serene opportunity to engage safely with nature.

I46-1 Attention to safely connecting the various existing bike paths and equestrian trails to create options for longer routes would seem especially important to encourage people to exercise and invite more usage. And ensuring equitable access with pocket parks and areas for families to gather under trees (with bike racks and perhaps areas to secure horses separately) with educational info-graphic signage that helps people understand the various flora and fauna of the area would be an added bonus. Creating these periodic oases within our city along the river would add much needed green-space to our region.

Thank you for this chance to comment. We are eagerly looking forward to learning more and thank you in advance for keeping the community updated as progress on the revitalization of the river continues.

Gratefully,

Shirley Otis-Green and Sam Green

2003 West Riverside Drive, Burbank CA 91506
818-515-9230

Ariana Villanueva

From: Ash Kramer <ashleyckramer@gmail.com>
Sent: Wednesday, March 31, 2021 1:32 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

Hello LA River Master Plan team,

I wanted to comment on the 2020 LA River Master Plan PEIR.

I47-1

I am concerned with the claim that the proposed Project would have a less than significant impact on displacing a substantial number of existing people or housing.

> Impact 3.13(b): Would the proposed Project displace a substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere?
> Construction and Operation Typical Projects: Less than significant KOP Categories 1–6: Less than significant Overall 2020 LA River Master Plan Implementation: None required. Construction and Operation Typical Projects: Less than significant KOP Categories 1–6: Less than significant Overall 2020 LA River Master Plan Implementation: Construction and Operation Typical Projects: Less than significant KOP Categories 1–6: Less than significant Overall 2020 LA River Master Plan Implementation: less than significant
> (Executive Summary, p 119)

Currently, a substantial population of people live on the river, in the river, or adjacent to the river. It is simply incorrect to say that construction of new river projects would have less than a significant impact on the population already living there. I think it's crucial that part of the mitigation of these impacts be that housing is found and provided for the people displaced by the project, or that the project design include features that would allow the people already living in place to continue to live there with access to greater resources: water, restrooms, county-provided services.
It is not enough to say "services were offered" to someone experiencing homelessness and then remove them from a project location; which is what we've seen happen over and over again.

Given that you have noted that for objective 6 of the 2020 LA River Master Plan—Address potential adverse impacts on housing affordability and people experiencing homelessness—you are using a more capacious definition of "impacts" ("the use of "impacts" in objective 6 is distinct from the use of "impacts" under CEQA where, per State CEQA Guidelines Section 15358 (b), impacts analyzed under CEQA must be related to a physical change in the environment.") I think it's important to consider the extent to which any project will impact the people who currently live on the site and offer humane mitigation techniques.

Thank you,

Ash Kramer
Cypress Park

Ariana Villanueva

From: Jon Gerfen <gerfenjon2@gmail.com>
Sent: Friday, April 2, 2021 5:01 PM
To: PW-LA River CEQA
Subject: LA River Master Plan

CAUTION: External Email. Proceed Responsibly.

Ms. Komjakraphan-Tek

After receiving the county's correspondence regarding the L. River Master Plan I find it to be fatally lacking in several regards.

1) Tremendously over priced

2) Poorly designed

3) Completely unnecessary

Our neighborhood has been degraded by the existing L.A. River Bike Path which is a pathway for crime, arson, homelessness and theft. The lie that the bike path was going to be "secured" at dusk or during rainfall events has been evident since 2011, when this overpriced fiasco was opened. Your plan makes no consideration for the safety of our neighborhood (Corbin Ave to Tampa Ave). Now the county wants bring more homeless, more trash, and more crime into our neighborhood by connecting our neighborhood with known homeless population in the Sepulveda Basin. I48-1

Take care and fix the mess that has already been created and not spend any more of our taxes dollars on this foolish pipe dream of some misguided eco-fascists who think "they" know what is good for someone else's neighborhood. No doubt the money that would be wasted on this silly stupid idea could be better spent on repairing outdated and crumbling existing infrastructure, seismic safety upgrades, fire protection, public safety and homelessness. But alas, I fear the fix is in and this is yet another idea that will go astray with bureaucrats and politicians and big money doing what they want to anyway and anyone else be dammed, and then walk away.

Jon Gerfen
Reseda, Ca.

Public Records Act Request Form

certified mail

date: 3/9/2021

Public Records Officer LOS ANGELES PUBLIC WORKS
STORM WATER QUALITY DIVISION

City of ALHAMBRA CA 91803

Dear Records Officer, This is a request pursuant to state and federal public records act government code section 6250 et seq and federal 1304. 1305-1306 section 703 copies of the following documents requested.

-Insurance payouts
-forgotten bank accounts
-foreign investments
-bonds
-IRS or state tax refunds
-uncashed checks
-excess real estate taxes
-unlclaimed refunds
-stock dividends
-insurance policies
-undistributed retirement funds
-Lawyer trust account
-Interest income form deposit account
-Safe deposit accounts
- uncashed payrolls
-cashier checks
-vendor checks
-securities
-dividends
-security deposits
-intangible properties
-safe deposit box contents

Pleas let me know in advance if there is charge for copying these documents pursuant to govt. code 6256 your written response within ten days will be appreciated

Sincerely ANTONIO IVAN GOMEZ

THIS IS A RECORDATION OF NOTICE TO INTENT TO PRESERVE AN INTEREST IN PROPERTY OR SECURITIES) OR ANY YOU HELD CREATES A PRESUMPTION ON AFFECTING THE BURDEN OF PROOF OF THAT THE OWNER WHO CLAIMS THE INTEREST HAS NO ABANDONED IN DOESN'T INTEND TO ABANDON THE INTEREST

IS A FRAUD MISUSING THIS INFORMATION MISSLEGRESENTATION IMPERSONATION CONSPIRACY

TITLE 18 (17) 63 (1363

RULE 301 ET 301.01
ET Section 203.01. (3) (4)

To Whom it may concern,
I Antonio Juan Gomez am the Beneficiary altogether with all the improvements on the property and all easements. Rights *opportunities rents royalties*, mineral oil and Gas Rights as well as profits. Water, Water rights and Water stock and also all fixtures now or hereafter attached to the property. Rights of Public over any portion of said lying within the boundaries of any road, street or highway.

Easements for the purposes pipelines etc. Water rights claims or title to water unattended mining claims.
Acts authorizing the issuance there of water claims or title water abstract the outer continental shelf (ocs) Lands act as amended. (43 usc.) 1331 et seq and 43

CIVIL CODE (880 310) (880-370) (c) (b) (b)(1)
WE DON'T GIVE UP ANY RIGHTS. WE DON'T WANT TO ESCHEAT TO GENERAL FUND - WE DON'T WANT TO FORFEITURE NEVER
I.M SAID RACIAL INJUSTICE NEVER AGAIN

MC-030

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):	FOR COURT USE ONLY
TELEPHONE NO.: FAX NO. (Optional): E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name):	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS: MAILING ADDRESS: CITY AND ZIP CODE: BRANCH NAME:	
PLAINTIFF/PETITIONER: DEFENDANT/RESPONDENT:	
DECLARATION	CASE NUMBER:

ANTONIO T GOMEZ AND FAMILY MEMBERS (SUSANA ALVIZO) (ANGEL DIAZ) (UNSTANDARD

WE CALL THE UNANIMOUS OF THE DECLARATION OF INDEPENDENCE UNITED STATES OF AMERICA WHEN THE COURSE OF HUMAN EVENTS IT BECOMES NECESSARY FOR ONE PEOPLE TO DISSOLVE THE POLITICAL BANDS WICH HAVE CONECTED THEM WITH ANOTHER. AND TO ASSUME AMONG THE POWERS OF THE EARTH THE SEPARATE AND EQUAL STATION TO WICH THE LAWS OF NATURE AND NATURE'S GOD ENTITLE THEM A DECENT RESPECT TO THE OPINIONS OF MANKIND. REQUIRED THAT THEY SHOULD THE CAUSES WICH IMPEL THEM TO THE SEPARATION. WE HOLD THESE TRUTHS TO BE SELF EVIDENT THAT MEN ARE CREATED EQUAL, THAT THEY ARE ENDOWED BY THEIR CREATOR WITH CERTAIN UNALIENABLE RIGHTS THAT AMONG THESE ARE LIBERTY AND THE PURSUIT OF HAPPINESS

WE PURSUING THE DECLARATION OF INDEPENDENCE WE SOLEMNLY PURSUIT AND DECLARE THE RIGHT TO BE FREE FROM FORCE COERCION THREAT OR FORCE OR FRAUD INITIATED AGAINST ANY INDIVIDUAL FOR ANY REASONS BY ANY INDIVIDUAL FEDERAL STATE AND LOCAL GOVERNMENT GROUP OF INDIVIDUAL OR SOCIETIES INITIATION FORCE FRAUD COERCION, CONSPIRING, INTIMIDATING, DECEIVING IMPOSING TAXES ON US WITHOUT OUR CONSENT TRESPASSING, MY PENALTY FOR CUTTING OFF OUR TRADE WITH ALL PARTS OF THE WORLD STEALING OUR LAND OUR WATER RIGHTS AND MINERAL RIGHTS OUR ASSET

WE RESERT STOP PROHIBIT ANY ONE TO TRY TO ACT IN OUR BEHALF. WE WANT TO STOP AND PAYMENT TO ANY AGENCIES. WE WANT TO STOP IRS FROM TO STOP ANY PAYMENT TO ANY THING ANY OF AND ONE TO TRY TO ACT IN OUR BEHALF STOP THE FEDERAL STATE AND LOCAL GOVERNMENT TO TRYING TO COLECT ANYTHING THAT BELONG TO MY FAMILY MEMBERS

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(TYPE OR PRINT NAME)

(SIGNATURE OF DECLARANT)

☐ Attorney for ☐ Plaintiff ☐ Petitioner ☐ Defendant
☐ Respondent ☐ Other (Specify):

MC-030

ATTORNEY OR PARTY WITHOUT ATTORNEY *(Name, State Bar number, and address):*	*FOR COURT USE ONLY*
TELEPHONE NO.: FAX NO. *(Optional):* *E-MAIL ADDRESS (Optional):* ATTORNEY FOR *(Name):*	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS: MAILING ADDRESS: CITY AND ZIP CODE: BRANCH NAME:	
PLAINTIFF/PETITIONER: DEFENDANT/RESPONDENT:	
DECLARATION	CASE NUMBER:

THE DELEGATES OF THE CONSTITUTIONAL CONVENTION IN 1787 IS CALLED THE SUPREME LAW BECAUSE OF THE STATE CONSTITUTION AND BOTH FEDERAL AND STATE LAWS CANNOT VIOLATE THE US CONSTITUTION

AND SUPPORT OF THIS DECLARATION WITH A FIRM RELIANCE ON THE PROTECTION OF OUR RIGHTS TO SECURE THIS RIGHTS GOVERNMENT ARE INSTITUTED AMONG MEN. DERIVING THEIR JUST POWERS FROM THE CONSENT OF THE GOVERNED THAT WHENEVER ANY FORM OF GOVERNMENT BECOMES DESTRUCTIVE OF THESE ENDS, IT IS THE RIGHT OF THE PEOPLE TO ALTER OR TO ABOLISH IT AND TO INSTITUTE NEW GOVERNMENT LAYING ITS FOUNDATION ON SUCH PRINCIPLES, BUT WHEN ALONG TRAIN OF ABUSES AND USURPATIONS PURSUING INVARIABLE THE SAME OBJECT EVINCES A DESIGN TO REDUCE THEM UNDER ABSOLUTE DESPOTISM IS OUR RIGHT IS OUR DUTY TO THROW OFF SUCH EVIL GOVERNMENT SO WE WANT TO OBJECT TO ABOLISH THIS KIND OF ABUSING OF POWER OF GOVERNMENT WE RESPECT THEM TO COLLECT ANY PENNY FROM MY FAMILY MEMBERS

THE UNITED STATES SUPREME COURT WAS MEANT TO FUNCTION AS A PRINCIPLED APOLITICAL BODY DESIGNED TO PROTECT INDIVIDUAL AND PROPERTY RIGHTS WE WANT TO DISSOLVE REVOKE ANY UNLAWFUL GENERAL PARTNERSHIP FROM ANY COMPANY AGENCY OF GOVERNMENT CENTRO REGIONAL MEDICAL, PREMIUM HEALTH FRESNO SSA-1545 SIMAS HOSPITAL CLINICS UNION SECURITY AIDS ANY OPERATIVE AND CRIMINAL CONTRACT WITHIN MAIL CODES PERSONS FIRMS ATTORNEY DEP. MEDICARE INSURANCE THIS IS CALL UNLAWFUL ASSISTANCE DOCUMENT IN IS A FRAUD

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(TYPE OR PRINT NAME)

(SIGNATURE OF DECLARANT)

☐ Attorney for ☐ Plaintiff ☐ Petitioner ☐ Defendant
☐ Respondent ☐ Other *(Specify):*

MC-030

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS: MAILING ADDRESS: CITY AND ZIP CODE: BRANCH NAME:	
PLAINTIFF/PETITIONER: DEFENDANT/RESPONDENT:	
DECLARATION	CASE NUMBER:

I WANT TO REVOKE OR REJECT ANY INSTRUMENTS OR ANY LEGAL PAPER THAT HAVE BEEN SIGNED IN BLANK AND POWER ATTORNEY ANY CORPORATE OFFICER PARTNER ADMINISTRATOR OR TRUSTEE TRYING OR ACTING IN OUR BEHALF. SOLICITING FUNDS. GETTIN A LOAN CLAIMING A REAL PROPERTY. PERSONAL PROPERTY. ANY SECURITIES. ANY ROYALITIES ANY INTERESST TAX. ANY UNCLAIMED PROPERTY. ANY STOCK. BONDS. INSURANCE CLAIMS. ANY WATER OIL GAS. LAND. FARMS WINE. FISH ANYTHIN THAT BELONG TO MY FAMILY MEMBERS WE WANT TO STOP. AGING. IHSS IRS SSA. CDC, CENTRO REGIONAL, MEDICAL HEATH PREMIUM, FEDERAL STATE IN LOCAL GOVERMENT ANY GENERAL PARTNERSHIP. ANY POLITICAL PARTY. ANY ORGANIZATION. COMPANY. UNIONS SCHOOLS HOSPITALS, CHARITIES CHURCHES ANY PERSON THIRD PARTY FEDEX ANY TAX ACCOUNT OF (including MEDICAL MEDICARE, IS YOU DO. YOU WILL ACCOUNTABLE FOR FRAUD CONSPIRACY. FOR INJURING PERSONS PROPERTIES. A PERSON. WE DON'T GIVE YOU ANY POWER TO ACT IN OUR BEHALF. If MY FAMILY MEMBERS SIGN ANYTHING DOESN'T MEAN THEY GIVE YOU A POWER. BECAUSE THEY DON'T KNOW ENGLISH. AND YOU DON TELL THEM THE TRUE If YOU CONSPIRING OR HELPING TO INJURE, OR HARM, YOU ARE COMMITTING A CRIME BY USING ANY OMMISSION I CERTIFY THAT I HAVE THE AUTHORITY TO EXECUTE THIS FORM

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

ANTONIO JUAN GOMEZ
SUSANA ALVIZO HUANO
ARIEL DIAZ
CHRISTIAN DIAZ

(TYPE OR PRINT NAME) (SIGNATURE OF DECLARANT)

☐ Attorney for ☐ Plaintiff ☐ Petitioner ☐ Defendant
☐ Respondent ☐ Other (Specify):

MC-030

ATTORNEY OR PARTY WITHOUT ATTORNEY *(Name, State Bar number, and address)*:	*FOR COURT USE ONLY*
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PLAINTIFF/PETITIONER: DEFENDANT/RESPONDENT:	
DECLARATION	CASE NUMBER:

WE RESTRICT OBJECT PROHIBIT. RESTRAIN. BLOCKING FEDERAL, STATE AND LOCAL GOVERNMENT FROM GETTING DECEIT CHEAT USING ANY ASSET, TO COLLECT TO SELL TO ACT IN OUR BEHALF WE DON'T AND NEVER GRANT NO POWER, DISSOLVE ANY GENERAL PARTERNSHIP IF YOU HELD ANY MONEY DOESN'T BELONGS TO YOU IS AN EMBEZZMENT.

FOR THOSE WHOM ARE DRAFTING LEGAL FORM. INSTRUMENTS OR GIVEN LEGAL ADVICE IN ORDER TO DECEIT STEAL IS A FRAUD. LAW FIRMS ATTORNEY AT LAW OR CREATING CHEATING LAWS TO DECEIT VALVE PRODUCERS YOU WILL BE CHARGED FOR CLAIM FOR ASSISTANCE DOCUMENT OR ON LANGUAGE ASSISTANCE ADVICE JUDGES COURTS MASTERS MINDS YOU WILL BE ACCOUNTABLE FOR CONSPIRING TO HELPING TO CREDIT A FRAUD. TO INJURY PEOPLES PEOPLES PROPERTY

WE EXERCISE OUR RIGHTS UNDER CIVIL RIGHTS 1870. UNDER OUR CONSTITUTIONAL RIGHTS WE RULE THE FEDERAL LAW. STATE. DON'T PROTECT PEOPLES' RIGHTS AND PROPERTIE RIGHTS UNDER CLAYTON ACT UNDER SHERMAN LAW NO FEDERAL - NO STATE NO LOCAL GOVERNMENT CAN VIOLATE THE CONSTITUTION. UNDER THE CALL OF INDEPENDENCE

NO ONE IS ON TOP OF THE LAW

DEFINITION OF CAPITALISM. IS A ECONOMIC SYSTEM CHARACTERIZED BY PRIVATE OWNERSHIP OF CAPITAL GOODS AND BY INVESTMENTS THAT ARE DETERMINED BY MY PRIVATE DECISION THE MAN WHO RUNS THE GREEN COMPANY

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(TYPE OR PRINT NAME)

(SIGNATURE OF DECLARANT)

☐ Attorney for ☐ Plaintiff ☐ Petitioner ☐ Defendant
☐ Respondent ☐ Other *(Specify)*:

MC-030

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PLAINTIFF/PETITIONER: DEFENDANT/RESPONDENT:	
DECLARATION	CASE NUMBER:

GOLDEN HELMET CONTINUALLY EXPAND NO ONLY SECIETHL VALUES AND PRODUCTIVE JOBS BUT ACTUAL TAKE LEVERAGES THE ONLY REAL VALUE NOT HUMAN BEING WAS TO GIVEN SOCIETY IS ALSO HIS RATIONAL THOUGH TIME IN EFFORT NO ONE CAN GIVE MORE THAN GOLDEN HELMET " THA GIFT CAN BE MULTIPLIED INTO HIGHLY LEVERAGED TANGIBLE VALUES THAT GREATLY BENEFIT EVERYONE OR ANYTIME THAT CONTRIBUTING INDIVIDUAL, RAN WITHDRAW AT ANYTIME MAXIMUM VALUE PRODUCTION TO DIMINISH OR ENDS THESE GOLDEN HELMET AT THE POINT THE NEWLY ENRICHED INDIVIDUAL MUST DIRECTLY SUPPORT SOCIETY BY PAYING TAXES
THE RADICAL BENEFICIES OF QUANTUM SEPARATION (NO TRANSITION) BETWEEN THE LEGISLATIVE EJECTIVE AND INDIVIDUAL BRANCHES OF GOVERNMENT THE UNITED STATES OF GOVERNMENT MONTESQUIEN INDENTIFIED THE NO TRANSITION QUANTUM SEPARATION BETWEEN CERTAIN SOCIETIES CULTURES AND CIVILIZATION FREE ENTERPRISE INDIVIDUAL PROPERTY RIGHTS ENTREPRENEUR CREATING JOBS A BUSINESS CONTROLLING SYSTEM NEED'S NO EXTERNAL AUTHORITY WOLD MATTER IS A SOVEREIGN WHO ALONE IS RESPONSIBLE FOR HIS OR HER OF LIFE GOVERNMENT FORCED DISTRIBUTION OF WEALTH IN FACT GOVERNMENT FORCED TAKED WEALTH REDISTRIBUTIONS ARE OBJECTIVE CRIME CRIMINAL ACT OF THEFT INDIVIDUAL RIGHTS AND OBJECTIVE RAW ARE WHAT BRING PROSPERITY THOSE WHO ARE ACTING EVIL PIPS DISHONEST LAWYERS THOSE ARE HACKING MANIPULATING OUR SYSTEM PUNISHED BRIVING TO COURT FOR BREAKING OBJECTIVE LAW AND WILL BE UNDER PERJURY HONEST OATH TELL THEIR LYING THEIR FRAUD THEY DID IN ORDER TO STEAL TO THE VALUE PRODUCER

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(TYPE OR PRINT NAME) (SIGNATURE OF DECLARANT)

☐ Attorney for ☐ Plaintiff ☐ Petitioner ☐ Defendant
☐ Respondent ☐ Other *(Specify)*:

MC-030

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PLAINTIFF/PETITIONER: DEFENDANT/RESPONDENT:	
DECLARATION	CASE NUMBER:

WE EXERCISING OUR RIGHTS A) UNPATENTED MINING CLAIMS

MINERAL RIGHTS OIL GAS WATER MINE GOLD SILVER ROYALTIES LANDS. SECURITIES STOCKS. SALMON REAL PROPERTY PERSONAL PROPERTY TANGIBLE UNTANGIBLE. FARMS FOOD LAND'S WINE TAX INTEREST. BONDS LIGHTING STOCKS RENT LEASE ETC

B) RESERVATIONS OR EXCEPTIONS IN PATENTS OR IN ACTS AUTHORIZING THE ISSUANCE

C) WATER RIGHTS. CLAIMS OR TITLE TO WATER. AND MINERAL RIGHTS AND EASE

1) WHETHER OR NOT RECORD IN THE PUBLIC RECORDS OR AGREED TO BY THE INSURED CLAIMANT AT DATE POLICY BUT CREATED SUFFERED ASSUMED BY THE INSURED CLAIMANT .PATENT- COPY RIGHTS OF FREE MARKET

2) NOT KNOW TO THE COMPANY NOT TO RECORDED INTHA PUBIC RECORDS AT DATE OF POLICY BUT KNOWN TO THE INSURED CLAIMANT AND NOT DISCLOSED IN WRITING TO THE COMPANY BY THE INSURED CLAIMANT PRIOR TO THE DATE THE INSURED CLAIMANT BECAME AN INSURED UNDER THIS POLICY

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(TYPE OR PRINT NAME)

(SIGNATURE OF DECLARANT)

☐ Attorney for ☐ Plaintiff ☐ Petitioner ☐ Defendant
☐ Respondent ☐ Other *(Specify)*:

MC-030

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS: MAILING ADDRESS: CITY AND ZIP CODE: BRANCH NAME:	
PLAINTIFF/PETITIONER: DEFENDANT/RESPONDENT:	
DECLARATION	CASE NUMBER:

TRADEMARK RIGHTS

U.S PATENT AND TRADE MARK OFFICE

I WANT GET TRADEMARK PROTECTION FOR THE NAME FREE MARKET FREE ENTERPRIZES TRADE MARKS ARE GRANTED FOR GEOGRAPHIC NAMES NAMES IN ASSOCIATION WITH SPECIFIC PRODUCTS AND SERVICES WITH THE FREE MARKET IN WICH I AM THE RIGHT THE OWNER THE TRADE FREE MARKET I WOULD DEMAND FOR LICENSING FEES TO SHOW OR USE OR FIGURES OR FACE OR BODY OR A PERSON LICENSING OR INTELLECTUAL PROPERTY AND ADVERTISING SERVICES AFTER FIVE YEARS OR CONTINUES USE IN THE MARKET PLACE THE TRADE MARKED OFFICE GRANTED DUBIOUS TRADE MARKS IN DEMANDING THE T.V. RADIO. FILM MAKER TELEVISION PRODUCERS AND OTHER ARTIST PAY LICENSING FEES FOR THE USE GOOD OF SERVICES

EXERCISING OUR RIGHTS UNDER PROTECTION CAUSE RIGHT 1870. UPPER RECOGNIZING THE CRAYTON ACT. UNDER MY CONSTITUTIONAL RIGHTS UNDER MY FEDERAL RIGHTS UNDER TITLE IX UNDER TITLE 18 (1) (63) (1363) FRAUD IN INTERNET

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(TYPE OR PRINT NAME)

(SIGNATURE OF DECLARANT)

☐ Attorney for ☐ Plaintiff ☐ Petitioner ☐ Defendant
☐ Respondent ☐ Other *(Specify)*:

DEFINITION OF A NON SEQUITUR IS
A STATEMENT DOESN'T FOLLOW LOGICALLY
FROM ANYTHING PREVIOUSLY SAID
THE NON SEQUITUR IS A PRIME CHEATING TOOL
OF THE MASTER CHEATING.
FULL UNDERSTANDING OF THE POWER NON SEQUITUR.
BANKS. POLITICS. BUROCRATAS. ORGANIZATION UNIONS
LAWYERS OR ATTORNEYS AT LAW. FIRMS. GOV. AGENCYS.
ALL OF THEM WITH NON SEQUITURS CHEATERS
DOCTRINES THAT TRICKED ORDINARY MAN AND WOMEN
BUT IM HUNTING CHEATERS CROOKED'S CONSPIRACY
TO BRING IN PUBLIC AND PUTTING BEHIND BARS.
THAT'S IS THAT THIS KIND PEOPLES DESERVE. THAT
THE WHITE-COLLAR HOAX WORKS HAND AND HAND.
WITH THE POLITICAL HOAX CONTROLLING THE MONIES
AND SUPRESSING THE WORKING CLASS THE ORDINARY
MAN AND WOMEN

IT IS A VIOLATION OF TITLE 9 DESCRIMINATION

I DON'T GRANT NO PERMISSION. NO ANY DONATION
ANY POWER AND NEVER WILL TO. ANY OF 50
STATES O ANY COUNTY'S ANY CITY'S ANY FEDERAL
AGENCIES ANY STATE OR FEDERAL GOVERNMENT
MUNICIPAL OR LOCAL NO ORGANIZATION NO CHURCHES
ANY ONE. TO WANTS. TO USE THE COURT USING.
CORRUPTION OR CROKED. JUDGES. OR BAD ELEMENTS. OR
ANY SECTION. TO DECEIT INOCENT PEOPLE THIS UNLAWFUL
DETAINER ASSISTANCE
IM SUPPORT ONLY THE ARMY IF DOES THE RIGHT.
NO CONSPIRY. PROTECT - THE CONSTITUTION. PROTECT TO PERSONS
PERSONS PROPERTY, AND BRING BAD ELEMENTS OF THE
GOVERNMENT, OR ANY ONE. PUT AT JAIL IF THEY BREAK THE LAW
AND ENFORCE TOP TO DF LAW

Legal Exhibit

Ego-"Justice" Terminator

Objective Law Must be Upheld

This Legal Exhibit demands that objective law be upheld by all officers of the court. Attach this Exhibit to all motions, legal documents, correspondence used in any local, state, or federal jurisdiction.

This Legal Exhibit Demands the Termination of:

1. Subjective, Political-Agenda Laws
2. Ego "Justice"

Upon receipt of this Legal Exhibit, under penalty of job termination, judges as well as prosecutors and lawyers must reject *all* forms of subjective, political-agenda law and ego "justice". Those officers of the court must henceforth practice only objective law.

Subjective Laws include political-agenda laws conjured up by politicians and bureaucrats to gain self-serving benefits, false egos, and unearned power. Enforcement of political-agenda laws requires the use of force and armed bureaucrats against innocent people.

Objective Laws are not conjured up by politicians or bureaucrats. Instead, like the laws of physics, they arise from *the immutable laws of nature*. Such laws are valid, benefit everyone, and advance society. Objective laws are based on the moral prohibition of initiatory force, threats of force, and fraud.

Ego "Justice" is the use of subjective, political-agenda laws to gain harmful livelihoods and feel false importance. Ego "justice" is the survival tool of many harmful politicians, lawyers, and judges.

Benefit-of-the-Doubt Clause

Except for the most egregious offenders, this Legal Exhibit presents an opportunity for officers of the court to amend their past errors of supporting subjective law and using ego "justice".

Citizens should always try to serve as jurors on political-"crime" trials...and *always* vote "not guilty."

Each officer must henceforth uphold objective law and reject ego "justice" along with its gun-backed, political-agenda laws and enforcements.

Purpose of this Legal Exhibit

1. To inform officers of the court that practicing ego "justice" and using threats, force, fines, guns, and jails to enforce political-agenda laws are serious, objective crimes that must eventually be prosecuted.

2. To inform officers of the court that they are henceforth fully responsible for upholding objective law and rejecting ego "justice".

ORDER

Render criminal penalties *only* against those violating objective laws in committing objective crimes. Objective crimes occur only upon the initiation of force or fraud against individuals and their property. Such crimes include murder, rape, assault, robbery, fraud. Those crimes also include *all* ego-"justice" frauds. Such criminal frauds encompass gun-backed threats, gun-backed assaults, gun-backed pillagings, and gun-backed false imprisonments executed by armed bureaucracies enforcing political-agenda laws. Also, the illegal, political weapons of RICO and seizure laws are increasingly used against innocent people. ...All such political-agenda and ego-"justice" crimes are terminated by enforcing *objective* law.

After receipt of this Legal Exhibit, any officer of the court who commits such crimes of ego "justice" and judicial fraud will eventually be identified, prosecuted, and have his or her harmful career terminated. And, through objective justice, court officers guilty of those serious crimes must pay restitution to their victims.

NOTICE:

This Legal Exhibit is not copyrighted — attaching to all legal documents. This ... for use in jurisdictions worldwide.

Ariana Villanueva

From: VERONICA ANN VILLEGAS <vvillegas@ucla.edu>
Sent: Friday, April 30, 2021 9:49 AM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

Dear LA County Public Works:

I am an Angeleno who loves the LA River and cares about its future being as verdant and vibrant as possible. The County's LA River Master Plan Update is a once in a generation opportunity to provide creative solutions to improve our communities, the river, and the County of Los Angeles.

I have concerns over the Plan as it stands, and wish to see the following improvements:

I50-1 **Environmental Impact:** As it stands many environmental impacts have been alluded to in the Environmental Impact Report, however it is still unknown the true effects of some of the proposed structures--such as platform parks. I cannot find any measurable research on platform parks, however the Environmental Impact Report named possible impacts on fish species and species who live in the river. This type of park will cut off the river from what little natural resources it has, particularly the sun. As an alternative, brown fields along the river can be transformed into parks and be a more environmentally and economically feasible solution. The Plan has identified contaminated areas along the River but has not prioritized them as opportunity sites. Restoring these lands must be a high priority for the County, as a means to delivering environmental justice.

I50-2 Another solution to improving the environmental health of the river is to embrace a naturalized river. Bypass tunnels would help alleviate flooding, if that's the main deterrent to naturalization. We should not ignore the robust community outreach among plans before this one that demonstrate the feasibility and popularity of concrete removal, channel widening, and habitat restoration to foster a resilient Los Angeles. We can naturalize the LA River and mitigate flood risk. This Plan should seriously embrace these options instead of dismissing them.

I50-3 The city is two years behind its proposed pollution goal. This is a prime opportunity to create projects to reach those goals, such as creating: wetlands, rain gardens and ponds. Measure W can fund these projects.

This plan lacks measurable goals for ecosystem improvement and progress for water quality goals.

Health Impact: This plan lacks improvement to the water's quality. How do you expect the population to play near potentially toxic water? It needs to first be improved.

I50-4 **Social Impact:** With creating attractive green space there increases the potential for gentrification. River-adjacent communities have long demanded community-driven restoration and park access to the LA River. Implementing major park construction in low and extremely low-income communities poses a threat that current residents will be displaced by new projects. The County must invest heavily in anti-displacement programs and policies, AND implement them **before** any project construction is underway.

I50-5 **Community Participation:** I hope to see that the People drive this plan. Given the lack of clarity and prioritization in this plan, I hope the priorities listed above are seriously considered and a robust implementation plan is outlined that includes community involvement as projects roll out.

With the amount of money necessary for a platform park we could afford to remediate lands, prepare for climate change, and stem the tide of displacement in river-adjacent communities.

Thank you for taking the time to read my comment letter. As a community member, these are issues that are important to me and are not reflected in this Plan. I am calling on you as my elected County representative to instruct the County Public Works to take bold action in the face of the opportunity at hand.

Thank you,
Veronica Villegas

Grace Komjakraphan

From: Albert Alfasso <aalfasso@gmail.com>
Sent: Tuesday, May 4, 2021 11:33 AM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

I51-1 As a frequent bike rider, Safety and Security should be a priority. Increasingly, the bike paths are used as open space for the un-housed to live on. Those of us who want to use the paths for their intended purpose, feel unsafe and choose to go elsewhere, spending our dollars elsewhere.

Grace Komjakraphan

From: Les Hew <lthew1@yahoo.com>
Sent: Tuesday, May 4, 2021 11:50 AM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

Hello,

Thank you for allowing public comment on the river master plan.

First of all, I would like to say these projects sound very interesting and offer potential recreation and open space opportunities. Many of us would like to see such features along the L.A. River. However, with every change there is an effect as you well know and all must be addressed, positive and negative.

I52-1 The one I am most concerned about is the impact to the city residents as more wildlife habitat is expanded. As you probably know, the urban coyote is a big and growing problem for pet and public safety. Thousands of pets are killed each year in L.A. County due to lack of wildlife management. Bites on humans are on the rise also. I would like to see the Department of Fish and Wildlife weigh in on this PEIR more heavily. We need the wildlife biologists to tell us the whole picture of how habitat disruption will affect those in the cities that border the river and beyond. Has anyone on the river project considered this and what are their thoughts?

Thank you for your time and consideration,

Theresa Hew
Long Beach resident

Grace Komjakraphan

From: Rosemary Leibowitz <rleibowi@sbcglobal.net>
Sent: Tuesday, May 4, 2021 12:17 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

I53-1 I am very disappointed that the plan gives no opportunity to remove some concrete and allow water to soak into the soil. I have read the reasons but still feel that there could be more soft bottom. WE NEED THE WATER.

Rose Leibowitz
12050 Valleyheart Drive #303
Studio City

Get Outlook for iOS

Ariana Villanueva

From: E L <emlacu@yahoo.com>
Sent: Thursday, May 6, 2021 2:35 PM
To: PW-LA River CEQA
Subject: Re: Information

CAUTION: External Email. Proceed Responsibly.

Hi LA River CEQA Team,

I54-1 What is a PEIR study area and analysis mean?
I've reached out to the below email address and they are not responding Is there another party I should reach out to?

Thanks
Elizabeth

Sent from my iPad

> On Apr 1, 2021, at 9:53 AM, PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov> wrote:
>
> Good morning Elizabeth,
>
> There are no site-specific projects analyzed in the Draft 2020 LA River Master Plan PEIR, and the 2-mile width was selected for the purpose of the PEIR study area and analysis. Since the map you are referring to is not within the Draft PEIR, we recommend that you contact lariver@pw.lacounty.gov for more information.
>
> -LA River CEQA Team
>
> -----Original Message-----
> From: E L <emlacu@yahoo.com>
> Sent: Wednesday, March 31, 2021 2:17 PM
> To: PW-LA River CEQA <LARiverCEQA@pw.lacounty.gov>
> Subject: Re: Information
>
> CAUTION: External Email. Proceed Responsibly.
>
> Hi
>
> Would you please let me know on the below request?
>
> Sent from my iPad
>
>> On Mar 26, 2021, at 11:15 AM, E L <emlacu@yahoo.com> wrote:
>>
>> Hi LA River
>>

>> Is there a way to find out if my home is in the area for the project?
>> I've checked the map and it's not highlighted in color but is close to the small and big pink crosses.
>>
>> Thanks
>> Elizabeth
>>
>> Sent from my iPad
>

Ariana Villanueva

From: leslie klein <kleinleslie@yahoo.com>
Sent: Thursday, May 6, 2021 6:36 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

I55-1 we need a plan for the LA river, that allows for more wilding, and air and water quality protections. doing so will support more birds, trees and protect monarchs and wildlife and not to pollute our waters.

thank you,
dr leslie klein

Ariana Villanueva

From: Merryl Edelstein <merryledel@yahoo.com>
Sent: Friday, May 7, 2021 7:31 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

I56-1

As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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 (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; **section from the pipebridge south of Willow Street to Del Amo Boulevard**. Host to significant shorebird populations (on a global scale) during fall migration. **In addition there are shorebird species which breed in this stretch, notably Black-necked Stilt and American Avocet.**

I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider **disturbances to the Lower Los Angeles River Important Bird Area.** I 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. In addition, there is an **annual Shorebird Survey** conducted by Point Blue that includes the Lower Los Angeles River.

Thank you your attention to these issues.

Merryl Edelstein
Long Beach, California

Ariana Villanueva

From: Ron Cyger <ron@cyger.org>
Sent: Friday, May 7, 2021 7:34 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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.

I57-1 = Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.

I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I 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 for your attention to these issues.

Ron Cyger
Monrovia, CA

I58

Ariana Villanueva

From: Andrew Birch <andyrbirch@yahoo.com>
Sent: Friday, May 7, 2021 7:49 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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.

I58-1

· 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 (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.

I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I 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.

Best, Andy Birch
Los Feliz

Ariana Villanueva

From: Ari Martinez <Ari.Martinez@csulb.edu>
Sent: Friday, May 7, 2021 9:35 PM
To: PW-LA River CEQA
Subject: Master Plan for development of the LA River

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

I59-1

As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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 (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.

I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I 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.

Sincerely,

……
Ari E. Martinez
Assistant Professor
Department of Biological Sciences
California State University, Long Beach
phone: (352) 275-6169
email: arimartinez043@gmail.com

website:arimartinez.com
Twitter: @AriAracari

Ariana Villanueva

From: Sara Boscoe <saraclementina@yahoo.com>
Sent: Saturday, May 8, 2021 12:32 AM
To: PW-LA River CEQA
Subject: 2020 LA river master plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

I60-1

As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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 (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration. This is of a particular interest to me as I live in the South bay. The species diversity here is amazing year round and a great birding spot in Los Angeles. I look forward to this being a continuing place in LA where so much species diversity can be found.

I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I 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.

Sara Boscoe
Hawthorne CA

Ariana Villanueva

From: Nancy Salem <vintage330@gmail.com>
Sent: Saturday, May 8, 2021 12:50 AM
To: PW-LA River CEQA
Subject: Los Angeles River Master Plan

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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.

I61-1

· 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 (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.

I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I 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.

Please help protect bird habitat for future generations.

Nancy Salem
Long Beach

Ariana Villanueva

From: Amy wolfberg <amyd1968@hotmail.com>
Sent: Saturday, May 8, 2021 10:14 AM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern,

As a lifelong Angeleno, I truly love and believe in our wonderful, diverse, unique city and the incredible bounty of wildlife that resides therein.

I62-1 To that end, I strongly urge you to please ensure that the Draft PEIR prioritizes a healthier, more resilient & brighter River future.

It is thrilling to know that we are so close to having the LA River come back to vibrant life, enhancing communities and renewing civic pride in our great city.

Thank you for your time.

Sincerely,
Amy Wolfberg
amyd1968@hotmail.com
213-280-6269

I63

Ariana Villanueva

From: Erica Silverman <ericas521@yahoo.com>
Sent: Saturday, May 8, 2021 12:07 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

I63-1

As part of the community of local Los Angeles birders, I am writing to urge you to pay special attention to certain specific areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. At a time when we face the destruction of urban ecosystems worldwide and the continued extinction of essential species, we all must take responsibility to protect valuable habitat for 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 (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.

As we restore this valuable green and open space for humans, we must be cognizant of the importance of species survival and the role our cities are obligated to play in this. I hope you will consult the community-generated datasets of species presence, available via eBird and elsewhere, to understand the presence and patterns of use by sensitive and protected species.

Thank you your attention to these issues!

Sincerely,

Erica Silverman
Montecito Heights





Visit my website
Watch my book trailers:
http://www.ericasilverman.com

Ariana Villanueva

From: busyday@ca.rr.com
Sent: Saturday, May 8, 2021 12:10 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR comments

CAUTION: External Email. Proceed Responsibly.

To Whom it may Concern,

I64-1

As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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.

1. Atlantic Ave in Vernon/Bell to Southern Ave in South Gate. The extensive concrete section here provides important shorebird habitat during fall migration.

2. Rosecrans Ave in Paramount to Willow St in Long Beach. Also concrete riverbed. Host to significant waves of shorebirds moving through during fall migration.

I ask for the highest scrutiny of the impact to biological resources in these areas of the river, and consideration of the possible impact/disturbances of your project on the entire Lower LA River Important Bird Area. You can reference bird data sets on websites like eBird to understand the presence and patterns of use by bird species on the river.

Stopping-off/feeding/resting areas are critical for global shorebirds on their long journeys, and such areas are in short supply in the Los Angeles area.

Sincerely,
Richard Barth

Ariana Villanueva

From: Gregory Hachigian <gregoryhachigian@gmail.com>
Sent: Saturday, May 8, 2021 12:39 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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.

I65-1

· 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 (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.

I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I 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.

Also, so important, is water capture and storage.

I65-2

Thank you for your attention to these issues.

Gregory Hachigian
Torrance

Ariana Villanueva

From: Susan Gilliland <sgillila@usc.edu>
Sent: Saturday, May 8, 2021 4:01 PM
To: PW-LA River CEQA
Cc: Susan Gilliland
Subject: 2020 LA River Master Plan PEIR Comment

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern,

I66-1 As a local Los Angeles birder, I would like bring your attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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.

I am asking for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I 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.

· 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 (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.

Thank you your attention to these issues.

Susan Gilliland, PhD, MPH, RN
Pasadena, Ca

Ariana Villanueva

From: Frank D. Gilliland <gillilan@usc.edu>
Sent: Saturday, May 8, 2021 4:36 PM
To: PW-LA River CEQA
Cc: Susan Gilliland
Subject: 2020 LA River Master Plan PEIR Comment

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern,

I am writing to ask you consideration of Lower Los Angeles River Important Bird Area in the master plan. I would like bring your attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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.

I am asking for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I 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.

I67-1

· 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 (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.

Thank you your attention to these issues.

Frank Gilliland, MD, PhD, MPH
Pasadena, Ca

Ariana Villanueva

From: Bella Liu <yatingbellaliu@gmail.com>
Sent: Saturday, May 8, 2021 5:05 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

I68-1

Birds bring us more than joy and tourism money. They clean the carrion in our environment, pollinate our flowers, spread our seeds, eat our pests, and so much more. By taking care of birds, we care for our environment. Without a healthy ecosystem, we would need to purify our water and air by ourselves. We would need to grow food without their mutualistic symbionts, without the benefit of pollinators or natural pest control. Conservation isn't just sentimentality and grand notions of harmony with other species.

As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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 (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.

I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I 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.

Ariana Villanueva

From: ovibose gmail <ovibose@gmail.com>
Sent: Saturday, May 8, 2021 8:14 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

To Whom it May Concern,

I69-1

My wife and I are LA County residents and homeowners, and we are also avid birders in the LA area. The stretches of the LA River that are open to the public and are relatively accessible, such as in Sepulveda Basin in Van Nuys and heading east thru Sherman Oaks, and along the east & north edge of Griffith Park and thru the Frogtown area, and then especially the long section along the LA River bike path between Atlantic Ave near Slauson in Maywood down to the ocean in Long Beach, are among our favorite places to watch & study birds. These areas, and likely also the rest of the LA River that is not as easily accessible, are very important areas which provide scarce habitat for many species of breeding or migrating or over wintering birds. Such habitat is very scarce in the LA region, and what little we have should be strongly protected. Many of these species are protected under federal and state laws, and/or are designated as "species of special concern".

Even many of the areas of the river that appear to be badly degraded, or simply concrete wastelands, still provide important habitat for the bird species. We have on multiple occasions seen rare and endangered species in some of the most unlikely looking areas of the river, even where the river is simply a concrete channel running thru industrial zones, and with little or no vegetation or soft dirt bottom.

We encourage the County to protect the existing stretches of the river that are in a more or less natural condition. And in addition to improve the sections that are in a far from natural condition by adding native vegetation where appropriate, and by removing as much concrete as possible and creating a dirt bottomed river channel. The entire 50-plus mile stretch of the LA River from the San Fernando Valley down to the Pacific in Long Beach should be restored and improved to return it to a natural river with more extensive habitat for birds and other wildlife. We realize that this would be a major undertaking, and very costly, but it is a worthy long-range goal. In the meantime, the most important areas should be given special consideration, and should be protected from any development that would adversely affect the bird populations there.

Currently the areas of the river that LA area birders are most aware of as important bird areas are:
- The LA RIver thru Sepulveda Basin and downstream of the dam.
- The LA River along the north & east edges of Griffith Park, past Frogtown & Atwater Village and down to the Elysian Park area.
- The LA River thru Vernon, Maywood, Bell and Cudahy. Even though much of this appears to be a wasteland of concrete, it still provides some needed and well-used bird habitat.
- The LA River thru Long Beach, especially from around Del Amo Blvd south to PCH.

However, the other sections of the 50-plus miles are no doubt also very important to resident and migratory birds, but since some of these areas are not easily accessible to the public, we can not comment specifically.

Thank you for your attention.

Sincerely,
Donald White & Lisa Chang
Culver City, CA

Ariana Villanueva

From: Pollito Gnoche <pollitognoche@gmail.com>
Sent: Saturday, May 8, 2021 8:17 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

I70-1

As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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 (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.

I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I 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.

Polly M., young birder, Los Angeles

--
Polly M. (she/her)

Ariana Villanueva

From: Jeffrey Boyd <jboyd@lbcc.edu>
Sent: Sunday, May 9, 2021 1:17 PM
To: PW-LA River CEQA
Subject: "2020 LA River Master Plan PEIR Comments"

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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.

I71-1 **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 (G2) and Rio de Los Angeles State Park. This area has small, fragmented 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; section from Willow Street to Long Beach Boulevard. This region is host to significant shorebird populations (on a global scale) during fall migration. Also, after the last spring rains, the silt-covered cement-bottom stretches along this area afford relatively undisturbed nesting sites for our locally breeding shorebird species, such as Black-necked Stilt, American Avocet, and Killdeer.

I ask for the highest scrutiny of the impacts of recreational development to biological resources, especially in these areas mentioned above, and to consider lessening the disturbances to the Lower Los Angeles River Important Bird Area. I 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 along these

I71-1 cont. stretches of the LA River.

Thank you for your attention to these issues.

Sincerely,
Jeff Boyd
Long Beach

Ariana Villanueva

From: Grace Wong <gywseven7@gmail.com>
Sent: Monday, May 10, 2021 6:44 AM
To: PW-LA River CEQA
Subject: "2020 LA River Master Plan PEIR Comments"

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

I72-1

As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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 (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.

I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I 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.

Grace Wong
Altadena, CA

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Your Subscription | Contact Group Owner | Unsubscribe [gywseven7@gmail.com]

Ariana Villanueva

From: Rob Bender <robbender@roadrunner.com>
Sent: Monday, May 10, 2021 9:05 AM
To: PW-LA River CEQA
Subject: LA River Master Plan Comment

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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.

I73-1 · Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.

I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I 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.

Best,

Rob Bender
Atwater Village

From: ken.unger@cox.net
To: PW-LA River CEQA
Subject: Los Angeles River Bird Area
Date: Monday, May 10, 2021 4:06:24 PM

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

I74-1

As a local Los Angeles birder living in San Pedro, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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 (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.

I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I 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.

Kenneth M. Unger, MD
Ken.unger@cox.net
(713) 542-4312

Ariana Villanueva

From: ronhirst <ronhirst@cox.net>
Sent: Tuesday, May 11, 2021 10:35 AM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

I75-1

As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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 (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.

I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I 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.

Ronald Hirst

Santa Barbara, CA 93103

Ariana Villanueva

From: Sarah De Santiago <Sarah.DeSantiago@student.csulb.edu>
Sent: Tuesday, May 11, 2021 11:55 AM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments
Attachments: Green GentrificationPoster_LA River Master Plan.pdf

CAUTION: External Email. Proceed Responsibly.

To whom it may concern:

I76-1 I recently reviewed the L.A. River master plan and created a research poster regarding the master plan and highlighted concerns for green gentrification and displacement of working-class tenants, residents, and unhoused communities living in encampments along the river. Public comments displayed in the reports have stressed the importance about adding more concrete solutions and protections for tenants and at-risk homeowners before the plan is carried out as land speculation is already underway. Risk for displacement is high and the plan itself does not provide a specific action plan to ensure that people feel protected and acknowledged. Please consider the many families and individuals who will be affected by this project if there aren't more equitable and socially just solutions put in place at the neighborhood, encampment, and individual levels.

Thank you for your time.

Sincerely,
Sarah De Santiago

LA River Master Plan- Green Gentrification Analysis

Sarah De Santiago

Department of Geography, California State University, Long Beach

Introduction & Background

The 2021 LA River master plan is taking on the task of redefining and revitalizing all 51 miles of the river to include more greenspace, thorough bike trails, and a wider flood plain without the concrete slabs that have become synonymous with its existence throughout the city of Los Angeles. Frank Gehry and Laurie Olin are the lead architects behind the design process. The project is estimated to cost 19-24 billion dollars over the span of 25 years and is expected to cost 1.5-3 million dollars to maintain annually. The master plan includes demographic information on communities who live along the river, planning strategies for each portion of the river, and funding allocation for the duration of the project. There has been public concern on how this plan will affect current communities who live near the river and whether or not this plan includes tenant protections and is taking the well-being of residents into account (Prieto, 2021).

Previous studies on urban greening programs show that through green reinvestment in historically low income and minority neighborhoods, there is potential to resegregate cities and create an inverted suburbanization, which can benefit a select few and displace many people in the process (Anguelovski et. al, 2019). Socially just and inclusive strategies must be in place in order to prevent the displacement of people during large scale environmental projects like the revitalization of the LA River. Financialization of nature and green spaces are directly connected to rising property values which could put current homeowners and renters at risk to be bought out or displaced to make way for wealthier residents (Anguelovski et. al, 2019). I will attempt to explain how the L.A. River plan meets the framework Julian Agyeman developed for just sustainability. Does this plan improve quality of life and well-being for all people, does it meet the needs of both present and future generations, does it keep in mind and provide justice and equity in terms of recognition, process, procedure, and outcome, and lastly, does it attempt to stay within ecosystem limits? (Agyeman, 2013).

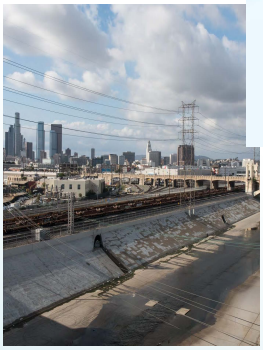


Figure 1: View of the LA River and its current design near Downtown Los Angeles. (Shutterstock)

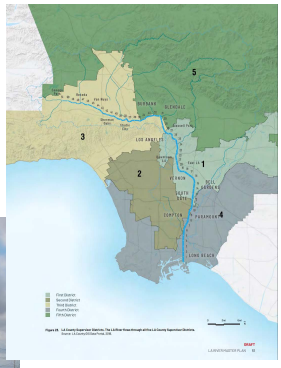


Figure 2: Map showing the five Supervisor Districts that the LA River flows through. *(Pg. 51 of LA River 2020 master plan)*

Methods

The aim is to evaluate the LA River Master Plan based on a socially just framework that not only addresses environmental concerns but also accounts for current issues like affordable housing, homelessness, and displacement for residents that live near the LA River. What solutions are currently recommended or lacking in the plan and how can a just process and outcome be ensured for all community residents if this project is to be carried out? Are tenant protections and anti-eviction policies being enforced to avoid further displacement of already vulnerable communities? Public comments serve as the basis for input and reactions surrounding this plan. The public comments were collected from community meetings held by the LA River master plan committee. Public engagement reports were created to guide the planning process and remind those in attendance that their opinions and voices were taken into account. These reports are available online for public access. Based on public opinions expressed in community meetings, many residents are both curious, excited, but concerned about housing, potential displacement, and social equity.

Results

Community Meetings for LA River Master Plan : Public Comments

Based on survey results, the large majority of attendees have been local to the area for more than 15 years or have lived in the area their entire lives. The two generations most present in these meetings were Baby Boomers and Millennials. Below are some of the public comments collected and included in the Community Engagement Reports in 2019. Comments regarding homelessness and affordable housing show that many community residents are concerned about how housing, homelessness, and potential displacement will be handled. Prioritizing these issues before the project goes any further has been made clear based on these public comments in communities who have varying levels of displacement already going on.

Glendale:

- "Don't get rid of people who don't have homes, let's create solutions."
- "Who usually comes to these meetings? How is privilege, access, class, race involved? How will you reach out and acknowledge voices of people who will be affected?
- "What are the implications for issues of gentrification?"
- "How will you make sure to create equitable access? How will you reach out to people who can't come to meetings like this?"

Canoga Park:

- "Must try harder with outreach for public comments."
- "Why are you not addressing existing infrastructure and homeless problems first?"
- "Allow funding to help homeless problems and infrastructure first."
- "City Planning needs to tend to our existing problems first. Who represents us residents?"

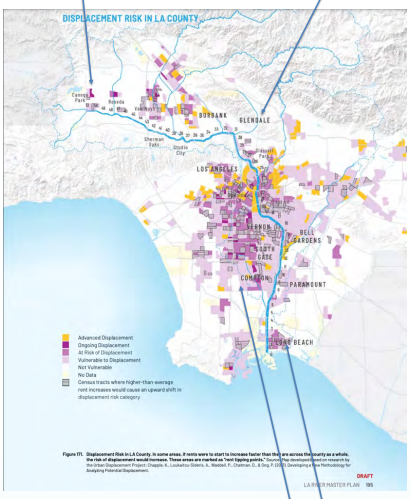


Figure 3. Map of Displacement Risk in LA County *(Pg. 195 LA River 2020 Master Plan)*

Central Los Angeles:

- "What homeless orgs are you working with to help advise, but also provide services to homeless people along the LA River?"
- "Small businesses must be included in the conversation as they too are too being displaced quietly."
- "Where is the community? Outreach? Boyle Heights has over 100K residents but barely 50 people are here."

North Long Beach:

- "Please think about how the needs and rights of homeless people will be affected when they are displaced from riverbed area"
- "Clearing the homeless encampments based on 'compassionate' practice is not a solution. This plan avoids the answer of what will be done with homeless residents."
- "Need all the action to address severe housing shortage."

Discussion

The public meetings are meant to give residents a platform and an active voice in the decision-making process but as one person said, there needs to be better outreach strategies in place to gather comments and opinions from people who do not have access or knowledge of these meetings. According to a 2018 progress report on the LA River, 75% of the homeless population in Los Angeles were currently sleeping outside and unsheltered. The map in figure 4 shows the need for affordable housing along the 51 miles of the LA River. Critical areas include Downtown Los Angeles, Vernon, Southgate, Long Beach, and Canoga Park. The comments obtained during community meetings call upon prioritizing homelessness and affordable housing before embarking on such a large project with the river.

A previous study on green gentrification discusses the tools implemented by developers involved in greening projects. By using nature as a commodity and promoting greening projects as a benefit for all people equally, reinvestment in financially neglected neighborhoods occurs with a goal to boost property values and attract more affluent people to the area. This leads to an increase in land grabbing, landscape manipulation, and creates accumulation by dispossession in areas with less political and financial power (Anguelovski, et. al 2019).

While the master plan and related reports present demographic information, housing need, and displacement risks, it falls short of providing community residents with a solid plan that is socially just, measurable, and sustainable. The master plan does not propose specific policies and offers vague solutions about how much funding would exactly go into providing affordable housing options. To be a more socially inclusive project, further research must be done on how to better serve the communities there now through the practice of recognition and acknowledging cultural preferences, land tenure, and existing social networks. Implementing an environmentally just framework can help guide the process, inform decision makers, activists, and empower residents to work toward an equitable and mutually beneficial agreement.

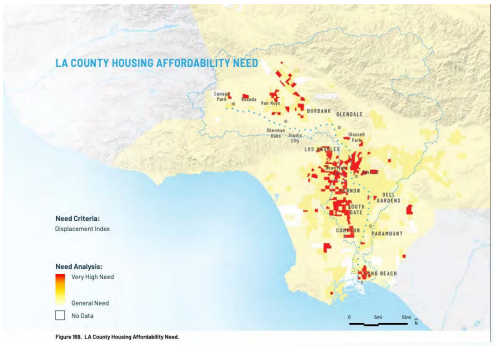


Figure 4. Map of Housing Affordability Need in LA County *(Pg. 169 LA River 2020 Master Plan)*

Conclusions/Policy Recommendations

- Address lack of strong tenant protections for areas along the LA River. Enforce tactics that advocate for policies that secure right to housing while planning greening project.
- Implement longer lasting ordinances like Ordinance 186585, which protects renters and prohibits certain commercial businesses from being evicted during the COVID-19 crisis in Los Angeles.
- Community Land Trusts funded by public and private partnerships related to the LA River project are recommended to be implemented prior to plan completion.
- Draft a budget that will go directly into protecting, producing, and improving affordable housing units for vulnerable communities near the LA River.
- Use maps on displacement risk and housing need from master plan to draft other specific plans that are carried out in conjunction with design process that addresses housing and homeless concerns first. Specifically list non profit organizations, private and public partners who will be assisting on proposed protections to be carried out.
- Use a just sustainability framework to guide the process of a large scale project such as the LA river master plan to understand the many delicate layers involved in the process and overall outcome.

For more information

Please contact Sarah.DeSantiago@student.csulb.edu *for* more information on this project.

From: Miles Griffis
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments
Date: Tuesday, May 11, 2021 2:17:11 PM

CAUTION: External Email. Proceed Responsibly.

Hello,

My name is Miles Griffis, I am a Los Angeles-based independent journalist covering the environment, people, and LGBTQ+ issues. I've written for publications like the *New York Times, Vogue, Outside,* and many others. I recently spent over three months reporting a story for *High Country News* about unhoused anglers on the Los Angeles River where I talked to over 100 unhoused individuals living on the river, 23 of them anglers.

I77-1 While conducting interviews for my article, most unhoused Angelenos living on the river were completely unaware of the Master Plan and were disappointed they were not given a fair opportunity to be a part of the planning. Others stated they found in person meetings to be difficult to attend because of transportation issues and many expressed they weren't able to comment because they did not have cell phones or reliable internet in order to voice their comments. Many individuals I spoke with were concerned about gentrification and being

I77-2 removed from their homes and way of life on the river as a result of the master plan.

I77-3 Some unhoused residents I spoke with pointed out that the Master Plan doesn't include any housing for the nearly 9,000 unhoused Angelenos who live and use the river daily across the county. Experts in my story predicted that nearly 1,000 use the river directly for sustenance. The PEIR states that many encampments will be swept during construction and that increased patrol will be implemented to discourage those living on the river, but doesn't present any solutions to house these unhoused residents. Throughout my research in speaking with historians like Blake Gumpretch and geographers like Jason Post for my story, I found that the Los Angeles River has been a location for unhoused and immigrant communities for over a hundred years as they have been pushed to its banks due to a failure of the city and county's ability to provide lasting initiatives to resolve homelessness. The Los Angeles River has always been home to our unhoused community, yet no direct survey was taken of this population in planning. One of my expert sources who has been studying the river for over 6 years described neglect of this community on the Los Angles River as a "humanitarian crisis" and cited that nearly four per day are

I77-4 dying unhoused. What is the Department of Public Works plan to house these people who rely on the river as a direct source of life if the PEIR plans to remove them?

Below I've included my story so that it can be put into the public record. Thank you for your time.

The Overlooked Anglers of the Los Angeles River

On a March afternoon on the Los Angeles River, two anglers waded in the concrete channel of the Glendale Narrows, casting their lines for carp and largemouth bass. Above them, a belted kingfisher perched on a mattress that had been caught in the crook of a budding cottonwood during a recent storm surge. Some recreationists enjoy catch-and-release on the river, but others — low-income and unhoused people who need sustenance — were hoping to leave with coolers, buckets or even shopping carts full of freshly caught fish.

For over 10,000 years, the Los Angeles River — known to the local Gabrieliño-Tongva Tribe as Paayme Paxaayt — has provided food, water and a way of life to residents of the Los Angeles Basin. Steelhead trout once spawned in its headwaters and helped feed the numerous villages along its course. But since 1938, the 51-mile river has been bound in concrete. Now, many worry that its fish aren't safe to consume, a stigma that has long loomed over angling here.

"Most tend to think the quality of the water in the Los Angeles River is poor, but it's fairly clean water," says Sabrina Drill, natural resources advisor for the University of California Cooperative Extension. While toxicity varies by species and location on the river, a 2019 LA River report found that a person can safely consume 8 ounces of common carp, bluegill, and green sunfish, up to three times per week. Still, Drill did not recommend this, since most of the studies contained small samples.

Yet many unhoused and other low-income Angelenos — over a thousand people a year, according to some experts — supplement their diets with the urban river's fish and crustaceans. Nearly 9,000 of the estimated 66,000 unhoused people in Los Angeles County live along the river, where they've set up camps and shelters — even small gardens with fruit trees, bushes and terraced agriculture, hidden off its concrete banks.

Their future, however, has become even more tenuous with the recent draft of the LA River Master Plan, a massive proposal to revitalize portions of the river with pavilions, cultural centers and multimillion-dollar parks. The plan — developed by a committee of nonprofit organizations, municipalities and governmental entities, assisted by public comment — will be released later this year. But already advocates have raised concerns, and groups like the Eastyard Center for Environmental Justice are worried about the prospect of "green gentrification," which occurs when housing prices rise after parks are built in historically marginalized communities.

The draft plan's environmental impact report suggests that many homeless encampments are likely to be removed during construction, and that law enforcement patrols will increase to prevent new ones from forming. The plan offers no housing solutions for the thousands of people currently living on the

river.

Homeless advocates worry that those who will be most heavily impacted by the plan had no chance to comment, since many who live on the river lack reliable access to the internet or are unable to attend public meetings. “What’s happening on the Los Angeles River is a humanitarian crisis,” says Jason Post, who has been studying the river for six years. “The reality and experiences of LA River anglers and of people who, on the day-to-day, live in and along the river are not reflected in the master plan. You have economic revitalization and park construction prioritized over people’s ability to live and survive.”

> ***“You have economic revitalization and park construction prioritized over people’s ability to live and survive.”***

What we know about the river’s modern community is limited, but its members are part of a long history of invisible Angelenos who have lived and fished along the riverbanks for more than a century, both before and after channelization. In “Unnatural Nature,” a study published in the December 2020 *Geographical Review*, Post and co-author Perry Carter examined how anglers have reimagined and repurposed this far-from-pristine space as parkland and urban wilderness.

Their study, which noted the inequities in the park-poor city of Los Angeles, showed how the river provides refuge, food and shelter for some anglers and unhoused people. None of the 23 sustenance anglers I spoke with in the three months I reported on this story wished to speak on the record. Many couldn’t afford fishing licenses and so were operating outside of the law; others said they had been harassed by law enforcement. In the past, anglers and unhoused Angelenos have been given loitering tickets while on the river. Others feared encampment sweeps.

Carolina Hernandez, the Los Angeles County Public Works principal engineer and spokesperson for the LA River Master Plan, says that while the plan doesn’t specifically address fishing or sustenance fishing on the river, it does prioritize healthy ecosystems that allow angling. Social justice and environmental groups were on the plan’s subcommittee, but no homeless advocacy groups were involved, and very few unhoused residents attended meetings. “There was not a direct survey of our unhoused community in the LA River Master Plan,” Hernandez told me. The plan is a road map, she added, one that shouldn’t supersede specific project engagement.

Recently, in Glendale Narrows, I saw how intimately those experiencing homelessness interacted with the river. One woman washed her clothes in the

current as her cat watched a stand of black-necked stilts feeding in the shallows. In the distance, three men played darts on a sandbar island, their tents lined up below a large cottonwood. Another man sat patiently nearby with his tenkara rod cast in the flow. Beside him, a small red cooler held a medium-sized carp.

One unhoused resident I met near an encampment farther upriver told me he's lived along the waterway for over a decade, constantly moving his camp up and down the river to stay hidden. The man, who is in his mid-40s, told me he bathes in the river, eats carp from it, and currently sleeps at the mouth of a storm drainage. "I don't know where I would go if (the master plan) swept me away from my home," he said. "The river keeps me alive."

Thank you for your time,

Miles W. Griffis

--
Miles W. Griffis
Confetti Westerns

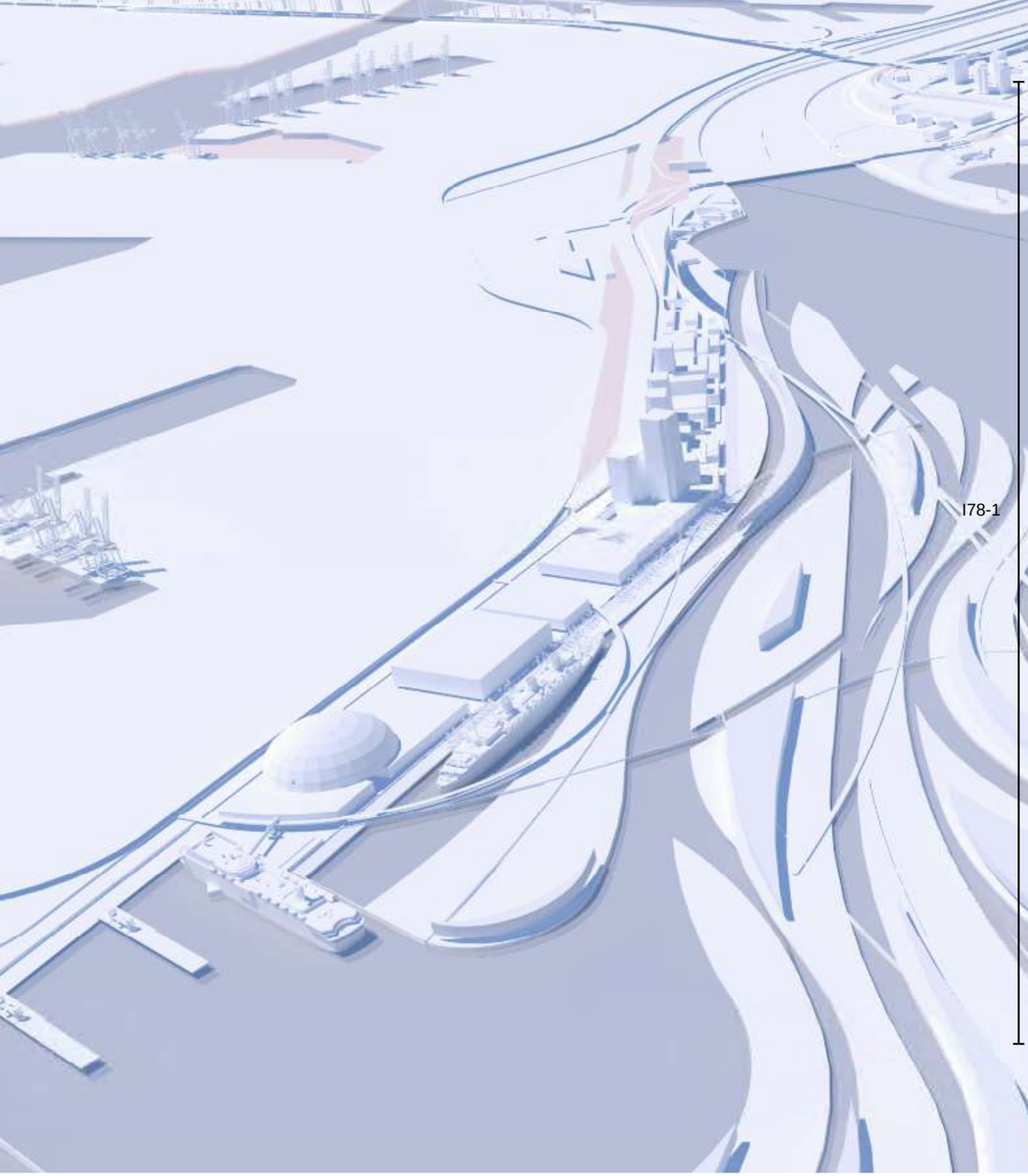
From: Robert Karn
To: PW-LA River CEQA
Subject: "2020 LA River Master Plan PEIR Comments"
Date: Wednesday, May 12, 2021 12:07:32 AM
Attachments: Long Beach Estuary 3.pdf

CAUTION: External Email. Proceed Responsibly.

See attached

--

Consilium Urban Design & Architecture
Robert M Karn AIA LEED AP
2507 Maine Avenue
Long Beach CA 90806
Tele 978 760 1183
robertmkarn@gmail.com



I78-1

Long Beach Estuary ***5 /6/21***

Americans have become accustomed to having their "urban drainage districts/corp of engineers" entities solve a single problem. Conveyance of flood water. The byproduct of this acquiescence was and is a billion dollar enterprise to build and maintain a concrete channel. Billions more will be required to solve additional problems. A solution to one of these additional problem's is the subject of my suggestion to Los Angeles's The River Project planning process.

Admittedly the Los Angeles river had a difficult start, inconsistent volumes lead to a communal comfort with ever encroaching infrastructure on a potentially necessary allotment of space. Until a couple of flood events demonstrated the folly of such comfort. Looking back at the outcomes that exist today one can't help but wonder couldn't the functions and densities achieved in the floodway have been achieved outside of the floodway with little or no impact on the overall look of LA and Longbeach. The answer is of course yes but that is water under the bridge so to speak.

This second conceivably third rebuilding of the Los Angeles River corridor has opportunities, some limited by the encroached infrastructure. Solving the "new" problem of providing appropriate openspace (and flood water storage/conveyance space) utilizing natural systems is certainly worth the long term investment. US city planners and residents have seen appropriate solutions elsewhere and are finally beginning to understand the value of contiguous open space systems through urban areas.

There are a limited number of significant opportunities that would return some of the magic to the (communal understanding) of the story of the Los Angeles River basin: One and perhaps the most important is the fact of a river delta.

Frame One of the LA River study area is Long Beach where the "drainage way" (euphemisms on early maps) empties into the ocean. There is no visual or mental understanding of what could be construed as a river delta. Normally this natural organism straddles the line between fresh and saltwater, which lives by the movement and exchange of these waters to create a unique habitat.

Development has desired this area.Proposing to fill it with infrastructure for generating private wealth while offering the community a seat at the table for a substantial subsidy. The Los Angeles river delta needs to demonstrate how a world class city builds a sustainable future based on the idea and performance of its natural water systems. Imagine in another 100 years this generation's legacy?

With single mindedness the previous administrators built a floodway. It is time to harness this single mindedness to build a continuous natural habitat beginning at its most important point the end of the river corridor.

The design concept portrays an idea. The location of uses have been organized for one primary purpose. To build a vast (commiserate with the size of the city of Los Angeles) estuary. New development is located along the highway bordering the port with the primary cruise terminal located at the highway's end. This consolidation frames the estuary while not impacting it. The concept proposes an approximate proportion of 50% water and 50% land. With natural system engineering it could be habitat for numerous species and an active filter for some of the less desirable elements traveling out to sea from the urban drainage. It proposes a series of islands (including the existing industrial ones) to stimulate as much natural exchange as possible. Interconnecting the estuary lands are pedestrian pathways and bridges. Some areas should be reserved for habitat research and inaccessible for the general public.

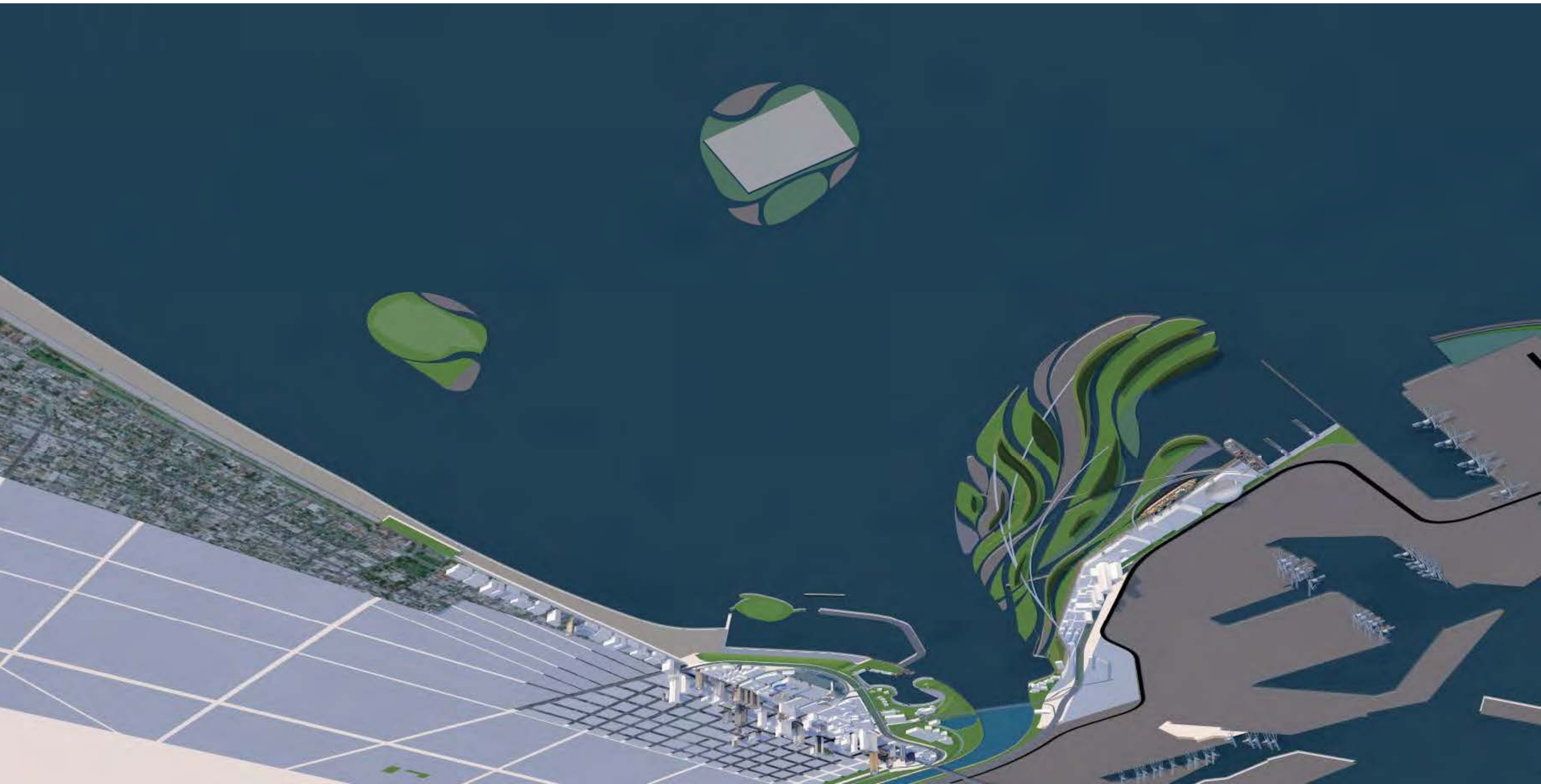
My second recommendation is to develop guidelines for the location of child play areas. They should not be within 100-300 meters of significant arterial roadways (depending on the tested pollution levels) and toxic point sources. Similar to other first world nations.

Robert Karn 2507 Maine Long Beach, CA 90806



LONG BEACH CITY AND PORT OF LONG BEACH

LONG BEACH TO SEAL BEACH



LONG BEACH ESTUARY

From: Marianne Vogel Bender
To: PW-LA River CEQA
Subject: LARMP COMMENT
Date: Wednesday, May 12, 2021 1:30:44 PM

CAUTION: External Email. Proceed Responsibly.

To LA county -

I79-1

As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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 (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.

I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I 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.
Marianne Bender
Atwater Village

Marianne Vogel Bender
c 215.262.8892
mariannebender12@gmail.com

From: Deloris Jones
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments
Date: Wednesday, May 12, 2021 2:03:01 PM

CAUTION: External Email. Proceed Responsibly.

I80-1 I live in Lynwood within one mile of the LA river. Since much of the river improvements plan is not directly controlled by the LA county, my concern is about the possibility of "eminent domain" being enacted. I do not want to be displaced from my home to accommodate a river improvement.

Sent from my iPhone

From: Michael J. Connor
To: PW-LA River CEQA
Subject: Email address
Date: Wednesday, May 12, 2021 2:30:08 PM

CAUTION: External Email. Proceed Responsibly.

I81-1 We are preparing comments on the LA River Master Plan and on the PEIR. We have an email address for the PEIR comments but cannot locate an email address for submitting comments on the LA River Master Plan itself. Or are you accepting comments on both the Plan and the PEIR? Unfortunately, the LA River Master Plan website comment forms will not accept attachments and I have received no response to my question when I posted via the comment form.

Thank you for any help you can provide,

Michael

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

From: Lisa Petrus
To: PW-LA River CEQA
Subject: Safe crossing
Date: Wednesday, May 12, 2021 6:42:59 PM

CAUTION: External Email. Proceed Responsibly.

I82-1 Kester at the 101 FWY is part of this plan. There is no safe way for pedestrians or cyclists to cross Kester. There have been multiple pedestrians involved in accidents. The most recent was a 90 year woman who was run over and left for dead by a hit and run driver. She was seriously injured (2 fractured legs etc.) and her dog killed. The location has been approved for a crosswalk but apparently they don't have $200,000 to fund it. **Safety must be the number one concern for this Master Plan.**

Best,
Lisa Petrus
Area4 Residential Representative
Sherman Oaks Neighborhood Council
CD4

From: Molly Hill
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments
Date: Wednesday, May 12, 2021 10:22:50 PM

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

I83-1

As a local Los Angeles resident and birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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 (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.

I ask for the highest scrutiny of the impacts to biological resources, including and especially in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I 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 for your attention to these issues.

Best, Molly Hill
Los Angeles

From: David Joyce
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments
Date: Thursday, May 13, 2021 10:37:03 AM

CAUTION: External Email. Proceed Responsibly.

I was born in Sherman Oaks, Ca, in 1960.
I used to walk by the river, and explore it.
I've had birthday parties which were tied to the LA River Cleanup - put together by FOLAR.

I84-1 It's tremendously important to me that we:
restore the native plant & biodiversity of the region, and that we deal with the many invasive plant species which are so problematic - crowding out the native plant life.

Restoring the native plant biodiversity is absolutely THE KEY issue, for me, as it's the cornerstone of *life for the LA River, and the animals, birds, fish, insects. These are interconnected, and will impact the future of our city, our environment.*

Sincerely
David Joyce
Reseda, Ca

From: Ann Cantrell
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments
Date: Thursday, May 13, 2021 11:30:06 AM

CAUTION: External Email. Proceed Responsibly.

1. The plan should include taking out the concrete bottom in some if not all portions. , This is the only way to restore the river. There are currently areas of the river with soft bottoms and those are the ones where the plants grow and wildlife resides. I do not want more concrete added to or over the river. Let people enjoy the natural beauty of a restored river with access to parks, open space and wetlands along its length. No added development or commercialization.

2. This plan and many previous ones have called for parks/open space/wetlands in the Wrigley Heights portion of the river in Long Beach. Currently a self-storage and RV parking lot have been approved and gated housing development is going through the CEQA process for the site. What appears to be missing from this Master Plan is how to ensure that cities and private land owners conform with the plan. I85-1

Ann Cantrell
Long Beach resident

From: Allison McSurely
To: PW-LA River CEQA; DPW-Lower LA River
Subject: 2020 LA River Master Plan PEIR Comments - Neighborhood River Shuttle Service
Date: Thursday, May 13, 2021 11:34:36 AM

CAUTION: External Email. Proceed Responsibly.

Thank you for this thoughtful work.

I86-1

One vital consideration that seems to be left off the master plan is how South LA residents, who have been historically denied any County investment in natural amenities, are expected to get to the River.

(Or aren't they?!)

You need to consider that almost forty percent of South LA residents are under 21, and more than half have very low incomes, and would now have to take buses for more than an hour getting in freeway traffic to reach a river only six miles away as the crow flies.

We need FREE SAFE PUBLIC RIVER SHUTTLES with stops serving all LA County neighborhoods.

We also need logical parking areas near plentiful south of the 10 River parks, and safe lit bike paths to the River from South LA public schools and recreation centers.

Thank you for considering and addressing this issue.

Sincerely,

Allison McSurely, Director
Little Portion Social Center
8874 South Broadway
Los Angeles, CA 90003

https://www.google.com/maps/dir/Los+Angeles+River,+California/8874+S+Broadway,+Los+Angeles,+CA+90003-3635,+USA/@34.0027475,-118.2854052,13z/data=!3m1!4b1!4m19!4m18!1m5!1m1!1s0x80c2b7c873c06f81:0xa44a2d47e68ffb3b!2m2!1d-118.2231868!2d34.0154242!1m5!1m1!1s0x80c2c9ea96aa3a27:0x8af2a84daab49854!2m2!1d-118.2778088!2d33.9560003!2m4!1b1!5e0!5e1!5e3!3e3

From: Tilly (Good is Better)
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments
Date: Thursday, May 13, 2021 11:34:45 AM
Attachments: Hinton-PEIR-Letter.pdf

CAUTION: External Email. Proceed Responsibly.

Hi there

Please find attached my PEIR comment letter. I would be grateful for confirmation that you've received it.

Thanks,
Tilly



Dr Tilly Hinton
Writer | Research Scholar | Floral Designer | Facilitator | Grants and Awards Wrangler | Cultural Producer | Impact Consultant

E tilly@goodisbetter.net **W** linktr.ee/tillyhinton
Us phone +1 323-536-7998
Au phone +61 7 5660 6759

Tilly Hinton, PhD
Independent Scholar and Curator
Los Angeles CA 90057
tilly@goodisbetter.net

County of Los Angeles Department of Public Works
LARiverCEQA@pw.lacounty.gov

11 May 2021

Dear Sir/Madam,

2020 LA River Master Plan PEIR Comments

I87-1 I am writing to comment on the draft Program Environmental Impact Review (PEIR) for the County's LA River Master Plan. I am an independent scholar and the founder/curator of Los Angeles River X.[1] I have over a decade of international research and community engagement expertise in river landscapes and their complex interrelationships with surrounding communities, particularly the Los Angeles River. On that basis, I make the following comments on the Draft PEIR.

The PEIR should consider the entire watershed, or at least tributaries

I87-2 The overarching weakness of this PEIR is that it takes an infrastructural not an environmental view, in that the focal area has been arbitrarily defined as the river channel and a one-mile strip along each bank. By largely ignoring the nine major tributaries - which are by definition integrally part of the Los Angeles River – the PEIR cannot possibly provide an accurate environmental assessment. I ask that the final PEIR accurately conceptualize the river as including its tributaries. I know that the PEIR claims in the executive summary that it 'uses a data-based methodology informed by an extensive collection of data that describes the physical, social, and cultural attributes of the LA River; its surroundings; and its watershed including ecosystem, demographic, and hydrologic studies that were conducted for the entire 834-square-mile watershed and Los Angeles County', this is not sufficient. The County is the only agency with jurisdiction to take a genuinely whole-river, whole-watershed approach and missing this opportunity is unacceptable.

The "typical" projects are atypical

The two projects that are put forth as typical are far from typical when they are contrasted with other project possibilities that are framed in the Master Plan. The two "typical" projects are a Multi-use Trail and a river adjacent gathering place composed of various Common Elements from the Master Plan.

These are relatively low-impact projects and are very similar to existing features of the LA River, so it is unhelpful to have built the PEIR around them. Instead, the PEIR should analyze significant projects such as:

I87-3
- channel transformation (the Plan includes terracing, deepening, widening, converting walls from trapezoidal to vertical, diverting water in tunnels, and further restricting public access),
- capping the river with large concrete platform parks or cantilevers (a concept the County has championed in presentations and media outreach but neglected in the PEIR),
- building infrastructure composed from the common elements every 0.4 – 0.6 miles along both banks of the river (while the PEIR analyzes one such project, it is an entirely different matter to consider the environmental impacts of some 204 of these Shade, Rest, and Gathering Pavilions" along the River's banks).

[1] http://goodisbetter.net/lariverx

I87-3 cont.

The two typical projects are not genuinely representative of the Master Plan's scope and intent, and on that basis the PEIR is flawed. At a minimum, please revise the PEIR to assess the cumulative impacts of multiple instances of Common Elements “typical projects”. The Master Plan’s intention is that there would be a few hundred of these Shade, Rest and Gathering Pavilions. It is manifestly insufficient to evaluate the impacts of only one. To represent the intentions of the Plan more adequately, a channel transformation project and a river capping project should also be included in the PEIR, or these should be tempered in the Master Plan document.

Complexity of the Document/Unhelpfulness of Public Meetings

I87-4

The draft PEIR is cumbersome, lengthy and inaccessible. It is vastly out of step with CEQA readability requirements. Section 15140 requires that ‘EIRs shall be written in plain language and may use appropriate graphics so that decision makers and the public can rapidly understand the documents’. Section 15141 stipulates that ‘the text of draft EIRs should normally be less than 150 pages and for proposals of unusual scope or complexity should normally be less than 300 pages’. The PEIR is 1,992 pages long, uses a hyphenated page numbering system that makes it impossible to navigate the document electronically, and it is not compatible with Read Aloud functionality in Acrobat. The PEIR is more than six times the maximum length specified in CEQA. Because of the pandemic, access to physical copies, or any large-scale maps, has not been possible. Furthermore, the PEIR due date is the same day as comments on the Master Plan itself, which is a hefty 1,170 pages long. These are unacceptable burdens to place on a constituency of community members who are likely to be alienated by the complexity of the documentation and the confusion of simultaneous public comment processes.

The information and town hall sessions that were held by the County and its consultants via zoom were inadequate. Some meetings prohibited questions, only allowing comments. At others, not all questions were addressed and were only visible to the organizers not to other attendees, quashing opportunities for learning from fellow community members’ perspectives.

Document complexity, coupled with poorly designed online meetings, places tremendous burdens on readers and locks people out of the public comment process. In practical terms, I ask the County to revise the Final PEIR using plain language for clarity and accessibility, provide a more functionally navigable PDF, and include in-person viewing opportunities for documents and large-printed maps. The document should be substantially shortened. If this is genuinely impossible then additional public comment time and proactive in-community support for informed comment writing should be provided by the County so as to empower community members to understand the documentation and submit comments under CEQA.

Tiering

I87-5

In the PEIR and in County online public meetings sessions, tiering has been discussed as a means to simplify and expedite environmental approval for future projects. The implications of this are opaque, and concerning given that CEQA is a self-executing statute, making the County akin to the judge, jury and executioner of the river’s future.

I am concerned by statements such as:

> “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.” (p. 199)

"Impacts would be less than significant for later activities when carried out by the County. Impacts would be significant and unavoidable for later activities when not carried out by the County." (p. 331)

"This conclusion of significant and unavoidable impacts also applies to the overall 2020 LA River Master Plan." (p. 1842 and elsewhere)

because these statements seem to imply that future projects, even significantly detrimental ones, may – at the discretion of the County – bypass rigorous environmental impact review.

I87-5 cont.

The PEIR also notes that future project-specific reviews 'would incorporate by reference the general discussions from the previously prepared PEIR and would focus solely on the issues specific to the environmental analysis subsequently prepared for the later activities' (p. 199). This amplifies the need for the current PEIR documentation to be both robust and accessible because community members and other stakeholders will need to be working with it for the next twenty-five years.

Please revise the explanation of tiering and the statements about significant and unavoidable impacts – using plain English – so that it the implications are clearer in the PEIR.

In conclusion

In closing, I reiterate that the Draft PEIR requires major revisions if it is to be an appropriate CEQA document. The two major concerns with the PEIR are document complexity and that the "typical projects" are not representative of the intent or scope of the Master Plan. Underpinning this is the fundamental weakness of the Master Plan design: that it fails to take a watershed approach or even a whole-of-river approach. Layered over these concerns is a lack of clarity about the operationalization of how tiering would affect public comment and oversight opportunities for future projects that tier off this PEIR.

I87-6

The current draft of the LA River Master Plan would cause significant adverse environmental effects, many of which are obscured by the framing and design of this PEIR. The Master Plan is also a missed opportunity for doing something truly remarkable for the environmental (and that includes human) remediation and safekeeping of our city. I request that the County develop a more representative PEIR, substantially change the proposed Master Plan, or impose as a condition of approval of this PEIR that every River or River-adjacent project be subject to full rigorous CEQA review. As it is, the draft PEIR is unacceptable.

Best regards,



Tilly Hinton, PhD

From: eroach2009@gmail.com
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments
Date: Thursday, May 13, 2021 11:35:57 AM

CAUTION: External Email. Proceed Responsibly.

I88-1 I have been a resident of Atwater Village for over 15 years now. In the that time , I have heard and seen city officials continuously promise to make improve the safety and cleanliness of the river path for its residents. To date, both issues have not been addressed and/or improved. In fact, from a cleanliness standpoint the river path next to me house between Glendale Blvd and Los Feliz Blvd has gotten dirtier. Partially due to the groups(gangsters, drug dealers, and unruly teenagers) that party (do drugs and drink) during the night and day and leave their paraphernalia behind. The other part is due to the homeless encampments that have been erected throughout the path, which takes a way form the desire to walk on the path due to feeling unsafe. About a week ago, I was coming home and saw a person defecating on the walk path that's juxtaposed to my driveway. Yet you market these walkways as a great place to bring your family and you tell the public it is safe when it is not. Put the time and effort into truly addressing the homeless issue and the safely issues so that the walkways can truly be enjoyed in the manner you portray them.

I88-2 **On the part of leadership or departmental authority**
The entrance to my driveway and the walkway to the river path is apparently managed by 3-4 different divisions of the city. So, when I have tried to bring up concerns on safely related to closing the path in the evenings or for cleaning up the area or for overgrown tree grooming, I have continuously been bounced from one division to another. Each pointing the finger at the other and saying they are not responsible for what happens in that section and/or more importantly they do not have the budget to affect any change.

My point is your macro proposal will only exacerbate these micro issues because there isn't a set body in place with the authority and budget to address the concerns of the citizens. I urge you to address these issues first, so you have the right department in place to address the greater issues to come with the execution of your master plan.

Erica Roach

From: Allen Arslanian
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments
Date: Thursday, May 13, 2021 12:47:26 PM

CAUTION: External Email. Proceed Responsibly.

Hello,

I89-1 My comments for the LA River plan are: local Indigenous tribes need to be more involved in returning the river to its natural habit. All the concrete walls of the river bed must be removed and returned to the native soil that is in the area. By planting native plants along the river, this will help clean river naturally.

Focusing more on the cleaning the river, rather than development and most importantly ramping up education to the people in the LA region on the effects of illegal dumping, polluting and showing them how impactful littering within the community affects the LA river. Perhaps imposing more fines to discourage people from polluting might be helpful as well.

Thank You,
Allen Arslanian

Ariana Villanueva

From: Jesse Ross <jesse.ross@gmail.com>
Sent: Thursday, May 13, 2021 12:52 PM
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

I90-1

As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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 (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.

I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I 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.

Best,
Jesse Ross
Palms

From: Robert Leyland
To: PW-LA River CEQA
Subject: "2020 LA River (LAR) Master Plan PEIR Comments"
Date: Thursday, May 13, 2021 12:54:12 PM

CAUTION: External Email. Proceed Responsibly.

The project subject to the PEIR is not adequately reviewed for reasons too numerous to enumerate in the time available. Below, I recommend as a Preferred Alternative the Los Angeles River Urban Wildlife Refuge (LARUWR) for the entire 51-mile corridor.

I91-1 1a. The EIR ought to be edited for brevity and clarity. It should be prepared by independent consultants, free from any actual or appearance of conflict of interests.
1b. The County Public Works Department and consultants are biased and not qualified to design and manage the LAR. Their experience is inappropriate for the LAR, which require respect and likely reverence for Nature.
2. The LA River was a river, but is not now; it should be restored as such as much as possible. It is a flood control channel with a few soft natural bottoms that engineers could not pave.
3a. Under history section, the EIR omitted the L.A. RIVER URBAN WILDLIFE REFUGE plan (LARUWR) prepared by the staff of the Santa Monica Mountains Conservancy (SMMC) circa 2005.
3b. The EIR should adequately evaluate the LARUWR as an alternative, including but not limited to the following questions:
I91-2
- What would be the impact of the LARUWR, as a wildlife corridor;
- Would it help mitigate the human-caused 6th Mass Extinction;
- Would it help mitigate the climate crises;
- Could it serve as outdoor natural history classrooms;
- Would it provide quality passive recreation for communities with chronic natural park deficits.

3c. A moratorium on construction should be considered along the 2-mile wide corridor.
I91-3 3d. Compare the gentrification impact of the proposed LARUWR upon riverside communities, including related displacement and rising rents, with the projects proposed subject to the PEIR.
I91-4 4. What is the actual flood risks, at a time of increasing draught?
I91-5 5a. Would a robust riparian ecosystems in the midst of our communities help reduce flood risk, which real estate development increase by compacting and paving permeable soils.
5b. Would a meandering river, more effectively replenish aquifers and reduce damages by slowing water flow?
I91-6 6. Would the LARUWR increase carbon sequestration, hence mitigating the climate crisis?
I91-7 7. Urban farms, e.g. South Central Farm) are compatible alongside riparian systems and riverside communities, offering increase food security.
I91-8 8. In spite of my concern for the homeless and affordable housing are irrelevant to the LAR. In my view, attempts to raise the issue serves to obfuscate both the former and the latter.

The PEIR listed nine objective most of which ought to be reconsidered in whole or in part.
I91-9 1. Flood risk and "resiliency"
a. The fear of floods have been used to justified the destruction lo the LAR. Now more than ever the fear mongering is inexcusable as droughts are increasing in duration and frequency.
Snowpacks are smaller, providing even less water to flow in what was once a river. These are consequences, in whole or in part, of the human-caused climate crisis.
Objective #1: The climate crisis deserves to be meaningfully addressed. None of the nine objectives address the climate crisis, likely the greatest threat we face. The omission is telling and reason for concern. It represents an abdication.
b. Resiliency, as used in the PEIR, seems a disingenuous term. The LAR will never be able to be resilient unless it is allowed to do what is natural for rivers do.
Objective #2: Redundant and disingenuous. There are little if any restrictions that limit riverside development, all of which frustrates Objective #2.
Objective #3: Ditto. There can be no support for that which does not exist; there are no 'healthy' ecosystems, along or near the LAR.
Objective #4. Enhance ... access...corridor. encouraging or enhancing access could have a deleterious effect on the

quality of the visitor's experience and Wildlife population, as has occurred elsewhere. Visitors should not be encouraged along the bottom and sides.

I91-10 Enhancing access will likely lead to gentrification and displacement;
Objective #5: Arts and culture; are two of the gimmicks used to gentrify and displace existing communities, usually lower incomes and diverse for higher income White outsiders known elsewhere as 'hipsters,'introduced to make the target area "hip." Art and culture is fine elsewhere, not at or near the LAR. I recommend visiting Boyle Heights, to learn about its resistance to gentrification, manifested in opposition to art galleries, etc
Objective 6. Housing affordability. Unrelated to the LAR unless the purpose is to revitalize and increase profits for the real estate and construction industries and the elected officials that serve this sector.
Objective #7: This is Orwellian doublespeak. In my view, it sets the unsuspecting public for bait and switch. The objective needed is for the PEIR to refrain from verbosity and hucksterism.
Objective #8: Water. The PEIR should remind the public of the draught that our leaders have contributed to by exacerbating the climate crisis. Yet, the same leaders do nothing to mandate water conservation.
Objective #9: DITTO. This scheme seems to be to use the LAR as a pretext to exploit the water now flowing to satiate the insatiable LACO greed and thirst. Perhaps this is the reason the LARUWR SMMC plan was shelved. Our anti wildlife City and County intends to sacrifice and not give refuge to wildlife.

CLOSING COMMENTS

• If the suggested Preferred Alternstive is not selected, I would encourage supporting the No Project Alternative.

I91-11 • I object to the apparent effort to discourage participation through review and comments by creating an unwieldy, and user unfriendly document seemingly written to obscure rather than enlighten. It should be re-written and edited, as stated, for brevity and clarity. The objective should be to encourage the public and decision makers to read the PEIR so that together we may contribute and/or make an informed decision. THE PEIR failed, using these criteria and hence failed to comply with CEQA spirits or intent to make available an adequate EIR.

Respectfully,
Robert Leyland
robert.leyland15@gmail.com
Los Angeles CA
(323)336-7185

From: Jeffrey Sapin
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments
Date: Thursday, May 13, 2021 1:19:41 PM
Attachments: LA River Master Plan Public Comment from Larchmont Charter HS.pdf

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CAUTION: External Email. Proceed Responsibly.

Hello,

I92-1 My name is Jeffrey Sapin, and I am the Environmental Science teacher at Larchmont Charter High School. Please find attached my public comment as well as the public comments of 26 of the students in my Honors Environmental Science class. Please let me know if there are any issues accessing the document.

Thank you so much!

Sincerely,
Jeffrey Sapin and the students of Honors Environmental Science and Sustainable Agriculture

--
(He/They)
STEAM Facilitator
Science Department Chair
Larchmont Charter High School
2801 W. 6th St
Los Angeles CA 90057
(213) 867 - 6300

To Whom it Concerns,

My name is Jeffrey Sapin and I am the Environmental Science teacher at Larchmont Charter High School, a public charter located in the KoreaTown area of Los Angeles. Over the past month, the 11th and 12th grade students in my Honors Environmental Science and Sustainable Agriculture class have been learning about watersheds and the potential impacts that the LA River master plan might have on ours. As an assignment, my students have been tasked with drafting a public comment which highlights both a strength and a weakness of the master plan - addressing how either an environmental issue or a measure of sustainability relates to specific items in the master plan.

Personally, I am grateful for the volumes of information which are contained within the LA RIver Master plan. The details and accounts of the river from historical, sociological, and environmental perspectives are through and thoughtful. From the survey or assets, direction from the steering committee, and the continus community engagement and feedback cycles, I am heartened to see principles of equity, justice, and environmentalism as the guiding principles in this planning process. As a Los Angeles native, I am extremely proud to see that this monumental new plan incorporates so many of the ideals I value as a member of this community. As an environmentalist, I appreciate the broad range of goals and methods described in support of healthy and connected ecosystems. From natural soil remediation techniques, incentivizing nurseries with native plants, supporting urban agriculture, and promoting biodiversity at many scales, there are many rich goals at the benefit of the environment. When this work is completed I look forward to seeing more wildlife in and around the river, a rejuvenated ecosystem which provides habitats for local flora and fauna, promotes habits of health throughout the city, and incentivizes innovative social and economic activities.

I92-2

However, I want to echo the sentiments which my students and many other organisations have raised. With such a large scale and sweeping plan, this is a huge lift and there is little in the way assurances that the goals outlined here will be reached. While the methods described for each goal describe and define best practices, with no mention of quantifiable results for any of the described goals, it is unclear how competing agendas of environmentalism and business will balance out. Furthermore, there appears to be great reliance on “river champions” to spearhead many of the initiatives outlined. My fear is that those champions will need to have particular skills and supports, and that the places where these champions are needed the most are the places where they are least likely to get that support. With an agenda that will require the coordination of an army of people over more than a decade, how does the city support the development of those organizations and individuals who will be needed to lead on the front lines? How will the opportunities and resources be promoted equitably to foster that increase in civic engagement? While I understand that this planning document is not intended to provide all the answers to all the questions, and updates are continuously being made, in pursuit of excellence I think we would all love to see numerical expectations that match the vigorously optimistic tone of this document.

In closing, I want to restate that I am overwhelmingly excited about the goals and methods that are outlined in this plan. For myself, and the many students I work with who are passionate about their hometown, there are many illustrious improvements and opportunities for involvement on the horizon, and we are all excited to see this plan born into the world as it’s creators have envisioned. Please find below the work from 27 of my students.

Thanks again.

Sincerely,

Jeffrey Sapin M. ED
Science Department Chair
Larchmont Charter High School

Shawn Babitsky

Mr. Jeffrey Sapin

Honors Environmental Agriculture / Pd. 3A

9 May 2021

Final Draft: LA River Public Comment

To Whom It May Concern,

The LA River Master Plan along with the Los Angeles Sustainability Plan are both geared towards improving the environmental sustainability in this city. However, the LA River Master Plan specifically focuses on the regional impacts of this particular river. Although the plan is not without faults, it does have some notable strengths.

One of the most important strengths of the LA River Master Plan is that it will significantly benefit the homeless community in LA. This is very important since the homeless population is so large and only growing here. In fact, channel abc7 reported that there are roughly 41,000 people experiencing homelessness in Los Angeles. The plan included a detailed description of how the group plans to build restaurants, commercial buildings, and residential buildings around the river. This is summarized in the Lower Los Angeles River Revitalization Plan or LLARRP. This will not only help the homeless population but it will also produce a rise in employment since it will create jobs.

I92-3

Nonetheless, as I mentioned before, this plan is not without faults. Although this plan will create jobs and work to decrease homelessness, it might be environmentally harmful. As described by Emily Folk in an article in EcoMENA, industrializing the surrounding area of the river will likely harm wildlife. Ripping up plantlife and displacing wildlife populations will significantly harm the ecosystem. This claim is supported by a 2017 article from populationgrowth.org which explains that negative effects of this plan could resemble what we saw in the Industrial Revolution. This all needs to be considered and the pros and cons need to be weighed before setting this plan into action.

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Sam Benarroch

Reading the LA River Master Plan as someone who frequents the LA River via the bike path makes me very satisfied. The planned pathways spotlighted in the *Existing Project Spotlight: LA River Valley Bikeway and Greenway* section are extremely important. The environmental implications of improving upon our existing bikeways could prove to be tremendous. A 2015 study by the Institute for Transportation and Development Policy determined that an increase of about 20 percent in cycling worldwide could "cut carbon dioxide emissions from urban passenger transport by nearly 11 percent in 2050". The steps taken to optimize the LA River bike paths are a big strength of the plan. Making it easier to bike means less traffic, and the stress of a traffic jam isn't just time wasting, it's bad for the environment. *Environmental Leader* says, "when you find yourself stuck in what looks more like a parking lot than a highway that's where your car really starts eating up gas" adding that the optimal speed for fuel efficiency is about 45-65 miles per hour. In the same article, it says that cities that invest in public transit, such as bike roadways, are more likely to get cars off the road. The project adds nine segments that close gaps in the path allowing for an ease of transportation and encourages a more legitimate alternative to traditional roadways. The emphasis on the expansion of existing bikeways will have more people considering more eco friendly ways of travel, offsetting emissions by not only taking cars off the road, but keeping cars at the optimal speed range for fuel efficiency.

I92-4

As a biker, I also travel by a lot of homeless encampments, which have environmental risks all on their own. Reading the LA River Master Plan, I have serious concerns as to the extent of what the master plan addresses. If we don't do enough to mitigate the cause and effect of homelessness, the problem would absolutely persist. According to a report by Amerlia Marie Gomez presented to the faculty department of Public Policy and Administration, in 2013, San Jose officials cleaned up one of the biggest encampments in the country and retrieved 2,850 gallons of human waste, 1,200 needles, 315 shopping carts, and 618 tons of trash from the encampment located near Coyote Creek. In a separate instance, a whopping 575 tons of trash was collected over the span of four months from the American River Parkway in 2018. These examples demonstrate parallels to the LA River Homeless issue and the potential for unsheltered people's environmental impact on surrounding areas, and since the river goes straight to the ocean, the plan should do more to address this issue with specifics. According to River LA, 58,000 homeless people live in LA currently, and the vague language in the plan such as "Incentivize stronger resident equity building tools" and "Continue coordination among the web of organizations that perform outreach" is personally worrying. Instead of saying "Identify funding necessary",

I92-4 cont.

actually identify the funding necessary. Los Angeles has a rich history of not doing enough to mitigate the homeless epidemic, and it's worrying there isn't even a ballpark amount for how much the LARMP plans to invest in our unsheltered communities. At the start of Mayor Garcetti taking office in 2013, the city had 22,993 unhoused residents and in 2019 the problem increased to a whopping 36,300, even after promises by mayor Garcetti to "declare war on homelessness" in 2015. The Master Plan implies more of the same, and even with the success of the permanent supportive housing, more of the same just isn't enough. An issue which 95% of voters call "a very serious problem" should be more than just vague buzzwords of sorts, and instead an intricate and carefully crafted plan that does more than enough. This isn't just an environmental issue, these are people. Being more in depth is necessary when discussing such a large issue concerning the LA River and should be top priority. In relation to the environment, that is 58,000 people who potentially pose a threat against the environment. The LA River Master Plan can, and should do more to address it.

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Jacob Blitstein
Period 4
04/19/21

LA River Public Comment:

Have you ever wondered what happens to the water that we use in our homes or collect from our rain storms? If you didn't know then then you know now that in each of our streets all across the city there are drainage and sewer systems that transport our water that is both used or hasn't been used yet and has just been collected. One of these systems is known as the LA River which stretches from 48 miles which is past the valley and all the way to Long Beach. The Los Angeles River has played a vital role in the development of this city. In the 1800s, it was the primary source of water for people living in farms and agricultural areas across early Los Angeles. This system of water has been existing for many years and each component has an important purpose in the functioning of this transportation. But there are two main components that I would consider are one of its strengths involving the access gateways and a weak part would be the off channel Landsets. There is evidence and reasoning behind these statements which will be presented in the following paragraphs.

To begin with, there are many positives and strengths that come with the LA river Master plan and its impacts on our great city. One of the best qualities and components about this plan revolves around its trails and access gateways along the River. These trails and access gateways play a large role in maintaining the cleanliness of our water and the amount of water that enters to either be repurposed or to be considered runoff water that would then lead to the ocean instead.The water that enters the La River every day has been cycled in an uncontrollable system that not only leads to easy access for toxic plastics to mix but also for landslides and floods to occur at a higher rate. But as time has passed the LA River has evolved from an uncontrolled, meandering river providing a valuable source of water for early inhabitants, to a major flood management system. This water that leads to such places as the La River is either wasted out into our oceans or repurposed and cleaned to be reused as a source of water for such things as toilets, plumbing and much more. By having a transference system on the LA River that cleanly organizes the placement to this system of water we are able to better help our environment and not pollute our h20 with any sort of toxic or plastic materials thus helping our environments and our usage of the substance. The water running from Long Beach to northern Los Angeles isn't entirely 100 percent clean even if there is rain water that leads to this system. The Plan's strategic guidelines endorse numerous key elements for flood hazard and resilience, which include persevering with weather alternate research, thinking about flood hazard to important infrastructure, developing emergency motion plans to improve preparedness, and updating the prevailing Los Angeles river watershed hydrology. Over the course of the subsequent century it is statistically probable that the Los Angeles River will flood and overtop its banks and levees. These trails all have their purposes and without the certain modifications made to prevent such floods from occurring Los Angeles would be facing yet another weather associated crisis. By having a system of drainage tunnels and access gateways any time there is a flood or landslide these tunnels provide room and space for which the water doesn't overflow out of the La River. They will then lead to other such water runoffs that will balance out the overall water level and help to prevent landslides. Landslides occur from the mixture of too much water and dirt or land causing the ground to shift. The water is meant to be transported down the river where it will lead to other bodies of water or facilities that can clean and reuse it. By balancing its overall water usage and water entry we won't have too much water entering the river as the trails are used as a filtered system that slows the amount of water entering the river thus preventing any danger. Without these trails and runoffs Los angeles would have serious damage to fix all of the time from such natural disasters.

I92-5 Finally, one of the Los Angeles Rivers greatest flaws involves its channel landsets. By having these off Channel Land assets it is a lot easier to have our water exposed to toxic chemicals as all of the plastics, metals and trash will have an easy

I92-5 cont.

transported system to our source of H20. Although it is meant to better organize what enters our water it isn't always the cleanest and these pathways can lead back to our system of water negatively impacting both humans and our environment. Any sort of sewage system in the street is able to lead to our source of water whether it's in the ocean or the river thus exposing it to toxic chemicals. Then these plastic's or trash will easily lead to the water that is used by our environment which will then negatively impact the plants and humans that use it. An inch of rainfall in L.A. generates 3.8 billion gallons of runoff, so you're talking about more than 12 billion gallons of water that could be captured, but that flows within hours down our concrete streets and into the ocean. That means all of the animals that live in the ocean are getting direct contact with trash from our city killing over 1 million sea animals especially with the 100 million tons of trash in the ocean right now. This would lead to a negatively impacting situation and should be rethought of or changed to where it better cares and helps our LA River. The popular LA river stretches also can harbor enough fecal bacteria to make kayakers, anglers and swimmers sick. Our oceans and Rivers have suffered enough from being polluted by human trash that was littered. If we want to keep and maintain a healthy system we need to find a new sort of system that allows such rain water to go to the river without bringing toxic pollutants with it or a way to filter the water that enters the LA River before entering such assets in order to have a clean source. Although this is an important component to the La River master plan it does much more good by transporting such trash rather than safely bringing in water that can either be reused by humans or that will negatively impact and kill animals or living plants like coral reefs that thrive from a healthy source of water.

I92-6 The La River Master Plan is meant to begin after this year's proposal fixing some of the mistakes that come with this system or upgrading already good parts of this body of water transportation and filtration.By having this masterplan we are preventing any such dangers from natural disasters including flooding and managing what is put into our water so we safely can benefit rather than pollute our environment. Each part of the La River Master Plan has a purpose and some may be more efficient than others but each plays their part in benefitting all of those who live near it, not just humans. If we want to protect our ocean life and prevent further damage already sustained on this body of water then we need to be involved and sign this. There are so many people that say they want to make a change but aren't actually taking action. It only takes support from a few others for your movement to grow and to make change and that is needed at this moment. We need the LA River Master Plan and we need it to be the healthy organized system that it was meant to be.

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"Here's a Look at the Updated L.A. River Master Plan" https://urbanize.city/la/post/heres-look-updated-la-river-master-plan

To whom it may concern,

My name is Martin Carpio. I am a 16-year-old student from Larchmont Charter School, and I have lived in Koreatown, Los Angeles for my entire life. Improving the LA river is an important and timely project that must be addressed within the coming decades. This Master Plan proposes some key elements that can make or break its effectiveness, specifically its plans to provide easy access to parks and trails along the river, and the level of air pollution produced from the implementation of its kit of parts.

The LA River Master Plan's goal to provide equitable, inclusive, and safe parks, open space, and trails is one of its many strengths. Along its 51 mile stretch lies only 32 miles of trails that are available for recreational use (LA River Master Plan, 2021). Additionally, only about 5 of 17 cities along the river "meet the World Health Organization's minimum standards of 2.2 acres of parks per thousand people." This is a statistic that must change for the better in the coming years. Recreational areas are integral parts of communities that offer satisfaction with our city, a place to connect with other people, and an opportunity to stay active. My neighborhood, Koreatown, has over 168,000 residents (We All Need Parks, 2018). In order to meet the WHO's minimum standard, we would need 369.6 acres of park space. Koreatown has less than 19. The lack of parks within my neighborhood shows how important it is to establish trails and parks along the river. People all over Los Angeles deserve accessible parks and open space, and creating parks along the river may be one of the easiest ways to achieve this. If enough parks are established along the river, it could fulfill the WHO's standard for the ratio of parks to residents, provide more opportunities for Angelenos to spend time at a park, and encourage the development of parks throughout Los Angeles. With the development of these parks along the river, it provides an opportunity for people from Koreatown and other park-scant neighborhoods to go to them and embrace the recreational time they deserve.

I92-7 The LA River Master Plan faces a potential setback in its sustainability goals when it comes to the amount of air pollution that will be produced from the implementation of its kit of parts (KOP). Many air pollutants are bound to be released, especially in regards to construction, such as the use of heavy equipment, vehicle trips, large haul trucks, and so on. According to sections 3.2-44 and 3.2-45 of the Program Environmental Impact Report, even when several measures are taken to reduce the release of various emissions, it "cannot be stated with certainty that emissions would be below applicable regional or localized emissions thresholds. Impacts would be significant and unavoidable." Even though there will be numerous methods of mitigation, they may not be enough to meet local emissions limits. This issue must be fixed as it is becoming all the more important to prevent the acceleration of climate change in the next few decades. There must be greater efforts to mitigate the emission of air pollutants in order to ensure that the

I92-7 cont.

negative aspects of the plan do not outweigh its many benefits. Although air quality may be improving in Los Angeles, it does not mean that we can trade improvements for setbacks. Los Angeles county contains nine of the fifteen most polluted cities in the country, and does not meet national air quality standards (IQAir, 2021). The LA River Master Plan could delay the cities from meeting these standards by contributing significantly to air pollution.

The benefits of the Master Plan clearly outweigh its downsides. It is true that the emission of pollutants from various heavy machines will be a setback for us in terms of conservation. However, the greater accessibility of parks not only promotes community development but also provides green infrastructure than can make up for it. All in all, the LA River Master Plan should be implemented as soon as possible thanks to its beneficial aspects to our community.

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To Whom it concerns,

I am a student in high school, and we have been learning about the Los Angeles Master Plan. I have been researching many issues that face the city of Los Angeles. One of the important issues that faces our city is the quality and quantity of fresh water. One of the weaknesses from the quality and quantity of fresh water is, wasting too much of it. According to a website called, “Some Perspective on Water Usage,” by Brent Dickerson (n.d.), it states, “An average household uses 320 gallons of water a day, which is 116,800 gallons of water per year.” This was only the amount of water used in an average household, meaning that there were more gallons of water used for other occasions. Furthermore, the same website, “Some Perspective on Water Usage”, also states, “Considering outdoor usage by the average household (the 30% mentioned above), the EPA says "as much as" 50% of this is wasted. That would be 48 gallons a day of wastage by the average household, which, in a year, would be 17,520 gallons.” There was about an amount as high as 18,000 gallons of water wasted per year. This is identified as a weakness because we're losing the quantity of water we have each year. I believe that not a lot of action is being taken towards this matter because the amount of water we use each year is slowly increasing, rather than decreasing.

Additionally, I believe flooding is another problem to Los Angeles’s quantity of fresh water. It was said that flooding has occurred prior to an extensive development. According to the Hydrology and Water Quality article, it states, “The steep mountains that are surrounding the LA River, create a tendency for flash flooding.” Having constant floods can lead to destroying homes and property damage. More importantly, floods can affect the environment. Floods are dirty water that may carry chemicals and diseases that can affect the soil’s quality in the environment. According to a source called, “What Are The Consequences of Flooding (April 29, 2019),” it stated that water supplies may get polluted in a certain area due to the floods. I would identify this as a weakness because floods include chemicals and can cause harm to the environment. Chemicals can lead to people getting hurt. Also, floods can not only harm the environment, but also affect the quality of fresh water. Floods aren’t necessarily caused by humans, but there are still things we can do to help be prepared for flash floods.

Continuing on, the LA River Master Plan is working on flood management and water conservation. According to the LA River Master Plan PDF, it states that they are ensuring that flood control and public safety needs are met. Also, it states that they are considering stormwater management alternatives. One of the strengths that’s provided by the LA River Master Plan PDF is by, “diverting and treating stormwater and dry weather flows within the river channel for groundwater recharge, direct use as recycled water, and to supply water for parks and ecological areas.” I would identify this as a strength because this is part of a process to help manage floods. The LA River Master Plan will help

make use of the floods and stormwaters. I believe if the proper action is taken, there won't be lots of water going to waste.

Looking at the bright side, there are some strengths we can do to help employ and encourage efficient water use. According to the LA River Master Plan PDF, it states that perhaps the most direct way to improve local water supplies, is to simply use less water. However, the question is how can we, as a community use less water? Well, according to the same article (LARMP), it cites, "Encourage an inter-institutional study on climate change impacts to water supply planning in the LA Basin. Provide incentives for parks and other projects to utilize best practices for water conservation." Examples provided from the LA River Master Plan's PDF, shows how encouraging certain communities or places can help with using water efficiently. It's important to make people be able to see posters or signs around their local parks or other places so they can read the signs and take note that they should try to use water efficiently.

Another way we can learn to help our city's issue with the quality and quantity of fresh water is, to coordinate water quality improvements with the Safe, Clean Water Program (provided by LARMP PDF). According to the article called, "Safe Clean Water Program," it states, "The Safe Clean Water Program Goals help protect our coastal waters and beaches from the trash and contaminants in stormwater that make people sick and threaten marine life. Modernizes our 100-year-old water system infrastructure using a combination of nature, science, and new technology." We can use this program to help with water quality. The faster we take action, the faster we can get this done. Also, this can greatly benefit us. The Safe Clean Water Program can also give us updates on LA County's water system to see the billions of gallons of water that we lose each year. I do feel that this program is effective and efficient because the program helps in multiple ways on how we can improve water quality.

Furthermore, another strength from the LA River Master Plan can be, coordinating with the Watershed Management Program and Enhanced Watershed Management Program Groups. In the LARMP PDF, it states, "There are four WMP or EWMP groups along the LA River that have adopted programs through which participating cities and agencies meet their water quality requirements. Expand stormwater capture for groundwater recharge, increase distributed stormwater capture, and reduce effective imperviousness in the watershed, prioritizing nature based solutions where possible." This quote shows how WMP AND EWMP Program Groups are helping with stormwater runoffs. Additionally an article titled, "Changes are Coming to the L.A. River," by Luke Ginger (2020), it states, "The State Water Board and other stakeholders have created the Los Angeles River Flows Project to evaluate the environmental and recreational impacts of reducing wastewater discharge into the L.A. River. The goal is to identify a water flow regime that will support a healthy river ecosystem, allow for recreation opportunities, and recycle enough

water to be drought resilient.” This quote shows how the LA River Master Plan is trying to improve the amount of water we’re using. It proves that they are slowly making changes to reduce the amount of wastewater.

I want to thank you for taking your time to read my comment about the LARMP. To sum this all up, we may still have a lot of things to improve on. However, I do believe that we still have time to fix the issues surrounding our city’s water quality and quantity of fresh water. There have been great examples such as the Safe Clean Water Program, that can help improve our water quality, and hopefully many more to come!

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Ralph De Jesus

Honor Environment Agriculture

May 9, 2021

Mr. Sapin

Final Draft of LA River Master Plan Public Comment

There are several benefits and drawbacks to the LA river master plan for this project. One of its strongest points is the impact and change of trails and gateways across the river. This event would also rid the environment of toxins that have accumulated in the water due to human littering. Ways of getting rid of toxins in the river are conventional water, meaning filtration, use of chlorination, and sedimentation-- with this, it lowers the levels of toxins. The new trails and gateways will also provide a healthy ecosystem for the people who live near the vicinity. Placement of trails and gateways in specific locations along and around the river would make the river better and cleaner. The off-channel land sets that are a part of the river are a flaw in the LA river design. The addition of channel offsets to the Los Angeles River raises concerns about more pollution and hazardous substances being emitted or entering the river. The intentions of this plan are intended to help humans become more coordinated, but the polluted materials at some point will eventually find their way into the river, as well as harming and deteriorating the other aspects of the environment. The adversity our ecosystem faces is the climate crisis and the need of revitalizing things that are prohibiting and ruining the climate or causing it to change. Any type of plastic or garbage can quickly find its way into the water used by our society, causing harm to the plants and humans that use it. Consequently, this will be a bad condition that should be rethought or changed to better care for and support our LA River.

I92-8

The River can be able to provide a source of helpful resource for the locals near the river when and if millions of dollars are invested in this plan and take it seriously. In the last 25 years, the LA River has done a good job of preventing or reducing the likelihood of floods. According to a trusted source, Architect Frank Gehry, “Picture “elevated platform parks” — massive, bridge-like green spaces that occupy government airspace high above the flood channel’s musty floor, and four feet above the rim of the channel walls. Constructed on hulking concrete planks and enormous girders, the earthen parks would stretch nearly a mile over both rivers and support a lush landscape of trees, grass, scenic ponds, horse trails, and walking paths.” (LA Times). The Master Plan recognizes the problem of flooding, and to address it, the plan proposes expanding the river's potential, minimizing peak flood areas, and incorporating

strong infrastructure to address the long-term effects of climate change and any severe weather events. The river plan will be upgraded as part of the master plan to cope with climate change, which is beneficial for the environment. The vision of the Los Angeles County Board of Supervisors would be a significant and innovative change for the community and climate change. Since the LA river is being upgraded, the areas around it should be flood-ready and capable of handling severe events. Upgrading the watersheds, channels, floodplain strategies, and upstream and downstream effects can help renew the LA river. Climate change will have a negative impact in the future, such as potentially the rises and decreases of temperatures, and rising sea levels causing the LA river to flood, thus, specific plans must be in a position to assist in the resolution of these issues. "With the threat of a changing climate, the importance of reducing flood risk increases as the frequency and intensity of extreme storms change," notes Page 145 of the Complete Los Angeles River Master Plan Document. The bulk of the upgrades to channels, bridges, and by-pass tunnels were still being discussed. Flood management will help to keep the city clean and dry. Page 149 of this document, supports the argument of upgrading the old system to help prevent flooding. The master plan promises to research current climate change and its effect on Los Angeles, which is a pressing concern. (Page 149.) With up-to-date data, a modern system can be developed that takes into account the short and long-term effects of climate change, reducing the risk of flooding.

I92-9 The LA river master plan has a flaw in that it does not address hazardous substances or materials entering the river as a result of human littering or flooding. People may be harmed by harmful chemicals in water, and death is a possibility. More effort should be put into stopping these toxic chemicals from entering the river. The production of the LA river master plan, as I've mentioned before, costs roughly, hundreds and millions of dollars. Multiple substances concentrations in the LA River were found to be above federally set water quality levels, making it a polluted water body. Total Daily Maximum Loads (TMDLs), a regulatory item that sets the maximum pollutant permitted to be discharged into an impaired water body, were created under Section 303(d) of the Clean Water Act in an attempt to restore impaired water bodies. (Page 216 of the LARMP). A suggestion I have in mind is-- there should be a procedure or structure in place to prevent any hazardous material from entering the river if there are any dumpsites, public areas, or sewage waste treatment buildings nearby. An upside to the use of this unpolluted water is that it may be diverted from the Los Angeles River and may be used to supplement a regional water supply. Water that has been diverted may be used to improve ecosystems, promote tourism, or provide water to municipalities and industries. The ability to use

I92-9 cont.

the LA River for these purposes is influenced by its water quality, as it states on Page 218 of the LARMP Document. There must be a plan in place for garbage not to end up in the river if public areas are to be built around or near the river. Trash is less likely to enter the river if these public areas are isolated or not too close to it. There should be a more comprehensive strategy in place for sewage sites and other hazardous chemicals and materials. It would be ideal if there was some kind of water catcher or watershed to prevent any water from flowing directly into the river from the site, which is only in place to keep people safe along the river and in the event of severe weather. For this strategy to be effective, it must include a component that relieves communities of the burden of displacement while also assisting in the development of stronger relationships with these communities.

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With the LA river master plan there are a lot of strengths and weaknesses to this future project. One of the strengths being is the change and impact of trails and gateways around the river. This will equally clear the water of pollutants that are in the waters from people littering. It will also provide a healthier environment and ecosystem for the surrounding habitants. With placing trails and gateways in certain areas on and around the river, will provide a safer and cleaner river. A weakness in the LA river plan is the off channel landsets that are a part of the river. Having channel offsets added to the LA river brings the concern of more pollutants and toxic chemicals being released or getting into the river. These channel offsets are to make humanity more organized but over time trash and other harmful chemicals will find themselves in the river, which will lead to pollution to the river and the ecosystem, harming surrounding wildlife. Any sort of sewage system is able to lead to our source of water whether it's in the ocean or the river thus exposing it to toxic chemicals. Any sort of plastic or trash will easily lead to the water that is used by our environment which will then negatively impact the plants and humans that use it. This would thus become a negatively impacting situation and should be rethought of or changed to where it better cares and helps our LA River.

I92-10

On page 286 from the LARMP Main Volume states it is pushing forward on flood reduction. The LA river has done a good job of stopping or reducing the chances of flooding in the past 25 years. With the master plan, the river will be upgraded to deal with climate changes and the water flow with that. This will provide an update to the already existing watershed hydrology, shown by the LARMP (Plan at a Glance). With the LA river being upgraded, areas around the river should be flood ready and be able to have capacity for extreme events. To help renew the LA river is to upgrade the watersheds, channels, floodplain strategies, and upstream and downstream impacts. In the coming future, climate change may come into harsh effect and flood the LA river, there needs to be planes in place to help solve these problems. With most of the changes being in channels, bridge modifications, and by pass tunnels. To prevent floods will help keep the city safe and clean.

I92-11

The weakness in the LA river master plan is that there is not enough talk about harmful chemicals or materials getting into the river, from people littering or flooding. Harmful chemicals in water can hurt people and could lead to death. There needs to be more of a push towards preventing these harmful chemicals from getting into the river. In the document Hazards and Hazardous Materials from LARMP, clearifies what are the specific materials and chemicals that can be harmful and hurt people. If there are any trash sites, public areas, and sewage waste management buildings nearby, there should be a procedure or structure to prevent any harmful material from getting into the river. For the plan of having public areas around or near the river, there needs to be a plan to not have trash finding itself in

I92-11 cont.

the river. If these public areas are separated or not too close to the river then there is a less chance of trash getting into the river. For sewage sites and other harmful chemicals and materials, there should be more of a plan around that. If there could be some sort of water catcher or watershed to prevent any water going directly to the river from the site would be best. These are only to keep people safe around the river and incase of extreme weather conditions.

The LA river master plan is a great idea in updating the aging river structure. With the rapid change in the environment due to climate change, more water is being created and the river that we have now is ill prepared. This chance to change the river gives opportunities to make it look nice and open up some areas around the river to the public.

Emily Esquivel

As a teenager as well as a student, being part of my Los Angeles community I want to learn more about the La river and it's master plan and how this plan was going to make a change in any way. As for the process of the plan I noticed that the La river plans can have both negative and positive impacts.First is a problem that has a major effect which is the problem of the La river facing flooding situations. In the article La River Master plan it stated "The LA river has a long history of flooding even before extensive settlement.when it rains large amounts of water flow out of the mountains into the flat areas". This shows how the flooding has had a big effect for the longest time and there still is no change to solve this problem.This as well reflects how much or how many communities can get affected throughout the floods. Due to the flooding becoming something regularly that happens when it rains, there has been some trying in keeping residents safe. In the article LA River residents said to brace for 100-year flood it states "residents living along the LA River that they may be at risk for flooding and might be required to obtain flood insurance". This shows how far the flooding can go and it's portability to hitting areas where many people live. In the past there have been some plans from the previous Board of Supervisors in 1914, in the article Historical Background it says " in 1914 to build dams in the mountains to slow runoff and catch debris, but local taxpayers were unwilling to provide enough money to complete more extensive flood control plans". This shows that there have been plans that are in order and maybe have been done but it was something that didn't workout.As well in needing a plan to run money is needed. That is a big problem but they are focusing on tackling the problem of floods and trying to prevent them from not happening anymore. In the article History Of The Los Angeles River it talks about the certain areas that have dealt with floods and the struggles when they hit. .As stated in the article it says "In 1815 the Los Angeles River floods washed away the original Pueblo de Los Angeles. In 1825 a flood caused swamps to be formed between the Pueblo location and the ocean causing the River to flow southerly into its current location. In 1861 another flood caused the San Fernando Valley to flood, washing away river banks and water distribution systems." This is a great example of which can show how in previous time's a flooding had an effect on many locations and communities within those locations. As in the future or in new plans there can be space to hopefully make changes within this problem.

As the LA river brings positive outcomes an outcome of the LA river is that it brings communities together. As this being a part of a positive outcome many good relationships are built. This helps me as a teenager in my community because it's a way to make changes in the world. In the article about the La River it specially said "throughout the

planning and implementation process, the City will seek regional cooperation with adjacent cities such as Glendale, Burbank, and Long Beach, along with the County of Los Angeles and other river-related agencies". This shows that they always make sure to seek to get everyone around the la river to share their opinion or ideas so that the plans can be fine with everyone but to also be sure they work together. As plans are decided towards the LA river as a resident in your city you can give your opinion like stated in the article Changes are Coming to the L.A. River "When the L.A. River Master Plan is released to the public, you can provide comments about the changes you would like to see in the watershed". This shows that you are free as a resident to give out your opinion and agree with others in your community to seek and understand you are comfortable with this.The importance of communities coming together and working together is important because it opens up new ideas and opportunities. As well as building stronger ideas to make our world better. In the article Los Angeles River Communities for Environmental Equity "Los Angeles Communities for Environmental Equity seeks to bring together neighborhoods, like minded organizations and stakeholders of all types – be they residents or visitors who simply enjoy a walk along the Los Angeles River". This is another great example of showing how the government makes sure to understand what a resident might want and be pleased with. The article Friends Of The LA River Plans a Huge Summer Cleanup; County Seeks Comment On Master Plan especially states "Christiansen and the Friends of the L.A. River hopes to bring the river back to its roots. And, for Earth Week, Folar is planning a huge cleanup. From June to July, the group is asking for help, cleaning up 100 tons of trash from the waterway". This overall is a great way to end saying that as a community there are always positive outcomes and great opportunities. As well as new ideas and strong community bonds. As for the La river facing it's negative and positive outcomes there can be changes in the future with future plans or plans that are likely able to run some day and make a change.

Kellen Frankel

The LA River is a landmark recognized by everyone who lives in the city of angels. Roughly 51,000,000 people live along the river. The water flows from all the way up north to all the way down to our beautiful beaches. We love our river. However, while having a river is cool, the LA River kind of sucks. Ask anyone in Los Angeles, and they'll tell you, the LA River is barely considered a river. It's more of a soggy concrete path littered with trash and dirty water than anything else. It's functionality, to control flooding, works only around a crazy 2% of the time. A few years ago my grandfather from New York came to visit. When driving around he was told to make a left on the bridge and he got super lost because he couldn't find the bridge over a river. When my mom showed him where, he stared at it and asked "that's a river??".

So we all have our complaints about the river, but in recent years, events have begun to be put in motion that may change our city's river. In 2015 our mayor Eric Garcetti rolled out his plan for a new sustainability system for the LA River. This system would completely revamp the LA River as we know it, by changing it from a massive concrete path to a sustainable, ecological and economical wonder. The plan includes redesigning the areas around it, creating new businesses, plant life, and more. Here are some of the strengths and weaknesses of the plan.

The first strength I want to talk about is the face value. Creating a beautiful landmark that runs through our city rich with lush parks and cool businesses sounds so cool to have. I've been biking the path along the LA river for years and I always thought it would be so cool if there was more built to incorporate the beauty of it. This would also allow hundreds of possible local businesses to open up and create innumerable job opportunities. It is estimated that the project will open up about 200 spots for future businesses. Another really cool concept introduced was using the natural ecosystem it creates to create a more lush environment. The marshlands are some of the most beautiful sites in the city, so if we can get a fraction of that beauty along the river as opposed to the dirty trash filled concrete with over 28% E-coli levels, that would be a win. Additionally, by making the river look less like a trash pit, it may inspire others to not treat it that way. At the moment, people near it just throw whatever they want into the river, because what's one more plastic bottle in a sea of trash? By making the river look prettier, establishing more gathering places and parks around it, it may inspire people to treat the river as it is, a natural beauty. I also like how instead of removing the parts of the river that currently work, they're suggesting "Elevated Parks" which would be built on top of the current passages.

I92-12

There are some issues with the plan however. As I said, getting cool businesses along the river bed would be nice, but it can be overdone. My personal vision is a small cafe or rest stop along the bike path or parks, but this can very easily get out of hand, and massive supermarkets and malls can be created. I think this would be ultimately terrible for the mission we're working on here. Another worry I have is that the plan will be put in motion, dozens of construction sites will begin working along the river, and then something will go wrong, and work is paused. Around 60% of all construction projects face delays. This can happen for up to years, meaning that there would just be open work sites abandoned along the river, which would just make it even worse, possibly even compromising the little bit of beauty it still retains.

Personally, I'm excited for this project. I really hope it works out well. Having a beautiful river filled with neat restaurants, amazing parks and wondrous landscapes would really brighten up such a key aspect of our city. It would also aid in the gentrification process, which would merge communities which is always nice. I have my concerns as I stated. I'm a firm believer in the concept of Murphy's law, and that if something can happen, something will happen. Ultimately, I believe it's worth the risk. I love it when people build neat

things that incorporate the beauty of nature into them. I think having a long string of parks and businesses would bring nothing but benefits to our city, such as the massive 42 acre park being suggested. I really hope this goes well, and I’m excited to see the results.

Jackson Gross

LA River Master Plan Pros & Cons

There are many components to the LA River that used to make up entire ecosystems and species. This life source of the LA River helped these systems thrive and grow until settlers started to see the value of its resource. When development in the surrounding areas started, the population around the LA River started to change drastically and not being able to support the ecosystems that it used to. Now in modern-day (more like 90 years ago), they sailed up the river using concrete to cover the base. This led to unforeseeable changes that would not be identified until the present day.

Strengths:

In the LA River Master Plan, they realized how important it was to revert part of the river back to its former form. What does that mean? Well removing the bottom bed of concrete that the river has been flowing on for the past 90 years.

Now, why is removing this piece of concrete so important? It won't run off into the ocean anymore and be able to be reabsorbed back into the land. For the past 90 years whenever there was any amount of water in the LA River, it would all follow into the ocean due to the fact there were no access points for the water to be absorbed by the dirt. With this new change, we can decrease the amount of runoff and increase the reabsorption process.

Still, what's so important about having it reabsorb into the dirt? So when water is being reabsorbed into the earth it can support local life once more by way of increasing the groundwater again for our plants and local ecosystems. This could also help support the old ecosystems that used to thrive off the river before its industrialization.

Weaknesses:

I92-13

according to the introduction pdf 1.1.3.9 talks about the pollution problem that the LA River faces, stating that they are having 800 water quality improvements planned. With that said in this section even states that they are unsure of keeping up with the constant milestones in order to continue the improvement of the LA River pollution.

In this small section, I was left with two questions, what are some of these plans, and two what is the majority of the pollution coming from. Referring to the LA River index talking about the majority of pollution for the LA river is from streets (cars), industries and urbanization. Also referring to the pollution section, the runoff that flows down the LA river with the mixture of trash and oil from the streets leads to contamination of

I92-13 cont.

the River. This creates the stance that this water should be treated and made clean before we consider letting it get absorbed back into the earth.

How can we fix this polluted water situation? Well, there's really no easy way, but the solution I can think of is mindful awareness and more extensive cleaning of storm drains on the street. Let's talk about mindful awareness, this is the idea that our society adopts that it's important to throw their trash away in a proper waste bin, and if they see trash they can throw it away because they care. Also taking more public transportation can lead to less pollution being produced from automobiles. Unbforchidently when it comes to urbanization, there are not too many things we can do, planting more trees would be a good start. I believe that some of these solutions could be implicated to help decrease the pollution in the LA River would drastically decrease.

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Sofie Hahn
Honors Environmental
Mr. Sapin
4/19/21

LA Master Plan Comment

While the LA River Plan will be very helpful to communities in LA by making the river more sustainable and will open up job opportunities, the general waste management and flooding concerns are not easily detailed for the reader. While waste management is mentioned in the Los Angeles River Master Plan, it focuses on pollutants in the water rather than actual steps the plan will take to clean up the river. The LA Master Plan describes the LA river's waste as, "Water picks up pollutants and absorbs heat as it drains more impervious paved areas on its way to the LA River, impairing water quality and adversely impacting the beneficial uses water provides."

I92-14 While these detailed explanations of the bad quality of the water are necessary, they have little benefit when compared to explaining the steps of how this plan will lead to cleaner water. There are rules and regulations set in place to make sure that our water is clean, such as the California Toxics Rule, which establishes acute and chronic standards for bodies of water, such as inland surface waters and enclosed bays and estuaries that are designated statewide as having beneficial uses. Regulations such as this will help the LA River and other bodies of water become cleaner as they must adhere to these rules. This ensures that the LA River will be clean with these new plans in place.

I92-15 The environmental impact report for the LA River Master Plan is very detailed and well researched, but has little explanation of how the flooding situation will be lessened with this project. The communities along the LA river deserve a way to ensure that they won't be flooded in the case that heavy rainfall occurs. According to Patch, "The river has long created a dividing line down the county, acting as a barrier to equity and opportunity for those who live along it." This plan leaves much to be desired as it only states that flooding has happened in the river before and that the mountains around it can create flash flooding.

I92-16 According to the LA River Master Plan, "Following catastrophic flood events in the 1930s, development and expansion of flood management infrastructure was implemented, including channelizing 51 miles of the LA River." This would only leave someone who lives near the river concerned about flash floods and the lack of flood protection we currently have against flash floods. This needs to be addressed in the master plan as people living along the river are at risk of flooding.

The LA River Master Plan does a great job at stating how they will improve local water supply reliability. According to Urbanize LA, “Olin, who is a partner at the studio of the same name, envisions 100 miles of public trails along the river, as well as park projects that restore habitats and improve water quality.” By first explaining the quality of water in LA, the reader gets a background understanding of how clean and reliable the water is in the river. According to the LR River Master Plan, “Water is a scarce and valuable resource in drought-prone Southern California. In the greater LA basin, water supply consists of approximately 55% imported water, 40% groundwater, and 5% sourced from recycled water and local surface water.” The plan then explains how the river will be more sustainable in terms of economic viability, environmental protection, and social equity.

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Natalie Heredia

The LA River Project is something that will impact the greater Los Angeles community. This is a plan that will not only improve the environment but socially as well. You will be giving the LA River a new reputation and it'll be a great opportunity for the community to work together towards something that will leave an impact on generations to come.

One of the strengths that I admire the most about this project is the plan to assist the homeless community along the LA River. I think that they are being taken into consideration is an important thing. I admire the fact that there will be some sort of housing made available to them. My only fear is that this is not being thought about in its full capacity and that this will be a sustainability issue.

It is known that the homeless community encounters some obstacles when finding housing for them. First off homeless people are so used to being on their own and making their own rules and to suddenly go into a place where there are rules and regulations can be something that draws them away. I don't think that there should be no rules but I think that a slow transition into those rules is important. Maybe a 1 week class that goes over all the rules and conditions and lets them ease into it.

Another aspect that needs to be taken into consideration is the idea that a home is not all these people will be in need of. Poor mental health is unfortunately something that is common among the homeless community. The Downtown Streets Team says "Serious healthcare issues both cause homelessness and result from homelessness. Healthcare issues such as addiction, psychological disorders, HIV/AIDS, and a host of ailments require long-term, consistent care. Homelessness inhibits this care, as housing instability often detracts from regular medical attention, access to treatment, and recuperation. The inability to treat serious medical conditions can aggravate a person's health issues, thus contributing to cost". Just because you give someone a home doesn't mean it will help the root of the issue. You should be providing free therapy or at least therapy at a very discounted price.

Maybe another program that would help the homeless community is a program that will get these people on their feet again. A program that would help them find jobs along with temporary housing.The Covenant House says "For young people living on the streets, finding a job is very difficult, if not impossible. Many have no education and no one to offer guidance or to show them how to write a résumé, how to search, or how to prepare for an interview. They're completely unfamiliar with what it takes to land – and keep – a job". From there they could be taught skills that they will need to be able to stay on track such as budgeting and communication skills. I think that helping them with these essential skills will benefit them more in the long run.

Overall, this project is great and I can see how much my community will be able to grow and be improved.

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Finlay Higgins

Honor Environment Agriculture

May 4th, 2021

Mr. Sapin

Final Draft of LA River Master Plan Public Comment

Hello, my name is Finlay Maxwell Salvador Higgins, and I am a student at Larchmont Charter School. I was born and raised in Los Angeles so as an Angeleno myself the Los Angeles River Master Plan shows promising benefits to my community and the safety of many citizens. After reviewing the La river master plan I noticed that the benefits are huge. The plan emphasizes bringing jobs, greenery, and resources to the communities along the Los Angeles River. That being said, the potential of backfire from the plan is very present. With the 150 million dollar plan, it doesn't discuss how to reduce the risk of gentrification. Without any measure taken affordability challenges will become a much bigger issue. So the major flaw of the plan is the lack of forethought in reducing gentrification. However, the initiative still excels in prioritizing saving lives and properties through flood protection. The plan highlights enlarging the capacity of the river, reducing peak flood areas, and including strong infrastructure for the long-term effects of climate change.

The LA River Master Plan's main strengths are the prioritization of saving lives and properties from flooding. The plan promises on making certain adjustments to ensure the safety of Angelenos. In goal number one of the Master Plan, it identifies certain communities that have a higher risk of flooding. On-Page 145 of the Complete Los Angeles River Master Plan Document, it discusses that, "With the threat of a changing climate, the importance of reducing flood risk increases as the frequency and intensity of extreme storms change." The Master plan identifies the flooding issue and to solve this issue the plan intends to enlarge the capacity of the river, reducing peak flood areas and including strong infrastructure for the long-term effects of climate change and any extreme weather events. More information can be found on Pages 148 and 149. "However, a changing climate is likely to increase the frequency of extreme precipitation events that result in inflows that may exceed the channel's current capacity." (Page 149). The plan intends to enlarge the capacity of the river by deepening the channel, prioritizing natural features, and removing not locally/invasive plants (Page 148). With all of this carried out, large storms will be carried out to the ocean much easier. The master plan will reduce peak flood areas by raising upstream dams and increasing the capacity of existing dams.

When carried out these steps will store runoff water and will slowly release the water into the river, therefore, reducing the risk of flooding. Lastly, reforming the current infrastructure is critical for fighting the effects of climate change or any massive weather events. Our current infrastructure was built with old climate data. With the pressing issue of climate change; the master plan promises to conduct studies on the current climate change and its effect on Los Angeles. (Page 149). With-up -to-date data-- a new infrastructure will be able to be built that will consider the impacts of climate change both short and long term, therefore, reducing the risks of flooding. The plan builds upon work that has been going on for years and strengthens flood prevention.

I92-17

The plan of the Los Angeles River Master Plan has many strengths, but also shows the potential for many flaws. The plan does recognize the threat of displacement. The biggest flaw with the plan is the little effort to reduce gentrification. The issue of gentrification is barely talked about in goal 6th of the master plan. Although the Master Plan at a Glance document points out that the community surrounding this project is what will make it successful. It does not get rid of the fact that one of the major fears of the plans for citizens is displacement. Step 5 of the Los Angeles Master Plan is all about engagement to different communities. The plan does well to list out all communities they will engage in and addresses the 3 round engagement process. The process includes discussing current conditions, prioritizing goals, and walking through the whole master plan. On top of that Step 5 of the Master Plan also includes using social media as a way to get across to people through ads, social media posts, and monthly emails. The one thing the Master Plan barely fails to identify is the issue of gentrification. With more greenery and access to parks and trails means more attraction to these areas around the Los Angeles River. With “1,000,000 people living within one mile of the La river” (Steven Sharp) there will be a rush for buyers. With the environment around the river changing it will only elevate this rush for buyers. Making it so all of these “neighborhoods along the river that aren't currently

I92-18

experiencing housing scarcity will likely be soon.” (Richard Dion). The Los Angeles River will become a magnet for buyers. With these buyers, gentrification follows shortly behind. For real estate, the river, parks, and trails will serve as another asset to their properties. As a result the price will most likely go up. For this plan to be successful there needs to be an aspect of the Master Plan that lifts the stress of displacement from communities and helps to build stronger relations with these communities.

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Samuel Kim
Honors Environmental Agriculture
Mr. Sapin
May 9, 2021

Final Draft of LA River Public Comment

Hello, my name is Samuel Kim and I am a high school student attending Larchmont Charter School. As a Los Angeles native and current resident, I am deeply excited about the prospect of the 2021 LA River Master Plan and the opportunities it presents for environmental and community improvement. However, it is imperative that we also discuss the inherent flaws within the plan and the challenges that may arise along the way. In this way, we will be better equipped to tackle any shortcomings and set ourselves up for long-term success and sustainability.

One of the biggest strengths of the plan is the adjustments and modifications made to the surrounding river channels and floodplains. The primary advantage of this is flood protection and increased flood conveyance capacity, as outlined on page 286 of the master plan document. Although river flood prevention and reduction initiatives have remained a prime focus for the past 25 years, the 2021 LA River Master Plan further builds upon this work. Many aspects of the master plan, including changes to the river channels and floodplains, will provide an update to the already existing watershed hydrology. Pages 288-291 of the master plan document further discuss channel-based strategies for conveyance and the steps necessary to achieve the 1% flood event capacity goal. With these upgrades, the LA river, and its surrounding areas will become more flood and extreme-weather-ready than ever before. In turn, this will create a more sustainable and healthy river ecosystem that is better prepared to deal with the harsh implications of climate change for years to come. Another benefit derived from the floodplain and channel modification/rehabilitation is improved water supply and quality. This will not only clear the river of pollutants but also prevent litter from entering the water in the first place. As a result, this will provide a healthier river ecosystem as well as a safer environment for both wildlife and surrounding inhabitants. It is very apparent from the plan that public health and safety are the number one priority. With global warming and the ongoing climate crises showing no signs of slowing down, we must formulate such solutions with future-proofing and sustainability taken into consideration.

I92-19 On the contrary, the proposed benefits and infrastructure improvements of the LA River Master Plan will inevitably come at the cost of housing availability and affordability. The vague and general response that the plan provides for these issues is undeniably one of the primary weaknesses of the plan. As stated under Goal 6 on page 189

I92-19 cont.

of the plan, there is an overwhelming correlation between increased parks/open spaces and increased displacement/housing costs in the surrounding area. Although Goal 6 outlines a general plan of action aimed to resolve the housing crisis, there are no guarantees or timelines provided to ease public concerns. Section 6.3 on page 193 calls for “increasing units of affordable housing within one mile of the river”, however, it does not provide any discrete information on exactly how this will be paid for, where the money will come from, and when this will be achieved by. There is also no consideration for the possible negative implications that such large-scale housing development will have on the environment. In the absence of social and economic sustainability measures, the plan will inevitably fail.

The LA River Master Plan should aim to focus on public concerns pertaining to the housing crisis by integrating concrete details, dates, and promises within Goal 6 of the Master Plan document. Currently, the public perception of Goal 6 is nothing but that of empty promises. If the plan displays consideration for the public audience and their opinion by completing ensuring financial and environmental sustainability, the plan will subsequently gain overwhelmingly positive public support and reception. The success of the LA River Master Plan depends on clear promises and concise language that will gain the active engagement and participation of our community.

Kayla Kwak

5/6/2021

Honors Agriculture

Mr. Sapin/P.3

LA River Public Comment

The Los Angeles River has been and will continue to be one of Los Angeles' major rivers. This river is 51 miles long and flows through the San Fernando Valley, along cities of Glendale, Burbank, Griffith Park, etc flowing through Los Angeles County. For years the city of Los Angeles has been sustaining and building off of the Los Angeles River with a plan that was set during 1996. The Los Angeles River Master Plan website states that since 1996, it's been 25 years, so much has developed and changed in this city, the community has become more urban, technology has advanced, and so the Los Angeles River Master Plan needs to be modified.

Modification of any plan takes lots of brainstorming, time, effort, communication, and a clear vision looking into the future. The brand new master plan was community and data based in order to shape the river. But, like most plans they're always changing and developing into something that may potentially become even stronger. Looking into this new plan I can clearly recognize some strengths and weaknesses.

Some strengths I see in this master plan are their 9 Key Goals. On the LA River Master Plan website it says, "The 9 Key Goals are what drive the mast plan which include: flood risk reduction, parks, access, arts and culture, housing affordability/homelessness, engagement and education, water supply, and water quality." (LA River Master Plan, 2021) I admire how vital topics are being brought into the master plan, hoping to better not only the river, but our community as a whole. According to the LA River Master Plan Public Input site, we are able to see that the new implementation of their 9 Key Goals, "...identifies where those needs are the greatest." (Rylah, 2021) Out of the 9 Key Goals, two specific strengths that I can see that correlate deeply with environmental topics is water supply and water quality. The water supply in Los Angeles is going into the direction of shortage due to the lack of rain and inadequate water supplies, but with the new innovations on the river I have hope. To add to this, water quality is an issue in many parts of the world, even in other states. Most of us living in Los Angeles are fortunate enough to have good quality water, but to maintain this quality we need new and innovative resources. This is where water quality from the 9 Key

Goals takes place. With this idea being pushed into the making of this master plan, we can hope to see better quality water in the future, more water, and a sustainable and eco-friendly city, we call home.

Along with the many strengths that I recognize in this master plan, I also see some places where improvements can be made. One of the biggest weaknesses I found in this plan is the amount of money that is spent into making such improvements. While the intentions are clear, bright, and good I'm afraid that the millions of dollars spent into improving this river in our city, may not be as beneficial as we want it to be. According to LA Times, "This part of the river's renewal centers on a Frank-Gehry-designed set of elevated platform parks over the rivers and a $150-million cultural center on the riverbank." (CHRISTENSEN and NICOLAIDES, 2021) From this, what I see is something that may seem really nice, but may be time consuming, and money wasting. I'm sure that while we may see some good come out from these modifications, I'm worried that it may not prioritize residents, current neighborhoods, local businesses and workers, etc which can possibly gentrify and increase prices along the river.

The Los Angeles River has been and will continue to be a significant part of Los Angeles, and one if it's major rivers. This new plan will continue to develop, grow, and I'm excited to see how our city manages to improve the river and our continuously evolving city.

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Brad Lee
Mr.Sapin
5/2/2021
Honors Environmental Agricultural

Final Draft

Potential Weakness:

I92-20 The aim of the 2020 LA River Master Plan is to reduce flood risk and enhance river resiliency (LA River Master Plan). However, not all parts of the river have the same potential for transport. Low-channel capability in some areas increases the likelihood of flooding of river-adjacent communities by as much as 25% in any given year (LA County). With storms, rain, and floods, the LA River may exceed water levels that it cannot handle. To control flood risk for people and property during storms, it is important to preserve total capacity as well as improve river conveyance capacity in high-risk areas. Furthermore, as the environment changes, the frequency and severity of extreme precipitation events will likely increase, resulting in flows that could surpass the channel's current capacity. For example, with a plan that is expected to take years, climate change will change the flow, water supply, and may even exceed the current water supply. The LA River Master Plan aims to have a strong understanding of hydrology of the LA River in managing flood risk. There have been multiple studies, "The Master Plan is based on the best available hydrologic study of the entire LA River watershed." However there is no clear direction of any plan or solution which is worrying. Just having data is not enough especially when this is one of the biggest concerns regarding the LA River. There is no guarantee that it can be updated well enough or in time as it will probably cost a lot and researchers may not understand all the variables to be able to upgrade at this current time. There are several new projects in the works. New projects along the LA River would have to take into account the long-term effects of climate change as well as the need for resilient infrastructure to handle these extreme events.

With so much urbanization happening in Los Angeles, housing has become one of the biggest issues for residents in Los Angeles. Families incomes are more heavily used on rent and even ⅓ of homeowners are rent burdened (LA County). Accordingly, housing is directly associated with another troubling issue: homelessness. According to Forbes, "Los Angeles City & County was the CoC with the second highest number of people

I92-21 experiencing homelessness in 2020 at 63,706." As the LA River is focused on 51 miles of linked open space, this may

I92-21 cont.

have a strong negative impact on housing and homelessness. There is a risk that growing parks and open space would reduce housing affordability. As a result, we will just grow these issues that we have been wrestling for decades. While the LA River may seem to bring communities together, the large attraction of homelessness may scare away residents. Like any other open space/park, it will be a large gathering for homeless people. Without a plan to balance our problems in housing/homelessness and urbanization, this will just create more chaos and more trouble for our communities.

Potential Strengths:

The top two activities reported by community members along the LA River are walking and bicycling. Participation in these two activities combined exceeding participation in all other activities combined (LA County). 32 of the river's 51 miles have trails alongside them (LA County). The LA River Plan can help transform not only the river but the community in Los Angeles for decades. For example, according to the The LA River Master Plan, "Thousands of acres of publicly accessible open space that will help address public health issues, especially in the most disadvantaged communities." This can help abolish the idea of the LA River being dangerous and bring new light to communities that may be in a need of open space/park. Especially as 61 percent said they don't use the river because of safety issues as twelve of the 17 cities along the LA River do not meet the World Health Organization's standards of 2.2 acres of parks per thousand people. The LA River Master Plan understands this and the LA River is not only seen as a water source but an area that brings communities together, opportunities, and open doors. This can help the overall health of L.A residents and help be a center for residents to exercise or even just go outside for a while for communities in Los Angeles. It is not seen as only as a river but a center of gathering and that can help promote activity outside. In a time like this with the pandemic for the past year, many of us need to relieve some stress and a park is one of the ways to help keep one's mental strength. The benefits physically can be to help control weight, reduce blood and insulin levels, and improve one's sleep.

With more safety measures being implemented and more open space being open, the L.A River will become more accessible. Access to trails along the L.A River is now extremely variable in terms of ease and availability. A total of 90 access points lead to trails that cover 32 of the river's 51 miles, but only just one-third of these access points have signage, and only 70% have sidewalk connections; Bus service is available, but only two metro rail stations are within a half-mile of a river access point (LA County). As a result, it's not surprising that one of the top five reasons given by community residents for not visiting is that The L.A River is clearly unsure of where it should go. The LA River is meant to be a shared resource for the entire county. This may be another precious cornerstone to all of Los Angeles as it can bring everyone together especially as Los Angeles is a culturally diverse melting pot. For example, according to KOP Category 1: Trails and Access Gateways included in the 2020 LA River Master Plan, they plan to add pedestrian trail, bike trail, equestrian trail, equestrian facility, multi-use trail, light tower/ water tower, lookout/boardwalk, channel access, vehicular access, underpass and overpass, vegetated buffer, and habitat corrido. The opportunities are endless providing jobs, activities, and fun for the city of Los Angeles. It will promote a lifestyle of taking care of the environment especially when we can see the positive results with doing so. Examples of ecological uses include habitat corridors, planted vegetated buffers used to separate high-traffic zones from low-traffic zones, and connections between large areas of habitat to provide sufficient habitat for wide-ranging animal species (LA County). Not only will adding all these trails and different buildings will it benefit humans but the animals who will live there. There are more chances for protection of animals and growth of animals especially in a place in L.A with such urbanization. For example, according to the LA River Master Plan. “provide successional development of plantings into communities of plants that are ultimately best suited to the conditions of their environment, provide a continuous native tree and plant corridor along the river with linkages to riparian habitat and upland areas near the river, and achieve healthy soil biology, not just chemistry, by providing the critical foundation for each stage of succession that would ultimately host a sound ecological system.” These are just some of the ways the LA River Master Plan can use the River to its fullest potential in an environmental direction.

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Valeria Noriega

To whom it may concern,

I am a student from Larchmontcharter School and currently in my Honors Agriculture class we are learning and engaging ourselves with the new and evolved LA river master plan. We were told to do research and read through the plan as much as possible to point out the strengths and weaknesses of the master plan. In this first section I will be addressing the strengths I found in the plan. I noticed that the new plan is trying to expand the parks with the LA river and bring in the community. I saw this as a strength because community is important to me and knowing that there will be parks, bridges, and new trails being established will give people the opportunity to explore more of their dear LA river and give the community ways to get out and spend time together. As Lozano, M. (2018, September 23). Indigenous Voices Missing in Los Angeles River Revitalization Plans states that "As part of the process, public agencies and community groups have helped draft more than 200 proposals that are expected to bring numerous environmental and health benefits to communities along the river. These include replacing concrete slabs with green space in park-poor areas, connecting neighborhoods via scenic bridges, restoring habitats, and more recreational perks like horseback riding, kayaking, and soccer fields." I personally think this is a great idea because it is really inclusive to all the communities surrounding the LA river and integrates more green space and nature onto all the concrete that the river is. Having these projects being included, will also give the area more diversity that will be open to everyone. As Ginger , L. (2020, October 22). Changes are Coming to the L.A. River states "Create diverse, vibrant public spaces along and connected to the Lower Los Angeles River resulting in safe, inviting, healthy green spaces that support diverse local communities, allowing equitable access to nature and a variety of recreation entertainment, multi-modal transportation and socio-economic opportunities that enhances quality of life and sustains watershed health." The plan also talks about wanting to include the community as well, hosting meetings and making sure that the community will be okay and that their voices can be heard. As stated in the *Master Plan Fact Sheet "The engagement plan included: 13 Community Meetings, 2 Town Halls, Youth Summit Native Community Discussions, 10 Community Partners"* This is good for the surrounding communities and that they will be able to participate with these projects, when the community feels they are satisfied with the plans they want to roll out. Another thing that stood out to me in the master plan and that I don't notice often in Los Angeles recreational parks. They usually don't include options or resources to blind or deaf people, or even people with disabilities. But as I was reading through the plan I noticed that you are making sure that along the trails it is accessible to people with needs for example you have said in the plan that they "Ensure that an

accessible path of travel leads to sign and that braille is within reach if used" as stated in the *LA River Master Plan* . (2020, January). This is great that you are recognizing people with disabilities and are trying to make sure their experience at the LA river is the same as any other person. I am glad that the Los Angeles community is a big factor of this new master plan and I am excited to see what the future holds for the LA river and community.

In the LA River we were also asked to point out one of the weaknesses, and I noticed that there have been many problems in the past with flooding. As I was looking for research I noticed that in the *LA River Master Plan* . (2020, January) it stated "The LA River has a long history of flooding, even before extensive settlement. When it rains, large amounts of water flow out of the mountains into the flat areas where present day cities are located. Historically this water spread out in large areas that would sometimes be miles wide. As more people settled in these areas, moving water away from homes, business, and communities became important." So we know that the flooding had a great impact on surrounding communities and has affected the people that have lived in the areas for years. The way it has been built has made it so floods keep occurring because the leveling of the concrete walls are too low and makes the water fill up faster and the design isn't as safe. This would also affect the houses of people and the damages would be huge, that would come out of the insurance of those people and not many would be happy with that. As stated in Lin, R. G. (2018, March 26). *The 'nightmare' California flood more dangerous than a huge earthquake*. Los Angeles Times. "Take the heavy rains from the winter of 2016-17 — which poured over a period of 80 days — and compress them down to fall in 23 days: California would experience a flood event so grave it would overwhelm our flood-control systems, force 1.5 million people to evacuate, and cause economic damage that could total $725 billion." But now those families are asking for federal funding to make sure that they are working on stopping this problem and have even regretted buying a house by the river. Families have also created escape routes, how to be prepared, and making sure they have good insurance. As stated by Clifford , M. (2019, May 20). LA River residents told to brace for 100-year flood. "The LA River last flooded in 1938 and 1969, but those were 50 year floods, half the size of the one that could potentially hit now. LA's rapid expansion since the 1930s and '60s has made the river more susceptible to flooding today than it was when it was then." I think one way to improve this weakness is that you make sure that even all areas outside of the floodplains are also being protected, because as we know, floods can reach anywhere. Because I noticed that in the master plan you wrote this "All areas outside of the floodplain were considered to have no need." So it seems to me that you gave no importance to outside communities that could also be greatly affected by these floods. It

I92-22

I92-22 cont.

also seems that you only have an evacuation plan just for the surrounding communities which is important. But you should make sure that all the city is prepared for these floods, because everyone's lives are at risk. Floods can reach high feet of water and can damage anything in its way. It can last for many weeks and months and can create hazards. As we know when Los Angeles gets rainfall some roads will get filled up with water because of the sewers being flooded with trash and this just shows that communities don't need to be close to the river to face floods, they can happen anywhere at any time. In March 1938 there was a disastrous flood that took out most of Southern California from all the rivers like the La River, San Gabriels rivers, and the Valley rivers. As we know Los Angeles doesn't have a stable plan because nobody really recognizes or thinks that these natural disasters can happen. As stated Simpson, K. (2020, March 12). *Los Angeles Flood of 1938: The Destruction Begins*.KCET " The powerful force exceeded man's expectations for natural disaster along the river. Major infrastructures collapsed directly in view of bystanders, telephone connections were lost, and lives were taken with the rapidly bulging current. Destruction spread as long and wide as the river. In Universal City, 250-feet of concrete washed away the Lankershim Boulevard Bridge along with a cafe, ten homes and the Lakeside Golf Course." So we can see that nobody is really prepared and one thing you should

I92-23

focus on addressing is making sure that families near or far away from rivers have a plan and know where to go. There also seems that communities by the LA River don't have shelters or facilities that they can turn to incase of an emergency. And these things are needed because floods most of the time completely destroy houses. I feel like there should be community meetings that the community can attend to, where they can learn and inform themselves on how to stay safe and know what to do if there ever was a big flood again. Even how to have first aid kits or items they should have in their homes to be prepared. Also making sure that home structures that are near the river are built to stabilize floods and that they can focus on creating insurance plans for families that the government will pay for if they get damaged. The community should also have a say and participate in what they think is the most safest way to build the LA river, because they are the ones living near it and should know and have a sense of protection. Hopefully you take action on preparing the county of Los Angeles and all of Southern California on natural disasters that could happen and that they should have an open mind that homes and sourrofung can be greatly affected. And that they focus on strengthening this section of the LA River master plan because many people will want to feel satisfied that they know that the new plan will bring a better and stable structure for the LA River because of how many dangerous floods it has brought.

The Los Angeles River is home to 709 different kinds of species. From birds to fish to insects and more, this river is an enormous ecosystem for many different forms of life. One problem these species face is the concrete barrier of the river. Not only does the concrete disturb the look of the river, but it also affects the ecosystem around it very severely. When the concrete first was placed in the river many species were placed on the endangered list because the concrete took away their habitat. Some outstanding examples can be seen through various species on this list stated by “An Inventory of Loss on the Los Angeles River” by Roberto (Bear) Guerra (2018), like the Yellow-billed Cuckoo, Yellow-breasted Chat, Arroyo Chub, Western Pond Turtle and so many more. With the removal of concrete, replacing the river with the soft ground instead of hard ground will bring many benefits. The most prominent benefit will be seen through the dramatic improvements our ecosystem endures.

I92-24

For starters, the ecosystem will improve dramatically. The ecosystem will be much more natural, where the different species will be able to adapt much easier, especially living in a healthier environment. The species that rely upon the river will have more available habitats which add to the diversity and health of the overall river. The extraction of the concrete can also help to get the endangered steelhead trout to return to the Los Angeles River. The replacement of more vegetation will help brighten the areas around the river. The more trees and vegetation in the river can improve the mental health of the people who live near the river. Additionally, trees can also provide more carbon absorption which will help with the slowing of climate change. The concrete being taken out will bring a variety of positive effects on the environment. The ecosystems living around or in the river will flourish as well.

Even with the removal of just the bottom of the river so that the river will have a soft dirt bottom instead of a hard bottom can tremendously improve the river. If the river had a soft bottom, some of the water will be able to absorb into the soil for the plants and soil health instead of just going straight to the ocean. The concrete removal has a bunch of positives but it also has negatives. The actual removal of the concrete will be very expensive and a long and hard process. The river is 51 miles long and is accompanied by concrete throughout the entire stretch stated by the Department of Public Works (2021). This is one of

I92-24 cont.

the biggest problems that removing the concrete will face. With the removal of all the concrete to be able to complete this, the river would have to widen to take out all the concrete which will affect people living right by the river. This would not be a problem if you chose to only remove the bottom of the river and kept the sides with concrete.

I92-25 Another huge obstacle that needs to be tackled is the distribution of the amount of water in the river. This can cause flooding. If a heavy rainstorm comes, the water will not be able to move fast enough which may lead to floods becoming a huge possibility. If these events arise, the property could be lost through flooding that can accrue with the lack of concrete. This is the reason the concrete was initially put in, informed by “What Does the New LA River Master Plan Means for NELA?” by Eliot Brody (2021). The concrete provides a fast way for the water to flow to the ocean, making floods a very low possibility. With the amount of water that is going into the river during a storm if there was no concrete the water flow would be much slower, making floods happen more of a chance. As well as the concrete would be much cheaper and also easier to maintain, as it cuts off the possibilities of landslides into the river.

I92-26 This is where the solution to both problems can be solved; by keeping the concrete walls but having a soft bottom creating an invitation for trees and vegetation to grow. Concrete sides will naturally maintain the trees and vegetation as it limits the area of growth, allowing for sustainability by keeping the growth within the middle of the river. Also with the soft bottom, the trout will be able to access the river stated by “How Saving Southern California’s Steelhead Trout Could Also Help the State’s Watershed” by Debra Utacia Krol (2018), then begin to create its ecosystem in the river again and then being able to bring up the population of this endangered species in the river. Even with the problems that the removal of the concrete will bring, the positives overcome the negatives. Being able to bring back the ecosystems that this river once supplied, can tremendously improve Los Angeles.

May Rapp

LOS ANGELES RIVER MASTER PLAN PUBLIC COMMENT (FINAL DRAFT)

The LA River Master Plan is, first and foremost, a step in the right direction. There's lots of really great things in it and many problems addressed within this document that are very important for the restoration of such an important part of Los Angeles. When you see the river today, you see more of what was than what is. The Master Plan is trying to restore the River, with the goal in mind of turning it into more than the concrete basin it is today. There are definitely some very useful things about this plan. There are efforts to clean it up by beautifying and purifying the area and the water, which is really great and what I want for it, but I find there to be not enough details within this document about the real specifics of what this project is going to look like and how it'll turn out in execution. Therefore, I'm going to go over the pros and cons of this plan and point out its strengths and its weaknesses. The first strength I'd like to go over is the work that'll be done to make it a more habitable place for life. The river as you see it now consists of concrete walls containing dirty water, trash, and leeches, which I can't imagine is something you would want in your local river.. There are some really good solutions to this problem- one of them I quite like is from section 9.3.7 of the Funding and Implementation Matrix. This suggests using nature-based solutions to fixing the cleanliness of the water. I love the idea of naturalizing the area around the river. A great example of this is the Hoosic River Restoration Plan in North Adams, Massachusetts. They have a similar position to the LA River, where the river had to be surrounded by high walls to protect from dangerous floods, while losing out on a lot of what made this river, well, a river. They planned to create their own park and ecosystems around the river, replacing the high walls with nature and more functional watershed solutions in case of a flood. This would not only let the river become a resource to the city of North Adams, but a general boost to the city giving citizens a nice park to enjoy, along with something to bring in more tourists. As time goes on and this project continues, THIS is the standard in my eyes. You can find more from them at https://hoosicriverrevival.org/. What the Master Plan gas going on is a great step in the right direction, but it brings the question- what nature-based solutions are we talking about? This is one of multiple gripes I have with this plan. There's lots of nice sounding things, like Section 7.3.5's promise to "integrate Native American knowledge of plants and wildlife", but honestly, to me this means nothing. It reads like shiny sugar coated words to me that are made to appeal to people who scan and go on with their day. What is this "Native American knowledge"? Who are they going to get this knowledge from and how will this help the river's ecosystems? It feels a little closed-minded and vague to me. It

I92-27

I92-27 cont.

doesn't really help push anything forward, it's at best a promise to talk to some non-specific people. Moving forward, I also really like how they want to make the land more inhabitable for people as well as animals. They want to address homelessness and affordable housing, like in section 6.4.1, where they plan to use the excess land around the river to make space for affordable houses. It's a very important issue in Los Angeles since homelessness is such a problem here in L.A, with about 10% of the United States homeless population living in Los Angeles. Not to mention, the prices of housing are starting to get completely ridiculous in LA, so having more homes that people can really afford makes me very happy, because it's an extremely needed change. However, as usual- the details just feel very lacking to me. One of the main things that stuck out to me was in Section 6.5.2 - "Consider commissioning a study of the potential for an affordable housing specific tax increment financing tool as a means of significantly expanding funding for affordable housing along the river by capturing a small share of future growth in property tax revenue exclusively for affordable housing." The main issue with this to me is the first word- *consider.* That's something that I find to be really problematic with this document. Lots of hypotheticals, what they might do, what they could do, what will possibly happen, etc. Is this a plan, or a collection of ideas? If a document is just a bunch of maybes, I certainly wouldn't give it as much support as something that promised to do what it entailed. Overall, I think the LA River Master Plan is baby steps. There's some really good stuff, and the groundwork is there, but there just needs to be more clarity and details in a lot of its smaller sections.

Sally Shapiro

4/23/21

Period 3; Honors Environmental Agriculture

Public Comment:

To Whom it may concern,

My name is Sally Shapiro, I am 16 and I have been a resident of Los Angeles my whole life. The Los Angeles River has long been a place of industrial development and lessening water quality. This long river is home to many flourishing communities and residents. Updating the river is a necessary and important step in its long history. The need for the LA River Master Plan is clear and there are really great and integral parts, but the contents are in need of some improvement.

The plan does a good job of outlining the needs of different surrounding areas. The research and thoughtfulness is clear in pages 122 through 135 of the LA River Master Plan. It is clear that the plan has been through a thorough process of town halls, community events, collaborations with different organizations and Native tribes, and requests for public comments like this one. I applaud the plan for detailing the results of 10 different community events hosted by different organizations and that 1,306 community members participated across 13 community meetings. I appreciate the diverse voices and points of view brought to the table. Looking at the Steering Committee Members, a wide variety of people and perspectives are represented and considered. No one knows what will affect a neighborhood better than someone in that neighborhood. This is why community outreach is so important.

The river plan does a great job identifying the needs of communities neighboring the river, now it needs to work on fulfilling those needs. Laid out in the plan are many designs for new construction around the river. This includes things like parks, cafes, and other culture centers. While those things do offer lots to the surrounding community, they also require lots of construction. According to the CEQA Environmental Impact Assessment, the construction used along the river to achieve these things would result in “generation of air pollutant emissions from heavy-duty construction equipment, construction worker vehicle trips, material deliveries, trips by heavy-duty haul trucks, earthwork activities, and other construction activities.” The document goes on to say that these emissions could reach levels that “pose a significant risk to air quality.” (*Los Angeles River Master Plan: Program Environmental Impact Report* 2020) Not to mention, the introduction of these centers may need lighting, which will increase light pollution and use more energy, and might also need heating and cooling for bathrooms, gyms, museums, community centers, restaurants, and more. I understand that some of these things are unavoidable but the use of green energy sources can limit these results. Perhaps the river itself could be used for some sort of hydroelectric power source.

I92-28

I92-29 In that same vein, the construction of platform parks introduce more concrete and construction for the sole benefit of aesthetics. More concrete and construction around the river will potentially harm the air and water quality. Global cement production is at 4.2 billion metric tons, according to the World Cement Association and, according to Dr. Aditya Kumar who is an assistant professor of material science and engineering, "for every metric ton of cement produced, there's 1.2 tons of CO2 released." This is a huge problem. Research also shows that cement production accounts for 8 percent of CO2 emissions. (Sherman, 2021) Cement is a polluting industry and construction needs to start moving away from it and toward more sustainable practices. These ambitious plans for cement parks will just feed the global production of concrete.

I92-30 The lack of actual numerical goals given in the LA River Master Plan is troubling. The implementation of numerical goals allows for a better understanding and tracking of whether or not the plan has been met. Without quantifiable success metrics, it's hard to hold government officials accountable for reaching and following the goals laid out in the plan for water quality. Concrete around the river can cause runoff and hurt the quality of the water. According to the Environmental Protection Agency (EPA), 46% of U.S. streams are contaminated from water pollution. While there are many causes for this, runoff from rain is a big one. (*National Water Quality Inventory: Report to Congress,* 2017) Rain can pick up oils and dirt from the concrete and flow into the river. Also, if fertilizers and pesticides are used to treat the grass and plants in these parks, those harmful substances can make their way into the river, further polluting it. Plans can be put in place to make sure that these things are not used to maintain the flora dispersed in these trails, parks, and walkways. Furthermore, platform parks can block out the sun from the water in the river which could potentially have negative effects on the water quality. (*Advocacy Workshop Presentation Overview,* 2020) There are ways to measure how much the water quality has been affected. With numerical goals for water health, the public can make sure that the water hasn't been contaminated in any major way.

I92-31 Overall, the platform parks are not worth the downsides. It's not worth ruining our water and air quality for a few pretty parks over the water. The plan needs to focus more on green space which will act as natural flood control and will be good for the environment. If all the money used to create platform parks went to developing and maintaining bike paths and green spaces in disadvantaged communities by the river, more residents would be served.

There needs to be more specific numerical goals in the plan, platform parks should be taken out of the plan entirely, plan goals need to focus less on design and aesthetics, and green energy sources should be considered in river designs and park maintantience.

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Hello, my name is Paul Song and I am a student at Larchmont charter school. I was born and raised in Los Angeles and I love the Los Angeles River Master Plan for it's community and for its citizens. After reviewing the La river master plan I noticed it has a lot of benefits like bringing jobs, greenery, and adjustments and modifications to the LA River but also it tends to have flaws like how it fails to get community engagement with it's community which is pretty important With the LA river master plan there are a lot of strengths and weaknesses to this future project but having public inputs on this Master plan will help with long term success.

One of the Master Plan's biggest strengths are adjustments and modifications made in prioritization of saving lives and properties from flooding.It's biggest advantage of this is flood protection, as outlined in page 286 of the master plan document. Although river flood prevention and reduction initiatives have remained a prime focus for the past 25 years, the 2021 LA River Master Plan further builds upon this work. This advantage/ plan promises on making certain adjustments to trails, gateway and park close to the river. What makes this so important is its direct advantage to flood protection. In goal number one of the Master Plan it identifies certain communities that have higher risk of flooding. On Page 145 on the Complete Los Angeles River Master Plan Document it discusses that "with the threat of a changing climate, the importance of reducing flood risk increases as the frequency and intensity of extreme storms change."To solve the problems of floodings many years again the plan intends to enlarge the capacity of the river, reducing peak flood flows and including strong infracture for the long term effects on climate change and extreme weather.

I92-32

Although the Master Plan has really adjustments and modifications, it really lacks in community engagement which is one of their biggest weaknesses. The plan fails to provide any incentives that will attract community members and engage them in this large scale effort. It also fails to address situations that can possibly happen if something goes wrong such as harmful chemicals or materials getting into the river, from people littering or flooding. Harmful

I92-33

chemicals in water can hurt people and could lead to death. There needs to be more of a push towards preventing these harmful chemicals from getting into the river. In the document Hazards and Hazardous Materials from LARMP, clearifies what are the specific materials and chemicals that can be harmful and hurt people. Additionally, the plan fails to address public disapproval pertaining to fears of displacement and availability of affordable housing. This raises

major concerns in absence of social and economic sustainability measures, the plan will inevitably fail. The LA River Master Plan should aim to focus on community concerns by providing promises of financial support for low-income residents, such as rent control and funding for a land bank. If the plan displays a consideration for the public audience and their opinion by ensuring financial comfort and relief for LA residents, the plan will subsequently gain overwhelmingly positive public support and reception.

I truly believe that although the plan may not be ready right now, the comfort and criticism of the public comments will not only be good for the success of the LA Master Plan, it can also be a lifelong success that can really change the City of Los Angeles.

Audrey Vega

Honors Environmental Agriculture per.3

5/6/21

LA River Public Comment

While the LA River Master Plan ("Master Plan") does describe some deep-rooted issues regarding the LA River and its importance to the city, it lacks actual written steps needed in order to start to resolve those issues. My main interest regarding the Master Plan is how it handles the improvements of water supply quality and reliability. And though there are some statements within the Master Plan that clarify the handling of LA's water supply and where it comes from; issues relating to the water itself, such as waste management or flooding issues, are not sufficiently detailed. For this reason, I will be analyzing the Master Plan's goals and making suggestions on changes to the Master Plan that will more effectively address these issues.

To start off, within the Master Plan (pages 92-97) the "Existing Water Quality" segment states that there are 13 different types of pollutants commonly found in the LA river, "ammonia, bacteria, cadmium, copper, nitrate, nitrite, lead, selenium trash, and zinc." This is very helpful information within the Master Plan because it mentions the preexisting issues we must deal with when providing a large amount of water to a city with a large population. The problem with these contaminants consistent in the LA river's water supply is that they can become highly toxic to both people and wildlife. In a scientific journal published by SpringerLink we see that various uncontrolled amounts of these chemicals can cause issues from Alzheimer's disease to cancer. But with proper actions of distillation, absorption, and chemical testing, we can at least be sure that the contaminant levels will be kept low. The document goes on to mention how the city will work with other "EWMP/WMP agencies to identify and develop water quality improvement projects or programs along the LA River to capture stormwater and urban runoff for treatment, infiltration, or direct use, and support the designated beneficial uses of the LA River." This shows that they plan to work with other agencies and assign them to actually do the work recommended. The Master Plan will "work with" the agencies when one of these problems is highlighted, but the Master Plan does not explain or emphasize how any of the agencies will indeed take action. Yet, it is still important to see that the Master Plan is identifying the resources in place to fix problems or a path to send us in that direction.

I92-34 In the Environmental Impact Report's Hydrology and Water Quality section of the Master Plan overview, multiple statements are made about how we can control the water quality levels by pollution prevention within land management. "This permit requires runoff issues to be addressed during major phases of urban development (planning, construction, and operation) to reduce the discharge of pollutants from stormwater to the maximum extent practicable, effectively prohibit non-stormwater discharges, and protect the beneficial uses of receiving waters." This is an important message to note because it highlights goals about the protection of the water's quality. That is an essential aspect of water supply reliability. Since the introduction of the Master Plan discusses where the LA river's water comes from, it's important to address how that water gets polluted. In an article by CA Patch titled *LA River Master Plan Focuses On Water Quality, Parks Access*, the City News Service states that "The revised draft of the river master plan -- the first update in 25 years and the only plan encompassing all 51 miles of the LA River -- doesn't propose specific projects, but uses research and data to signify community needs, such as improved water quality, housing, improved ecosystems, access to parks, flood risk management, and needed funding opportunities for river- adjacent projects." This article addresses both the benefits and potential problems of the plan. It does a good job of explaining issues and who should be in charge of fixing them, but it does not explain how to specifically fix the issues.

To continue on this sentiment, in an article by Steven Sharp titled *Here's a Look at the Updated L.A. River Master Plan*, "Although the master plan does not effectuate any specific investments along the river, the document identifies 56 potential projects between the San Fernando Valley and the South Bay." From this statement, we can conclude that although the action plans presented in the proposal do a good job of setting up goals, the actual explanations of how to complete those goals are replaced by vague language. If LA is to continue with this Master Plan, I will once again state that one of the most important things to focus on would be the water's quality and reliability.

Why is the Master Plan's lack of specificity on issues such as water supply quality and reliability ultimately harmful to their environment? In the long run, the best ways we can help the environment are to make sure large companies and corporations minimize their water and air pollution, especially in largely populated cities such as Los Angeles. But it is also important to put a small amount of pressure on individual consumers in order to create the best possible environment quality. Due to the Master Plan's lack of directly stated orders in place detailing solutions to this water reliability and quality issue, people may not understand how to correctly preserve or utilize clean water. Instead,

by outlining these solutions and presenting them to the LA public, we can ultimately improve our environments. Especially if there is encouragement coming from city officials about it.

To conclude my central points, the Master Plan needs to focus more on what specific actions to take when solving for water quality and reliability in Los Angeles. Without this as a focus, we risk the development of a river space that ultimately cannot be used for what it was originally intended or improved for city residents living today. Pollution and water reliability are already major problems in California, let alone Los Angeles, one of the most populated cities in the entire country. So, I believe that we should address these issues head on and explain in detailed line-by-line approaches that lay out how we can fix these problems, instead of just stating goals and handing off the solutions to other agencies, companies or people down the road assigned to do the work. All we are asking for is specifics to help keep our citizens healthier and safer. Let's work towards a better LA River and a better Los Angeles.

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Sean Walter

The LA River Master Plan is a sustainability project that is attempting to revitalize the Los Angeles river into a completely new idea. What was a concrete eyesore that collected and dispersed trash throughout and all along Los Angeles is now supposed to be heading towards a vision that upholds the three pillars of sustainability (Social, Economic, Environmental). The social aspect of this project is meant to bring people and communities together rather than dividing them with a concrete blockade. By establishing new parks, walkways, paths, affordable housing and even new jobs this project reinforces the social pillar of sustainability. When it comes to the environmental pillar the master plan is meant to revitalize the ecosystem and bring wildlife back to their natural habitats. Another plan in mind is to remove the concrete floor of the river so the ground can absorb and filter the polluted water that would be carried to our oceans while simultaneously maintaining flooding protection. The last pillar is economic and the Los Angeles River Master Plan is planning on using multiple sources for funding such as non profit organizations, Grants, Private Foundations, Government Grants. This project sounds like an amazing opportunity in our heads however in execution it appears to be a logistical nightmare which presents as the largest weakness of this plan. The biggest strength of this plan is that if implemented and successful it would have a noticeable impact on communities such as more jobs, less trash and affordable housing and when people are able to have tangible differences made they are more inclined to keep that progress going because it's undeniable what is being seen. This idea is closely related to something called the broken window theory. The idea is that visible signs of something influence the ideas and actions of people exposed to it. James Wilson and George kelling were the founders of this academic theory and they stated that *"serious crime is the final result of a lengthier chain of events, crime emanated from disorder and that if disorder were eliminated, then serious crimes would not occur."* This idea is just to show how visible signs of improvement or some kind of enforcement will have preventive outcomes with the community.

As stated before, the largest weakness of the Master Plan is that funding does not appear to be sustainable. The plan relies on too many funding sources that the government doesn't have the power to influence and the decision making process for continuing funding is made by independent bodies that aren't working together which is a plan for gridlock and extremely slow progression which means more people with more changing agendas that get in the way of one another and this cycle of changing plans because of more and more time being needed for completion and putting new people in charge doesn't end. One of the three pillars is economic sustainability and this project doesn't have it, the

authors of the LAR master plan don't even say they have secured the funding necessary for these projects in fact the document just states *"Potential Funding Sources" pg 350-354 Appendix E.* Without concrete funding this is nothing but a pipe dream. In the copy of The Los Angeles River Master Plan the authors state *" Likewise funding for these projects will come from varying sources" pg 347 Appendix E.* This is a complicated problem because a plan that strives for sustainability has no way to secure and hold down one of the largest aspects of projects like these which is the how (often money). In addition to this time is a major role, this project wont take place overnight it would probably take years to complete and overtime new people move in and out of office and people change positions and roles in companies and with this comes possible agenda changes allowing for possible gridlocks in decisions and more time and money being spent. This project is relying too much on the faith that people will make decisions beneficial to people rather than their company or political campaign. Overall there are too many moving pieces and not enough plans lined up.

The biggest strength of this plan is that if implemented and successful it would have a noticeable impact on communities such as more jobs, less trash and affordable housing and when people are able to have tangible differences made they are more inclined to keep that progress going because it's undeniable what is being seen. Specifically I think accessibility is the best part of this project, it brings pathways uniting communities and not separating them. Environmentally removing the bottom of this concrete river would be beneficial to the ecosystem. .This project states that it is striving to be a *" Multi-use resource, serving human needs in a much broader sense than it does today" Executive Summary.* The only way to have things such as the previous flaw of economic sustainability line back up is to have a clear and presentable image that can be the vision that keeps people together and in doing this brings in more funding. It's almost like an investors meeting for a company, if investors like the results of a project or routine they are more inclined to keep investing which is exactly what this project's strength is. The Document also states that *" The biggest strength of this plan is that if implemented and successful it would have a noticeable impact on communities such as more jobs, less trash and affordable housing and when people are able to have tangible differences made they are more inclined to keep that progress going because it's undeniable what is being seen." Community,Art & Culture Memo-River Master Plan.*

In conclusion, The Los Angeles River Master plan is just that, a plan. With reinforcement to the economic pillar that this plan says it will uphold it will have a very bright future full of community revitalization, economic growth,

environmental benefits and a better Los Angeles. This project is built with intent to secure our future and it should be able to do that.

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Ben Wise
4/21/21
Period 3
Mr. Sapin

LA River Master Plan Comments:

As early as the 1800s the Los Angeles River was the primary source of water for agricultural gains. The Los Angeles River has been a historical landmark for many years and it originally flowed rapidly across a flood plain that is now the home of a plethora of monumental cities in Southern California. At one point in time, the water-assisted in creating ponds, lakes, and marshes however due to the current precipitation rate less water reached the land which led to the degradation of plant life. Considering the flooding events spanning the 1800's to the 1900s, substantial resources were depleted to compensate for the expensive reconstruction. Since money is shorter than ideal, it is important to prioritize and develop solutions directly responding to the problematic issues effectively at hand. The most alarming issue is that to create a healthier and sufficient system, we need to find a way for rainwater to spill into the river without bringing toxic pollutants with it.

The overall plan of the "LA River Master Plan" looks good at first with your detailed overview and blueprints for commercial developments with your proposals of parks and cafes, however, it is flawed as you spent noticeably less time discussing and developing water testing plans and waste management planning solutions. Your plan covers the pollution problem of waste management, but any sort of plan of action to solve the pollution dilemma is neglected. The plan needs to expand on regulatory proposals that will solve the pollution issue within the river. One of the most glaring problems of the LA river currently is its terrible issue regarding pollution. We know the communities along the LA river deserve a way to know that they are protected against heavy rainfall-induced flooding. I'm happy to read the details surrounding flooding and flash floods on page 145. Overall, this plan leaves much to be desired from an environmentalist standpoint, but not from a business standpoint.

The environmental impact the river implicates is significant. According to the LA River Index, the issue is as such, "In addition to air pollution, the water that flows overland is polluted by contaminated rainwater runoff whose sources range from oil and metals from roadways to disease-causing bacteria. Today the Los Angeles River has been designated as impaired due to multiple sources of contamination." (LARiverIndex, 1) As reinforced by the LA River Index, one of the most problematic issues of the LA River at the moment is its multiple sources of contamination and

the water that can flow overland due to rainfall, and into the river. It is necessary that solutions to the runoff that pollutes the river is in your master plan. Technically speaking, due to the Channel Landsets, water is at a higher risk of being exposed to toxic chemicals because of the vulnerability of trash and other pollutants interfering with the clean H20. The water supply of LA relies on the water quality of the river. In the passage, a background of how clean and reliable the water is in the riviera was showcased to the public to an extent. The proposition prevalently reports how the river could become sustainable, economically viable, environmentally protected, and socially equitable. I92-35

The Master Plan's strategic guidelines aimed to address several key elements for flood hazard and resilience which is remarkable. With the introduction of additional fundings, researchers can make determinations as to whether or not scale up programs that need to be revisited. It is necessary to reimagine the program in the sense that it should make the possibility of flood hazards irreverent while putting in place contamination and water runoff prevention to keep our river clean. Let's make the leap we have been needed to, and finally, upgrade the entire watershed infrastructure and rekindle the environment so we can allow the LA River to prosper!

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Tiffany Zarate-Gonzalez

In 2020 we witnessed such a tremendous amount of events that damaged most of us. And there was a global pandemic which put a halt to most of our projects or plans for the future but for most we looked past that and decided to make a plan that would improve our future. A plan that was reconsidered in 2020 was the LA masterplan which is a plan that would help improve the LA as well as surrounding areas. For a long time we have seen so much of the bad to the river that nobody has actually taken proper action to improve its situation. Now you see a plan that would help the community around the river, the environment around the river and the river itself, as it won't be polluted. Most of the information about this plan is in the LA River master online and it is where I got my information as well as the overview of it. Now I am writing to you today because I want to just put a spotlight on a very important topic of this plan as well as a very beneficial part of this plan. Let's start off with the negative part of this plan as I believe it should

I92-36

give more attention even though it talks about it in the overview of it. I want to talk to you about the gentrification that will take place once this plan goes to action. I know in the overview it says how you don't want to make this a vulnerable area for gentrification but rather make it an area for any homeless to have housing. But regardless, gentrification is still a very much big issue in Los Angeles. With major improvements to the area violence may not be an issue as well as it may become more of a tourist attraction place. East LA is a place that would get affected the most as we are now seeing major housing developments in the area. Just earlier this year it was announced that one of the historic Sears departments will be shutting down to make way into apartments. East LA is considered a Hispanic Latin American a low income area and with these changes it would no longer be a low income area as housing developments are being done and more people are willing to come to the place as changes are happening around the area. Now let me give you the of the doubt saying that you actually are going to make housing for the homeless and make the area a more sustainable lifestyle area for low income people. How do I know that the lifestyle cost won't increase making it hard for people to live in the area. As the place improves more tourists are going to want to come in making more businesses want to come in as well. With more businesses sure we get more jobs opportunities but it also makes the area expensive to live in. Making the area expensive for such a low income community will just push them out and you would create more unstable housing for these people making them possibly homeless at some point creating even bigger homeless situations that we have in LA. A great example of this would be in the West Adams community when the USC Village was introduced. Sure it did improve the area, as crime week rate went down but we saw major

I92-36 cont.

gentrification in the area too. Not only did the University change but the outer community changed too, as now people wanted to buy properties close to the Village. Rent that was once $800 a month went up to almost $2000 a month which is a tremendous amount of increase in price pushing an African-American and Hispanic base community. It helped make it a more white centered area. I brought that up as the Plan of the village was like that LA river plan, to help one community but it ended up hurting the other. Although I have talked bad about this project I believe it is attended to do good. East LA is a high crime rate area and with these improvements it would decrease the crime rate, making the community a safer place for people to actually feel confident in. Most of the time when people hear East LA they associate it to gangs and drugs. With the LA River Master Plan more parks are going to open as well as recreational centers for everyone. The addition of these instalments will bring in more people from different communities creating a better environment overall. People will have a different perspective of East Los Angeles, South Central, and Long Beach as they wont be associated with such a negative connotation. A nicer environment will inspire others to keep it that way and clean after it instead of trashing it and putting up graffiti. Overall the LA River master plan is intended to do good to the environment and help improve the surrounding communities of the river. However the plan shouldn't have to sacrifice community housing. With a couple of restrictions it is possible for the plan to go smoothly.

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Honors Environmental

Enoch Dong Lee

A River MP Public Comment Final Draft

A major dilemma that many cities face is looking for a safe, sustainable, and beneficial way to closely integrate nature into cities. This is mostly done by planting more vegetation or by creating more parks, but many forget that the various forms of water in cities are also included in nature. The 2020 LA River Master Plan is a project that plans to create more social and environmental benefits by improving areas around the LA River. While reviewing and researching the Master Plan, the reduction of flood risk goals are admirable, while the construction aspect induced worry.

Flooding is considered one of the worst and deadliest natural disasters due to the frequency and lasting damage that it can have on ecosystems and society. The Office of the Queensland Chief Scientist reported that the immediate impact of flooding causes the “loss of human life, damage to property, destruction of crops, loss of livestock, and deterioration of health conditions owing to waterborne diseases" while the long-term impacts can be “disruptions to supplies of clean water, wastewater treatment, electricity, transport, communication, education, and health care”. Although this natural disaster may seem irrelevant to LA residents due to the arid environment, LA can also experience massive damage due to flooding. Most regions in Los Angeles are not susceptible to flooding and usually have less than a 1% chance of experiencing a flood. However, as mentioned in the LA River Plan document, “Areas within the 1% floodplain were identified as very high need and required flood management improvements”. To prepare for the floods that LA will eventually need to face, actions need to be taken. Admirably the LA River Master Plan regards this natural disaster threat as something that needs to be taken care of. It plans to reduce and prepare for this flood risk by “modifying the channel […] raising levees, building
bypass channels or tunnels, removing invasive plants, or removing sediment from the channel. This aspect of the LA River Master Plan was admirable and well thought out.

Although there are various aspects of the LA River Master Plan that are admirable. The environmental impacts of the construction process and the material used were worrying. In the Environmental Impact Report provided by LA county, there is a section dedicated to Hazards and Hazardous Materials. This section “describes the geographic and regulatory setting for hazards and hazardous materials” and “identifies mitigation measures that would reduce or avoid any significant impacts“. The section talks about how potential/present hazardous materials, like oil, can/are affecting

I92-37

I92-37 cont.

the river. However, this section fails to mention the hazardous materials that can come from the actual construction of ideas mentioned in the Master Plan, like the residential areas. As mentioned by the Federal Highway Administration, construction factors, like “particulates” and “gas emissions”, can have an “effect on wetlands and streams”. This means that more careful consideration has to be involved in the construction process. For example, the residential areas can be constructed slightly further away from the river to ensure that particulates don’t poison the water. Another worry-inducing aspect of the plan is the use of concrete near the river. Concrete is not water permeable which is detrimental, because this means that storm-runoff will go into the river causing polluted water and an increased chance of floods. A potential solution is the implementation of pervious pavement which allows water to soak into the ground beneath the pavement. As mentioned by the American Concrete Pavement Association, “pervious concrete pavement can be used to substantially reduce the volume of runoff, to provide groundwater recharge and to reduce pollutants in stormwater runoff”.

The LA River Master Plan is a project that can be beneficial to Los Angeles due to the environmental and social benefits it can produce. This plan can reduce the threat of floods in various regions and create residential areas for the homeless. However, there are still various aspects that need to be considered and hopefully, before this plan can be implemented, this plan can improve to be something that will positively impact Los Angeles.

Citations

"1931 China Floods." *Great Disasters*, www.greatdisasters.co.uk/1931-china-floods/.

"Hazards and Hazardous Materials." Los Angeles County.

"How Does Flooding Affect Humans and the Environment?" *Internet Geography*, 2 Oct. 2019,www.internetgeography.net/topics/how-does-flooding-affect-humans-and-the-environment/.

jurisdiction=Queensland; sector=government; corporateName=Department of Environment and Science. "What Are the Consequences of Floods?" *Office of the Queensland Chief Scientist*, Jurisdiction=Queensland; Sector=Government; CorporateName=Department of Environment and Science, www.chiefscientist.qld.gov.au/publications/understanding-floods/flood-consequences.

PDF links:

https://pw.lacounty.gov/swq/peir/doc/PEIR-doc/3.08-Hazards-and-Hazardous-Materials.pdf

https://pw.lacounty.gov/wmd/watershed/lar/docs/LARMP-MainVolumeEnglish-PUBLICDRAFT.pdf

http://dep.wv.gov/WWE/Programs/stormwater/MS4/green/Documents/SW%20Mgmt%20with%20pervious%20concrete.pdf

LA River Master Plan Public Comment

My name is Francis Pierce and I am 17 years old. I have lived in L.A. for the entirety of my life and I have had the pleasure of being immersed within the multi-dimensional and diverse communities of the city. These are crucial to the identity of L.A. and are why the LA River Master Plan has given me a great feeling of optimism. The plan seems to be extremely thoughtful and considerate of not only the neighboring people on the river but also for how to proceed in a timely manner that pays attention to environmental needs as well. With that being said, the part of the plan that truly piqued my interest above all else was the “kit of parts" and how there are different procedures that will be instituted to help satisfy the separate needs of each community. This not only shows versatility but the much-needed skill of adaptability that will ultimately be the reason why this plan will prove to be successful. On the other hand, it is concerning to me how they expect each community living along the river to be cooperative and welcoming to the new change. This plan is only successful if full participation is met and if there are disputes between them it could prove to be a detrimental obstacle to the progression of the project as a whole. Regardless, the upside of this project is still unlimited and with the proper precautions, has the potential to reap great benefits economically, socially, and environmentally.

As previously mentioned, a point of strength in the Master Plan is how there is, “kit of parts" in regards to identifying the specific needs within each community. The kit of parts is so strong with how it “identifies the design components that are most appropriate for a given site’s needs” (LA River Master Plan Page 246). Applying the same strategy to each area would not only see a waste of resources and time, but it would worsen relations between the people living there and the actual project. To see the main issues in your neighborhood not be addressed but rather covered up by improvement in other already-sufficient areas would be extremely frustrating. This is a crucial aspect that cannot be forgotten as 17 cities touch the river with around, “1 million people (that) live within a mile of the river” (How to use the LA River Master Plan). With such a large portion of our city's population lying in such close proximity to the river, the right issues must be addressed in a manner where everyone receives what they need. Using the city of Long Beach as an example, it is the “second-largest city in the Greater Los Angeles Area” and overall has many areas dedicated to, “public open space” in its 51.4 square mile frame (LA River Index). Such an established and expansive city will require drastically different needs than a smaller and more compact city like Vernon, which is only 5.2 square miles in area. Also, by helping to define each component that will be incorporated into different areas of the river, it

helps to inform the people who will be using them what purpose they serve and why it is being built in their area. This connectivity will help heighten attitudes towards the fulfillment of the L.A. River Master Plan as people will be able to see their local areas receive the balanced treatment that it requires.

Although the L.A. River Master Plan does an adept job at trying to satisfy the community, the possibility of people not participating in the plan could unravel the effort. One solution to this problem that has been presented is to increase engagement through, “community meetings and surveys" (LA River Master Plan Page 122). Although this may seem like a sound option on the surface, the question of getting people to even attend the meetings could be difficult especially. This could cause participants to lose interest in the drawn-out process and without proper representation from the community, the Master Plan is doomed to fail. Another issue in terms of the community is maintaining these newly-built structures and facilities over time. With this being such an expansive project, it will be extremely costly to hire workers at each pavilion area that has been renovated, meaning that the responsibility of upkeep will fall to the surrounding community. As page 249 of chapter 11 states, “champions are needed for each goal and in each geographic area,” meaning that continued advocacy and involvement is not only welcomed, by an absolute must. The intentions behind this action are good-hearted but in the end, they only provide more of a significant risk that the entire plan will backfire. It is no surprise that the entire project is massive and requires a lot of effort, but the fact that “dedicated funding for many of the actions has not yet been identified” (LA River Master Plan page 447) is another concern for gaining community participation. It will be very difficult to gain the backing of an entire community with a lack of current funding as there is still no guarantee that any of the proposed plans will actually see fruition. Jon Christensen and Becky Nicolaides said it best in regards to the funding and future of the plan with how “we could pour millions of public dollars into a plan that looks impressive but drives out its target audience.” (Don’t let L.A. River Master Plan gentrify Gateway Cities)

Bibliography:

How to use the LA River Master Plan. (2021, January 13). [Video]. YouTube. https://www.youtube.com/watch?v=ToNwvgOYX14

Gehry, F. (2020, January 13). *LA RIVER MASTER PLAN*. LA River Master Plan. https://pw.lacounty.gov/wmd/watershed/lar/docs/LARMP-MainVolumeEnglish-PUBLICDRAFT.pdf

Long Beach | LA River Index. (2016). LA River Index. http://riverlareports.riverla.org/outreach/river-adjacent-cities-meetings/long-beach/

Nicolaides, J. C. A. B. (2021, February 21). *Op-Ed: Don't let L.A. River Master Plan gentrify Gateway Cities*. Los Angeles Times. https://www.latimes.com/opinion/story/2021-02-21/los-angeles-river-master-plan-gateway-cities-frank-gehry-gentrification-equitable-development

From: Jon Fisher
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments
Date: Thursday, May 13, 2021 2:23:29 PM

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

I am a Los Angeles County resident and birder (birdwatcher). I would like to bring to your attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers of migratory shorebirds during fall migration (July through September). This is not "natural" habitat, but much of it has become a critically important feeding, resting and breeding area for many, many birds.

I have been to and observed birds at all these locations, and it's difficult to put into words how important and rewarding to me those experience have been and continue to be. But these places are much more important to the birds themselves. Imagine a tired and hungry migrating shorebird, having flown for many hours and looking for a place to set down to feed and rest. For them, the Los Angeles River is that place.

I93-1 The Sepulveda Basin and the adjacent Los Angeles River includes extensive riparian habitat that is home to the threatened and federally protected breeding Bell's Vireo and other breeding Bird Species of Special Concern including 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 during fall migration. Most notably along the concrete section immediately south of the 134 Freeway.

"Frogtown"; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has fragmented 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; section from Willow Street to Del Amo Boulevard. This area plays host to significant shorebird populations (on a global scale) during fall migration. This lower portion of the Los Angeles River hosts large numbers of migrating shorebirds from July through September. This is the best place in the county to observe these birds. Its preservation is critical. Shorebirds and many other species utilize this area for resting and foraging throughout the year. There is precious little other habitat of this type in the county. This truly is a critically important bird habitat. If lost, there is nothing else to replace it.

It's odd to think (even for the seasoned birdwatcher) that so many birds can thrive in what is basically a concrete channel, but this is the reality. All too often these areas are bulldozed, scraped, trimmed or otherwise impacted by agencies that are well-meaning, but understandably wildlife conservation is not at the top of their priority list.

I93-1 cont.

I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I 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.

Biological diversity is key to healthy ecosystems and the quality of the planet overall. Preserving both species and numbers of birds is an essential place to start. Birds, as the most visible of wildlife, are a barometer for what's happening in the environment. Both current and future generations will thank us for doing all we can to protect these irreplaceable natural resources.

I very much thank you for your attention to these issues.

Jonathan Fisher
Glendale, CA

From: Calvin Bonn
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments
Date: Thursday, May 13, 2021 4:41:53 PM

CAUTION: External Email. Proceed Responsibly.

To Whom It May Concern:

I94-1

As a local Los Angeles young birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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. Watching thousands of shorebirds fly together in sync, or spread out on a mudflat foraging is a truely amazing sight, and stretches of the LA River are some of the best places to observe these incredible birds in Los Angeles County. Other members of the LA birding community and myself strongly urge you to give special consideration to the following areas due to their importance to the bird life of Los Angeles;

· 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 (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.

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

Thank you your attention to these issues.

Best,
Calvin B.
Redondo Beach

From: Cesar Estrada
To: PW-LA River CEQA
Cc: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments
Date: Thursday, May 13, 2021 4:57:40 PM

CAUTION: External Email. Proceed Responsibly.

Hello,

I95-1 Thank you all for the opportunity to participate in this very important phase in the LA River Master Plan PEIR Comments and suggestions, Being a responsible and peaceful and environmental friendly loving citizens I just have a few comments and suggestions and wont hurt and take much of your time on reading it. First and not the least is that I would love to see Military Hardware on the middle or on the banks of the River like a non nuclear or Conventional Aircraft Carrier at the opening of the LA River starting from the City of Long Beach then the likes of Planes, Tanks, Cannons, all varied kinds of military vehicles not including live ammunition off course.

I95-2 And if that is not gonna happen! I would just love to see trees or Palm Trees planted on the both banks and sides of the River to serve as shades on a warm weather and to add better aesthetics when times are and the interesting view in front of you are too far to be noticed with your plain sight and to the diminishing like mine's. The last but not the least is the wonderful life saving device this magical living trees will provide during the rush of flood during the storm seasons, imagine where are you can tie the other end of the rope, if there is a rope, at least when times people are coming to rescue a fellow individual every one can think instinctively to hold hand in hand or even hand to feet, and sometimes maybe feet to hands.

And if this still not going to happen, I will sneak every single night, sometimes days, and I will start planting nursery trees near by my house and work towards farther until every River Loving individuals would join me and hopefully.

Best,
Anonymous

Sent from Mail for Windows 10

From: Christine Rowe
To: PW-LA River CEQA; Chris Rowe
Subject: LA RIVER MASTER PLAN COMMENTS
Date: Thursday, May 13, 2021 5:02:19 PM
Attachments: LA RIVER MASTER PLAN SLIDES 210421-Public-Draft-Virtual-Meeting_ENG_SPA_sm_red.pdf

CAUTION: External Email. Proceed Responsibly.

Attention: Grace Komjakraphan-Tek
Los Angeles County Public Works
900 South Fremont Avenue, 11th Floor
Alhambra, CA 91803

To Whom This May Concern,

Thank you for extending the public comment period. I wish that the public comment period was extended longer. Due to COVID - 19, and other factors, including the extension of the time for our Federal income taxes to be due, I have not been able to study the Master Plan issue in detail as I would have liked.

I am commenting at this time only on what I heard on the ZOOM meeting presentations in recent months. In specific, I am commenting on this presentation attached.

1) I oppose the widening of the river at any point due to the potential impacts of that widening down stream.

2) Most important, the widening of the river could displace between 20,000 - 106,000 residents along the river.

I96-1

3) We already have a major homeless crisis, and there is no end in sight on how to house the unhoused. The issue of the unhoused must be addressed before we make any changes to the river.

4) Your map - slide 18 - on COVID - is inaccurate to the location of Canoga Park. The headwaters where the creeks converge is in Canoga Park. That is not shown on that map page.

5) I use the CalEnviroScreen 3.0 and 4.0 tools for pollution burden and population information.

6) The channel should remain lined for the purposes of flood control.

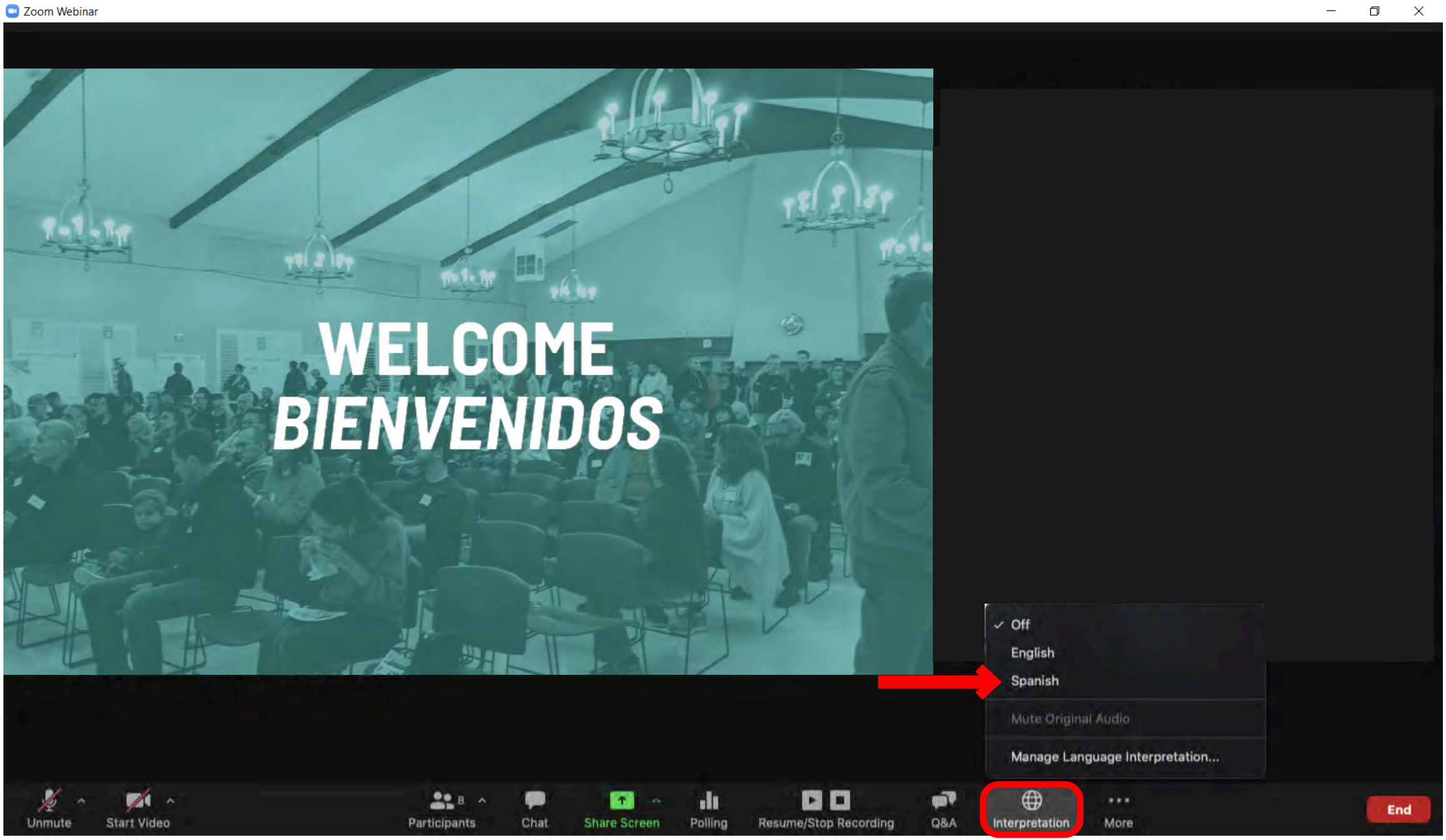
Please let me know if you can extend the comment period further.

Thank you.

Christine Rowe

West Hills

IF YOU WANT TO LISTEN IN SPANISH, CLICK THE SPANISH CHANNEL
SI QUIERES ESCUCHAR EN ESPAÑOL HAZ CLIC EN EL CANAL EN ESPAÑOL



WELCOME

BIENVENIDOS

Source: http://www.cityofcudahy.com/uploads/5/3/9/9/53994499/clara1_orig.jpg

MEETING AGENDA
AGENDA DE LA REUNIÓN

1

WELCOME / INTRODUCTION

BIENVENIDOS / INTRODUCCIÓN

2

OVERVIEW / ABOUT THE PLAN

INFORMACIÓN GENERAL / SOBRE EL PLAN

3

PUBLIC COMMENTS / QUESTIONS

COMENTARIOS PÚBLICOS / PREGUNTAS

4

CLOSING REMARKS / THANK YOU

COMENTARIOS FINALES / GRACIAS

WELCOME

BIENVENIDOS

Source: http://www.cityofcudahy.com/uploads/5/3/9/9/53994499/clara1_orig.jpg

LA RIVER MASTER PLAN
EL PLAN MAESTRO DEL RÍO DE LOS ÁNGELES

PUBLIC DRAFT VIRTUAL INFORMATION SESSION
BORRADOR PÚBLICO DE LA SESIÓN DE INFORMACIÓN VIRTUAL

21 April 2021 / *21 de abril del 2021*

ONE MILLION PEOPLE LIVE WITHIN
ONE MILE OFTHE LA RIVER

UN MILLON *DE PERSONAS*
VIVEN A UNA MILLA DEL RÍO
LOS ÁNGELES

25% OF CALIFORNIANS LIVE
WITHIN A ONE HOUR DRIVE

25% *DE LOS CALIFORNIANOS*
VIVEN A MENOS DE UNA HORA
EN COCHE



Source: Dusadee Corhiran (@DCorhiran), https://pbs.twimg.com/media/DE0xDU9UMAA3nVX.jpg, 2017

100,000 CFS FLOWS THROUGH DOWNTOWN DURING A 1% STORM

(THE FLOW AT NIAGARA FALLS IS ONLY 85,000 CFS)

100,000 CFS *FLUYE A TRAVÉS DEL CENTRO DE LA CIUDAD DURANTE UNA TORMENTA DEL 1%*

(EL FLUJO EN LAS CATARATAS DEL NIÁGARA ES SÓLO 85,000 CFS)

Source: Geosyntec

LA RIVER MASTER PLAN / *PLAN MAESTRO DEL RÍO DE LOS ÁNGELES*

THE LA RIVER IS 51 MILES LONG
EL RÍO LOS ÁNGELES TIENE 51 MILLAS DE LARGO

LA RIVER MASTER PLAN





Source: Geosyntec, OLIN.



RIVER MILE 51: CANOGA PARK
MILLA DEL RÍO 51: CANOGA PARK



RIVER MILE 43: SEPULVEDA BASIN
MILLA DEL RÍO 43: SEPULVEDA BASIN



RIVER MILE 39: STUDIO CITY
MILLA DEL RÍO 39: STUDIO CITY



RIVER MILE 29: ATWATER VILLAGE
MILLA DEL RÍO 29: ATWATER VILLAGE



RIVER MILE 24: ELYSIAN PARK
MILLA DEL RÍO 24: ELYSIAN PARK



RIVER MILE 22: DOWNTOWN LA
MILLA DEL RÍO 22: DOWNTOWN LA



RIVER MILE 12: SOUTH GATE
MILLA DEL RÍO 12: SOUTH GATE
Source: OLIN

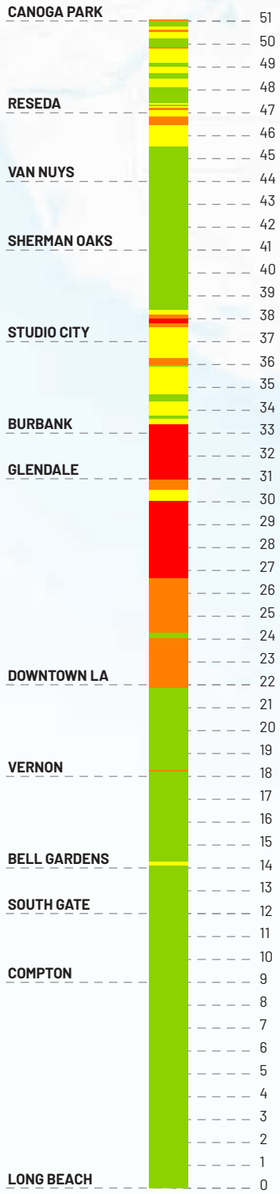


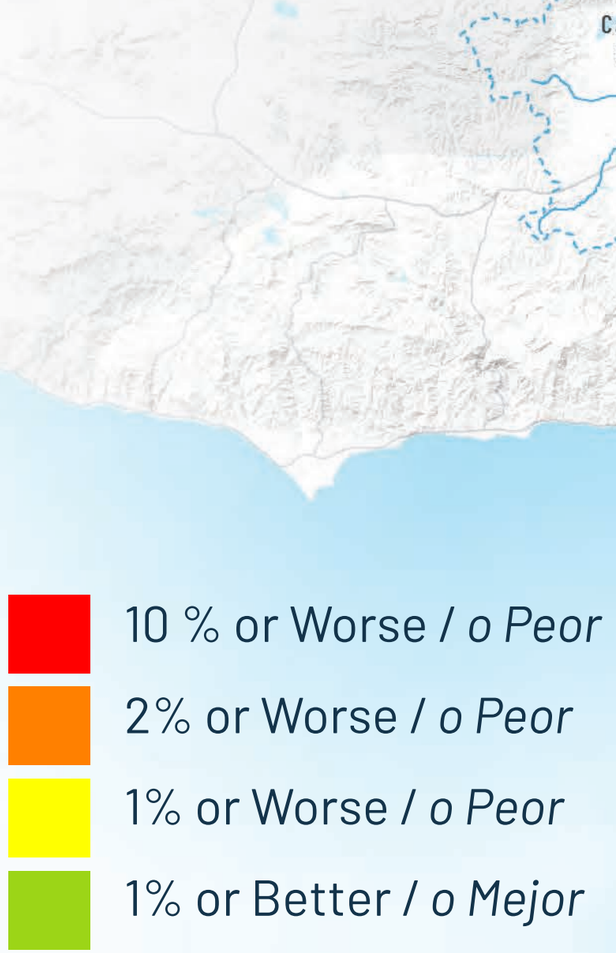
RIVER MILE 2: LONG BEACH
MILLA DEL RÍO 2: LONG BEACH

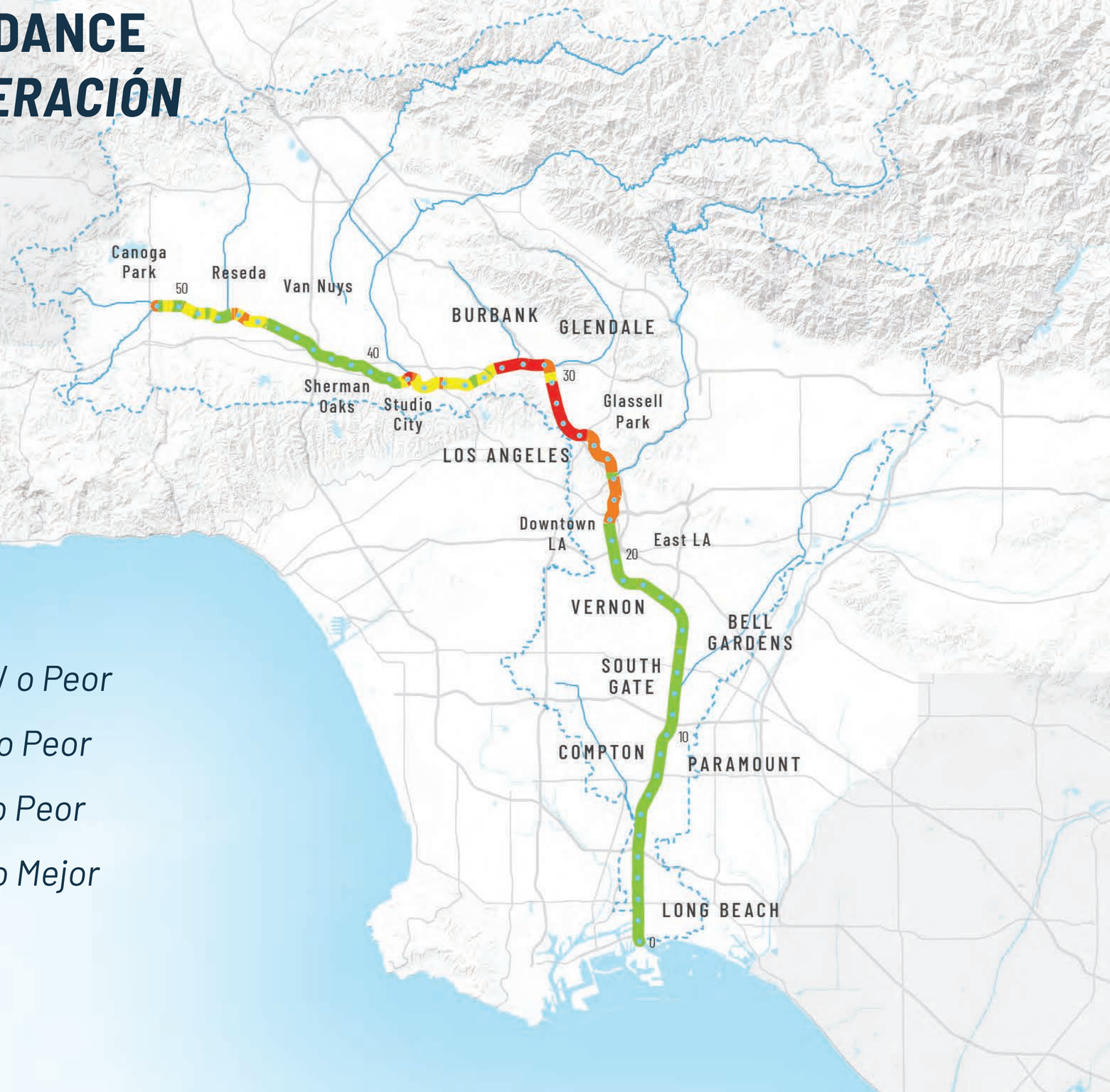


RIVER MILE 0: RIVER MOUTH
MILLA DEL RÍO 0: RIVER MOUTH

ANNUAL CHANCE OF EXCEEDANCE
POSIBILIDAD ANUAL DE SUPERACIÓN



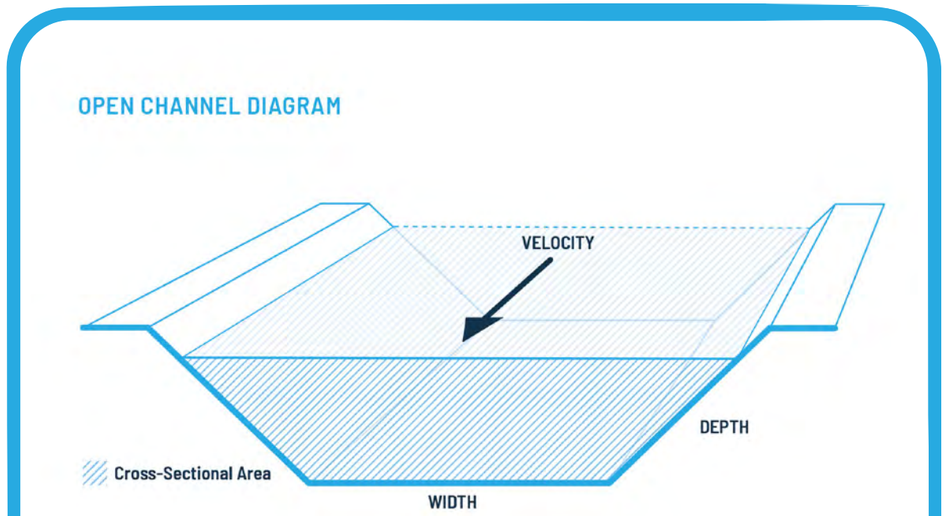




Source: LA River Master Plan, OLIN

WHY IS THE LA RIVER CONCRETE?
¿POR QUÉ ES DE HORMIGÓN EL RÍO DE LOS ÁNGELES?

- LONG HISTORY OF FLOODING
  LARGA HISTORIA DE INUNDACIONES
- WATER MOVES MUCH MORE QUICKLY THROUGH CHANNELS THAT HAVE LESS FRICTION, SUCH AS SMOOTH CONCRETE
  EL AGUA SE MUEVE MUCHO MÁS RÁPIDO A TRAVÉS DE CANALES QUE TIENEN MENOS FRICCIÓN, COMO EL HORMIGÓN LISO



CHANNEL CROSS SECTION
SECCIÓN TRANSVERSAL DEL CANAL



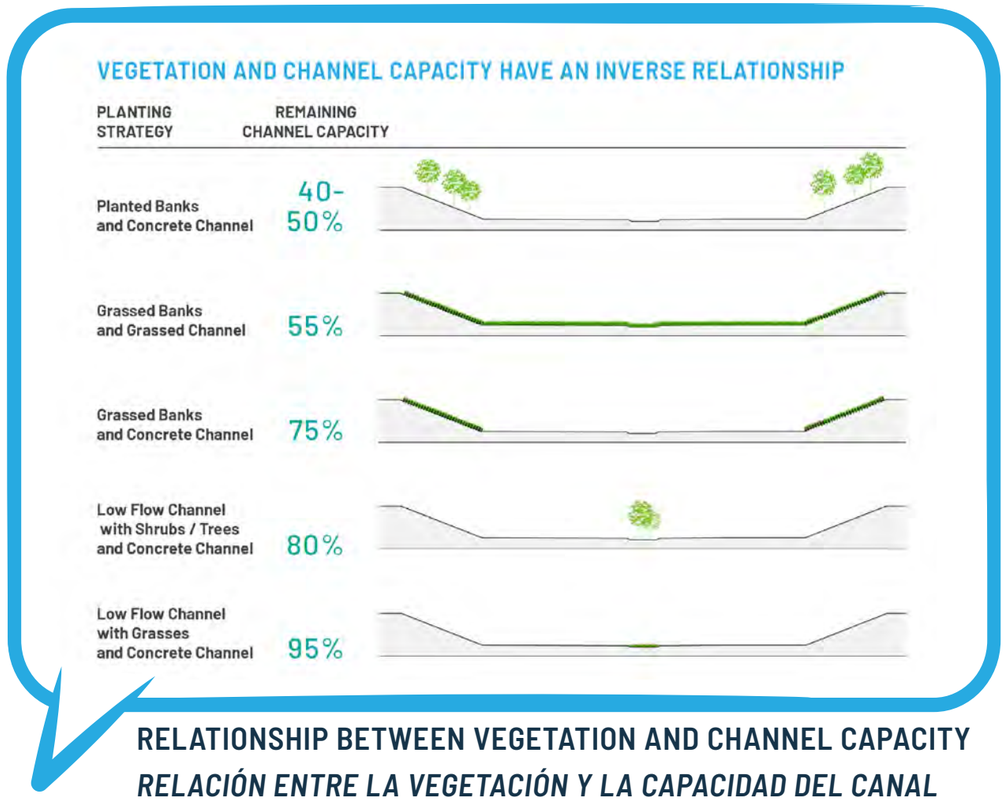




P22-27

CAN WE REMOVE THE CONCRETE?
¿PODEMOS REMOVER EL HORMIGÓN?

- A MORE NATURALIZED RIVER REQUIRES A MUCH WIDER FLOW PATH
  UN RÍO MÁS NATURALIZADO REQUIERE UNA RUTA DE FLUJO MUCHO MÁS AMPLIA
- REMOVING CONCRETE WOULD REQUIRE MASSIVE COMMUNITY DISPLACEMENT AND MAY NOT MEET THE DEMANDS OF INCREASED CLIMATE CHANGE
  LA REMOCIÓN DEL CONCRETO REQUERIRÍA UN DESPLAZAMIENTO MASIVO DE LA COMUNIDAD Y ES POSIBLE QUE NO SATISFAGA LAS DEMANDAS DEL CRECIENTE CAMBIO CLIMÁTICO



RELATIONSHIP BETWEEN VEGETATION AND CHANNEL CAPACITY
RELACIÓN ENTRE LA VEGETACIÓN Y LA CAPACIDAD DEL CANAL



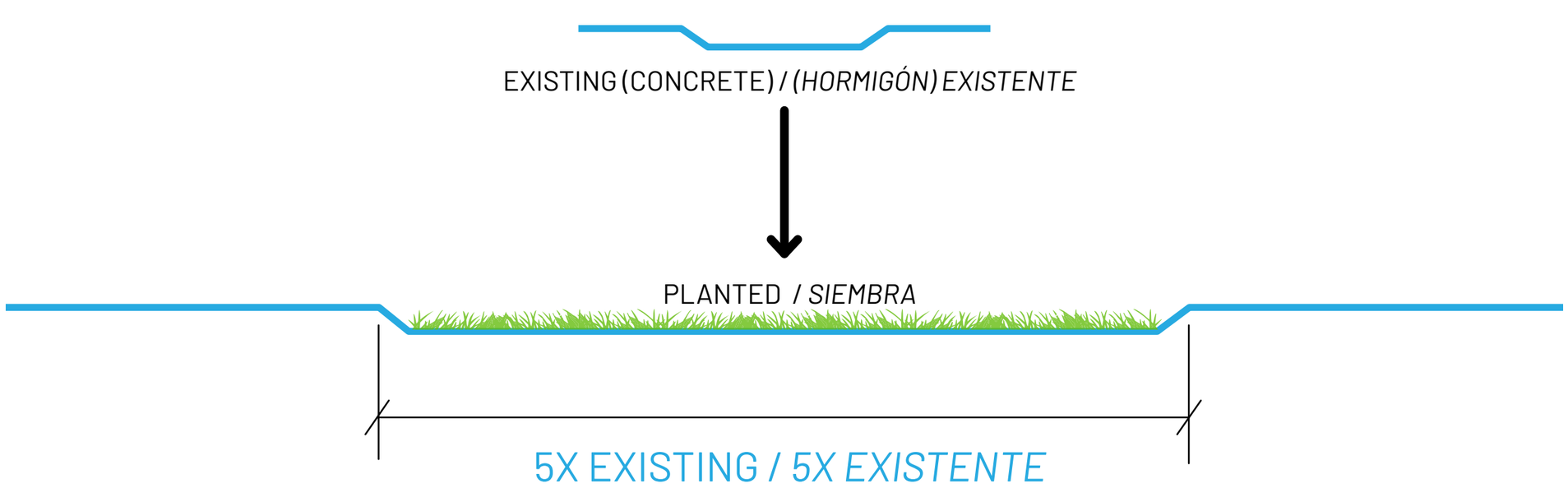




P22-27

70% GREENING OF THE CHANNEL COULD REQUIRE THE CHANNEL TO EXPAND 5X ITS CURRENT WIDTH IN ORDER TO MEET FLOOD REQUIREMENTS

LA ECOLOGIZACIÓN DEL 70% DEL CANAL PODRÍA REQUERIR QUE EL ANCHO DEL CANAL SEA 5 VECES SU ANCHO ACTUAL PARA CUMPLIR CON LOS REQUISITOS DE INUNDACIÓN



Source: Los Angeles River Revitalization Master Plan, 2007

WHY WIDENING THE RIVER ISN'T FEASIBLE
¿POR QUÉ NO ES FACTIBLE ENSANCHAR EL RÍO?

3X
WIDENING COULD IMPACT
ENSANCHAMIENTO PODRÍA AFECTAR



APPROXIMATELY / *APROXIMADAMENTE*

22,000 Residents / *Residentes*

35 mi. of Freeway / *millas de Autopista*

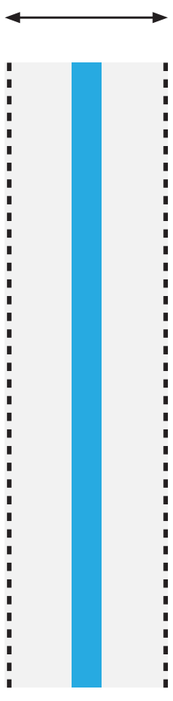
20 mi. of Railroad / *millas de Ferrocarril*

60 mi. of Transmission Lines / *millas de Transmisión*

82 Bridges / *Puentes*

169 Critical Facilities / *Instalaciones críticas*

5X
WIDENING COULD IMPACT
ENSANCHAMIENTO PODRÍA AFECTAR



APPROXIMATELY / *APROXIMADAMENTE*

60,000 Residents / *Residentes*

50 mi. of Freeway / *millas de Autopista*

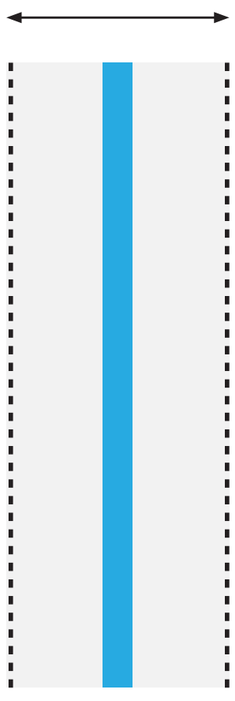
30 mi. of Railroad / *millas de Ferrocarril*

75 mi. of Transmission Lines / *millas de Transmisión*

93 Bridges / *Puentes*

385 Critical Facilities / *Instalaciones críticas*

7X
WIDENING COULD IMPACT
ENSANCHAMIENTO PODRÍA AFECTAR



APPROXIMATELY / *APROXIMADAMENTE*

106,000 Residents / *Residentes*

60 mi. of Freeway / *millas de Autopista*

30 mi. of Railroad / *millas de Ferrocarril*

90 mi. of Transmission Lines / *millas de Transmisión*

108 Bridges / *Puentes*

620 Critical Facilities / *Instalaciones críticas*

Assumptions: River is widened equal distances on both sides / River is widened equal distances on both sides; Width is measured from top-of-bank to top-of-bank, plus a 20' right-of-way / Width is measured from top-of-bank to top-of-bank, plus a 20' right-of-way

Note: Population calculated as a proportional share of the residential land within a given block group that overlapped the new river extent.

Source: US Census Bureau, 2016 American Community Survey 5-Year Estimates, 2016; LA County GIS Data Portal, Flood Zones, 2016; USACE, Floodplain Management Services Special Study LA River Floodplain Analysis (mapping limited to area from Barham Boulevard to First Street), 2016

IF WE COLLECT MORE STORMWATER, CAN WE GET RID OF THE CONCRETE? LIKE A CITY OF SPONGES?

SI RECOLECTAMOS MÁS AGUA DE LLUVIA, ¿PODEMOS DESHACERNOS DEL HORMIGÓN? ¿COMO UNA CIUDAD DE ESPONJAS?

- THERE ARE LIMITATIONS TO LAND AREA AVAILABLE
  HAY LIMITACIONES EN EL ÁREA DE TERRENO DISPONIBLE
- THESE IMPROVEMENTS BENEFIT WATER QUALITY BUT QUICKLY FILL UP DURING LARGE STORMS
  ESTAS MEJORAS BENEFICIAN LA CALIDAD DEL AGUA, PERO SE SATURAN RÁPIDAMENTE DURANTE FUERTES TORMENTAS
- REDUCING IMPERVIOUSNESS OF THE WATERSHED BY 28% WOULD NOT REDUCE FLOW ENOUGH IN THE RIVER CHANNEL DURING A 1% EVENT TO PREVENT FLOODING
  AUMENTAR LA PERMEABILIDAD DE LA CUENCA EN UN 28% NO REDUCIRÍA LO SUFICIENTE EL FLUJO EN EL CANAL DEL RÍO PARA PREVENIR INUNDACIONES DURANTE TORMENTAS QUE OCURREN UNA VEZ CADA 100 AÑOS



THERE ARE MANY TOOLS TO MANAGE AND CONSERVE WATER
HAY MUCHAS HERRAMIENTAS PARA ADMINISTRAR Y CONSERVAR EL AGUA


FIND MORE INFORMATION ABOUT THE HYDROLOGY AND HYDRAULICS OF THE LA RIVER WATERSHED IN APPENDIX VOLUME II: TECHNICAL BACKUP DOCUMENT

QUESTIONS ABOUT THE LA RIVER AND WATERSHED

Why is the LA River concrete?

OPEN CHANNEL DIAGRAM

VELOCITY

DEPTH

WIDTH

Cross-Sectional Area

Can we remove the concrete?

What if we put trees in the channel or have more natural areas like the part of the LA River by Griffith Park?


FIND MORE INFORMATION ABOUT THE HYDROLOGY AND HYDRAULICS OF THE LA RIVER WATERSHED IN APPENDIX VOLUME II: TECHNICAL BACKUP DOCUMENT

QUESTIONS ABOUT THE LA RIVER AND WATERSHED (CONTINUED)

If we collect more water upstream in dams or greenstreets can we get rid of the concrete? Like a city of sponges?

WATCH A VIDEO ABOUT STORMWATER MANAGEMENT

LA RIVER

But shouldn't we try to save more water?

Measure W was passed in 2018 and makes

$285M

available to the Safe, Clean Water Program for projects with a focus on stormwater capture, water quality improvements and community benefits.


FIND MORE INFORMATION ABOUT THE HYDROLOGY AND HYDRAULICS OF THE LA RIVER WATERSHED IN APPENDIX VOLUME II: TECHNICAL BACKUP DOCUMENT

QUESTIONS ABOUT THE LA RIVER AND WATERSHED (CONTINUED)

What is so complicated about widening and naturalizing the river?

VEGETATION AND CHANNEL CAPACITY HAVE AN INVERSE RELATIONSHIP

PLANTING STRATEGY

RESULTING CHANNEL CAPACITY

Planted Banks and Concrete Channel 40-50%

Grassed Banks and Grassed Channel 55%

Grassed Banks and Concrete Channel 75%

Low Flow Channel with Grades / Trees and Concrete Channel 80%

Low Flow Channel with Grasses and Concrete Channel 95%

WHAT'S AT STAKE WITH RIVER WIDENING

3X WIDENING COULD IMPACT APPROXIMATELY 22,000 Residents, 2% of Primary Schools, 8% of Secondary Schools, 8% of Transitional Schools, 2% of Colleges / Universities, 10% of Critical Facilities

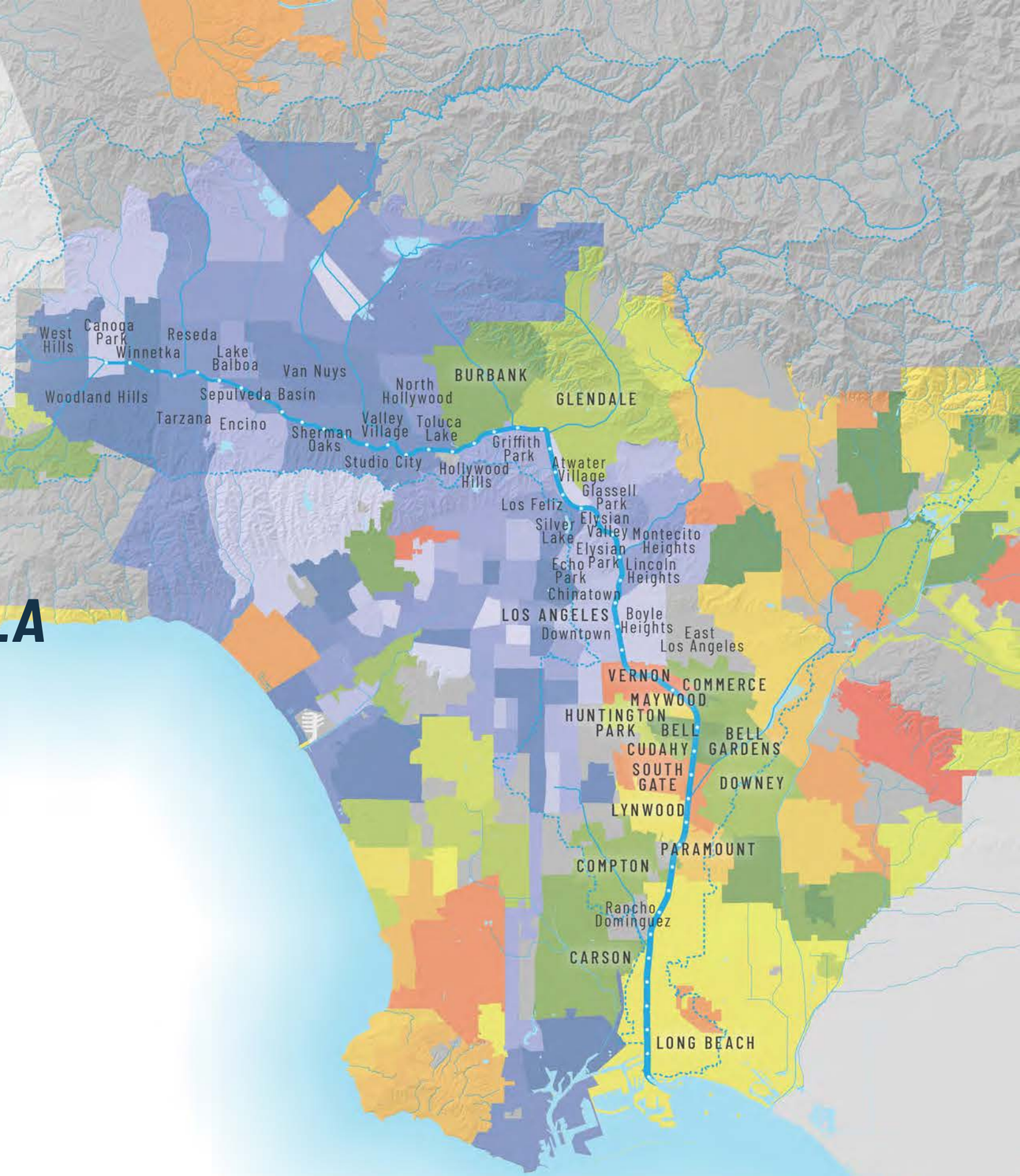
5X WIDENING COULD IMPACT APPROXIMATELY 40,000 Residents, 5% of Primary Schools, 12% of Secondary Schools, 12% of Transitional Schools, 5% of Colleges / Universities, 20% of Critical Facilities

7X WIDENING COULD IMPACT APPROXIMATELY 126,000 Residents, 9% of Primary Schools, 30% of Secondary Schools, 30% of Transitional Schools, 15% of Colleges / Universities, 63% of Critical Facilities

P22-27

TODAY THERE ARE 17 CITIES, 23 CITY OF LA NEIGHBORHOODS, AND 4 UNINCORPORATED COMMUNITIES WITHIN ONE MILE OF THE LA RIVER

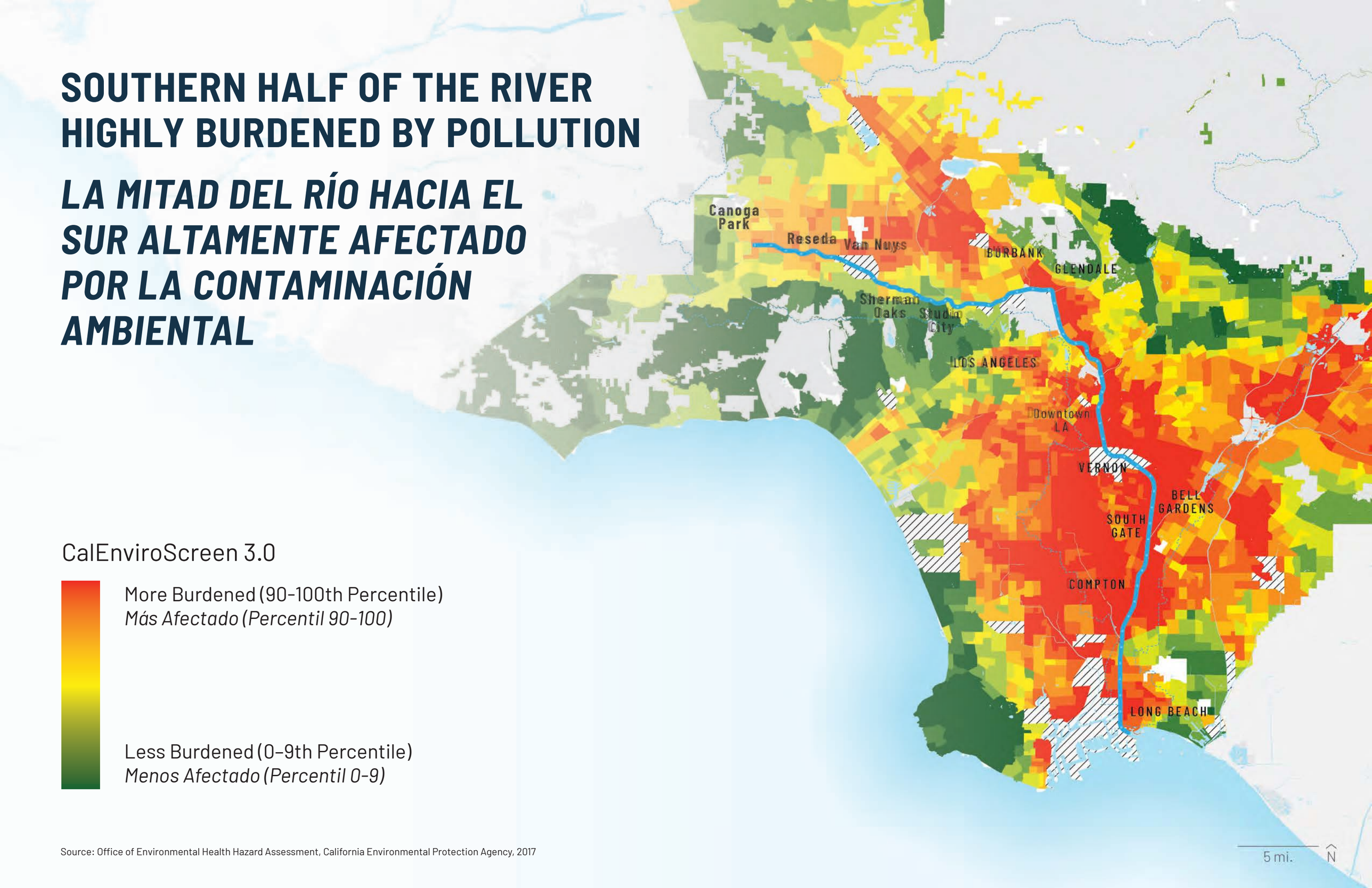
HOY EN DÍA HAY 17 CIUDADES, 23 VECINDARIOS DE LA CIUDAD DE LOS ÁNGELES Y 4 COMUNIDADES NO INCORPORADAS DENTRO DE UNA MILLA DEL RÍO LOS ÁNGELES



Source: Los Angeles county GIS Data Portal, City Boundaries and Annexations, 2016 & LA City Communities and Planning Areas, 2014.

SOUTHERN HALF OF THE RIVER HIGHLY BURDENED BY POLLUTION

LA MITAD DEL RÍO HACIA EL SUR ALTAMENTE AFECTADO POR LA CONTAMINACIÓN AMBIENTAL



CalEnviroScreen 3.0

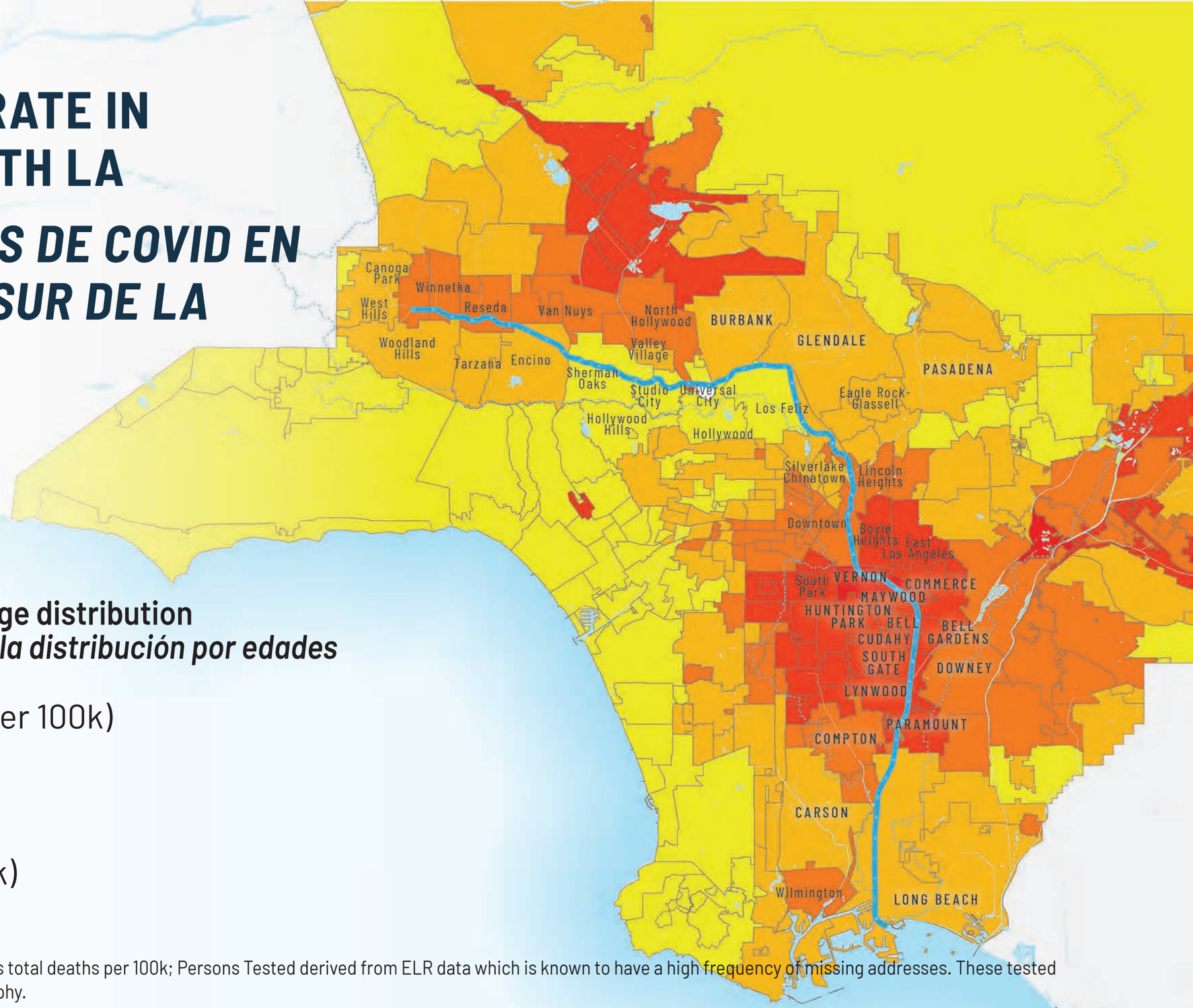
More Burdened (90-100th Percentile)
Más Afectado (Percentil 90-100)

Less Burdened (0–9th Percentile)
Menos Afectado (Percentil 0-9)

Source: Office of Environmental Health Hazard Assessment, California Environmental Protection Agency, 2017

HIGHER COVID CASE RATE IN COMMUNITIES IN SOUTH LA

MAYOR TASA DE CASOS DE COVID EN COMUNIDADES EN EL SUR DE LA



Rates adjusted for differences in age distribution
Tasas ajustadas por diferencias en la distribución por edades

High / *Alta* (~42.4k-83.0k per 100k)

Low / *Baja* (0-6.9k per 100k)

*Long Beach & Pasadena rates not age-adjusted and reflects total deaths per 100k; Persons Tested derived from ELR data which is known to have a high frequency of missing addresses. These tested persons without an address will not be allocated to a geography.

**Las tasas de Long Beach y Pasadena no se ajustan por edad y reflejan el total de muertes por cada 100 mil Personas Examinadas que se derivan de los datos de los Informes de Laboratorios Electrónicos (ELR por sus siglas en inglés) que se sabe que tienen una alta frecuencia de direcciones faltantes. Estas personas examinadas sin una dirección no serán ubicadas geográficamente.*

Source: Los Angeles County Department of Public Health, 3/20/21; Pasadena Public Health Department, 3/22/21; City of Long Beach Department of Health and Human Services

5 mi. N

HOW DO IMPROVEMENTS TO THE RIVER CHANGE NEED?

¿CÓMO LAS MEJORAS AL RÍO CAMBIAN LAS NECESIDADES?

Advanced Displacement / *Desplazamiento Avanzado*

Ongoing Displacement / *Desplazamiento Continuo*

At Risk of Displacement / *En Riesgo De Desplazamiento*

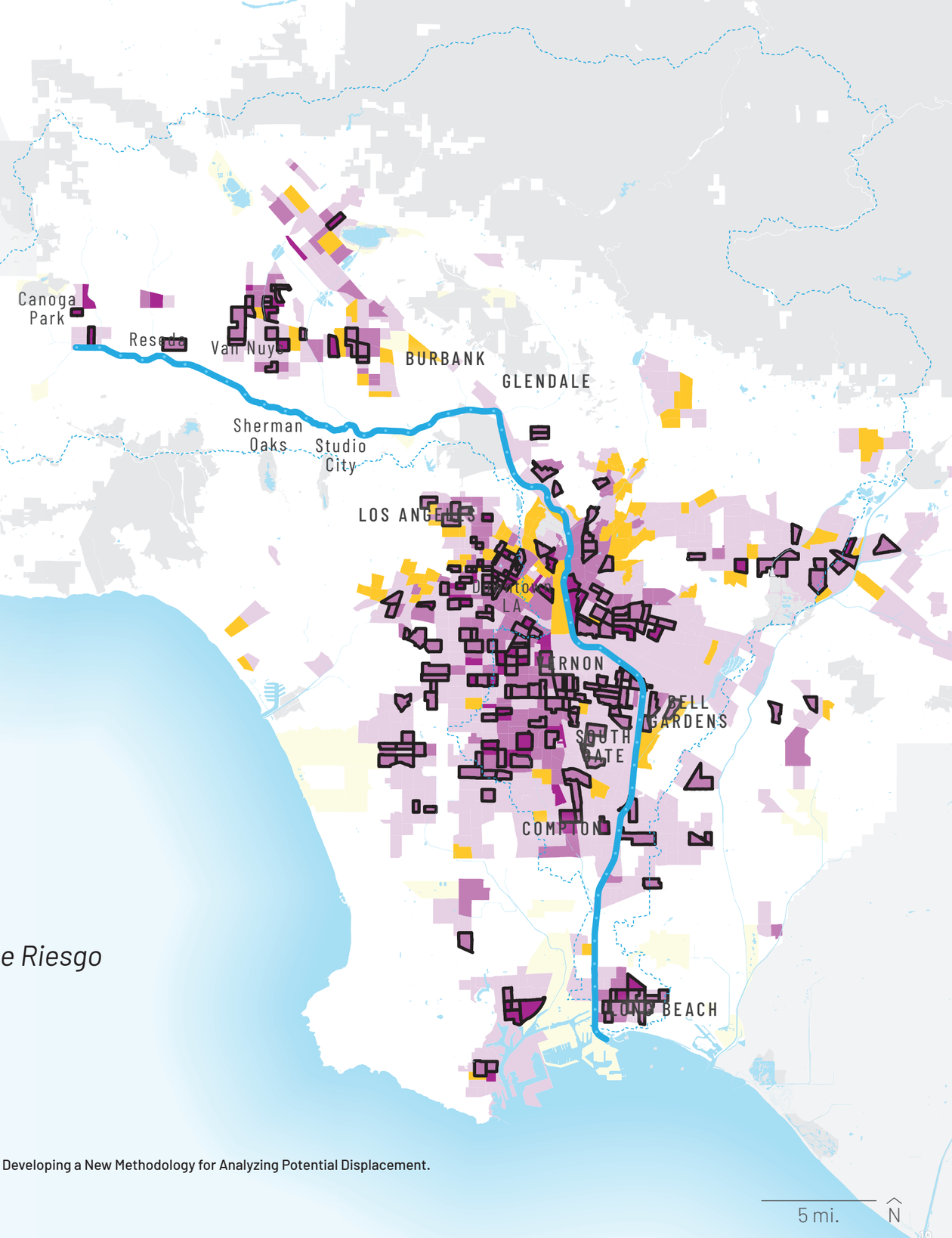
Vulnerable to Displacement / *Vulnerable Al Desplazamiento*

Not Vulnerable / *No Vulnerable*

Tracts Where Rent Increases Would Change Risk Category /
Tramos Dónde los Incrementos de Alquiler Cambiarían la Categoría de Riesgo

No Data / *Sin Datos*

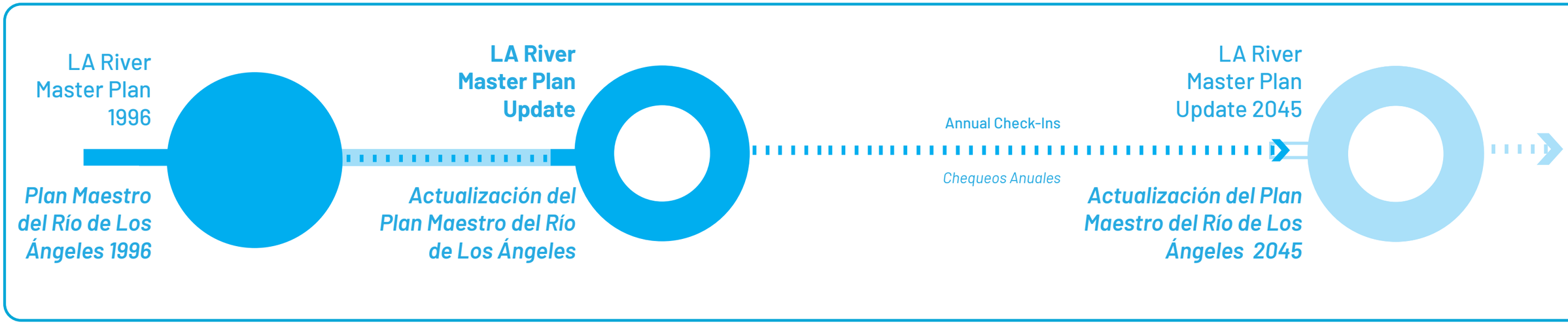
Preliminary, Subject to Further Refinement / *Preliminar, Sujeto A Mejoras Adicional*



Map developed based on research by the Urban Displacement Project: Chapple, K., Loukaitou-Sideris, A., Waddell, P., Chatman, D., & Ong, P. (2017). Developing a New Methodology for Analyzing Potential Displacement.

Source: LA River Master Plan, OLIN

TIMELINE
LÍNEA DE TIEMPO



On-going Studies
Estudios en marcha

- 2013-2015: LADWP Stormwater Capture Master Plan
  2013-2015: Plan Maestro de Captura de Aguas Pluviales de LADWP
- 2016 WRD Basin Master Plan
  2016: Plan Maestro de la cuenca WRD
- 2018: Water Boards' LA River Environmental Flows Study
  2018: Estudio de Flujos Ambientales y de las Juntas de Agua del Río de Los Ángeles
- 2018: Historical Ecology Study
  2018: Estudio histórico ecológico

Source: LA River Master Plan, OLIN

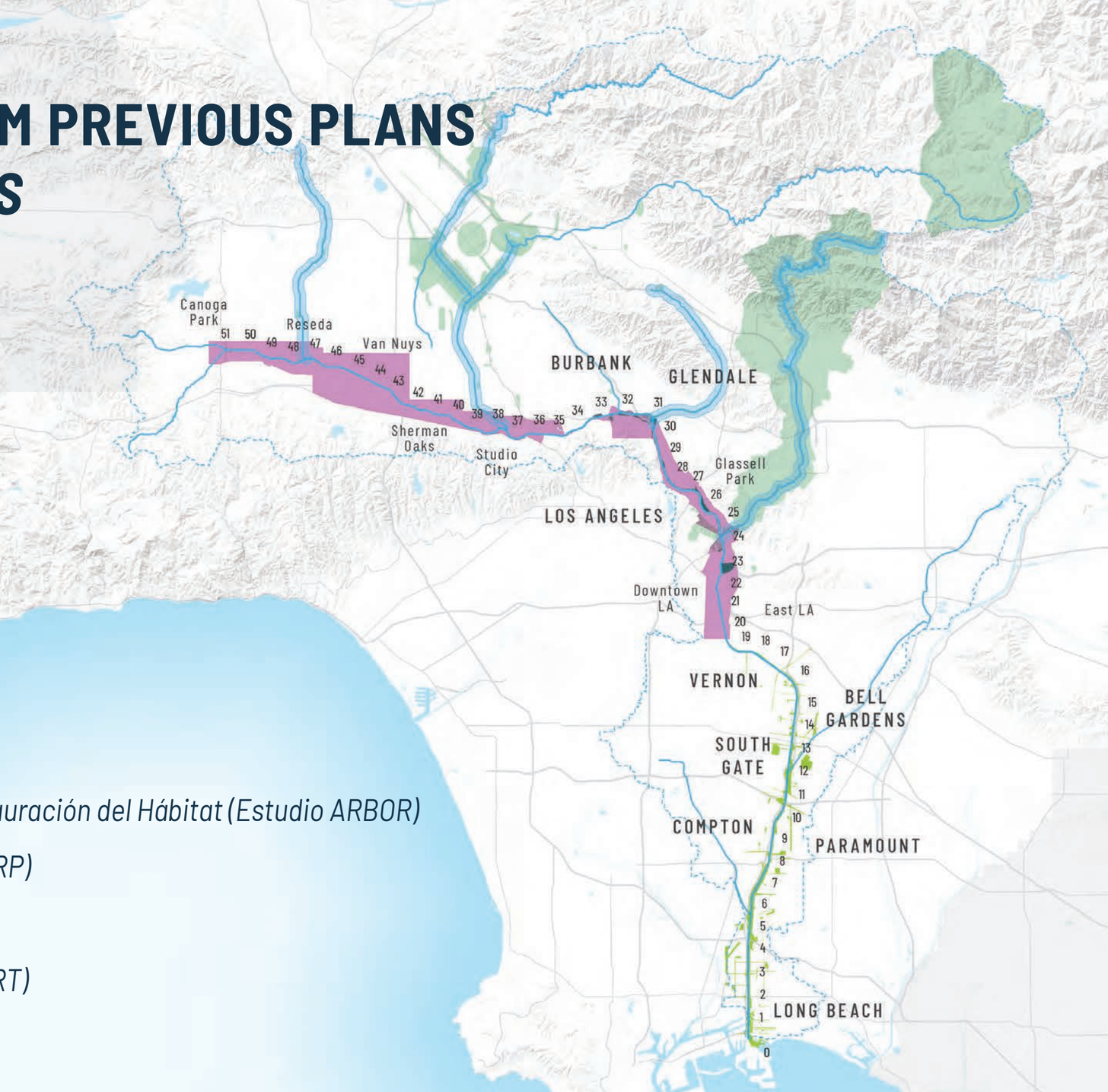
RELEVANT PLANNING EFFORTS
ESFUERZOS DE PLANIFICACIÓN RELEVANTES

140+

NUMBER OF DOCUMENTS REVIEWED AS PART OF LARMP LITERATURE REVIEW

NÚMERO DE DOCUMENTOS REVISADOS COMO PARTE DE LA REVISIÓN DE LA LITERATURA LARMP

PROJECTS AND OVERLAYS FROM PREVIOUS PLANS
PROYECTOS Y SUPERPOSICIONES DE PLANES ANTERIORES



RIO Zone (LARRMP) / *Zona RIO (LARRMP)*

Habitat Restoration Zones (ARBOR Study) / *Zonas de Restauración del Hábitat (Estudio ARBOR)*

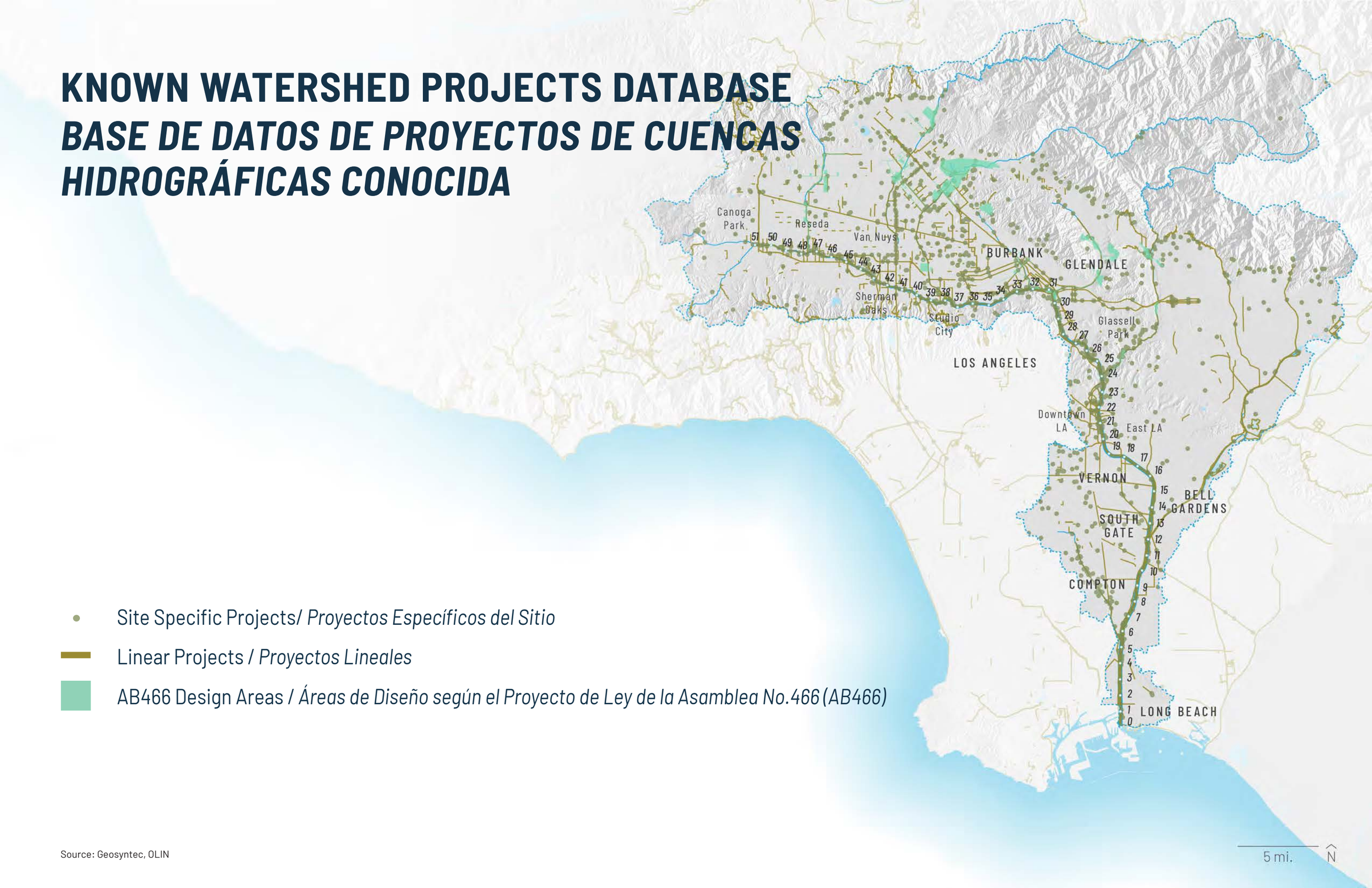
Opportunity Zones (LLARRP) / *Zona de oportunidad (LLARRP)*

Opportunity Areas (ULART) / *Area de oportunidad (ULART)*

Tributaries Studied (ULART) / *Tributarios estudiados (ULART)*

Source: LA River Master Plan, OLIN

KNOWN WATERSHED PROJECTS DATABASE
BASE DE DATOS DE PROYECTOS DE CUENCAS HIDROGRÁFICAS CONOCIDA



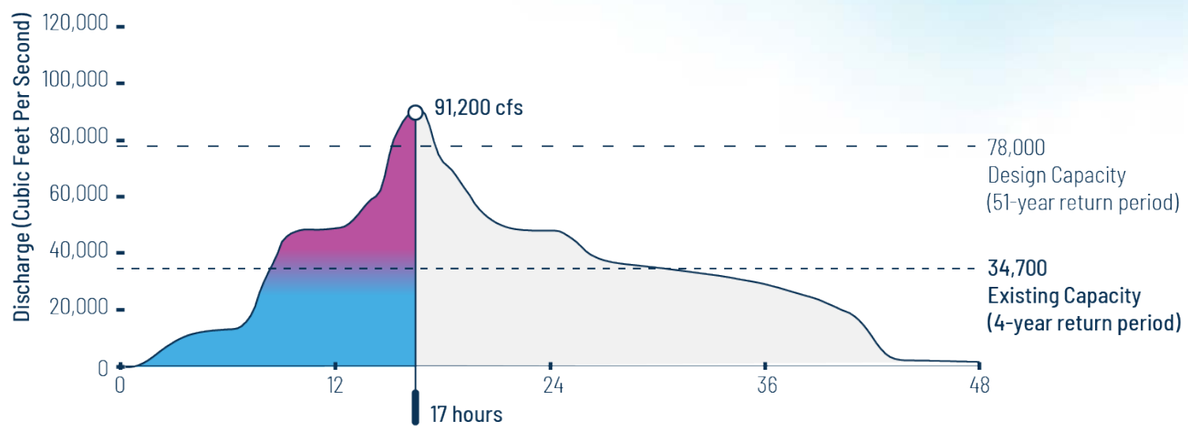
Source: Geosyntec, OLIN

WATERSHED HYDROLOGY RESEARCH
INVESTIGACIÓN EN HIDROLOGÍA DE CUENCAS

HEC-HMS Model / *Sistema de Simulación Hidrológica (HEC-HMS por sus siglas en inglés)*:
Glendale Narrows (River Mile 29) / *(Milla 29 del Río)*



Hydrograph / *Hidrografía*

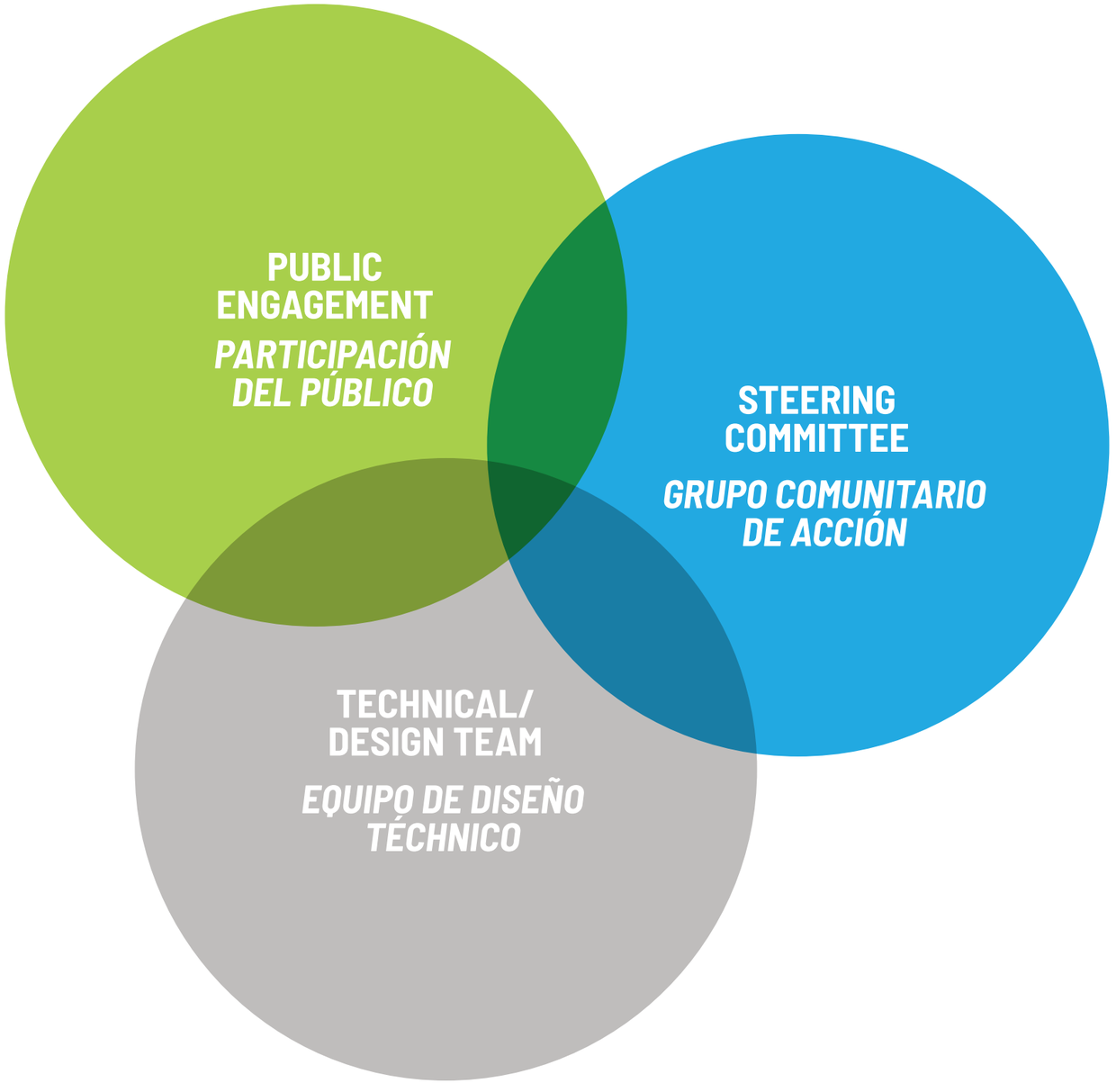


Channel Section / *Sección del Canal*



Source: LA River Master Plan, OLIN

PLAN INPUT
APORTES DEL PLAN



2.5 yrs

COMMUNITY ENGAGEMENT AND INPUT

PARTICIPACIÓN COMUNITARIA Y COMENTARIOS







Source: LA County Public Works; OLIN, 2020.



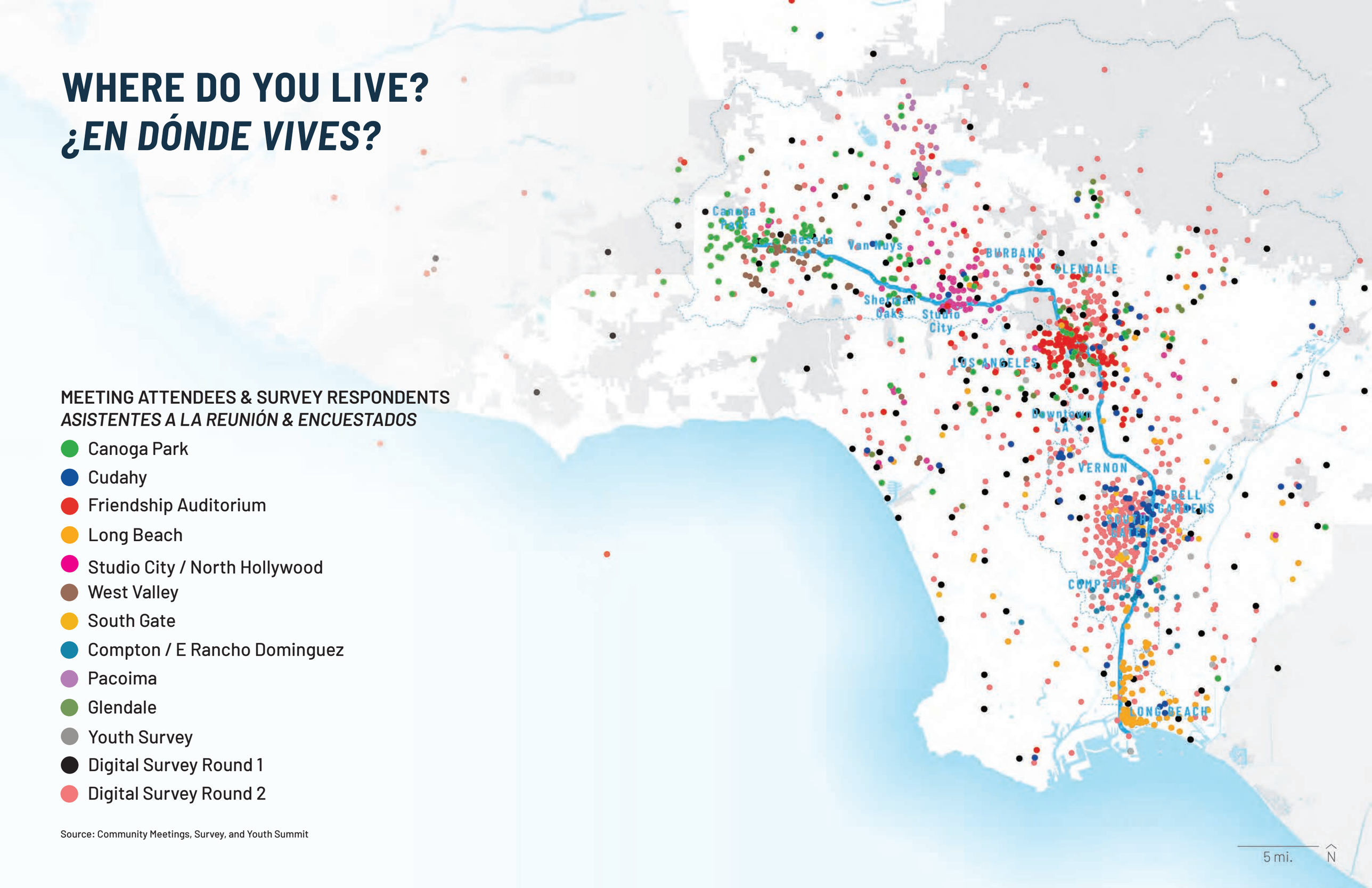
1,306
Participants Across 13 Community Meetings
Miembros de la comunidad asistieron a 13 reuniones comunitarias del Plan Maestro del Río de Los Ángeles

1,650
Completed Online and In-Person Surveys
Encuestas en línea y en persona

981,898
Digital Ad Impressions
Impresiones de anuncios digitales

800
Youth Summit Participants
Participantes de la Cumbre de la Juventud

WHERE DO YOU LIVE?
¿EN DÓNDE VIVES?



MEETING ATTENDEES & SURVEY RESPONDENTS
ASISTENTES A LA REUNIÓN & ENCUESTADOS

- Canoga Park
- Cudahy
- Friendship Auditorium
- Long Beach
- Studio City / North Hollywood
- West Valley
- South Gate
- Compton / E Rancho Dominguez
- Pacoima
- Glendale
- Youth Survey
- Digital Survey Round 1
- Digital Survey Round 2

Source: Community Meetings, Survey, and Youth Summit





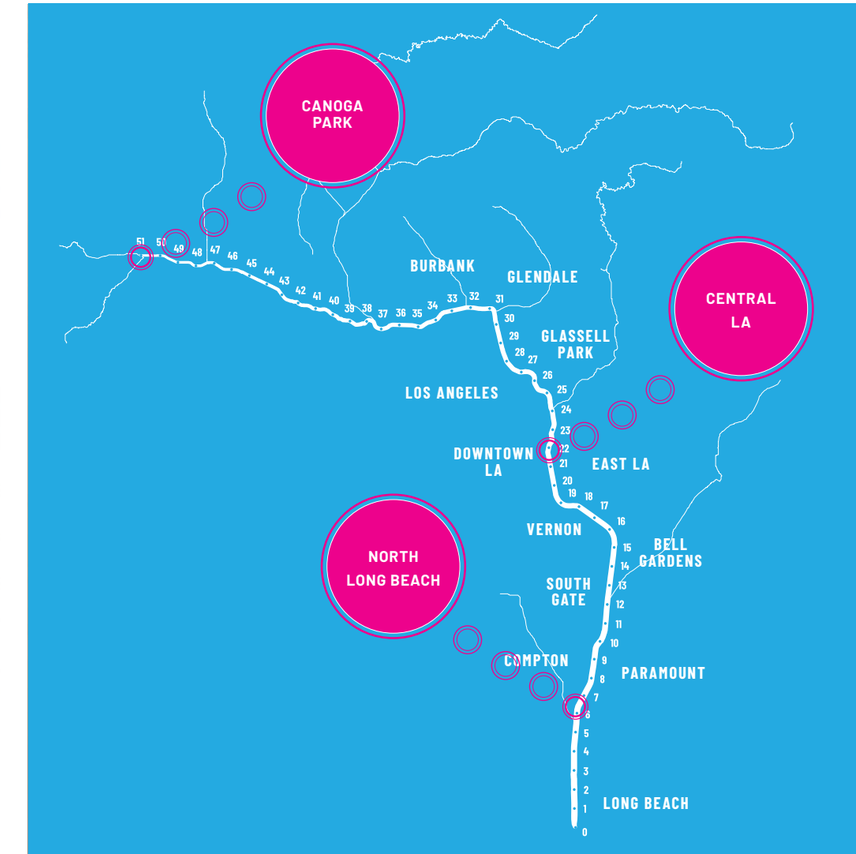
OCT 2019

COUNTY WIDE DRAFT PLAN OPEN HOUSES

PLAN PRELIMINAR PARA TODO EL CONDADO ASAMBLEAS PÚBLICAS



Source: LA River Master Plan, OLIN



COMMUNITY PARTNERSHIPS
ASOCIACIONES COMUNITARIAS

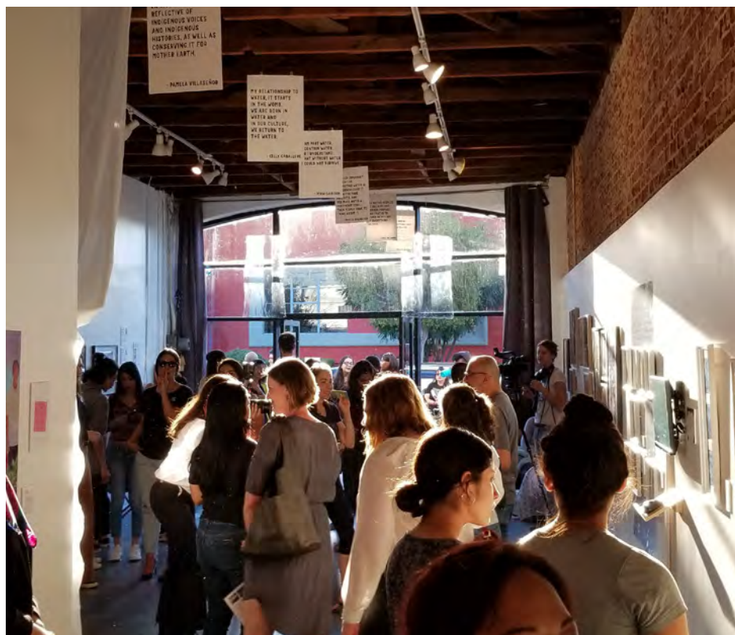




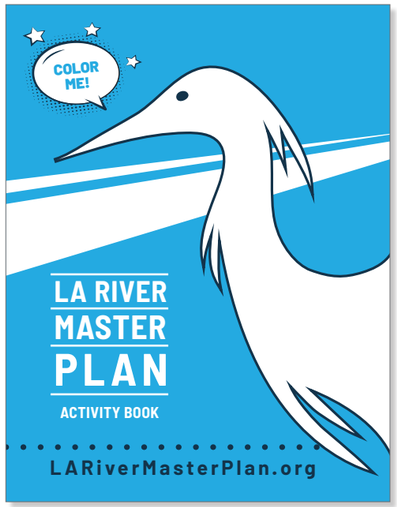


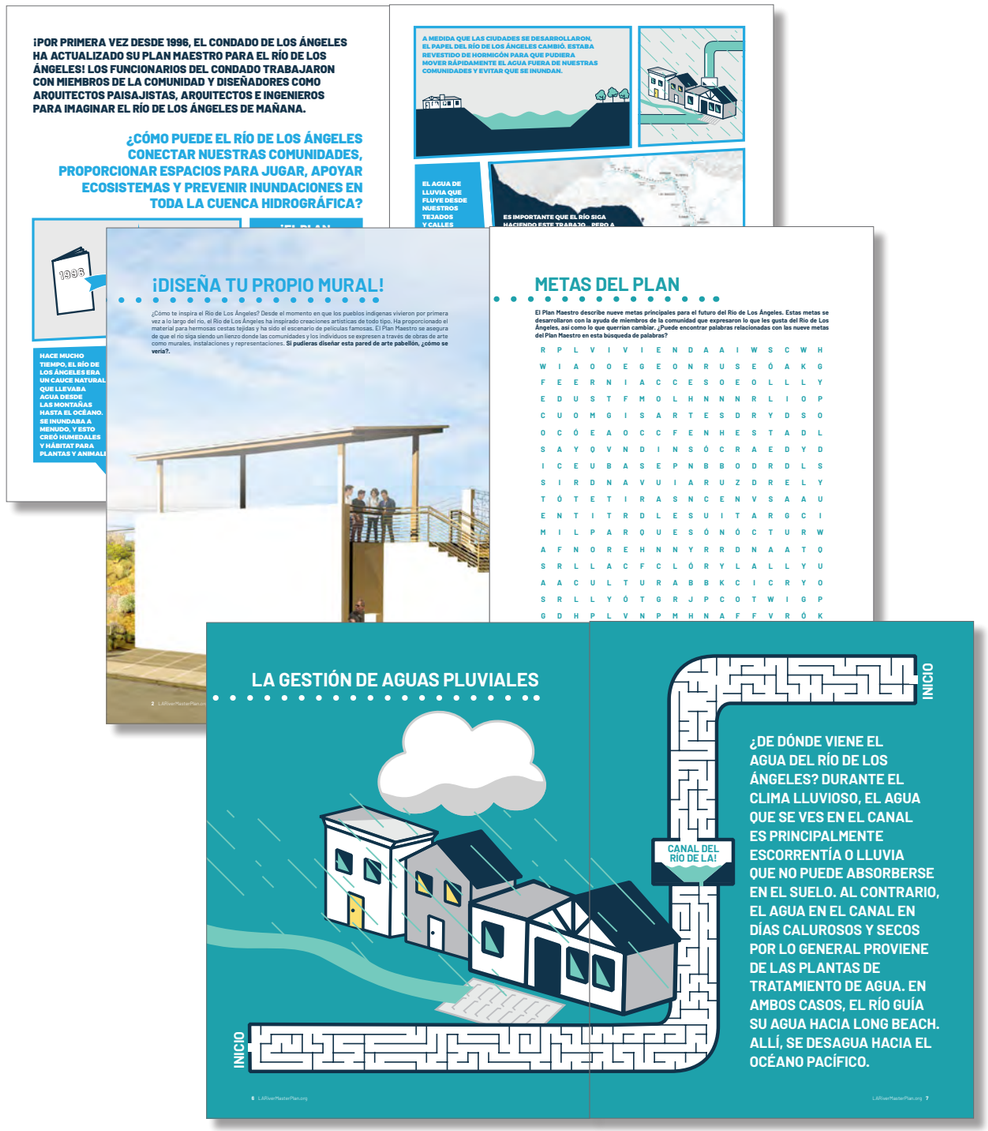






ADDITIONAL OUTREACH
ALCANCE COMUNITARIO ADICIONAL





KIDS' ACTIVITY BOOK
LIBRO DE ACTIVIDADES PARA NIÑOS



La Opinión

HYPER-LOCAL AD CAMPAIGN
CAMPAÑA PUBLICITARIA HIPER-LOCAL







AT-A-GLANCE AND FACT SHEET
FOLLETO A SIMPLE VISTA Y HOJA INFORMATIVA

Source: OLIN, Gehry Partners, Geosyntec

WHAT WE HEARD

- Concerns about community displacement due to lack of **affordable housing**
- Concerns about **flooding**
- Desire for **safety**
- Need for strategies to assist persons experiencing **homelessness**
- Care for **native plants and animals**
- Need for **parks**
- Need for **access, connectivity, and wayfinding**
- Concerns about **pollution**

LO QUE ESCUCHAMOS

- *Inquietudes sobre el desplazamiento comunitario debido a la falta de* ***viviendas asequibles***
- *Inquietudes sobre* ***inundaciones***
- *Anhelo por* ***la seguridad***
- *Necesidad de estrategias para ayudar a las las personas* ***sin hogar***
- *Proporcionar cuidado para* ***animales y plantas nativas***
- *Necesidad de* ***parques***
- *Necesidad de* ***acceso, conectividad, y orientación***
- *Inquietudes sobre* ***la contaminación***

REVIEW THE PUBLIC DRAFTS
REVISIÓN DE LOS PROYECTOS PÚBLICOS



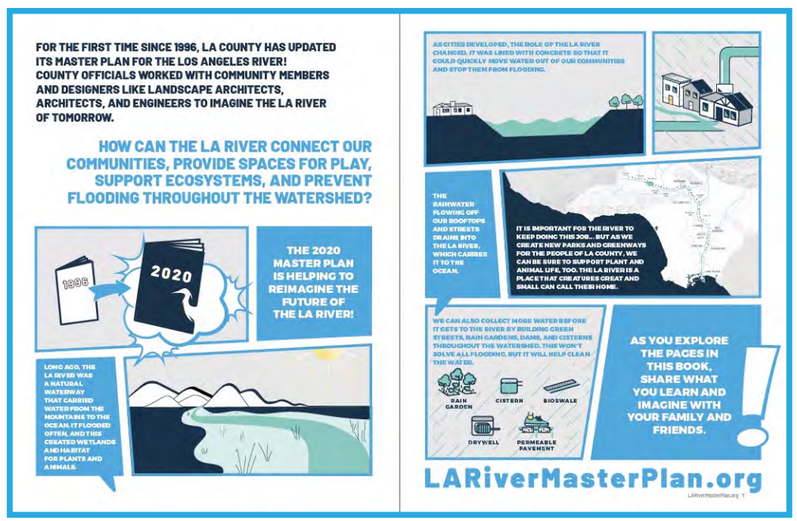
















Source: LA River Master Plan, OLIN

VISION

The Reimagined River

The iconic LA River flows through a 51-mile connected public open space that is seamlessly woven together with neighboring communities. It is an integral part of daily life in LA County—a place to enjoy the outdoors and to get across town, a place to appreciate the serene and to bring all people together, a place to celebrate a thriving urban habitat and understand infrastructure, a place to learn from the past and to shape the future.

VISIÓN

El Río Reimaginado

El icónico Río Los Ángeles fluye a través de un espacio abierto, público y conectado, de 51 millas que se entrelaza con las comunidades aledañas. Es una parte integral de la vida cotidiana del Condado de Los Ángeles, un lugar para disfrutar del espacio exterior y moverse a través de la ciudad, un lugar para apreciar la serenidad y juntar a todos, un lugar para celebrar un hábitat urbano próspero y entender la infraestructura, un lugar para aprender del pasado y darle forma al futuro.

GOALS
METAS



Reduce flood risk and improve resiliency.

Reducir el riesgo de inundación y mejorar la resiliencia

Source: Flickr, https://bit.ly/2mnAIGS, 2015.



Provide equitable, inclusive, and safe parks, open space, and trails.

Proporcionar parques equitativos, inclusivos y seguros, espacios abiertos y senderos

Source: LA County Public Works, 2018.



Support healthy, connected ecosystems.

Apoyar ecosistemas sanos y conectados

Source: KCET Departures, South L.A. Willow Street, https://bit.ly/2BbmsPT, 2010.



Enhance opportunities for equitable access to the river corridor.

Mejorar las oportunidades de acceso equitativo al corredor fluvial

Source: OLIN, 2018



Embrace and enhance opportunities for arts and culture.

Abrazar y mejorar las oportunidades para las artes y la cultura

Source: LA County Public Works, 2018.



Address potential adverse impacts to housing affordability and people experiencing homelessness.

Abordar los posibles impactos adversos en la asequibilidad de la vivienda y las personas sin hogar

Source: Flickr, https://bit.ly/2IDFIBg.



Foster opportunities for continued community engagement, development, and education.

Fomentar oportunidades para la participación, el desarrollo y la educación de la comunidad continua

Source: LA County Public Works, 2018.



Improve local water supply reliability.

Mejorar la fiabilidad del suministro de agua local

Source: OLIN, 2018



Promote healthy, safe, clean water.

Promover agua sana, segura y limpia

Source: OLIN, 2018

GOALS, ACTIONS, METHODS (GAM)
METAS, ACCIONES Y MÉTODOS



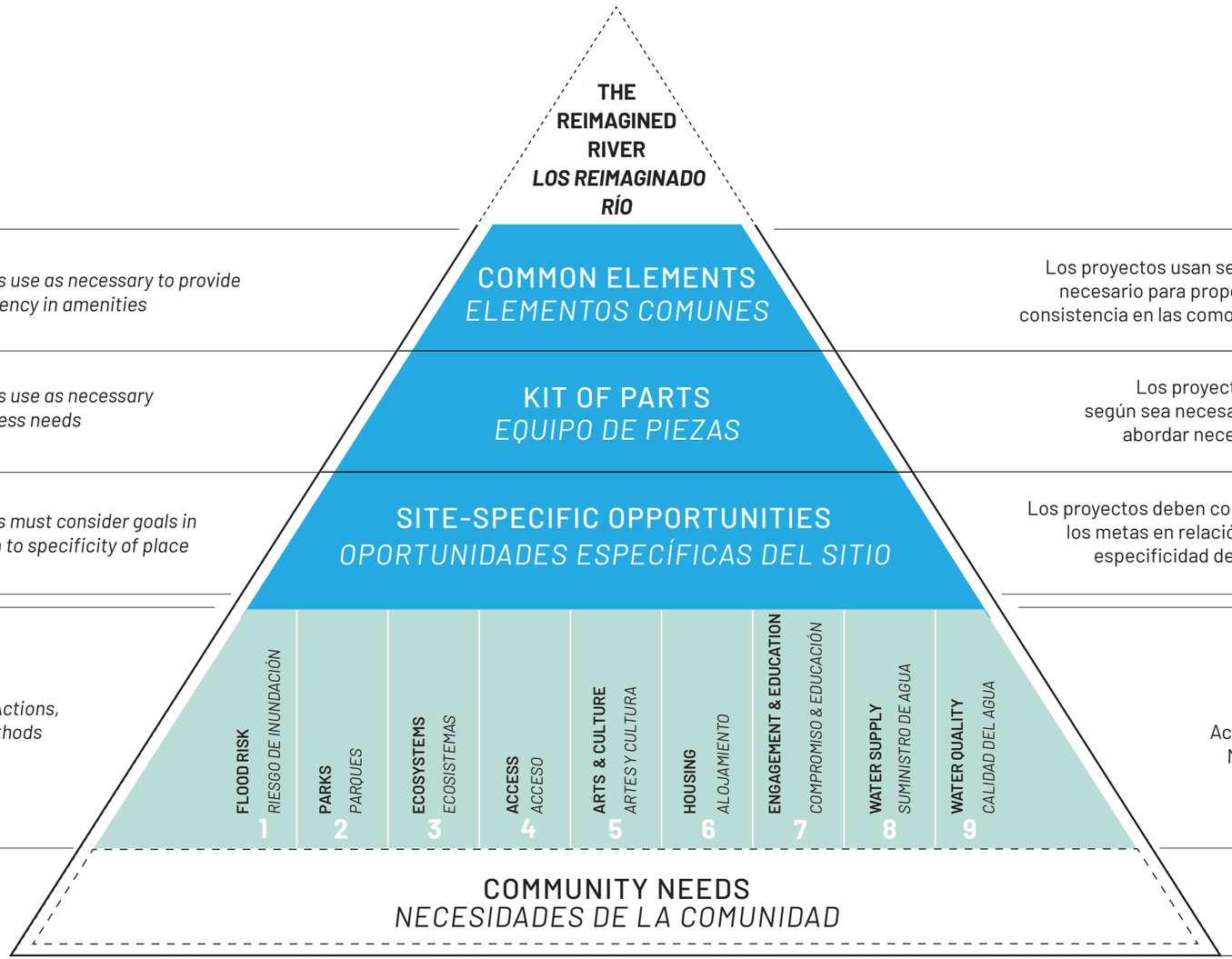




Source: LA County Public Works (top), OLIN (bottom), LA River Master Plan (right)

PROJECTS SHOULD BUILD UPON THE GOALS USING THE KIT OF PARTS AND COMMON ELEMENTS

PROYECTOS DEBEN BASARSE EN LOS OBJETIVOS UTILIZANDO EL KIT DE PIEZAS Y ELEMENTOS COMUNES

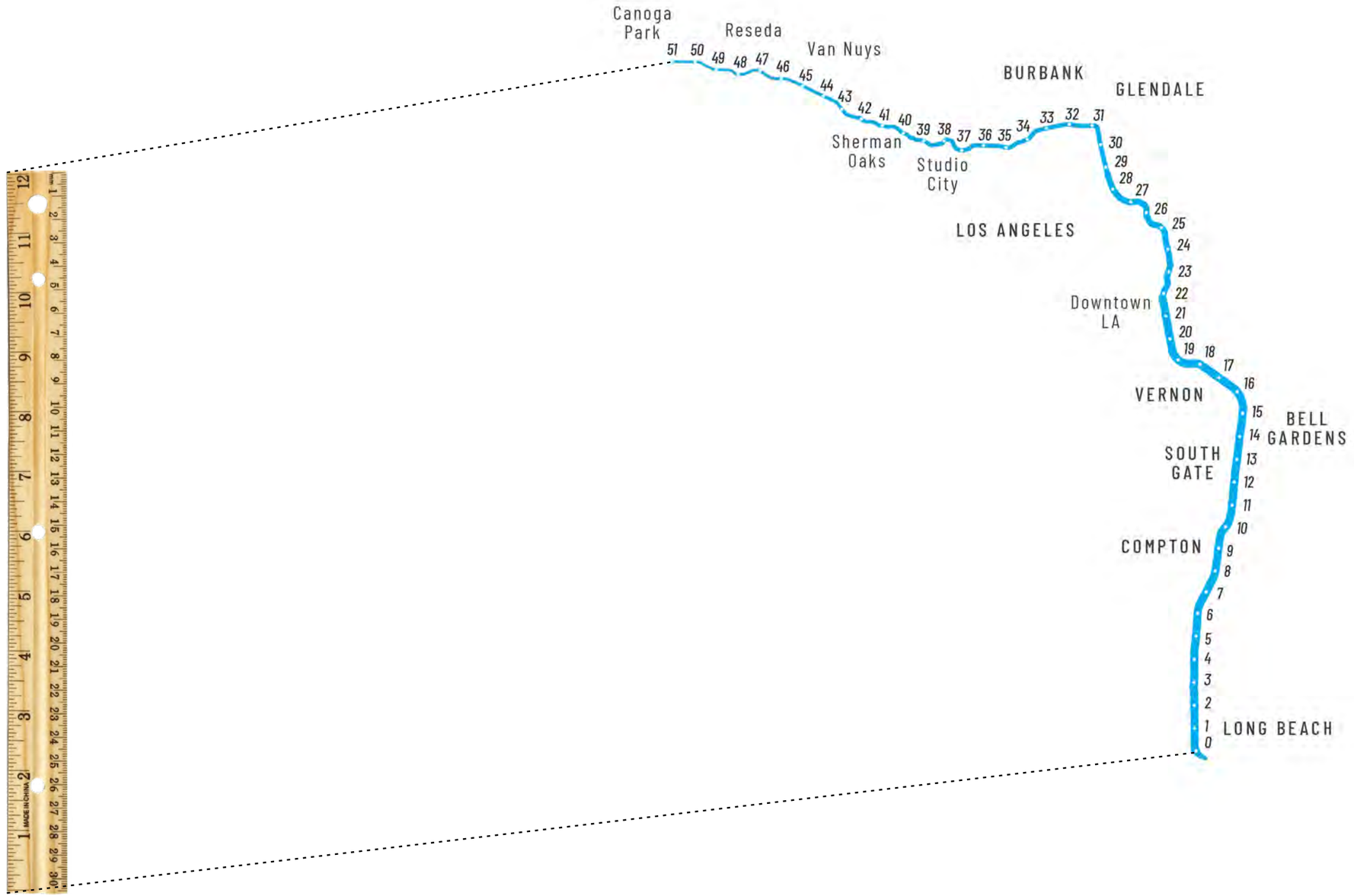


			SEE CHAPTERS *VER CAPÍTULOS*	
DESIGN	*Projects use as necessary to provide consistency in amenities*	Los proyectos usan según sea necesario para proporcionar consistencia en las comodidades		9 - 14
	Projects use as necessary to address needs	Los proyectos usan según sea necesario para abordar necesidades	**DISEÑO**	8
	Projects must consider goals in relation to specificity of place	Los proyectos deben considerar los metas en relación con la especificidad de lugares		7
STRATEGIC DIRECTIONS	*Goals, Actions, and Methods*	Metas, Acciones y Métodos	**DIRECCIONES ESTRATÉGICAS**	6
				4 - 5

COMMUNITY ENGAGEMENT / *PARTICIPACIÓN DE LA COMUNIDAD*

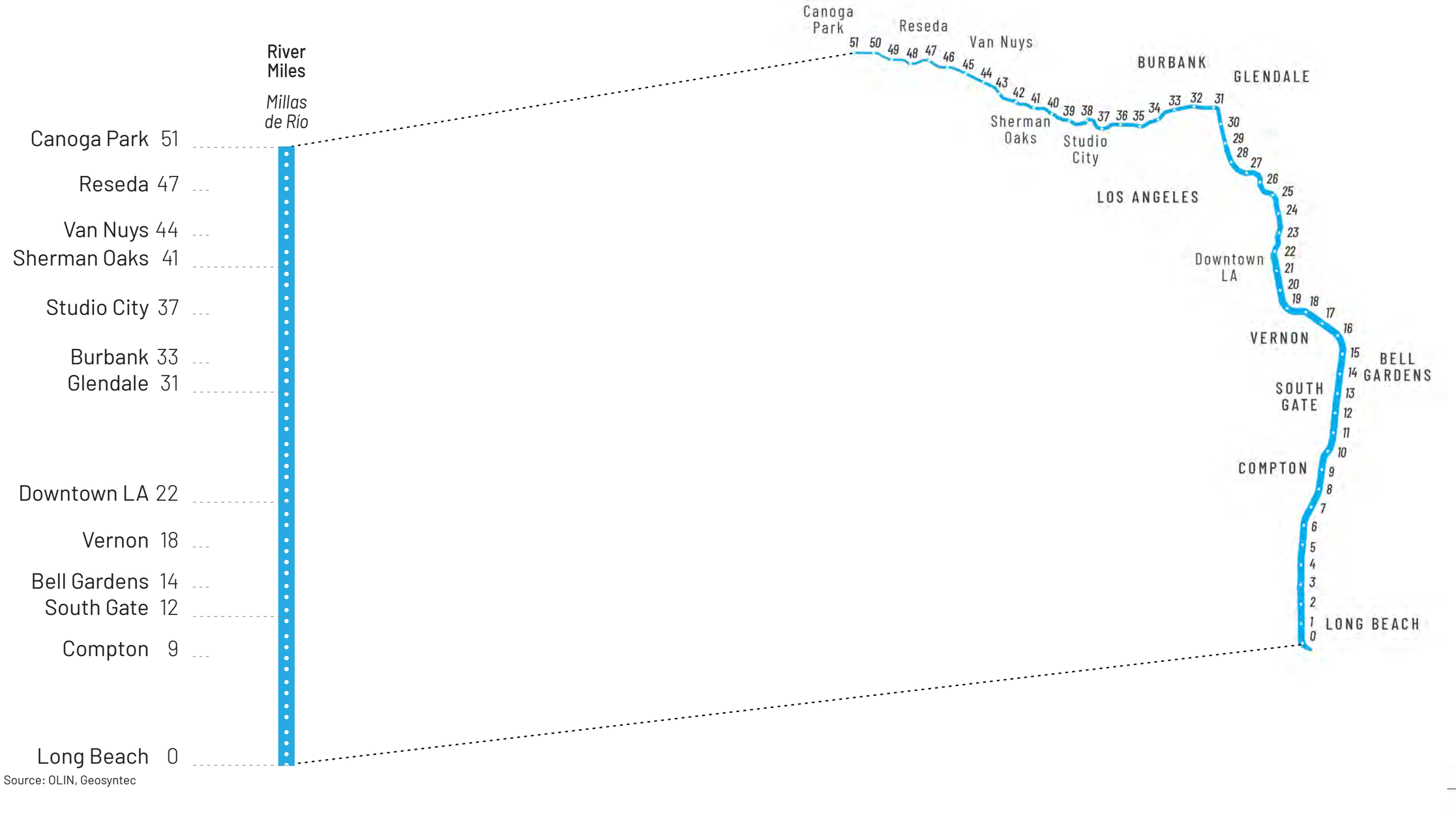
Source: OLIN, Gehry Partners, Geosyntec

THE LA RIVER RULER
LARMP: REGLA DE RÍO



Source: OLIN, Geosyntec

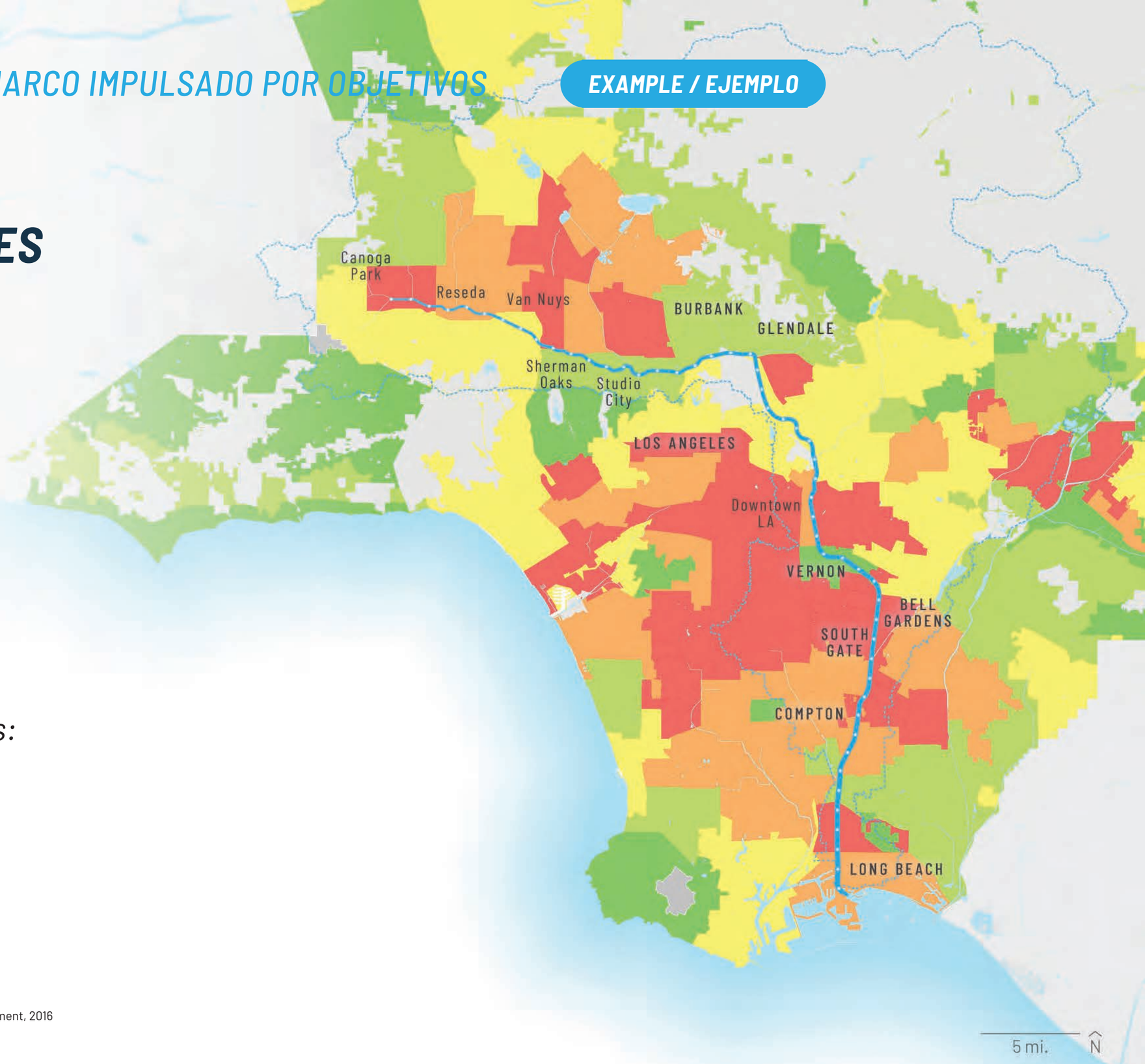
THE LA RIVER RULER
LARMP: REGLA DE RÍO



Source: OLIN, Geosyntec

EXAMPLE / EJEMPLO

PARK NEED
NECESIDAD DE PARQUES



Park Need Analysis:
Análisis de Necesidad de Parques:

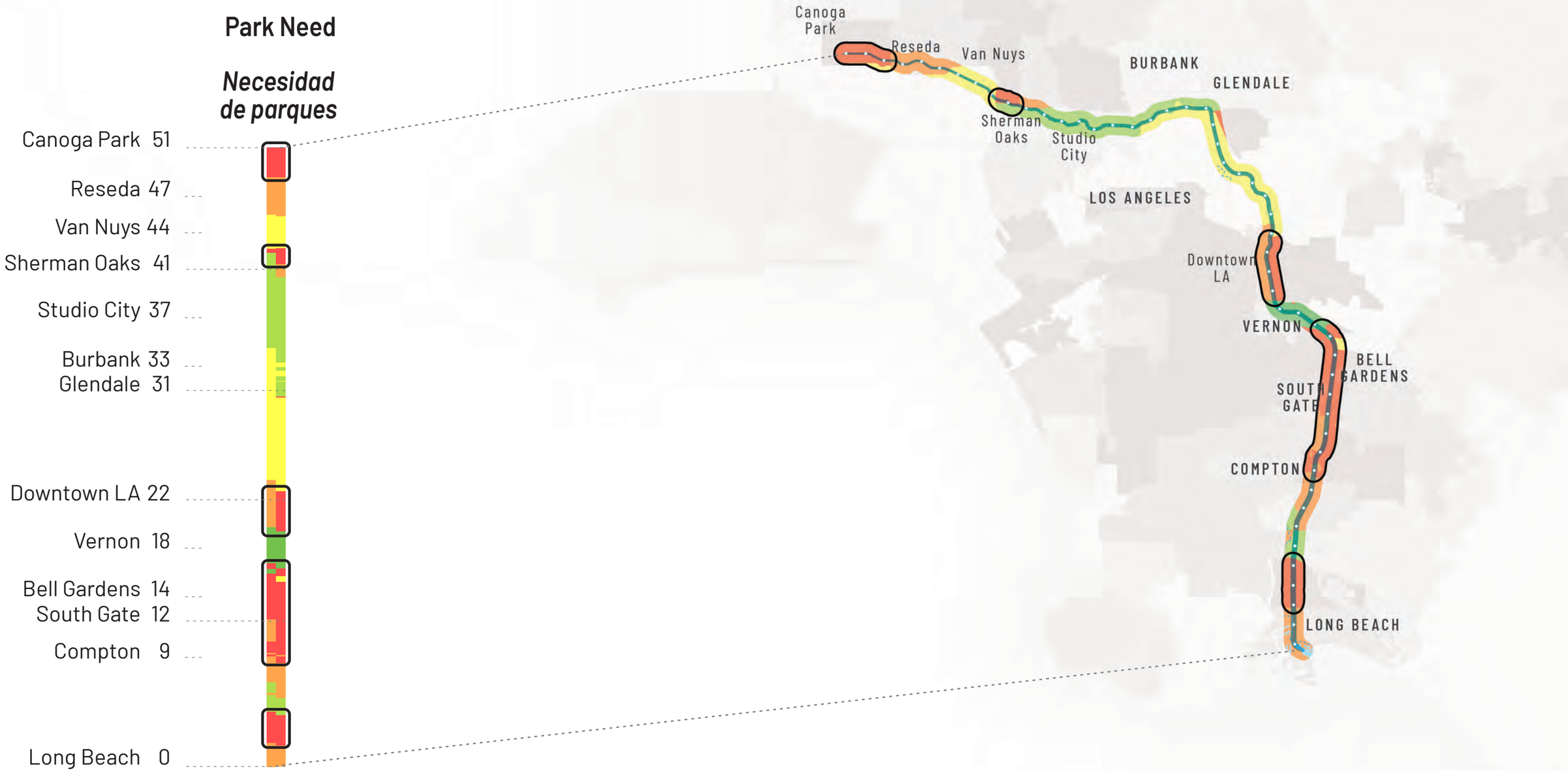
- **Very High** / *Muy Alta*
- **High** / *Alta*
- **Moderate** / *Moderada*
- **Low** / *Baja*
- **Very Low** / *Muy Baja*

Source: Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment, 2016

GOAL-DRIVEN FRAMEWORK / *MARCO IMPULSADO POR OBJETIVOS*

EXAMPLE / EJEMPLO

IDENTIFY AREAS OF HIGHEST NEED
IDENTIFICAR LAS ÁREAS DE MAYOR NECESIDAD

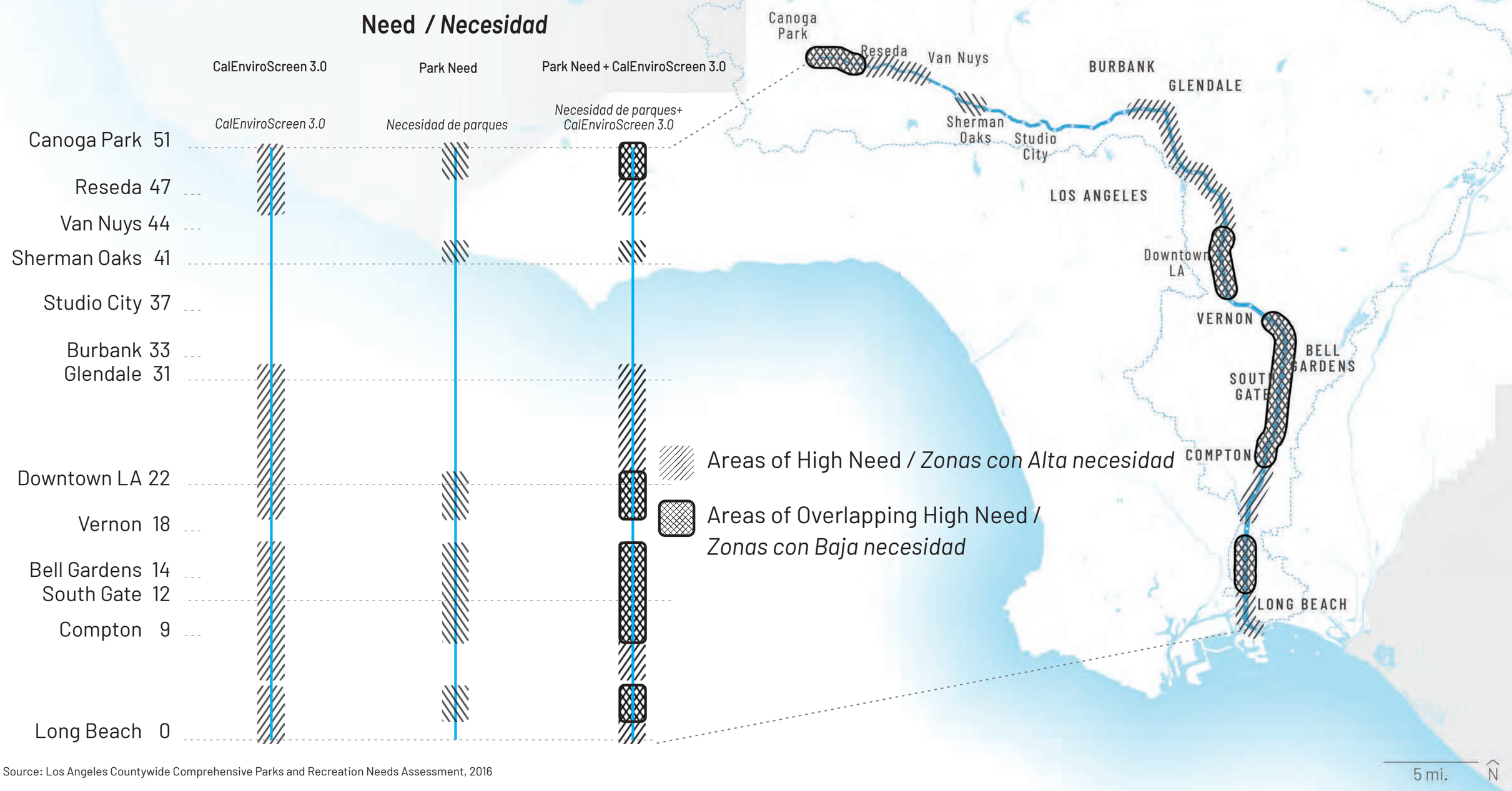


Source: Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment, 2016

GOAL-DRIVEN FRAMEWORK / *MARCO IMPULSADO POR OBJETIVOS*

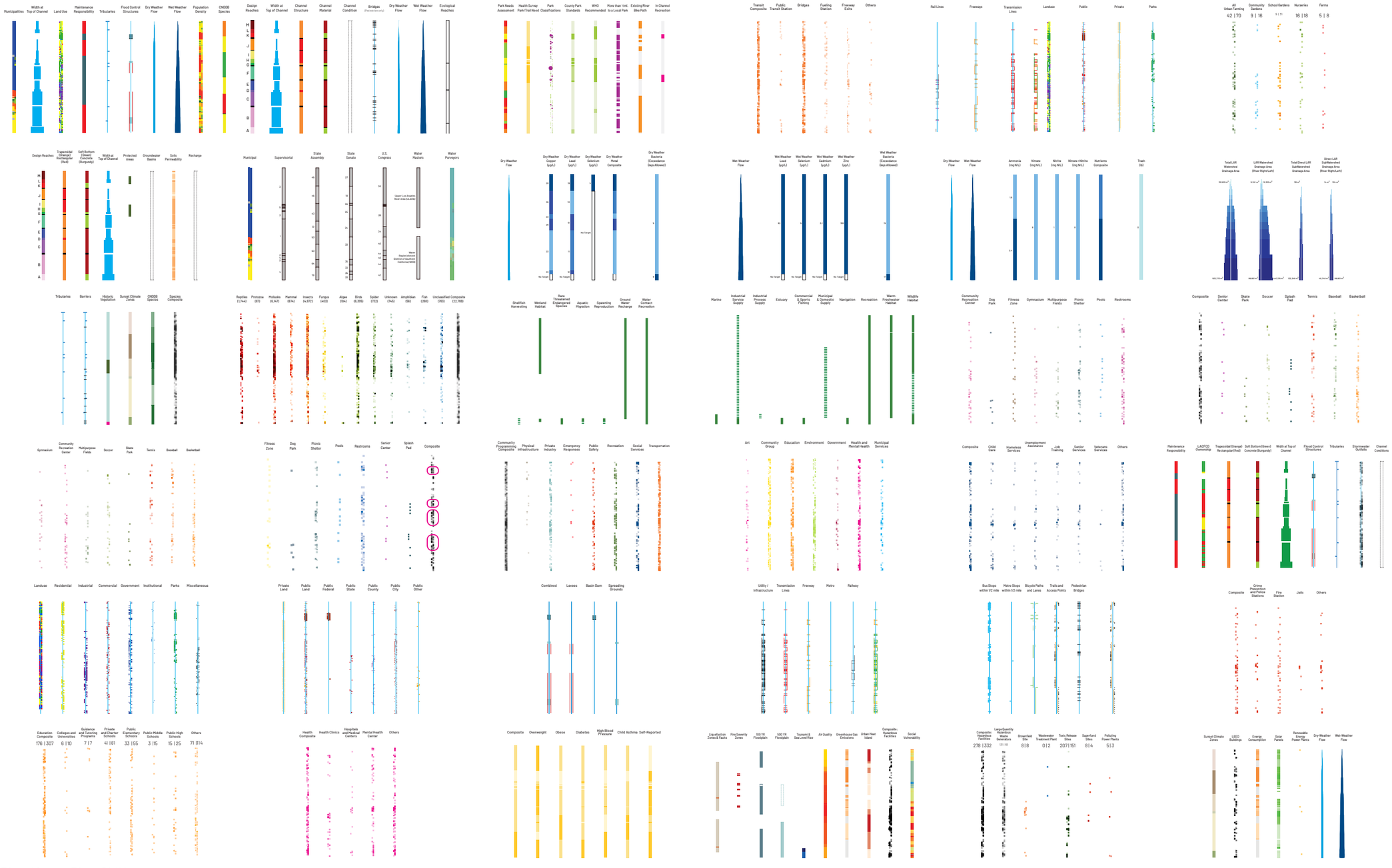
EXAMPLE / EJEMPLO

IDENTIFY AREAS OF OVERLAPPING HIGH NEED
IDENTIFICAR ÁREAS DE ALTA NECESIDAD



Source: Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment, 2016

DATA-BASED METHODOLOGY
METODOLOGÍA BASADA EN DATOS



Source: LA River Master Plan, OLIN



Reduce flood risk and improve resiliency.

Reducir riesgos de inundación y mejorar la resiliencia.



Provide equitable, inclusive, and safe parks, open space, and trails.

Proveer parques, espacios abiertos, y senderos equitativos, inclusivos y seguros.



Support healthy, connected ecosystems.

Apoyar ecosistemas sanos y conectados.



Enhance opportunities for equitable access to the river corridor.

Mejorar oportunidades para acceso equitativo al corredor del río.



Embrace and enhance opportunities for arts and culture.

Aproveche y mejore las oportunidades para las artes y la cultura.



Address potential adverse impacts to housing affordability and people experiencing homelessness.

Abordar posibles impactos adversos para la asequibilidad de viviendas y personas sin hogar.



Foster opportunities for continued community engagement, development, and education.

Fomentar oportunidades para la participación continua de la comunidad, el desarrollo y la educación.



Improve local water supply reliability.

Mejorar la fiabilidad del suministro de agua local.



Promote healthy, safe, clean water.

Promover agua saludable, segura y limpia.

Source: LA River Master Plan, OLIN

HOW DO WE LOCATE NEW PROJECTS?

Align need, opportunity, and cadence along the LA River Corridor

¿CÓMO LOCALIZAMOS NUEVOS PROYECTOS?

Alinee la necesidad, la oportunidad y la cadencia a lo largo del Corredor del Río Los Ángeles



XS, S, M, L, XL SITES
SITIOS DE XS, S, M, L, XL

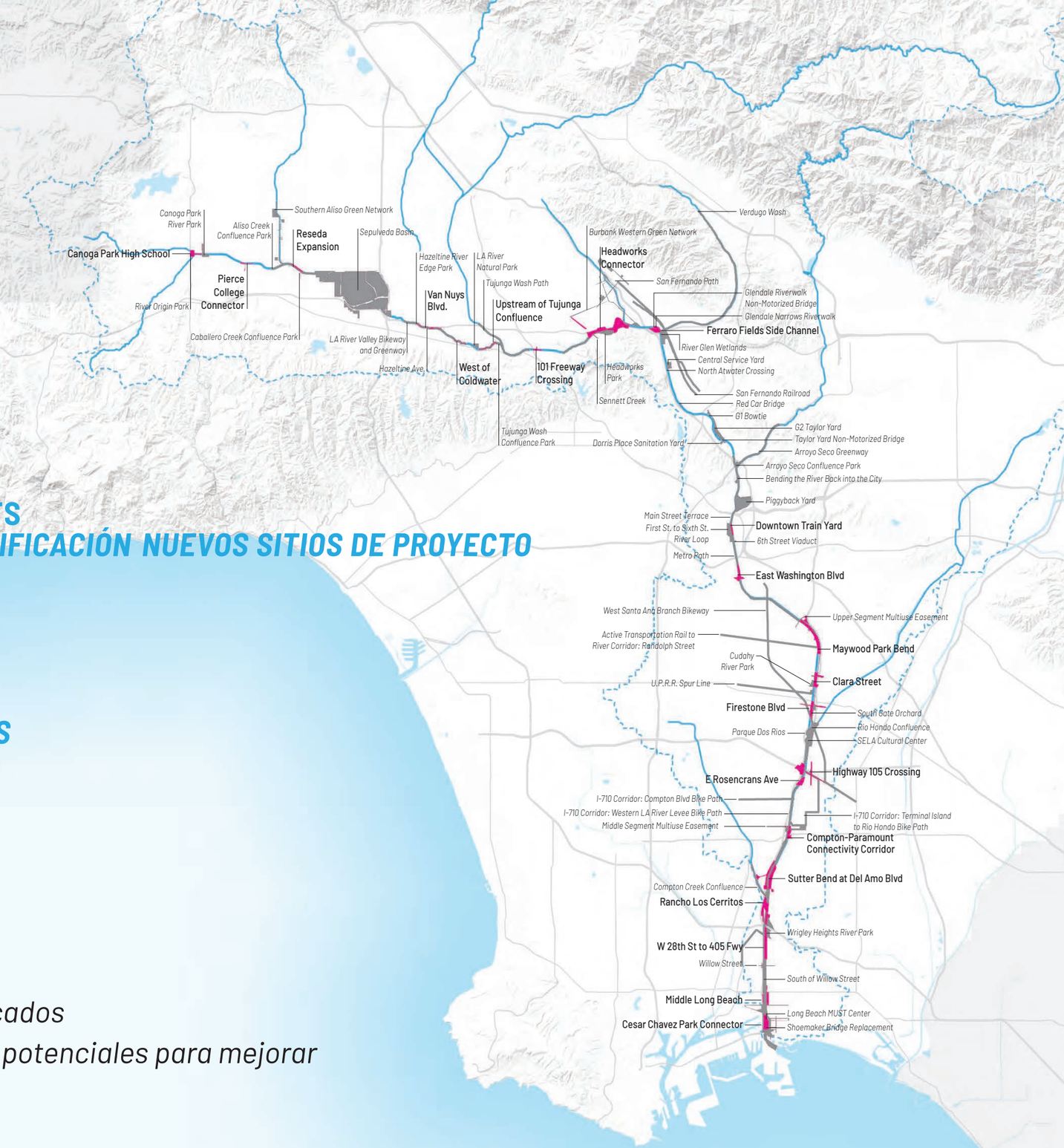
43 XS, S NEWLY PROPOSED PROJECTS
PROYECTOS RECIÉN PROPUESTOS

123 XS, S PROJECTS FROM OTHER PLANNING EFFORTS
PROYECTOS DE OTROS ESFUERZOS DE PLANIFICACIÓN NUEVOS SITIOS DE PROYECTO

22 M, L, XL NEWLY PROPOSED PROJECT SITES
PROPUESTOS

56 M, L, XL PLANNED MAJOR PROJECTS
PROYECTOS IMPORTANTES PLANIFICADOS

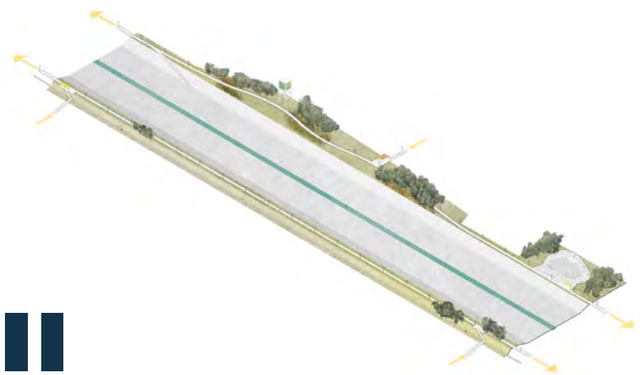
42 IMPROVED ACCESS POINTS
PUNTOS DE ACCESO MEJORADOS



- Proposed Project Sites / *Sitios de proyecto propuestos*
- Planned Major Projects / *Proyectos importantes planificados*
- ✚ Potential Access Points to Upgrade / *Puntos de acceso potenciales para mejorar*
- ● Existing Access Points / *Puntos de acceso existentes*

Source: LA River Master Plan, OLIN

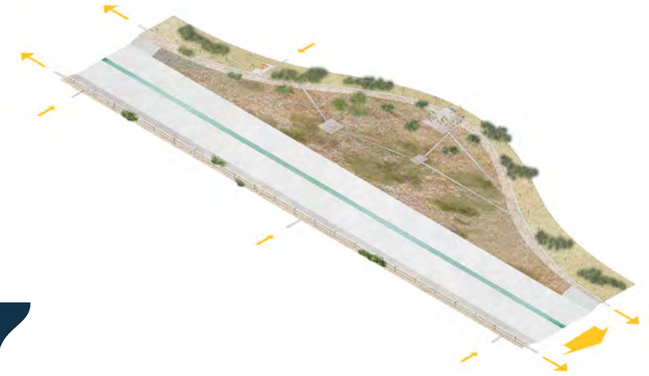
KIT OF PARTS: CATEGORIES
KIT DE PIEZAS: CATEGORÍAS



TRAILS & ACCESS GATEWAYS
SENDEROS Y PUNTOS DE ACCESO



CROSSINGS & PLATFORMS
PUENTES Y PLATAFORMAS



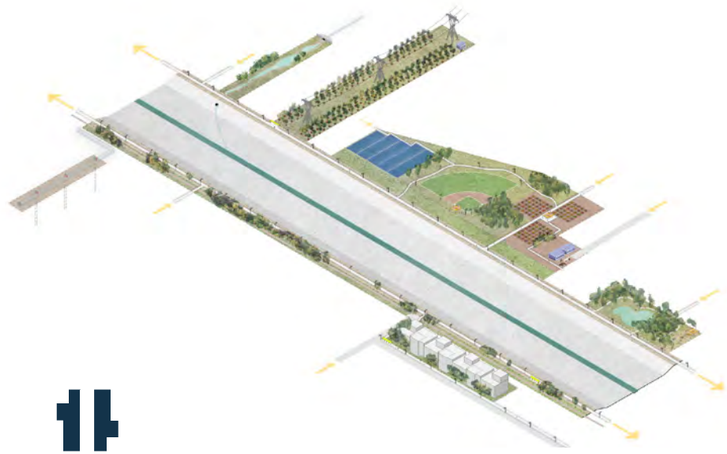
FLOODPLAIN RECLAMATION
RECUPERACIÓN DE LLANO INUNDABLE



CHANNEL MODIFICATIONS
MODIFICACIONES DE CANAL



DIVERSIONS
DESVIACIONES



OFF CHANNEL LAND ASSETS
ACTIVOS TERRESTRES FUERA DEL CANAL

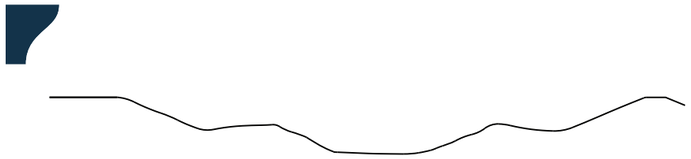
Source: LA River Master Plan, OLIN

BIODIVERSITY PROFILES
PERFILES DE BIODIVERSIDAD

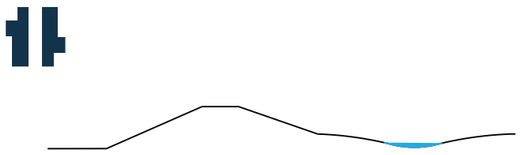
SAMPLE EXISTING OR PROPOSED PROFILE SECTIONS / *EJEMPLO DE SECCIONES DE PERFIL EXISTENTES O PROPUESTAS*

BASIN CONDITIONS / *CONDICIONES DE LA CUENCA*

SOFT-BOTTOM BASIN / *CUENCA DE FONDO SUAVE*

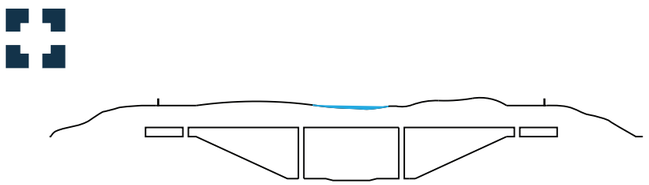


LANDSIDE ROW - RIPARIAN /
SERVIDUMBRE DE PASO DE TIERRA LATERAL- RIPARIO

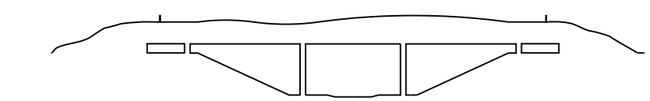


PLATFORM CONDITIONS / *CONDICIONES DE LA PLATAFORMA*

PLATFORM - RIPARIAN / *PLATAFORMA - RIPARIA*



PLATFORM - UPLAND / *PLATAFORMA- MESETA*

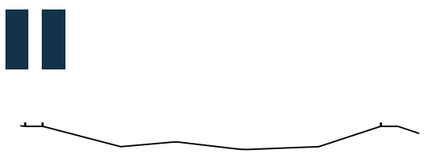


CHANNEL CONDITIONS / *CONDICIONES DEL CANAL*

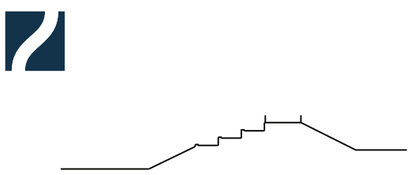
CONCRETE CHANNEL / *CANAL DE CONCRETO*



SOFT BOTTOM CHANNEL / *CANAL DE FONDO SUAVE*

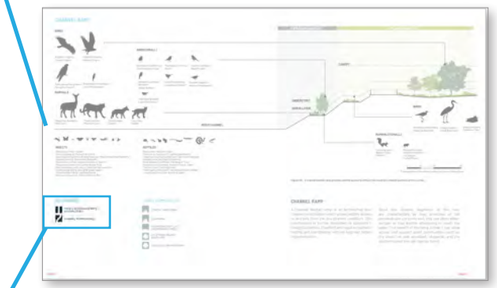


CONCRETE TERRACES / *TERRAZAS DE CONCRETO*



HABITAT RAMP / *RAMPA DE HABITAT*





KIT OF PARTS ICONS / *ICONOS DE KIT DE PIEZAS*

- TRAILS AND ACCESS GATEWAYS / *SENDEROS Y PUNTOS DE ACCESO*
- CHANNEL MODIFICATIONS / *MODIFICACIONES DEL CANAL*
- CROSSINGS AND PLATFORMS / *PUENTES Y PLATAFORMAS*
- DIVERSIONS / *DESVIACIONES*
- FLOODPLAIN RECLAMATION / *RECLAMACION DEL VALLE INUNDABLE*
- OFF CHANNEL LAND ASSETS / *ACTIVOS DE TIERRA FUERA DEL CANAL*

Source: LA River Master Plan, OLIN

BIODIVERSITY PROFILES
PERFILES DE BIODIVERSIDAD

SAMPLE INDICATOR SPECIES LIST / *LISTA DE ESPECIES DE INDICADORES DE MUESTRA*

BIRDS / AVES


Accipiter cooperii
Cooper's Hawk


Falco peregrinus anatum
Peregrine Falcon *


Pandion haliaetus
Western Osprey


Bubo virginianus
Great Horned Owl


Melanerpes formicivorus
Acorn woodpecker


Aphelocoma californica
California Scrub-Jay


Dendroica petechia brewsteri
Yellow Warbler


Empidonax traillii
Willow Flycatcher *


Lanius ludovicianus
Loggerhead Shrike *


Melozone crissalis
California Towhee


Psaltriparus minimus
Bushtit


Sayornis nigricans
Black Phoebe


Ardea herodias
Great Blue Heron


Chlidonias niger
Black tern *


Megaceryle alcyon
Belted Kingfisher *


Anas cyanoptera
Cinnamon teal


Himantopus mexicanus
Black-necked Stilt


Sternula antillarum browni
California Least Tern *


Vireo bellii pulsillus
Least Bell's Vireo *

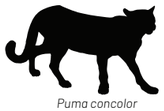

Sturnella neglecta
Western Meadowlar

MAMMALS / MAMÍFEROS


Canis latrans
Coyote


Lynx rufus
Bobcat


Odocoileus hemionus
Mule deer


Puma concolor
Mountain Lion


Eumops perotis
Western Mastiff Bat *


Myotis lucifugus
Little Brown Bat *


Sciurus griseus
Western Gray Squirrel


Otospermophilus beecheyi
California Ground Squirrel


Thomomys bottae
Botta's Pocket Gopher


Perognathus longimembris brevinasus
Los Angeles Pocket Mouse *



REPTILES AND AMPHIBIANS / REPTILES Y ANFIBIOS

Actinemys marmorata: Western Pond Turtle *
Anaxyrus californicus: Arroyo Toad *
Bufo boreas: Western Toad *
Crotalus oreganus: Western Rattlesnake
Ensatina eschscholtzii: Ensatina Salamander
Lampropeltis getula californiae: California Kingsnake
Phrynosoma blainvillii: Blainville's Horned Lizard *
Pseudacris regilla: Pacific Treefrog
Rana draytonii: California Red-legged Frog *
Sceloporus occidentalis: Western Fence Lizard
Taricha torosa: California Newt
Thamnophis hammondii: Two-Striped Garter Snake *
Uta stansburiana: Side-blotched Lizard

FISH / PECES


Catostomus santaanae
Santa Ana Sucker *

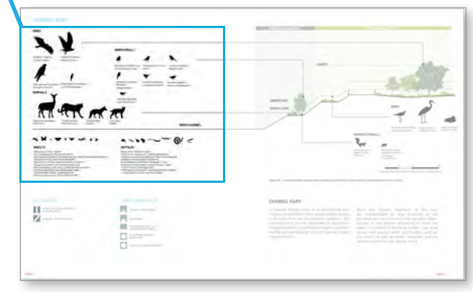

Gila orcutti
Arroyo Chub *



INSECTS / INSECTOS

Acroneuria Family: Stonefly
Anax junius: Green Darner
Callibaetis ferrugineus: Speckled Spinner Mayfly
Coenagrionidae Family: Damselfly
Danaus plexippus: Monarch Butterfly
Dasymutilla sackenii: Golden Velvet Ant
Epeorus Family: Mayfly
Ephemeroptera Family: Spiny Crawler Mayfly
Glaucopsyche lygdamus paloverdesensis: Palos Verdes Blue Butterfly *
Hydrophilidae Family: Scavenger Water Beetles
Leptotes marina: Marine Blue Butterfly
Nemoura Family: Spring Stonefly
Neoscona crucifera: Spotted Orbweaver Spider
Papilio rutulus: Western Tiger Swallowtail Butterfly
Phryganidia californica: California Oak Moth
Pogonomyrmex californicus: California Harvester Ant
Pteronarcys californica: Giant Salmonfly
Schistocerca nitens: Gray Bird Grasshopper
Tenebrionidae Family: Darkling Beetle
Xylocopa varipuncta: Valley Carpenter Bee

* Endangered or threatened species at state or federal level

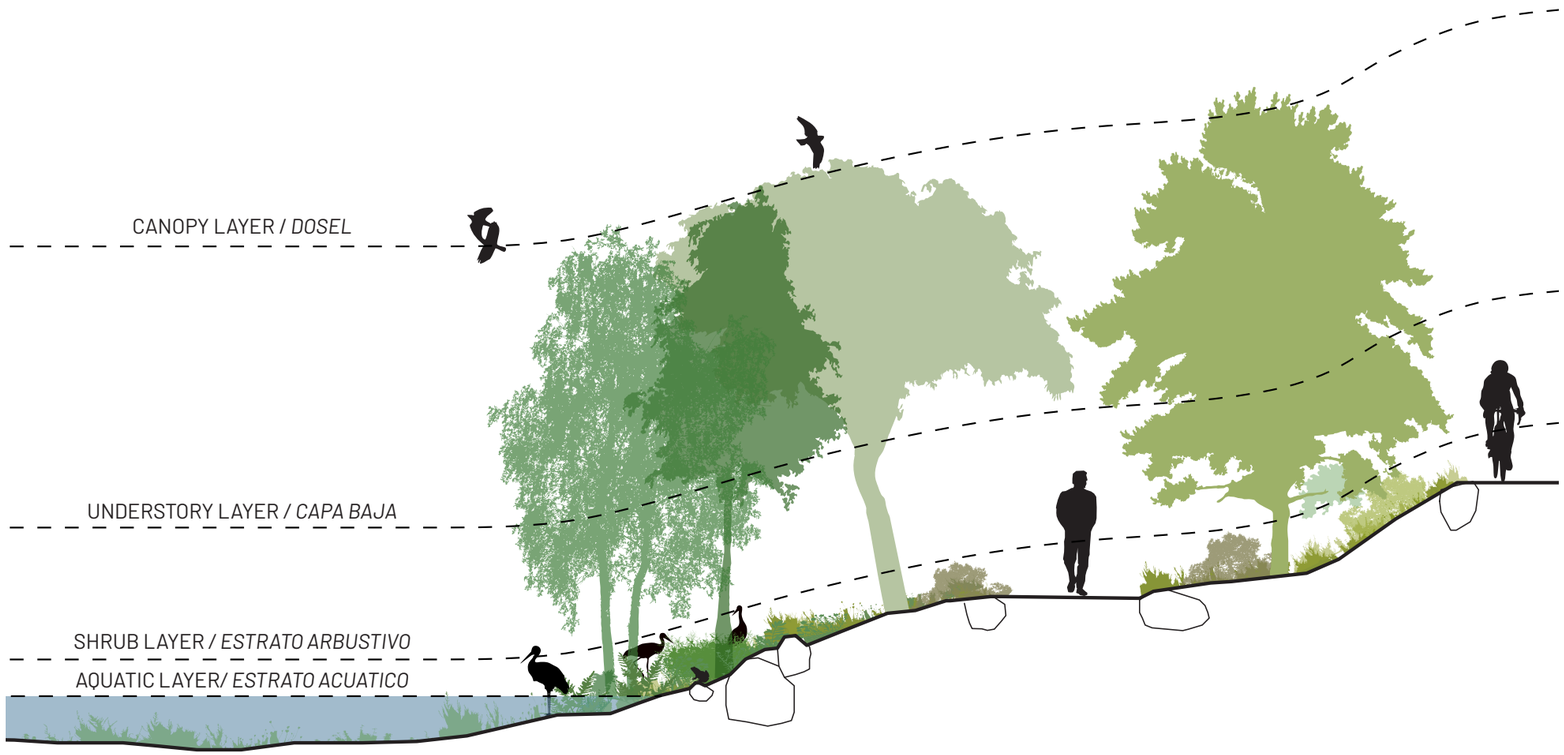


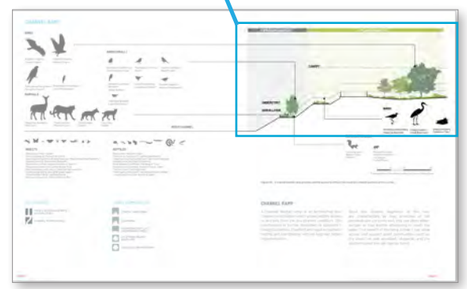
Source: LA River Master Plan, OLIN

BIODIVERSITY PROFILES
PERFILES DE BIODIVERSIDAD

SAMPLE HABITAT TYPE / *MUESTRA DE UN ÁREA DE HÁBITAT*

SEDIMENT BASIN RIPARIAN EDGE
CUENCA DE SEDIMENTO EN EL BORDE RIPARIO





Source: LA River Master Plan, OLIN

BIODIVERSITY PROFILES
PERFILES DE BIODIVERSIDAD

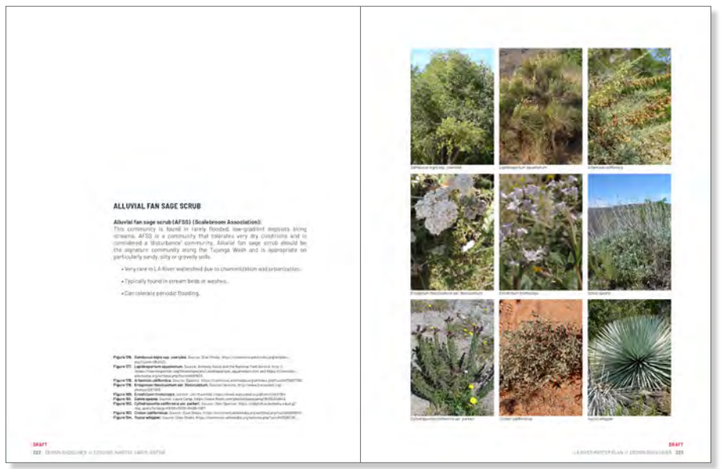
SAMPLE PLANT COMMUNITY VERTICAL STRUCTURE / *MUESTRA DE UNA ESTRUCTURA VERTICAL DE PLANTAS COMUNITARIAS*

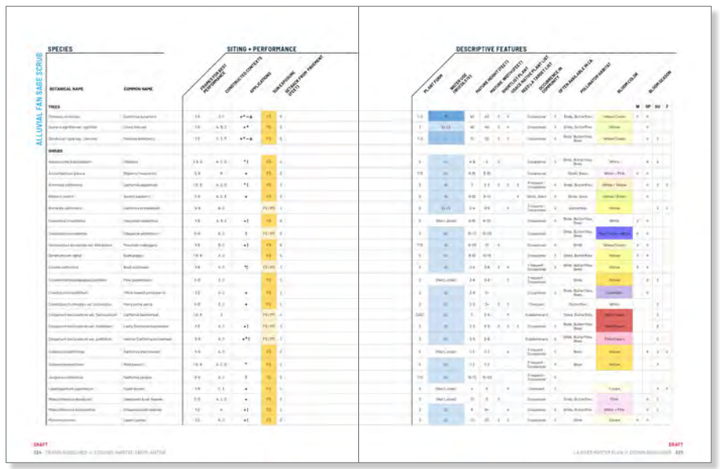
SCRUB AND CHAPARRAL | WOODLAND | RIPARIAN FOREST





SAMPLE PLANT COMMUNITY SPECIES LIST / *MUESTRA DE UNA LISTA DE ESPECIES DE PLANTAS COMUNITARIAS*





PLANT COMMUNITY ICONS / *ICONOS DE COMUNIDADES VEGETALES*

- ALLUVIAL FAN SAGE SCRUB / *VENTILADOR ALUVIAL DE MATORRAL DE SALVIA*
- COASTAL SAGE SCRUB / *MATORRAL DE SALVIA ALUVIAL*
- CHAPARRAL / *CHAPARRAL*
- DESERT SCRUB / *BOSQUE RIBEREÑO DEL SICOMORO DEL SUR*
- SOUTHERN COTTONWOOD-WILLOW RIPARIAN FOREST / *BOSQUE RIBEREÑO DE MADERA DE ALGODÓN Y SAUCE DEL SUR*
- SOUTHERN COAST LIVE OAK RIPARIAN FOREST/ *BOSQUE RIBEREÑO DE ROBLE VIVO DE LA COSTA SUR*
- PERENNIAL FRESHWATER EMERGENT WETLAND / *HUMEDALES EMERGENTES DE AGUA DULCE PERENNE*
- VALLEY OAK WOODLAND / *BOSQUE DE VALLE DE ROBLE VIVO*
- SOUTHERN SYCAMORE RIPARIAN WOODLAND / *BOSQUE RIBEREÑO DEL SICOMORO DEL SUR*
- CALIFORNIA WALNUT WOODLAND / *BOSQUE DE NOGAL DE CALIFORNIA*
- COAST LIVE OAK WOODLAND / *BOSQUE DE ROBLE DE LA COSTA*
- CLIMATE ADAPTED TREES / *ARBOLES ADAPTADOS AL CLIMA*

TECHNICAL APPENDIX: DESIGN GUIDELINES P204-307

Source: LA River Master Plan, OLIN

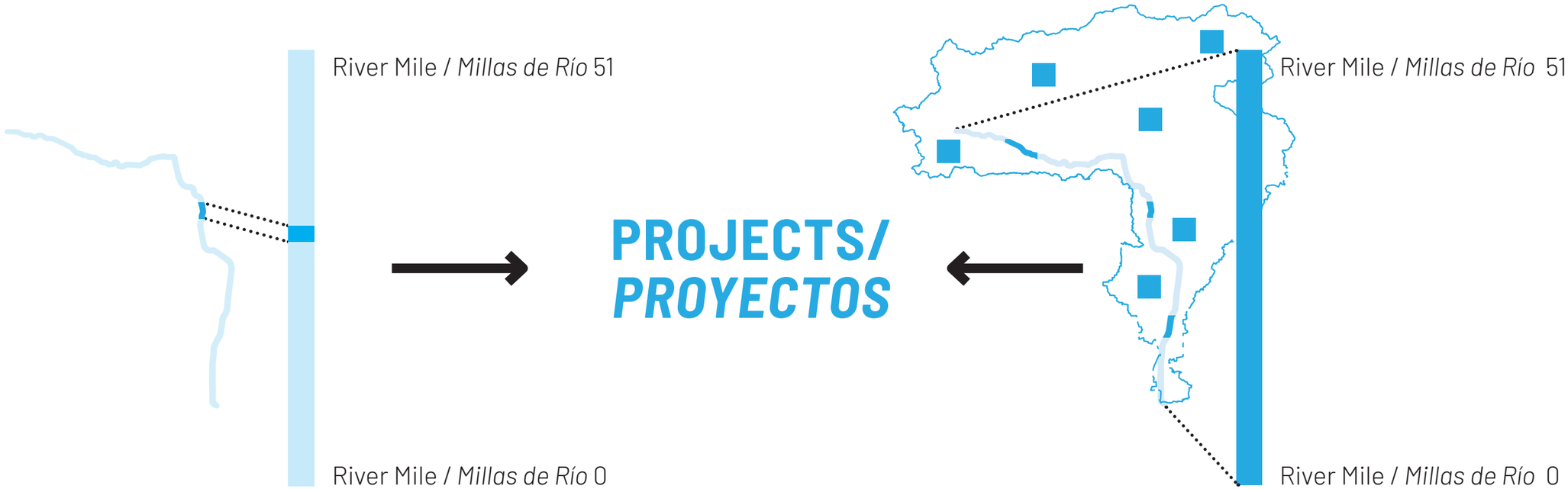
INVENTORY OF REPEATED COMMON ELEMENTS
INVENTARIO DE ELEMENTOS COMUNES REPETIDOS





Source: OLIN

EXAMPLE PROJECTS CAN BE SITE- OR SYSTEM-BASED
LOS PROYECTOS DE MUESTRA PUEDEN ESTAR BASADOS EN EL SITIO O EN EL SISTEMA



SITE-BASED
BASADO EN EL SITIO

SYSTEM-BASED
BASADO EN EL SISTEMA

Sources: OLIN, Gehry Partners, Geosyntec

WHAT DOES THE PLAN SAY ABOUT...

SOFT-BOTTOM AREAS OF THE RIVER

- Keep the **native riparian vegetation**
- In a habitat sensitive way, **remove invasive vegetation**
- Invest in strategies to take pressure off the main channel to **improve flood capacity**
- **Plant native vegetation**

¿QUÉ DICE EL PLAN SOBRE...

PUNTOS BAJOS DEL RÍO

- *Mantener **la vegetación natural ribereña***
- *De manera sensible al hábitat, **eliminar la vegetación invasora***
- *Invertir en estrategias para aliviar la presión del canal principal para **mejorar la capacidad contra inundaciones***
- ***Plantar vegetación nativa***

CH. 6: GOAL 1, CH. 9: FLOOD RISK REDUCTION IN THE NARROWS P292-297

WHAT DOES THE PLAN SAY ABOUT...

CLIMATE CHANGE

- **More intense storm events** are likely
- **Climate change considerations** should be included for all project planning
- **Update hydrology models** to include new climate data
- **Supporting local biodiversity** is critical in light of climate change

¿QUÉ DICE EL PLAN SOBRE...

CAMBIO CLIMÁTICO

- ***Eventos de tormentas más intensos*** *son más probables*
- ***Consideraciones sobre el cambio climático*** *deben incluirse en toda la planificación del proyecto*
- ***Actualizar modelos hidrológicos*** *para incluir nuevos datos climáticos*
- ***Apoyar a la biodiversidad local*** *es fundamental a la luz del cambio climático*

CH. 2: INTEGRATING FUTURE DATA P59-60, CH. 4: EXISTING SUSTAINABILITY AND RESILIENCE P112-114, CH. 6: GOALS 1,3,&8, CH. 9: FLOODPLAIN-BASED STRATEGIES FOR RESILIENCE P304-307

WHAT DOES THE PLAN SAY ABOUT...

AFFORDABLE HOUSING

- Provide **tenant support** (e.g. more funding for eviction defense)
- Provide resources and technical assistance for cities to adopt **stronger tenant protections**
- Develop resources for **tenant education and counseling**
- Identify funding and land for **affordable housing land acquisition and land banking**
- Expand the **Community Development Authority Home Ownership Program (HOP)**
- Designate communities at risk of increased displacement as **priority areas for County affordable housing investment**
- For large LA County projects, **require housing assessments**

¿QUÉ DICE EL PLAN SOBRE...

VIVIENDAS ASEQUIBLES

- *Proporcionar* ***apoyo al inquilino*** *(por ejemplo, más fondos para la defensa contra el desalojo)*
- *Proporcionar recursos y asistencia técnica para que las ciudades adopten* ***protecciones más fuertes para los inquilinos***
- *Desarrollar recursos para* ***la educación y asesoramiento para inquilinos***
- *Identificar fondos y terrenos para* ***adquisición de terrenos para viviendas asequibles y banco de suelos***
- *Expandir la* ***Autoridad de Desarrollo Comunitario del Programa de Propiedad de Vivienda (HOP por sus siglas en inglés)***
- *Designar comunidades en riesgo de mayor desplazamiento como* ***áreas prioritarias para la inversión del Condado en viviendas asequibles***
- *Para proyectos grandes del condado de Los Ángeles,* ***solicitar evaluaciones de viviendas***

WHAT DOES THE PLAN SAY ABOUT...

HOMELESSNESS

- Identify sites for **permanent supportive housing**
- Coordinate **outreach services**
- Update policies for flood season including coordination with trained outreach teams on **compassionate practices**
- Optimize temporary **sanitation stations**
- To assist persons experiencing homelessness, provide **river outreach staff training**

¿QUÉ DICE EL PLAN SOBRE...

SIN HOGAR

- *Identificar sitios para* ***vivienda de apoyo permanente***
- *Coordinar* ***servicios de alcance comunitario***
- *Actualizar las políticas para la temporada de inundaciones, incluyendo la coordinación con equipos de alcance comunitario capacitados en* ***prácticas compasivas***
- *Optimizar* ***las estaciones de aseo personal***
- *Para ayudar a las personas sin hogar, proporcionar* ***capacitación al personal de alcance comunitario del río***

CH. 6: GOAL 6, CH. 12: O&M P412-431

WHAT DOES THE PLAN SAY ABOUT...

CROSSINGS AND PLATFORMS

- Crossings and platforms are **one of six strategies in the plan**
- Communities can select which strategies are **best for their community**
- Bridges across the river are allowed in the plan and are encouraged to be **multi-use, multi-benefit, and planted with a biodiverse group of native species**
- On bridges and platforms, there is **no private development, housing, or parking**

¿QUÉ DICE EL PLAN SOBRE...

PUENTES Y PLATAFORMAS

- *Puentes y plataformas* ***una de las seis estrategias en el plan en la que***
- *Las comunidades pueden seleccionar las mejores estrategias* ***para sus comunidades***
- *Los puentes sobre el río están permitidos en el plan y se alienta a que sean* ***multiuso, de beneficio-múltiple y a la siembra de grupos de especies nativas***
- *En puentes y plataformas,* ***no hay desarrollos privados, habitacionales o de estacionamiento***

WHAT DOES THE PLAN SAY ABOUT...

DEVELOPMENT AND PROPERTY

- **Not private developer based**
- **No housing or community displacement** for river widening is proposed in the plan

¿QUÉ DICE EL PLAN SOBRE...

DESARROLLO Y PROPIEDAD

- ***No basado en desarrolladores privados***
- ***El desplazamiento de comunidades o viviendas*** *para el ensanchamiento del río no está propuesto en el plan*

WHAT DOES THE PLAN SAY ABOUT...

O&M AND BUDGET

- **Costs, funding sources, and operations costs** are in the plan
- **Ideas for river staff** are in the plan
- **O&M needs** for different types of projects are included

¿QUÉ DICE EL PLAN SOBRE...

OPERACIONES Y MANTENIMIENTO Y PRESUPUESTO

- ***Costos, fuentes de financiamiento y costos*** *operativos están incluidos en el plan*
- ***Ideas para el personal del río*** *están incluidas en el plan*
- ***Necesidades de Operación y Mantenimiento*** *para diferentes tipos de proyectos están incluidas en el plan*

CH. 12: O&M P412-431, CH. 13: FUNDING SOURCES

LA RIVER MASTER PLAN
EL PLAN MAESTRO DEL RÍO DE LOS ÁNGELES

51 **miles / *millas***

The LA River is 51 miles in length, running from Canoga Park to Long Beach.
El Río Los Ángeles tiene 51 millas de longitud, desde Canoga Park hasta Long Beach.

2,300 **acres**

There are 2,300 acres of primarily publicly owned land within the right-of-way, including the river channel.
Hay 2,300 acres de tierra principalmente de propiedad pública dentro de la servidumbre de paso, incluido el canal del río.

1,000,000 **people / *personas***

There are one million people that live within one mile of the LA River.
Hay un millón de personas que viven a una milla del Río de Los Ángeles.



- M, L, XL Planned Major Project / *Proyecto principal planificado M, L, XL*
- M, L, XL Proposed Project Site / *Sitio del proyecto propuesto M, L, XL*
- Existing Park/Protected Land / *Parque existente/Tierra protegida*
- Pervious and Impervious Surface / *Superficie permeable e impermeable*

Sources: OLIN, Gehry Partners, Geosyntec

CEQA UPDATE
ACTUALIZACIÓN CEQA

- PUBLIC WORKS IS PREPARING A PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT (PEIR)

  OBRAS PÚBLICAS ESTA PREPARANDO UN INFORME PROGRAMÁTICO DE IMPACTO AMBIENTAL (PEIR)

  - SCOPING PERIOD – SUMMER 2020

    PERÍODO DE 'SCOPING' - VERANO 2020

  - DRAFT RELEASED ON FEBRUARY 1, 2021, FOR PUBLIC REVIEW

    PROYECTO PUBLICADO EL 1 DE FEBRERO DE 2021 PARA SU REVISIÓN PÚBLICA

  - VISIT **HTTPS://PW.LACOUNTY.GOV/GO/LARMPCEQA**
    FOR MORE INFORMATION

    VISITA HTTPS://PW.LACOUNTY.GOV/GO/LARMPCEQA
    PARA MAS INFORMACIÓN





WE LOOK FORWARD TO CONTINUING THE CONVERSATION IN YEARS TO COME

LA COUNTY PROJECTS ARE IN PARTNERSHIP WITH COMMUNITIES AND INCLUDE INDIVIDUAL PROJECT OUTREACH

ESPERAMOS CONTINUAR LA CONVERSACIÓN EN LOS PRÓXIMOS AÑOS

LOS PROYECTOS DEL CONDADO DE LOS ÁNGELES ESTÁN EN ASOCIACIÓN CON LAS COMUNIDADES E INCLUYEN EL ALCANCE COMUNITARIO INDIVIDUAL DEL PROYECTO

Source: LA County Public Works

HAVE COMMENTS FOR US?
PLEASE REFER TO OUR WEBSITES FOR INSTRUCTIONS ON HOW TO SUBMIT COMMENTS.

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(BY MAY 13, 2021)

BORRADOR DEL DOCUMENTO PRINCIPAL DE PLANIFICACIÓN
(HASTA EL 13 DE MAYO, 2021)

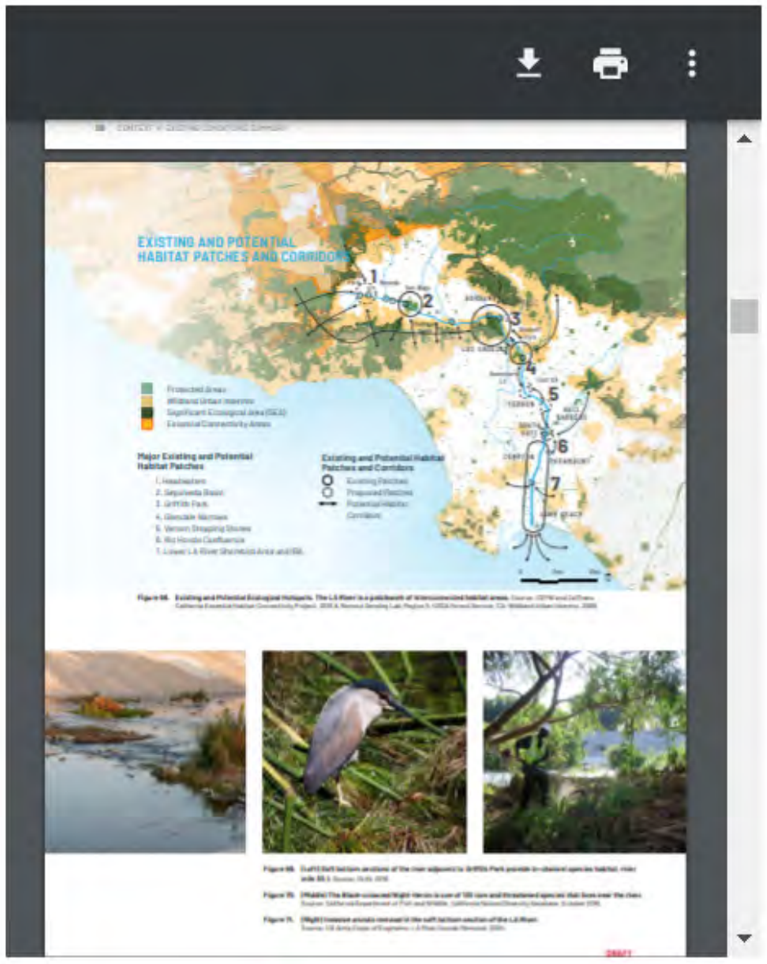
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DRAFT PEIR
(BY MAY 13, 2021)

BORRADOR PEIR
(HASTA EL 13 DE MAYO, 2021)

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LA RIVER MASTER PLAN COMMENTS

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SUBMIT FORM



LARiverMasterPlan.org

RE: "2020 LA River Master Plan PEIR Comments"

From: Steven Appleton

LARiverCEQA@pw.lacounty.gov

Dear "Master-Planners":

The LA County Master Plan's first order of business is to argue that a "naturalized" Los Angeles cannot co-exists with safe flood control. Common questions about LA River are presented and quickly dismissed as naïve: *"Can we remove concrete?" "What if we put trees in the channel…" "What is so complicated about widening and naturalizing the river?"* The answers are brief and general, setting the tone for a document that in my view both oversimplifies and overcomplicates.

I will address one specific situation to make my point.

The LA River adjacent to Taylor Yard is, without a doubt, is the area that has inspired a generation of poets, recreational enthusiasts, and small businesses. As a public artist who was drawn into its sway living on the edge of the river in Elysian Valley, I established LA River Kayak Safari in 2013. I have led nearly 10,000 people on kayaking trips in this soft-bottom stretch. Down here in the river, one enters that I call the river's "stage", an almost theatrical space within the City where the sounds and experiences of nature overtake the urban. Many creatures perform here, such as our native Baja California Chorus Frogs that are drawn to vernal ponds, willows, slow moving section. Waterfowl and fish are abundant. This intimate experience of nature within the City is precisely what has foisted the LA River into our consciousness.

I97-1

What has it taken to bring the LA River to public consciousness here? All it took was to build a bike path, a few pocket parks and increase public access. There is much more than can and will be done but my point is to say that the natural condition was the draw. The intimacy of nature is the draw for people and for a burgeoning river economy. From the "people perspective" the primary charm of the LA River derives from the intimate break it provides from the City. Not all the river should or can emulate Elysian Valley. However, for those of you public servants assessing this plan, you need to get your feet wet. People seek this intimate experience, and it should be forwarded in all processes of assessment of river plans. Not incidentally people and ecological perspective do oftentimes align. Each stretch of the river will require a specific inventory of its assets and possibilities – including how to mitigate flood risks.

Unfortunately, the Masterplan also employs broad generalities when it concludes that naturalization dreams are not feasible due to flood risk. For instance, the document lumps together the unique natural bottom section of Elysian Valley with the rest of the 52 miles when it states unequivocally, *"The additional space needed for channel widening would require the displacement of people, businesses, and infrastructure adjacent to the LA River. (page 26)* In a similar vein it states on page 23, *"It is not feasible to remove the concrete from the LA River without causing significant negative impacts to communities and local culture."*

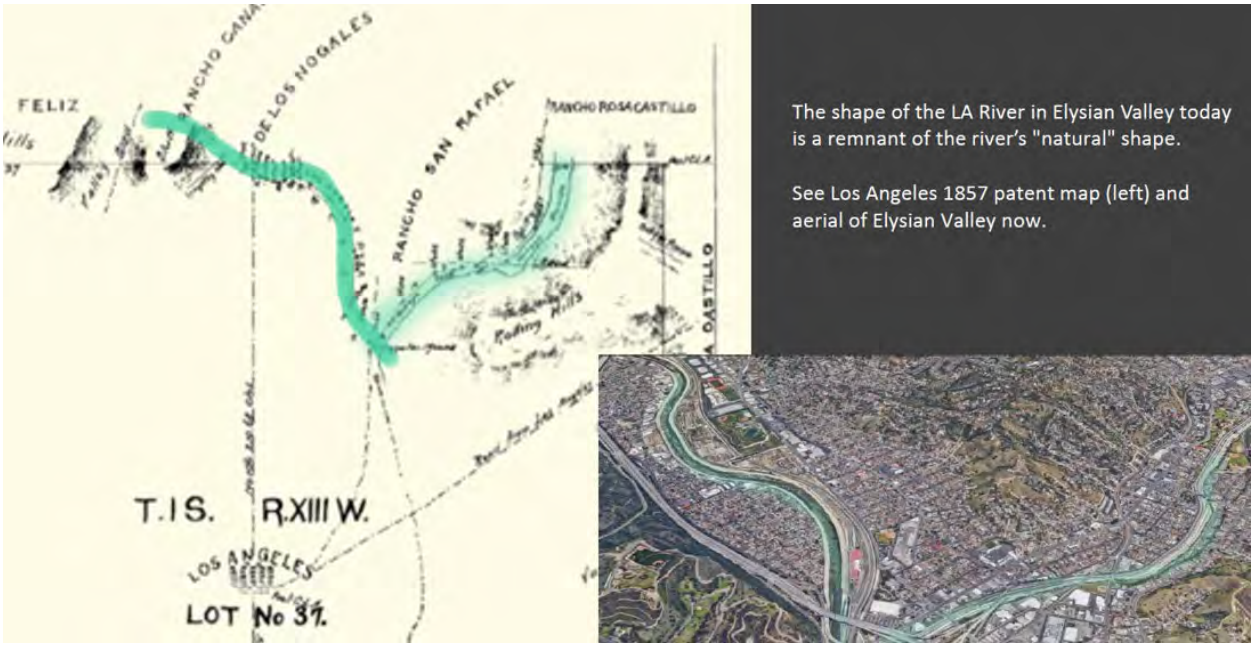
What? How would an engineered expansion of the river into publicly owned lands of Taylor Yard displace, *"people, business and infrastructure?"* How does it cause *"significant negative impacts to communities and local culture?"* The lands of Taylor Yard were purchased at great cost by the City of Los

Angeles for the specific purpose of enlarging the river's ecological footprint of the LA River and expand public access and stewardship alongside the presumed ecological benefits of increased aquifer recharge, biodiversity and cooling impacts of vegetation and waterway.

Many have contended that there is no alternative for Elysian Valley to mitigate its flood risks but to draw down the canopy of plants or to make a giant pipeline many miles upstream to bypass Elysian Valley in high water conditions. As members of the public, non-profit organizations and technical commentors have sought more data and information about this conclusion, the relevant agencies have provided scarce data or analysis. Asks for detailed topographic data have gone unanswered, possibly on the mistaken assumption that the public are not sufficiently skills to render technical comments?

The shape of Elysian Valley today closely mimics the shape of the river dating back to the very first patent map of Los Angeles. See below:

I97-1 cont.



Unlike so many other parts of the river where its banks were "straightened" during channelization, Elysian Valley was spared the straightedge. Why? Because Taylor Yard was in full swing as a local employer and the key method to move goods to and from the growing region. It could not be moved, or in the parlance of the plan "displaced." This historical artifact of the river's shape, combined with the flows of underground waters from the nearby Mt. Washington hills, is exactly why the river is softbottom here and why nature proliferates, and humans enjoy it. Is there a way to backchannel waters in a straighter line during flood conditions? Are there ways to expand the ecological footprint without creating public safety risks? Possibly. Has it been sufficiently studied? I think not.

(A good point of reference would be the detailed GIS mapping framework recently brought forth by Ethington and Longcore.)

I will conclude my limited comment by imploring government officials who serve constituents to think carefully about the approval of this plan without further study and engagement. I would caution you that proposed project ideas that cap the LA River with concrete expansions of real estate may consumed

I97-1 cont.

massive infrastructure spending but not deliver on the promised public and ecological value. Why not first study river adjacent underutilized properties and buildings that might more equitably, and efficiency be utilized to expand the flood, park, and public access of the river in your areas?

You should also pay attention to the fact that many leading non-profit and stakeholder groups who were the leaders that drove the river to prominence are opposed to the current Masterplan. Public works projects require strong consensus and the embrace of constituents. I am deeply worried that this Masterplan does not currently possess such a consensus and that it has defined sketchy projects rather than a process for the future. To embark without consensus of key constituencies is not wise.

I97-2

About consensus I would ad that the planning process lacked adequate community participation. As a person engaged in the river for more than 25 years- as artist, kayaker, activist, and volunteer public servant - my only option for engagement was to respond to presentations already hatched or make editorial comments on a 494-page document. My slight insult is of no import. What matters is that you have failed to take account of local knowledge that will be crucial for sustainable LA River projects. The assumption that local knowledge is merely about "what people want to see" or "how they want their parks to be…" is a slight to the depth of local knowledge which often contains historical, practical, and technical insights.

I urge you to convene of working group of community reviewers as a first step to establishing a process that is both more detailed and open-ended than the current Masterplan and which can gain broad consensus.

Sincerely,



Steven Appleton

From: Aida Ashouri
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments
Date: Thursday, May 13, 2021 10:21:38 PM

CAUTION: External Email. Proceed Responsibly.

To whom it may concern,

The following are my comments regarding the PEIR for the LA River Master Plan.

This plan has tremendous gaps that expose the river to potential harm.

I98-1 1) The document is overly complicated, too long, and has not been presented in a simplified manner to the community in order to be understood.

I98-2 2) The plan doesn't include the watershed or tributaries when considering the river, which would be a part of the river. The river is not just a storm drain, it is a living, breathing connection to the earth. It spans a wider area than what is currently considered.

3) The projects that are proposed in the Mater Plan are limited and there is not a full environmental review of all plans proposed or possible in the Master Plan

I98-3 4) Many projects are promoted in the Master Plan but they are not evaluated in the PEIR.

5) What is a typical project? The final PEIR should evaluate projects that are more representative.

I98-4 6) I am concerned that the PEIR states that there are impacts that are "significant and unavoidable" which could open the door for damaging projects. I would like to make sure that nothing damaging is considered "unavoidable." Please clarify this language.

7) Please examine impacts from the river that incorporate the entire watershed and tributaries and not just the concrete barriers.

Thank you,
Aida Ashouri

PEIR

The Draft PEIR requires major revisions to be an appropriate CEQA document for the County's draft Los Angeles River Master Plan. The two major concerns with the PEIR are document complexity and that the "typical projects" are not representative of the intent or scope of the Master Plan. I request that these two flaws be robustly addressed in revisions to the Draft PEIR.

I99-1 In terms of complexity, the draft PEIR is cumbersome, lengthy and inaccessible, in breach of CEQA Sections 15140 and 15141 which require plain language and where appropriate graphics so that the public can rapidly understand the documents as well as a length limit of less than 300 pages for highly complex projects. A document six times that length is unacceptable. In practical terms, the County must in the Final PEIR use plain language for clarity and accessibility, have a more functionally navigable PDF, and include in-person viewing opportunities for documents and large-printed maps. The document should be shortened and if this is genuinely impossible then additional public comment time and proactive in-community support should be provided by the County so as to empower community members to understand the documentation and submit comments under CEQA.

I99-2 Secondly, the PEIR is misleading and ineffective because the two projects that are put forth as typical are far from typical when they are contrasted with other project possibilities that are framed in the Master Plan. The two "typical" projects are a multi-use trail and a river adjacent gathering place composed of various common elements from the Master Plan. These are relatively low impact projects and are very similar to existing features of the LA River, so it is unhelpful to have built the PEIR around them. Instead, the PEIR should analyze significant projects such as channel transformation (the Plan includes suggestions to terrace, deepen, widen, convert walls from trapezoidal to vertical, divert water in tunnels, and restrict public access), capping the river with large concrete platform parks or cantilevers (a concept the County has championed in presentations and media outreach but neglected in the PEIR), or building infrastructure every 0.4 miles along both banks of the river.

Master Plan

I99-3 While the LA River Master Plan is an impressive and useful piece of river research, it is a manifestly inadequate vision document for the river over the next 25-year time horizon (and beyond). The Plan continues an almost century-old legacy of disregarding the riverly-ness of the river.

The major flaw in the Master Plan is that it is framed in terms of infrastructure and commercial opportunity, not ecology or even hydrology. Because of this failing,

we risk regression rather than advancement of nature connectedness, ecological improvements, and climate resilience in Los Angeles. A major flaw of the Plan is that it considers only a two mile wide strip of land along the river's 51 miles, a conceptualization of the landscape which has no logic other than to reveal the built environment bias of the Plan. The expansiveness of the Plan's countless pick-and-choose possibilities, coupled with an absence of a schema for prioritization or any professed values around tangible environmental justice, makes it likely that what would proceed under this Plan would be commercially-driven and highly deleterious for the river and the city's environmental wellbeing. Los Angeles has waited a long time for the Master Plan update, and deserves much better than what has been offered in the draft.

Key issues regarding the Master Plan that public officials and private investors should consider while finalizing this plan include:

- Managing knowledge.
- Protecting the environment.
- Reducing gentrification.
- Physical footprint.
- Promoting transparency and monitoring.

I99-3 cont. Addressing these challenges and mitigating negative impacts will transform the L.A. River and ensure a sustainable and just river for the coming generations.

Managing Knowledge

The Master Plan lays out the blueprint for this once-in-a-century project to transform a large swathe of the city and with the city's extremely checkered past of urban planning and injustice, this generation better get it right or risk being on the wrong side of history, again.

No shortage of "what could have been done" or more accurately "should have been done" exists, but these learnings should act as a stencil for the L.A. River project. The L.A. River project should take all of these and ensure that "never again" actually means never again.

In that respect, knowledge from historians, former public officials, and civil society organizations should be captured and transferred to policy makers to ensure that urban planning is more just. From redlining to destroying neighborhoods with freeways to rampant gentrification, the lessons are enormous.

A systematic approach to gathering and applying lessons from the past should be an integral part of any major undertaking. Such an approach creates a culture of

learning, from which present and future generations can profit.

Ensuring that "never again" is less a slogan and more a part of the city's DNA, both government and nongovernment forces and sources need to play a key role. Multistakeholderism is taking hold around the world in a variety of fora, such as the Extractive Industries Transparency Initiative (EITI, covering oil, gas and mining revenues) and the Kimberley Process Certification Scheme (addressing "blood diamonds"). A multi-billion project in the City of Angels (indeed potentially tens of billions) should be no different.

Protecting the Environment

With a mission to "protect and enhance California's coast," the California Coastal Commission has staunchly protected the California coast from undue commercial real estate influence and possible negative impacts. While overly cautious at times, the Commission has protected the environment and the interests of coast users, not just the wealthy few.

I99-3 cont.

Compared to unregulated coastal development in Croatia or the Crimea (in the latter, private property to the water's edge, fenced to the water), California should be proud of having a regulatory body that ensures that human imprint and impact is kept to a minimum.

Given the L.A. River's ecology, should there be a regulatory body to oversee the entire section of impacts from Mile 1 to Mile 51? Rivers don't live in silos and neither should public servants.

The strain on city services will likely rise—commercial and residential buildings require water and usually have parking spaces, to mention just two examples. Los Angeles should show leadership by abandoning parking minimums for housing. Following UCLA's Donald Shoup (the "Moses of Parking"—thou shalt not park for free), erasing parking minimums would have a large impact. Having a river that can be accessed and traveled by bike along large parts of its length (like Paris and London) will reduce traffic and directly, positively impact community health. Indeed, an interactive map models several crowded areas showing parking availability and the impact of reducing parking to make way for housing.

Reducing Gentrification

Gentrification is the elephant in the room. The Master Plan touches on the subject without actually mentioning the word, as part of its "6th Goal" regarding housing and the negative impacts of development. The housing crunch centers around Downtown L.A. and Long Beach, but affordability challenges are pressing all along the river.

I99-4

With the planned beautification and access to parks, areas will be more attractive and available, creating parking "creep" in surrounding neighborhoods and new demand for housing in the neighborhood. Neighborhoods along the river that aren't currently experiencing housing scarcity will likely be soon. As the quality of the river environment improves, real estate agents will mention river access as an additional asset.

In peripheral neighborhoods, a potential rush of buyers is likely and should spur the requisite planning. Indeed, the Master Plan lays it out in black and white—one in four Californians lives within one hour of the river. That is quite a magnet and a rush of buyers can be expected.
To help alleviate the stress and build communities, county officials should consider the following principles:

Embrace the 15-minute city concept – With this concept, all essential services and amenities can be reached using public transport, biking, or walking within a quarter of an hour. While it is hard to imagine any U.S. metropolis within striking distance of the coveted 15 minutes or under, Los Angeles should try, and try hard, to reach that goal. This policy would reduce strains on the city's transportation infrastructure and the millions of hours wasted in commuting to work and to shop.

I99-4
cont.

Promote home ownership – Low interest rates present a significant opportunity for homeownership, despite the pandemic. As the quality of life improves in some areas around the river, prices will go up and ownership will change. Boyle Heights and West Oakland in the East Bay Area are perfect examples or that. Civil society organizations (CSOs) discussing these topics in multiple languages should be part of any master plan. Financial literacy is a crucial aspect to justice.

Consider housing unit size – California's housing unit size is the smallest of any state, with an average unit size of 837 square feet. Seattle is the smallest city with 711 square feet with challenging weather. Los Angeles has a considerably larger apartment size at 792 square feet. With only one river, and as one of the world's largest metropolises, the demand for housing along the river in Los Angeles will require some people to live in smaller units. Space is too much of a premium for lofts. The Casitas Lofts, which offered a paltry 10% of its units for affordable housing, are a case in point. Lofts near transport hubs or with nearly exclusive access to parks would be as unjust as freeways.

Public ownership of housing – The Master Plan discusses land banks, in which the public agencies can purchase or hold land in the short-term to sell to the private sector for future development. Policymakers should go one step further—own and develop the land forever. An interactive map on public agencies that own land in the area is revealing. Initiated by L.A.'s Controller Ron Galperin, the map scopes

the ownership of public agencies. Some German cities wholly own companies with the mission to build affordable housing. These entities have proven the concept that social mission and economic activity are not a contradiction. Given
I99-4 cont. that hundreds of lots in the city and county are vacant, the economic upside of developing publicly owned land in Los Angeles must be in the billions. Los Angeles should consider having its own building entity, which provides a responsible and sustainable approach to the city's housing. It can lead by example—promoting justice and sustainability simultaneously. At the very least, an absolute freeze on any selling of public land should take immediate effect. If there is any transaction, it should be leased, but not sold outright.

The Physical Footprint

In addition to soft policies designed to mitigate gentrification and protect the environment, the following three issues will help to shape a more enlightened and just physical space.

The built environment – It is likely that an inordinate amount of buildings will be built along the corridor, so sustainability has to be the priority. Leadership in Energy and Environmental Design (LEED) rates buildings in energy, energy efficiency, environmental impact, water use, and footprint. A blanket policy should demand that all commercial and residential buildings are LEED Platinum, the highest level, to ensure that the environmental footprint and energy use are minimized. Finally, each building should roll out "materials passports" to increase recycling at the end of a structure's life cycle, to help spur participation in the
I99-5 circular economy.

Parks and recreational space – Some of the river's adjacent communities are the most park poor in the county, and the Master Plan rightly addresses it in the document's second goal. Neighborhoods along the river with the smallest amount of park space include:

- Compton - .6 acres per 1,000
- East Rancho Dominguez - .4 acres per 1,000
- Maywood - .3 acres per 1,000

With L.A. County's average park space at about 8.5 acres for every 1,000 citizens, East Rancho Dominguez and Maywood have 20-25 times less park space than the county average. Congratulations are due to the Master Plan for highlighting this in its second goal. If the plan delivers, the liveability around some neglected neighborhoods will improve significantly.

Community bridge building – Most bridges crossing the river are meant for cars and large vehicles. Therefore, it is important that small pedestrian and cycling

bridges are constructed, connecting communities with active transportation routes. Aesthetically pleasing simple structures, using Accelerated Bridge Construction (ABC), would allow more exchange on both sides.

These bridges would facilitate community interaction and duly promote cycling corridors, providing alternatives to more dangerous main arteries. From a structure to a concept, bridges could also help to promote dialogue and exchange through areas to sit in the middle, allow both sides of the river to "build bridges" among themselves.

Promoting Transparency and Monitoring

The L.A. River contracting process must be transparent and requires vigilant monitoring for its soft and hard impacts in the coming generations.

I99-5 cont.

Contract Transparency – In the notoriously opaque extractive sector, the momentum toward contract transparency reached a crescendo in January when countries belonging to the Extractive Industries Transparency Initiative (EITI) pledged to publish their oil, gas and mining contracts. Some of EITI's 55 member countries—Nigeria, Democratic Republic of the Congo and Kazakhstan—routinely fare poorly in Transparency International's Corruption Perceptions Index (CPI). American transportation, in which there are tens of billions of dollars at stake, could take a page out of EITI's hymnal. The publication of large-scale contracts (e.g., for freeways, bridges, and feasibility studies) would create more accountability in the private and public sectors and facilitate financial literacy among communities. After all, billions of dollars, impacting millions of people, are at stake.

Constant evaluation – With leading universities located within an hour of the L.A. River, several could form a consortium, acting as a neutral third-party, offering mountains of data regarding the Master Plan's impacts for the coming decades. UCLA, USC, Occidental, and Cal Poly Pomona all have very solid faculties in environment and urban planning. Given the Master Plan's complexities, a stand-alone unit could measure the impacts on an annual basis as a complement to civil society organizations.

In Conclusion

I99-6

The impacts of the vision expressed by the L.A. River Master Plan on those living adjacent to the river are and will be enormous. Our shared goal should be to bolster the positive impacts of the plan and do our collective best to mitigate the negative impacts as the Master Plan goes from paper to policy to practice.

L.A.'s freeways are a monument to cutting out and cutting off those with little or no voice. With the L.A. River, while we cannot change history, we can certainly learn from it. If we can do that, then we will succeed in transforming 50 miles of river in a climate-challenged metropolis.

I99-6 cont.

One man's developer is another man's destroyer. If some of these ideas are implemented, developers might not make a financial killing like the days of yore, but they will do more than a respectable business.

Lewis MacAdams, the L.A. River's patron saint, summed up his philosophy succinctly: "If it's not impossible, I'm not interested." Many may view some of the above proposals as unrealistic or impossible. That sentiment should be the ticket to entry for the project of the century. With that "impossible, but I'm in" attitude, those courageous and long-term thinking public servants and responsible private companies will achieve immortality. Most importantly, Los Angeles and its concrete channel-turned-river will serve as not only a place of community but as a lighthouse around the world not only talking sustainability and justice, but proudly walking it.

Thank you for your time and consideration of my comments.

E.R. Tucci
201 West Bixby Road
Long Beach, CA 90807

From: Joyce Dillard
To: PW-LA River CEQA
Subject: Fw: 2020 LA River Master Plan PEIR Comments
Date: Tuesday, May 18, 2021 5:56:36 PM

CAUTION: External Email. Proceed Responsibly.

Per your instructions.

Joyce Dillard

----- Forwarded Message -----
From: Joyce Dillard <dillardjoyce@yahoo.com>
To: LARiverCEQA@pw.lacounty.gov <LARiverCEQA@pw.lacounty.gov>
Sent: Friday, May 14, 2021, 12:56:10 AM CDT
Subject: 2020 LA River Master Plan PEIR Comments

I100-1 This document did not have the proper circulation without public access such as a library. It is impossible to read it on a smartphone. One must own a computer and have internet access.

I100-2 Chapter 2 objectives include homelessness, water supply and water quality. Homelessness is the wrong objective. Public health and safety should be the objective.

I100-3 Water supply is not an issue since the river is channelized. Water quality is related to the Clean Water Act and permitting. Channelized rivers fall outside the federal definitions.

I100-4 The KOP Kit of Parts needs to include aspects on the upstream and downstream of the area. The river is fragile and stability is questionable. The US Army Corps of Engineers have jurisdiction not the County or the cities.

Lauren Bon has received approval for water supply take for her art project Bending the River Back into the City This is a private project not a public project.

I100-5 Scientific measurable data is lacking. Earthquake activity from the coastal cities and ocean affect this area yet it is not addressed as part of this project.

I100-6 The problem with PEIRs is the lack of additional environmental filings by the Lead Agency. Other agencies such as the City of Los Angeles may file Categorical Exemptions with their City Clerk, but not with the State of California and not under the Lead Agency of the PEIR.

Joyce Dillard
522 Clifton St
Los Angeles, CA 90031

From: katherine kato
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments
Date: Thursday, May 20, 2021 11:29:19 AM

CAUTION: External Email. Proceed Responsibly.

March 4, 2021

Grace Kamjakraphan-Tek
Los Angeles County Public Works
Stormwater Quality Division
900 South Fremont Ave.
Alhambra, CA 91803

Dear Grace Kamjakraphan-Tek:

I am writing in response to the request for comments to the Draft PEIR of the 2020 LA River Master Plan. Something happened to my original email, this is a copy.

The LA River's purpose has always been flood protection. I'd like to see the new focus of our River to be the aesthetic enhancement of the water views and natural habitat.

I101-1

Of utmost importance, the overriding main goal should be to create a respite from the City, where visitors enjoy gorgeous natural and pastoral beauty. The River is the element we celebrate. It should not be a big money grab for everyone that ever wanted to have their own project. Please focus on designing areas that look like nature so our citizens can learn to enjoy this experience. The whole thing of the LA River is the experience. It's not about looking at it, it's about experiencing it—interacting with it. The intangible connection is what is missing.

In the River PEIR, your diagram all listed items are equally merited. Some of the goals have seemingly been repeated twice, and the graph should indicate which efforts take precedence. Please correctly emphasize and follow the top five requests from the public:

I101-2

1. Protect vulnerable plants and animals
2. Supplement water supply
3. Create connected communities
4. Address homelessness
5. Access to education and recreation (arts and culture)

I live in Studio City, less than half a mile from the LA River and visit almost daily on an unimproved area. We have several projects along the River in Studio City and it is exciting to have an opportunity to share my experience and contribute my suggestions. I will briefly review the pitfalls and, hopefully, steer you away from repeating our mistakes.

I101-3

-Art: We spent too much on fanciful gates and art installations every few feet. Too much art can be a bad thing. If we could go back in time, I would save funds for basic maintenance instead of ornamentation or art installations.
Suggestion: Art does not have to be on every space available. I see an overabundance of murals, panels, and decorative tiles all of which soon looked tired and dated. Consider a

limited thematic element for each section of the river incorporated within the environmental graphics. Plants and large boulders can be the “art”, creating a natural and picturesque atmosphere. Any views of art should not interfere with the serenity of the natural site. This includes art on bridges and any property frontage visible from the natural sanctuary and on temporary installations. Areas that have urban blight or billboards should not have additional features to add to the cacophony. No “statement art piece” on any fence, no installed artwork or land art should not take precedence over nature.

I101-3 cont.

-Plant Selection: We had difficulties with the learning curve on maintenance. Deciduous plants were removed as they were deemed to be dead. The heavy leaf litter did not break down quickly and smothered plants even on hillsides. Santa Ana winds blew leaves and periods of rain brought enough precipitation to silt up
the areas along the fence line and low areas.
Suggestion: Avoid those that require any maintenance trimming and restrict deciduous or poor out of season appearance to background areas. Please ask yourselves how each plant would look if you did no maintenance whatsoever or no maintenance after 3 years. Consider our drought and California’s increasing heat situation. Choose slow growing and long lived plants to save replacement costs.

-River view: Our Riverwalk has tubular steel fencing which block out most glimpses of water and wildlife; at some angles, it looks like a solid wall. All tubular steel fences will fail especially near access points and heavily dog accessed areas. This is usually from dog urine causing rapid oxidation.
Suggestion: Channel modifications shall be to increase a wider surface of water where possible, perhaps large reflecting ponds to lessen the endless views of concrete. It would be wonderful to have vernal ponds where possible. Please select wire fencing for maximizing expansive views.

-No O & M: Our area has woefully underestimated day to day maintenance costs. Build less and choose well in an effort to have the lowest maintenance as possible.
Suggestion: I recommend a much, much larger maintenance budget, not managed by any LA City department.

I101-4

-Grafitti and Tagging: Every type of surface has been defaced by various marks.
Suggestion: All fixtures must have anti graffiti coatings on the face and reverse. On flat surfaces design for obfuscation o such as perforated or mesh design trash receptacles. All surfaces should be able to withstand multiple chemical / repeated pressure washings.

-Homeless: This report seems as though you have no real world experience. Our Riverwalk is completely unusable; it is only a space for the unhoused. In our local park, brand new self cleaning restrooms were installed to reduce maintenance. They lasted almost 6 months before they were irreparably damaged and cannot be repaired.
Suggestion: Rangers should be on call to connect service providers to individuals experiencing homelessness. The River should not be a magnet for more homeless. Please, no showers or phone chargers and limit restroom facilities at select access points at manned ranger stations.

-Facilities and Amenities: We have no restrooms along the length of our local Riverwalk. City parks only have one restroom building for a huge area, some have no facilities whatsoever. The Griffith Park has walks from .6 miles to 8.7 miles, and no accommodation

I101-4 cont.

for restrooms. Baldwin Park to Playa Trail averages less than one restroom for three miles. There are no shade structures because we plan to visit during good weather and not during the heat of the day.

Snack bars should not be installed in the river project. This is not Disneyland. I prefer community inclusion where the local area becomes improved due to access to the LA River. A good example is Frogtown where there are many local cafes. This feels much more community oriented and of greater benefit.
Platform park seems to be a good idea for the park starved areas, but should not include a museum or amphitheater.
Avoid motorized travel on the bike trails.
Avoid political and religious statements.
Grow trees, not build rest pavilions. Within 10 years, you will have a natural shade area.
Residential areas alongside the River need a buffer from recreational activities. We have a channel and all sounds bounce off the vertical channel on the o
Other side and bounce back. I object to any pavilions, shade/rest pavilions within 300 feet of any residential property or viewed from residential site lines.

Be good stewards of our environment, with the main emphasis on creating a respite from the City, not an extension of the City. The whole thing of the LA River is the experience. It's not about looking at it, it's about experiencing it—interacting with it. Miles of concrete and other distractions destroy the human spirit. Please restore areas of nature that Angelenos need to learn to engage with and understand that this will breathe life back into people's lives as a wonderful healing experience. You can save Los Angeles with nature, this intangible connection which is almost lost from our society.

Sincerely,
Katherine Kato

MORONS
WHAT!
IS
YOUR
OBJECTIVE
???

I102-1

nt Name
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URB. GURLY
P.O. Box 792
L.A., CA.

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BOSS LADY
MS. GRACE K.

From: Erin Judge
To: PW-LA River CEQA
Subject: 2020 LA River Master Plan PEIR Comments
Date: Tuesday, June 15, 2021 9:26:46 AM

CAUTION: External Email. Proceed Responsibly.

To all decision-makers:

I live in Palms (zip code 90034), and I care about birds having safe places to live, eat, and migrate in LA.

I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. 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.

I103-1

· 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 (G2) and Rio de Los Angeles State Park. This area has small fragmented 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; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.

I103-2

I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I 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 for your attention to these issues.

Thank you,
Erin Judge
Palms 90034

Oral Comments

DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

Public Hearing in the Matter of:)
)
Los Angeles River Master Plan PEIR.)
)

Transcript of proceedings

Los Angeles, California

Via Videoconferencing Equipment

Wednesday, March 3, 2021

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Reported by: EILEEN ELDRIDGE, Hearing Reporter

File No.: AF01206

DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

Public Hearing in the Matter of:)
)
Los Angeles River Master Plan PEIR.)
)

Transcript of Online Meeting Proceedings, beginning at 6:00 p.m. and ending at 9:00 p.m., on Wednesday, March 03, 2021, electronically using the Zoom Webinar platform, reported by Eileen Eldridge, Hearing Reporter.

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Reported by: EILEEN ELDRIDGE, Hearing Reporter

File No.: AF01206

APPEARANCES:

Public Speakers:
Jennifer Piggott
Genevieve Osmena
Grace Komjakraphan-Tek
Ariana Villanueva
Tanvi Lal
Anthea Raymond
Teresa Austin
Andrew Lewis
Jessica Prieto
Adele Slaughter
Laurie Hoffman
Brandon Contreras
Cindy Doris
Maggie Darett-Quiroz
Ellen Dixon
Zihua Zhao
Mary Gonnelli
Marcus Fox
Serena Steers
Tilly Hinton
Michael Cowley
Luke Ginger
Nina Beckhardt
Brian Bastien
Jamila Cervantes
Laurie Angel
Juan Ovalle
Naomi Zamazal
Gabriela Tovat
Corliss Lee
Renee Lawler
Connie Elliot
Ann Cantrell
Wendy Zimmerman
Karen Barnett
Jasmine Gozalez
Seymour Liao
Veronica Soto
Lena
Michael Berg
Scott Edwards
Marianne Bender
Aida Ashouri
Christina Rowe
Ramona Ballhaus
Mr. Keshav

Public Speakers (Continued):
Mr. Captain Obvious
Unidentified Speaker
Unidentified Speaker
Mr. Reki
Ms. Jessica

Los Angeles, California, Wednesday, March 3, 2021
6:00 p.m.

MS. PIGGOTT: WELCOME. THE TIME IS 6:00 PM LOCAL TIME AND WE WILL NOW START THE 2020 LA RIVER MASTER PLAN DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT OR PEIR ONLINE PUBLIC MEETING. THANK YOU EVERYONE FOR PARTICIPATING.

MY NAME IS JENNIFER PIGGOTT AND I WILL SERVE AS YOUR NEUTRAL FACILITATOR THIS EVENING. I AM WITH ICF WHO IS SUPPORTING LOS ANGELES COUNTY PUBLIC WORKS AS AN INDEPENDENT THIRD-PARTY CONTRACTOR.

THIS ONLINE PUBLIC MEETING IS BEING RECORDED AND TRANSCRIBED. COPIES OF THE PRESENTATIONS IN BOTH ENGLISH AND SPANISH WILL BE MADE AVAILABLE ON THE PROJECT WEBSITE.

IF YOU NEED ASSISTANCE WITH ZOOM DURING THE MEETING, YOU CAN USE THE CHAT FEATURE LOCATED AT THE BOTTOM OF YOUR SCREEN TO MESSAGE THE MEETING HOST. WE APPRECIATE YOUR PARTICIPATION IN THIS ONLINE PUBLIC MEETING. WE WOULD MUCH RATHER BE WITH YOU IN PERSON, BUT WITH THE CURRENT CONDITIONS, WE WANT TO PROVIDE ALL THE INFORMATION WE CAN WHILE PROTECTING EVERYONE'S HEALTH. WE ARE GOING TO CONDUCT THIS AS CLOSELY AS POSSIBLE TO A

TYPICAL IN PERSON PUBLIC MEETING.

PLEASE MAKE A NOTE OF THE PHONE NUMBER FOR THIS MEETING. THE PHONE NUMBER IS 877-853-5247; MEETING ID: 822 0933 9229; PASSWORD: 0782 9699. IF YOU EXPERIENCE DIFFICULTY WITH YOUR INTERNET CONNECTION AT ANY POINT DURING THIS MEETING, YOU CAN CALL THIS NUMBER TO LISTEN TO THE MEETING.

ADDITIONALLY, INDIVIDUAL INTERNET CONNECTIONS AND BANDWIDTHS MAY IMPACT YOUR VIEWING EXPERIENCE THIS EVENING. WE RECOMMEND CLOSING ALL APPS AND PROGRAMS AND LIMITING OTHER STREAMING OR DOWNLOADS DURING THIS MEETING.

FINALLY, WE ARE RUNNING THIS MEETING USING ZOOM WEBINAR, WHICH MUTES ALL PARTICIPANTS AND RESTRICTS VIDEO FEEDS. ONLY THE MEETING HOST CAN UNMUTE YOU.

FOR ANY MEDIA REPRESENTATIVES THAT JOINED THIS EVENING, PLEASE CONTACT STEVEN FRASHER, PUBLIC INFORMATION OFFICER, AT FRASHER@PW.LACOUNTY.GOV OR 626-458-3974.

WE WILL CONDUCT THE ONLINE PUBLIC MEETING IN TWO PARTS, FIRST, LA COUNTY PUBLIC WORKS WILL PROVIDE AN OVERVIEW OF THE LA RIVER MASTER PLAN, A DESCRIPTION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT OR CEQA, APPROACH AND PROJECT DESCRIPTION, A SUMMARY OF ISSUES ANALYZED, AND THE ALTERNATIVES CONSIDERED IN THE DRAFT

PEIR. THEN WE WILL HAVE A FACILITATED COMMENT SESSION WHERE INTERESTED PARTIES CAN PROVIDE ORAL COMMENTS FOR THE RECORD.

BEFORE WE BEGIN, I WOULD LIKE TO REVIEW SOME GROUND RULES FOR THIS EVENING'S ONLINE PUBLIC MEETING. AS PREVIOUSLY STATED, WE WILL PROVIDE A PRESENTATION AND THEN RECEIVE ORAL COMMENTS. WE WILL NOT HOST A QUESTION-AND-ANSWER SESSION DURING THE MEETING. ADDITIONALLY, PLEASE NOTE THAT COMMENTS OR QUESTIONS TYPED INTO THE CHAT FUNCTION DURING THE MEETING DO NOT CONSTITUTE OFFICIAL COMMENTS AND WILL NOT BE ANALYZED. PLEASE REMEMBER THE MEETING IS BEING RECORDED AND TRANSCRIBED, SO NO INAPPROPRIATE LANGUAGE.

PLEASE NOTE THAT A HIGH NUMBER OF REGISTRANTS REQUESTED TO PROVIDE ORAL COMMENTS AT TONIGHT'S MEETING AND THERE MAY NOT BE ENOUGH TIME TO HEAR FROM ALL REGISTERED SPEAKERS. COMMENTERS WILL BE CALLED ON IN THE ORDER IN WHICH THEY REGISTERED. WHILE WE DO NOT ANTICIPATE BEING ABLE TO HEAR FROM ADDITIONAL SPEAKERS THIS EVENING, IF YOU DID NOT PRE-REGISTER TO PROVIDE AN ORAL COMMENT AND WOULD LIKE TO DO SO, PLEASE SEND A CHAT MESSAGE TO THE MEETING HOST, RAISE YOUR HAND USING THE HAND RAISE ICON NEXT TO YOUR NAME OR, FOR CALL-IN ONLY USERS, PRESS STAR 9 TO RAISE YOUR HAND AND WE WILL ADD YOU TO THE SPEAKER LIST.

WE WILL RECEIVE AS MANY COMMENTS AS TIME ALLOWS. IF YOU ARE NOT CALLED ON TO PROVIDE AN ORAL COMMENT THIS EVENING, YOU MAY PROVIDE A COMMENT IN WRITING EITHER VIA EMAIL OR REGULAR MAIL. ALL COMMENTS ARE WEIGHTED EQUALLY, WHETHER RECEIVED ORALLY, ELECTRONICALLY OR IN WRITING.

WE WILL MAKE EVERY EFFORT TO RECEIVE AS MANY ORAL COMMENTS AS POSSIBLE DURING THIS EVENING'S MEETING AND WILL STAY ON THE LINE PAST THE SCHEDULED END TIME TO ALLOW FOR ADDITIONAL SPEAKERS.

WE APPRECIATE THE CHANCE TO SHARE PROJECT UPDATES AND THE ENVIRONMENTAL PROCESS WITH ALL OF YOU. WE WISH WE COULD BE TOGETHER IN PERSON, BUT WE ARE GLAD TO COME TOGETHER VIRTUALLY.

AGAIN, THE PURPOSE OF THIS ONLINE PUBLIC MEETING IS TO SHARE INFORMATION ABOUT THE DRAFT PEIR, PROVIDE INFORMATION ON HOW TO PROVIDE COMMENTS, AND TO RECEIVE ORAL COMMENTS.

NOW, I WOULD LIKE TO INTRODUCE GENEVIEVE OSMENA WITH THE LA COUNTY DEPARTMENT OF PUBLIC WORKS FOR SOME INTRODUCTORY REMARKS.

MS. KOMJAKRAPHAN-TEK: THANK YOU, GENEVEIVE. MY NAME IS GRACE KOMJAKRAPHAN-TEK, AND I THANK YOU ALL FOR JOINING US TONIGHT. COUNTY OF LOS ANGELES, THROUGH THE DEPARTMENT OF PUBLIC WORKS, IS THE LEAD AGENCY UNDER

CEQA FOR THE LA RIVER MASTER PLAN DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT, WHICH YOU'LL HEAR REFERRED TO AS THE DRAFT PROGRAM EIR OR PEIR. I AM THE PROJECT MANAGER WITH PUBLIC WORKS FOR THE CEQA REVIEW AND AM SUPPORTED BY ARIANA VILLANEUVA, DEPUTY PROJECT MANAGER AT PUBLIC WORKS, AND TANVI LAL, PROJECT MANAGER WITH OUR CONSULTING TEAM WITH ICF. AS SEEN ON THIS SLIDE AND MENTIONED BY JENNIFER, WE HAVE A LOT OF INFORMATION TO GO OVER, AND WE WANT TO MAKE SURE WE CAN MAXIMIZE OUR TIME AFTER THE PRESENTATION TO HEAR FROM AS MANY OF A YOU AS POSSIBLE. OUR NEXT SLIDE, PLEASE.

BEFORE WE JUMP INTO THE MEETING, IT'S IMPORTANT TO UNDERSTAND THE PURPOSE OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT OR CEQA. CEQA IS AN ENVIRONMENTAL LAW ADOPTED BY THE STATE IN 1970 AND APPLIES TO ALL STATE AND LOCAL AGENCIES WHO WILL HAVE DISCRETION APPROVAL FOR OUR PROJECT. THE PURPOSE OF CEQA IS TO DISCLOSE TO DECISION MAKERS AND THE PUBLIC ABOUT POTENTIAL SIGNIFICANT ENVIRONMENTAL IMPACTS OF A PROPOSED PROJECT TO ENSURE THE DECISION HAS CONSIDERED THE EFFECT ON THE ENVIRONMENT, TO ENCOURAGE AND FACILITATE PUBLIC PARTICIPATION WHICH IS AN ESSENTIAL COMPONENT OF THE CEQA PROCESS, AND TO IDENTIFY AND INCORPORATE FEASIBLE MEANS TO REDUCE ANY IDENTIFIED POTENTIAL SIGNIFICANT ENVIRONMENTAL IMPACTS. PUBLIC

AGENCIES ARE REQUIRED TO EVALUATE POTENTIAL IMPACTS AND DIFFERENT ENVIRONMENTAL ISSUE AREAS SUCH AS AIR QUALITY OR BIOLOGICAL RESOURCES AND TO PREPARE A CEQA COMPLIANCE DOCUMENT SUCH AS AN EIR. NEXT SLIDE PLEASE.

AS JENNIFER MENTIONED, THE PURPOSE OF THE MEETING TONIGHT IS TO DISCUSS INFORMATION FROM THE DRAFT PEIR PREPARED FOR THE LA RIVER MASTER PLAN AS PART OF THE CEQA PARTICIPATION PROCESS. THE DRAFT PEIR WAS RELEASED FOR PUBLIC REVIEW ON FEBRUARY 1ST WHICH KICKED OFF THE 45-DAY PUBLIC REVIEW PERIOD. WE PROVIDED A NOTICE OF COMPLETION AND A NOTICE OF AVAILABILITY TO GATHER INPUT FROM INTERESTED PARTIES AND AGENCIES ON THE CONTENT OF THIS DRAFT PEIR. COMMENTS CAN BE SUBMITTED IN WRITING VIA MAIL OR E-MAIL TO THE ADDRESSES THAT WE'LL SHOW ON THE SCREEN AT THE END. AND WE'LL ALSO BE ACCEPTING ORAL COMMENTS AFTER OUR PRESENTATION. NEXT SLIDE, PLEASE.

THE LA RIVER MASTER PLAN PROCESS STARTED IN 2018 TO UPDATE THE 1996 LA RIVER MASTER PLAN AND CONSISTED OF INTENSIVE STAKEHOLDER COLLABORATIONS WITH A STEERING COMMITTEE AND SUBCOMMITTEES, COMMUNITY MEETINGS, COMMUNITY EVENTS HOSTED IN PARTNERSHIP WITH COMMUNITY BASED ORGANIZATIONS, A YOUTH SUMMIT, AND TELEPHONE TOWN HALLS.

A GOAL DRIVEN FRAMEWORK WAS ESTABLISHED AS A

FOUNDATION FOR THE LA RIVER MASTER PLAN THROUGH THE COMMUNITY ENGAGEMENT PROCESS AND A REQUEST DATA DRIVEN ANALYSIS OF EXISTING CONDITIONS TO ESTABLISH THE COMMUNITY NEEDS. THIS GOAL DRIVEN FRAMEWORK ALSO FORMED THE MASTER PLAN'S NINE GOALS FOR STRATEGIC FIRM, FOUR OBJECTIVES AS STRATEGIC DIRECTIONS FOR FUTURE LA RIVER RELATED IMPROVEMENTS AND INITIATIVES AND DESIGN CONSIDERATIONS IN THE MASTER PLAN. THE DESIGN FRAMEWORK INCLUDES POTENTIAL OPPORTUNITIES SITES, A MENU OF PROJECT ELEMENTS CALLED A KIT OF PARTS, AND UNIVERSAL DESIGN FEATURES CALLED COMMON ELEMENTS TO CREATE A UNIFIED IDENTITY ACROSS THE LA RIVER.

AS JENNY MENTIONED, THE DRAFT LA RIVER MASTER PLAN WAS RELEASED FOR A 60-DAY PUBLIC REVIEW ON JANUARY 13TH AND FOR DETAILS ON THE MASTER PLAN, PLEASE VISIT THE LARIVERMASTERPLAN.ORG WEBSITE. NEXT SLIDE, PLEASE.

THE CEQA APPROACH FOR THE LA RIVER MASTER PLAN IS A PROGRAM EIR. A PROGRAM EIR IS A TYPE OF CEQA DOCUMENT THAT CAN BE PREPARED ON A SERIES OF ACTIONS THAT CAN BE CHARACTERIZED AS ONE LARGE PROJECT GEOGRAPHICALLY RELATED. THEREFORE, A PEIR WAS DETERMINED TO BE THE APPROPRIATE CEQA DOCUMENT SINCE THE LA RIVER MASTER PLAN WILL CONSIDER LATER ACTIVITIES GEOGRAPHICALLY RELATED TO THE LA RIVER.

SINCE THERE ARE NO SITE SPECIFIC OR PROJECT

SPECIFIC DETAILS PROPOSED IN THE LA RIVER MASTER PLAN, THIS PROGRAM EIR PROVIDES AN INITIAL HIGH LEVEL CEQA CLEARANCE AND ALL LATER ACTIVITIES FROM THE MASTER PLAN WILL BE EXAMINED IN LIGHT OF THIS PEIR TO DETERMINE THE LEVEL OF SUBSEQUENT CEQA REQUIRED. AS SEEN ON THE MAP ON THIS SIDE, THE STUDY AREA FOR THE PROGRAM EIR CONSISTS OF THE 51-MILE LA RIVER LENGTH AND 1-MILE AREA ON EACH SIDE OF THE RIVER. THIS SPANS ACROSS 17 CITIES AND UNINCORPORATED LA COUNTY. TO BE CONSISTENT WITH THE LA RIVER MASTER PLAN AND FOR PURPOSES OF ORGANIZATION, THE STUDY AREA IS ORGANIZED INTO NINE FRAMES WITH MULTIPLE JURISDICTIONS IN A FRAME IN SOME CASES. NEXT SLIDE, PLEASE.

THE PURPOSE OF THIS EIR AS A SELECTED CEQA DOCUMENT TYPE IS TO IDENTIFY POTENTIAL SIGNIFICANT IMPACTS TO THE ENVIRONMENT, IDENTIFY FEASIBLE MEASURES TO MITIGATE THESE SIGNIFICANT EFFECTS, AND TO IDENTIFY REASONABLE ALTERNATIVES THAT CAN AVOID OR MINIMIZE THE PROPOSED PROJECTS SIGNIFICANT EFFECTS. THIS PROGRAM EIR AND THE LA RIVER MASTER PLAN WILL BE PRESENTED TO THE BOARD OF SUPERVISORS TO CONSIDER FOR ADOPTION IN ANY OF THE OTHER 17 JURISDICTIONS WITHIN THE PLANNED STUDY AREA CAN AND WILL BE ENCOURAGED TO CONSIDER ADOPTING THE PROGRAM EIR AND LA RIVER MASTER PLAN FOR USE ON LATER ACTIVITIES. NEXT SLIDE, PLEASE.

THROUGH THE PLANNING PROCESS A VISION FOR A REIMAGINED RIVER WAS DEVELOPED WITH NINE OBJECTIVES AS A STRATEGIC DIRECTION FOR FUTURE RIVER RELATED IMPROVEMENTS AND INITIATIVES. EACH OBJECTIVE WAS DEVELOPED THROUGH A COMMUNITY AND DATABASE NEEDS ANALYSIS AS AN INACTIVE PRIORITY FOR THE FUTURE OF THE RIVER AND IS EXPLAINED BY A RATIONALE THAT WEAVES TOGETHER TECHNICAL ANALYSIS AND COMMUNITY INPUT.

THE NINE OBJECTIVES ARE TO, ONE, IMPROVE FLOOD RISKS AND IMPROVE RESILIENCY, TWO, PROVIDE EQUITABLE, INCLUSIVE, AND SAFE PARKS; OPEN SPACE AND TRAILS, THREE, SUPPORT HEALTHY CONNECTED ECOSYSTEMS, FOUR, ENHANCE OPPORTUNITIES FOR EQUITABLE ACCESS TO THE RIVER CORRIDOR, FIVE, EMBRACE AND ENHANCE OPPORTUNITIES FOR ARTS AND CULTURE, SIX, ADDRESS POTENTIAL ADVERSE IMPACTS TO HOUSING AFFORDABILITY AND PEOPLE EXPERIENCING HOMELESSNESS, SEVEN, FOSTER OPPORTUNITIES FOR CONTINUED COMMUNITY ENGAGEMENT DEVELOPMENT AND EDUCATION, EIGHT, IMPROVE LOCAL WATER SUPPLY RELIABILITY, AND, NINE, TO PROMOTE HEALTHY, SAFE, CLEAN WATER.

THE REALIZATION OF THESE GOALS IS GOING TO REQUIRE COLLABORATION BETWEEN NUMEROUS LA COUNTY DEPARTMENTS AND BETWEEN THE COUNTY WITH EXTERNAL PUBLIC, PRIVATE, AND INSTITUTIONAL PARTNERS.

NOW I'LL HAND IT OVER TO ARIANA WHO WILL GO

INTO DETAILS ABOUT THE CEQA PROPOSED PROJECT.

MS. VILLANUEVA: THANK YOU, GRACE. THE PROPOSED PROJECT, UNDER CEQA, ANALYZED A BY THE PEIR IS A 2020 LA RIVER MASTER PLAN. FOR PURPOSES OF ENVIRONMENTAL ANALYSIS, ELEMENTS OF THE PROPOSED PROJECT ARE ORGANIZED AS TWO TYPICAL PROJECTS AND SIX KIT OF PARTS THAT TOGETHER COMPRISE THE OVERALL LA RIVER MASTER PLAN WHEN IMPLEMENTED AT A CERTAIN CADENCE ALONG THE RIVER.

IT'S ANTICIPATED THAT APPROXIMATELY 107 PROJECTS WOULD BE IMPLEMENTED UNDER THE MASTER PLAN OVER THE 25-YEAR HORIZON PERIOD OF THE PLAN. THESE PROJECTS WOULD BE INFORMED BY THE TYPICAL PROJECTS IN KIT OF PARTS IN A MANNER THAT WOULD BE DRIVEN BY THE NEEDS OF THE SPECIFIC SITE AND DECISION OF THE COMMUNITY WITH A SUBSEQUENT PROJECT OR LATER ACTIVITY WOULD BE LOCATED. ORGANIZING THE MASTER PLAN ELEMENTS IN THE PEIR IN THIS WAY FACILITATES THE ANALYSIS AND DISCLOSURE OF POTENTIAL IMPACTS AT A PROGRAM LEVEL IN THE ABSENCE OF SITE SPECIFIC OR PROJECT SPECIFIC INFORMATION AT THIS TIME. NEXT SLIDE, PLEASE.

I'LL GO OVER THE PEIR ANALYSIS OF THE TWO TYPICAL PROJECTS WHICH ASSUMES THAT THESE PROJECTS WOULD BE LOCATED BETWEEN THE AREA OUTSIDE OF THE TOP OF THE LA RIVER BANK AND WITHIN THE FENCE LINE OF EACH SIDE OF

THE RIVER. CONSTRUCTION AND OPERATIONS IMPACTS FROM THE IMPLEMENTATION OF THESE TYPICAL PROJECTS WERE ANALYZED BASED ON REASONABLE CONSTRUCTION AND OPERATIONS SCENARIO ASSUMPTIONS IDENTIFIED BY PUBLIC WORKS. THIS IS FOR ANY SITE WITHIN THE STUDY AREA WHICH INCLUDES THE 17 JURISDICTIONS AND UNINCORPORATED LA COUNTY. NEXT SLIDE, PLEASE.

THIS SLIDE SHOWS THE COMMON ELEMENTS TYPICAL PROJECT. THE COMMON ELEMENTS TYPICAL PROJECT COULD BE UP TO THREE ACRES OR ONE MILE IN SIZE AND COULD INCLUDE ANY COMBINATION OR ALL OF THE ELEMENTS SHOWN IN THE FIGURE, SUCH AS, BENCHES, KIT PAVILIONS, OR PLANTING. THE NEED FOR COMMON ELEMENTS WOULD BE DETERMINED BY SPACING AT SAID INTERVALS ALONG THE RIVER AND WOULD PROVIDE SAFETY, COMFORT, AND WAY FINDING. THEY WOULD BE USED AS REQUIRED BY PROJECTS UNDER THE LA RIVER MASTER PLAN TO ADDRESS THE OVERALL CADENCE OF AMENITIES. NEXT SLIDE, PLEASE.

NOW I'LL TALK ABOUT THE MULTI USE TRAILS AND ACCESS GATEWAYS TYPICAL PROJECT. THE LA RIVER MASTER PLAN AIMS TO CONNECT TO OTHER TRAILS AND PATHS ALONG THE LENGTH OF THE RIVER TO CREATE A MOBILITY NETWORK ACROSS LOS ANGELES COUNTY AND INTENDS TO ACCOMMODATE AS MANY USER TYPES AS SAFELY POSSIBLE. A MULTI USE TRAILS AND ACCESS GATEWAYS TYPICAL PROJECT WOULD INCLUDE A

CONTINUOUS PATH FOR MULTIPLE USES, SUCH AS, BIKE PATHS, EQUESTRIAN TRAILS, AND PEDESTRIAN TRAILS ALONG WITH EASY TO FIND AND WELCOMING ACCESS GATEWAYS, SUCH AS, ANNOUNCED ENTRIES TO THE LA RIVER AND ITS ASSOCIATED PARKS, TRAILS, AND GREEN WAYS.

THE FIGURES ON THIS SLIDE ARE EXAMPLES OF MULTI USE TRAILS AND ACCESS GATEWAYS ENVISIONED ALONG DIFFERENT TYPES OF CROSS-SECTIONS OF THE LA RIVER. NEXT SLIDE, PLEASE.

THE GRAPHIC ON THIS SLIDE SHOWS A CROSS-SECTION OF A MULTI USE TRAIL THAT SAFELY ACCOMMODATES A BIKE PATH, EQUESTRIAN TRAIL, AND PEDESTRIAN TRAIL. THE MULTI USE TRAILS AND ACCESS GATEWAYS TYPICAL PROJECT, AS ANALYZED IN THE PEIR, WOULD BE APPROXIMATELY 42 FEET WIDE AND COMPRISED OF A SIX-FOOT PEDESTRIAN TRAIL WITH TWO-FOOT WIDE BUFFERS ON EITHER SIDE, AN EIGHT-FOOT WIDE TWO-WAY BIKE PATH WITH A TWO-FOOT BUFFER, AND AN EIGHT-FOOT VEGETATIVE BUFFER, AND A TWELVE-FOOT EQUESTRIAN TRAIL.

THE LENGTH OF THE MULTIUSE TRAILS AND ACCESS GATEWAYS TYPICAL PROJECT WOULD BE APPROXIMATELY FIVE MILES. NEXT SLIDE, PLEASE.

THE SIX KIT OF PARTS OF THE LA RIVER MASTER PLAN ARE SHOWN ON THIS SLIDE. THE KIT OF PARTS ARE A SET OF TOOLS IN THE TOOLBOX AVAILABLE TO ADDRESS VIA

COMMUNITY NEEDS. THESE DESIGN STRATEGIES HAVE BEEN CATEGORIZED INTO SIX INFRASTRUCTURE AND URBAN RIVER TYPOLOGIES, WHICH INCLUDE TRAILS AND ACCESS GATEWAYS, CHANNEL MODIFICATIONS, CROSSINGS AND PLATFORMS, DIVERSIONS, FLOOD PLAIN RECLAMATION, AND OFF CHANNEL LAND OFFSETS.

THE SPECIFIC LOCATION AND DESIGN FOR THESE KIT OF PARTS AND THEIR DESIGN COMPONENTS HAVE NOT YET BEEN DETERMINED AND WOULD DEPEND ON A NUMBER OF FACTORS INCLUDING FURTHER COMMUNITY ENGAGEMENT, PROJECT PROPONENT DIRECTION, AND AVAILABILITY OF FUNDING. ACCORDINGLY, POTENTIAL IMPACTS OF THESE KIT OF PARTS WERE ANALYZED QUALITATIVELY AND AT A HIGH LEVEL IN THE PEIR. SIMILAR TO THE TYPICAL PROJECTS, THERE IS NO SITE SPECIFIC OR PROJECT SPECIFIC ANALYSIS OF THESE KIT OF PARTS IN THE PEIR, AND SUBSEQUENT PROJECTS OR LATER ACTIVITIES FROM THE KIT OF PARTS COULD HAVE ADDITIONAL ANALYSIS. NEXT SLIDE, PLEASE.

WITHIN EACH OF THE SIX KIT OF PARTS CATEGORIES, ARE A MENU OF OPTIONS THAT CAN BE INCORPORATED IN A PROJECT DESIGN, SUCH AS, BIKER/EQUESTRIAN TRAILS FROM THE TRAILS AND ACCESS GATEWAYS KIT OF PARTS. HOWEVER, A PROJECT ISN'T LIMITED TO USING EVERYTHING IN ONE LIST SINCE THE KIT OF PARTS IS MEANT TO BE USED IN COMBINATION TO MEET THE COMMUNITY NEEDS. THE COMMON

ELEMENTS COULD BE COMBINED TO THE KIT OF PARTS, WHICH WE DESCRIBED EARLIER IN THE COMMON ELEMENTS TYPICAL PROJECT, AND THAT CAN INCLUDE ELEMENTS, SUCH AS, BENCHES AND SHADE PAVILIONS THAT CAN BE INCORPORATED INTO A PROJECT TO BRING CONSISTENCY AND AMENITIES AND WAY FINDING ALONG THE RIVER. NEXT SLIDE, PLEASE.

THE PEIR ASSUMES THAT THE LA RIVER MASTER PLAN WILL BE IMPLEMENTED CONSISTENT WITH DESIGN GUIDELINES AS REQUIRED. THE DESIGN GUIDELINES ARE AN UPDATE TO EARLIER LANDSCAPE SIGN AND MAINTENANCE GUIDELINES AND ARE A FRAMEWORK TO SUPPORT THE DESIGN AND TECHNICAL SOLUTIONS FOR SUBSEQUENT PROJECTS OR LATER ACTIVITIES UNDER THE MASTER PLAN.

THE DESIGN GUIDELINES ARE ORGANIZED INTO FOUR CHAPTERS: ACCESS AND MOBILITY, ENVIRONMENTAL GRAPHICS, ECOLOGY HABITAT AND PLANTING, AND FACILITIES AND AMENITIES, AND HAVE BEEN ORGANIZED THROUGH THE NINE PLANNING FRAMES TO ADDRESS THE NEED FOR SITE SPECIFIC APPROACHES. SOME EXAMPLES OF THE DESIGN GUIDELINES INCLUDE ENERGY AND WATER CONSERVATION, MINIMUM DISTANCES FOR SETBACKS AND CLEARANCES, AND MONITORING AND MAINTENANCE PROGRAMS. THE DESIGN GUIDELINES PROMOTE A CONSISTENT APPROACH AND PROMOTE BEST PRACTICES AND RESILIENCY WITH THREE SPECIFIC NEEDS WITHIN THE GREATER WHOLE, AND ARE ALSO INTENDED TO PROVIDE THE FLEXIBILITY

TO REFLECT THE NEEDS AND EXPRESSIONS OF THE ADJACENT COMMUNITIES IN A DIVERSE IDENTITIES OF LOS ANGELES COUNTY.

NOW I'LL PASS IT OVER TO TANVI TO GO OVER THE PEIR ANALYSIS.

MS. LAL: GREAT. THANK YOU, ARIANA. AND GOOD EVENING, EVERYONE. BEFORE WE DIVE INTO A SUMMARY OF THE DRAFT PROGRAM PEIR IMPACTS ANALYSES, TO SET THE STAGE AND PROVIDE SOME CONTEXT, HERE IS THE DEFINITION OF SIGNIFICANT EFFECTS FROM THE STATED CEQA GUIDELINES, AS STATED IN THE GUIDELINES, A SIGNIFICANT EFFECT ON THE ENVIRONMENT MEANS A SUBSTANTIAL OR POTENTIALLY SUBSTANTIAL ADVERSE CHANGE IN ANY OF THE PHYSICAL CONDITIONS WITHIN THE AREA AFFECTED BY THE PROJECT INCLUDING LAND, AIR, WATER, MINERALS, FLORA, FAUNA, AMBIENT NOISE, AND OBJECTS OF HISTORIC OR ESTHETIC SIGNIFICANCE. ECONOMIC OR SOCIAL CHANGE BY ITSELF SHALL NOT BE CONSIDERED A SIGNIFICANT EFFECT ON THE ENVIRONMENT.

IN ACCORDANCE WITH THE STATE CEQA GUIDELINES, APPENDIX G CHECKLIST FORM, THE DRAFT PEIR ANALYZED POTENTIAL IMPACTS ON THE FOLLOWING 19 ENVIRONMENTAL RESOURCES: RANGING FROM ESTHETICS, AIR QUALITY, BIOLOGICAL RESOURCES, ALL THE WAY TO TRIBAL/CULTURAL RESOURCES, UTILITIES AND SERVICE SYSTEMS, AND WILDFIRE.

THE CUMULATIVE IMPACTS ANALYSIS FOR EACH OF THESE ENVIRONMENTAL RESOURCES WAS CONDUCTED USING A PROJECTIONS APPROACH AND IS PRESENTED IN THE RESPECTIVE TECHNICAL SECTIONS IN THE DRAFT PROGRAM EIR.

IN ADDITION, THE PROGRAM EIR PRESENTS IDENTIFIED AND ANALYZED IMPACTS FROM ALTERNATIVES TO THE 2020 LA RIVER MASTER PLAN.

AND LASTLY, OTHER CEQA ANALYSES, SUCH AS, IRREVERSIBLE ENVIRONMENTAL CHANGE AND GROWTH ADJACENT IMPACTS ARE ALSO INCLUDED IN THE PEIR. NEXT SLIDE.

BEFORE WE PRESENT THE SUMMARY OF THE IMPACTS ANALYSIS CONDUCTED IN THE PROGRAM EIR THIS SLIDE PRESENTS A QUICK GUIDE TO THE APPROACH TAKEN FOR THE IMPACTS ANALYSIS IN THE PROGRAM EIR AND THE COUNTY AND NONCOUNTY DUAL IMPACTS DETERMINATIONS PRESENTED THROUGHOUT THE DOCUMENT.

FIRST OFF, AN IMPACT ON AN ENVIRONMENTAL RESOURCE CAN FALL INTO ONE OF THE FOUR CATEGORIES LISTED ON THE LEFT SIDE OF THIS SLIDE. NO IMPACT, LESS THAN SIGNIFICANT IMPACT, LESS THAN SIGNIFICANT IMPACT WITH MITIGATION, OR SIGNIFICANT AND UNAVOIDABLE IMPACT. THE ANALYSIS IN THE PEIR INCLUDES IMPACTS DETERMINATIONS UNDER CEQA FOR THE 2020 LA RIVER MASTER PLAN THAT ARE APPLICABLE TO ALL 18 JURISDICTIONS IN THE STUDY AREA.

THIS INCLUDES THE COUNTY AND THE 17 NONCOUNTY

JURISDICTIONS, THAT IS THE 17 CITIES. EXCEPT FOR SIGNIFICANT AND UNAVOIDABLE IMPACTS, ALL IDENTIFIED SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED 2020 LA RIVER MASTER PLAN CAN BE AVOIDED OR REDUCED TO A LESS THAN SIGNIFICANT LEVEL IF THE MITIGATION MEASURES THAT HAVE BEEN IDENTIFIED IN THE EIR ARE IMPLEMENTED. THESE MITIGATION MEASURES WILL BE IMPLEMENTED FOR SUBSEQUENT PROJECTS, UNDER THE MASTER PLAN, THAT ARE CARRIED OUT BY THE COUNTY.

HOWEVER, BECAUSE THIS IS A COUNTY-WIDE MASTER PLAN AND THERE ARE ALSO 17 CITIES IN THE STUDY AREA, SOME OF THE SUBSEQUENT PROJECTS, UNDER THE MASTER PLAN, WOULD NOT BE CARRIED OUT BY THE COUNTY BUT RATHER BY ONE OF THESE 17 CITIES.

THUS THE COUNTY CANNOT ENFORCE OR GUARANTEE THAT THE MITIGATION MEASURES PRESENTED IN THE PROGRAM EIR WILL BE IMPLEMENTED.

THEREFORE, WHERE THE PROGRAM EIR CONCLUDES A LESS THAN SIGNIFICANT IMPACT WITH MITIGATION, THE SUBSEQUENT PROJECTS CARRIED OUT BY THE COUNTY, THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE WHEN THESE ACTIVITIES ARE NOT CARRIED OUT BY THE COUNTY. THUS, AS YOU CAN SEE IN THE TABLE ON THE RIGHT SIDE OF THIS SLIDE, WHEN IT COMES TO NO IMPACT OR LESS THAN SIGNIFICANT IMPACT, BECAUSE MITIGATION DOES NOT COME

INTO PLAY, THE IMPACT DETERMINATION REMAINS THE SAME WHETHER SUBSEQUENT PROJECTS ARE CARRIED OUT BY THE COUNTY OR ARE NOT CARRIED OUT BY THE COUNTY.

FOR LESS THAN SIGNIFICANT IMPACTS WITH MITIGATION, THE SUBSEQUENT PROJECTS CARRIED OUT BY THE COUNTY, THE IMPACT IS IDENTIFIED AS SIGNIFICANT AND UNAVOIDABLE WHEN THESE SUBSEQUENT PROJECTS ARE NOT CARRIED OUT BY THE COUNTY AS THE COUNTY CANNOT ENFORCE OR GUARANTEE THAT THE MITIGATION MEASURES WILL BE IMPLEMENTED.

LASTLY, IMPACTS THAT ARE SIGNIFICANT AND UNAVOIDABLE FOR SUBSEQUENT PROJECTS CARRIED OUT BY THE COUNTY, THEY REMAIN THE SAME WHEN THESE ARE NOT CARRIED OUT BY THE COUNTY BECAUSE, DESPITE THE IMPLEMENTATIONS OF THESE MITIGATION MEASURES, THE IMPACT WOULD REMAIN SIGNIFICANT AND UNAVOIDABLE.

THIS SLIDE HERE PRESENTS THE 16 ENVIRONMENTAL RESOURCES WHICH HAVE BEEN DETERMINED TO HAVE NO IMPACTS OR LESS THAN SIGNIFICANT IMPACTS REGARDLESS OF WHETHER SUBSEQUENT PROJECTS ARE CARRIED OUT BY THE COUNTY OR ARE NOT CARRIED OUT BY THE COUNTY.

NOTE THAT FOR EACH ENVIRONMENTAL RESOURCE, THERE ARE MULTIPLE CEQA CHECKLIST QUESTIONS OR CEQA CRITERIA TO GUIDE THE IMPACTS ANALYSIS. THUS WHILE ONE OR MORE CRITERION HAS BEEN DETERMINED TO NO IMPACT OR A

LESS THAN SIGNIFICANT IMPACT FOR A GIVEN ENVIRONMENTAL RESOURCE, OTHER CRITERIA UNDER THE SAME RESOURCE COULD HAVE LESS THAN SIGNIFICANT IMPACTS WITH MITIGATION OR SIGNIFICANT AND UNAVOIDABLE IMPACTS. THESE DETAILS ARE PRESENTED IN THE EXECUTIVE SUMMARY AND CHAPTER 3 OF THE PROGRAM EIR FOR ALL THE ENVIRONMENTAL RESOURCES.

THIS SLIDE HERE PRESENTS THE 13 ENVIRONMENTAL RESOURCES WHICH HAVE BEEN DETERMINED TO HAVE A LESS THAN SIGNIFICANT IMPACT WITH MITIGATION WHEN SUBSEQUENT PROJECTS ARE CARRIED OUT BY THE COUNTY AND SIGNIFICANT AND UNAVOIDABLE IMPACTS WHEN THESE SUBSEQUENT PROJECTS ARE NOT CARRIED OUT BY THE COUNTY.

THIS SLIDE PRESENTS THE 11 ENVIRONMENTAL RESOURCES WHICH HAVE BEEN DETERMINED TO HAVE SIGNIFICANT AND UNAVOIDABLE IMPACTS UNDER THE 2020 LA RIVER MASTER PLAN REGARDLESS OF WHETHER SUBSEQUENT PROJECT ARE CARRIED OUT BY THE COUNTY OR NOT CARRIED OUT BY THE COUNTY.

NOW, WE MOVE ON TO THE ALTERNATIVES. SEVERAL ALTERNATIVES WERE CONSIDERED AS PART OF THE SCREENING ANALYSIS IN THE PROGRAM EIR. THEY WERE INFORMED BY COMMENTS THAT WERE RECEIVED DURING THE EXTENSIVE OUTREACH AND SCOPING PROCESS CONDUCTED BY THE COUNTY FOR THE 2020 LA RIVER MASTER PLAN AS WELL AS OTHERS THAT WERE SUGGESTED DURING THE LA RIVER MASTER PLAN PLANNING

PROCESS.

OF ALL THE ALTERNATIVES CONSIDERED, BASED ON THE SCREENING ANALYSIS CONDUCTED, WHICH WAS DRIVEN BY WHICH ALTERNATIVE MET MOST OF THE PROJECT OBJECTIVES AND AVOIDED OR MINIMIZED SIGNIFICANT IMPACTS FROM THE PROJECT, TWO ALTERNATIVES WERE SELECTED THROUGH DETAILED CONSIDERATION IN THE PROGRAM EIR. ALTERNATIVE A, WHICH IS THE NO PROJECT ALTERNATIVE, THIS IS ESSENTIALLY CONTINUED IMPROVEMENTS IN ACCORDANCE WITH THE 1996 LA RIVER MASTER PLAN ALONG THE LA RIVER. AND ALTERNATIVE B WHICH IS A CHANNEL AVOIDANCE ALTERNATIVE UNDER WHICH NO CHANNEL MODIFICATIONS WOULD OCCUR AND NO IMPROVEMENTS WOULD OCCUR WITHIN BANK TO BANK OF THE LA RIVER.

LASTLY, IN ACCORDANCE WITH CEQA GUIDELINES, AN ENVIRONMENTALLY SUPERIOR ALTERNATIVE WAS IDENTIFIED AMONGST THE ALTERNATIVES CONSIDERED. NOTE THAT THIS WAS NOT BETWEEN THE ALTERNATIVES AND THE PROJECT. AND THIS WAS IDENTIFIED AS ALTERNATIVE B, THE CHANNEL AVOIDANCE ALTERNATIVE.

WITH THAT, I'M GOING TO PASS IT BACK TO GRACE TO DISCUSS THE ENVIRONMENTAL MILESTONES.

MS. KOMJAKRAPHAN-TEK: THANK YOU, TANVI.

ON THIS SLIDE WE HAVE THE ENVIRONMENTAL VIA MILESTONES FOR THE 2020 LA RIVER MASTER PLAN CEQA

PROCESS HIGHLIGHTED. THE NOP AND SCOPING PERIOD WERE COMPLETED IN SUMMER OF 2020. IN MAY 2020, COUNTY OF LAS ANGELES INITIATED THE AB52 TRIBAL CONSULTATIONS AND WE CONCLUDED THE CONSULTATIONS IN JANUARY OF THIS YEAR. WE ARE CURRENTLY IN THE DRAFT PEIR PUBLIC REVIEW PROCESS, AND BASED ON COMMENTS THAT WE'VE RECEIVED, THE 45-DAY PUBLIC COMMENT PERIOD FOR THIS PROGRAM EIR HAS BEEN EXTENDED TO 60 DAYS. THE NEW DATE TO SUBMIT YOUR DRAFT PEIR COMMENTS IS BY APRIL 2, 2021, AND NOTICES ABOUT THE CEQA EXTENSION WILL BE SHARED TOMORROW. THE FINAL PEIR WILL BE PREPARED AFTER THE DRAFT PEIR PUBLIC REVIEW PERIOD HAS ENDED AND WE ANTICIPATE THE FINAL PEIR AND NOTICE OF DETERMINATION BEING ADOPTED IN EARLY FALL OF THIS YEAR. NEXT SLIDE, PLEASE.

LADIES AND GENTLEMEN, THAT CONCLUDES OUR PRESENTATION THIS EVENING. WE ARE EXCITED TO HEAR FROM YOU, BUT AS JENNIFER MENTIONED AT THE BEGINNING OF THE MEETING, WE RECEIVED A HIGH VOLUME OF PEOPLE REQUESTING TO PROVIDE ORAL COMMENTS THIS EVENING. WE WILL STAY ON LINE UNTIL 9:00 P.M. TO ALLOW US TO HEAR FROM AS MANY COMMENTERS AS POSSIBLE, BUT THERE MAY NOT BE ENOUGH TIME TO HEAR FROM ALL REGISTERED SPEAKERS. COMMENTS CAN STILL BE SUBMITTED IN WRITING AND ALL COMMENTS ARE WEIGHTED EQUALLY WHETHER SHARED TONIGHT OR SENT IN AN E-MAIL OR LETTER. IF YOU ARE SPEAKING TONIGHT, WE

APPRECIATE YOUR ASSISTANCE IN ADHERING TO THE TWO-MINUTE TIME LIMIT AND GROUND RULES SO WE CAN ALLOW AS MANY PEOPLE TO SPEAK AS POSSIBLE. I WILL NOW TURN IT BACK OVER TO JENNIFER.

MS. PIGGOTT: THANK YOU, GRACE.

WE HAVE NOW REACHED THE SECOND PART OF THE ONLINE PUBLIC MEETING, A FACILITATED COMMENT SESSION. AS A REMINDER EACH COMMENTER WILL HAVE TWO MINUTES TO MAKE THEIR COMMENTS. DUE TO THE HIGH VOLUME OF REGISTERED COMMENTERS, WE WILL BE STRICTLY ENFORCING THE TIME LIMIT TONIGHT. THANK YOU FOR YOUR UNDERSTANDING. TO ASSIST WITH THE TIME RESTRICTIONS, WE'RE SHOWING A TIMER ON THE SCREEN, AND I WILL LET YOU KNOW WHEN YOU HAVE 30 SECONDS REMAINING. AT THE START OF YOUR COMMENT, PLEASE STATE YOUR FULL NAME FOR THE RECORD.

LADIES AND GENTLEMEN, OUR FIRST SPEAKER THIS EVENING IS ANTHEA RAYMOND.

ANTHEA, I'M GOING TO ASK YOU TO UNMUTE.

MS. RAYMOND: GREAT. I WASN'T EXPECTING TO TALK, BUT THANK YOU FOR THE OPPORTUNITY. I APPRECIATE ALL THE HARD WORK YOU'VE DONE AND I KNOW IT'S A VERY COMPLICATED PROCESS AND I WOULD ENCOURAGE EVERYONE ON THIS CALL TO PAY ATTENTION TO THE VARIOUS LEVELS OF SCRUTINY THAT ARE BUILT IN TO THE PROGRAM THAT THEY HAVE JUST OUTLINED. I THINK IT'S A VERY THOUGHTFUL EFFORT.

OC1-1

OC1-1 cont.

OBVIOUSLY, NO ONE IS GOING TO EXACTLY AGREE ON EVERYTHING, BUT I THINK IT'S A VERY HEROIC EFFORT IN BRINGING TOGETHER A LOT OF INFORMATION AND A LOT OF PEOPLE'S IDEAS. THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENT. OUR NEXT SPEAKER THIS EVENING IS MELANIE WINTER. I'M NOT SEEING MS. WINTER ON THE ZOOM THIS EVENING. IF YOU ARE A CALL-IN-ONLY USER, PLEASE PRESS STAR NINE TO RAISE YOUR HAND.

OKAY. OUR NEXT SPEAKER IS STEPHEN SUTTON. I'M ALSO NOT SEEING MR. SUTTON ON THE ZOOM THIS EVENING. MR. SUTTON, IF YOU ARE A CALL-IN USER, PLEASE PRESS STAR NINE TO RAISE YOUR HAND.

OUR NEXT SPEAKER IS CINDY ORTIZ. I'M ALSO NOT SEEING CINDY ORTIZ ON THE LINE THIS EVENING. CINDY, IF YOU ARE ON THE LINE, PLEASE RAISE YOUR HAND OR PRESS STAR NINE IF YOU ARE A CALL-IN-ONLY USER THIS EVENING.

OUR NEXT SPEAKER IS RUDY PEREZ. MR. PEREZ, I'M ALSO NOT SEEING YOU ON THE ZOOM THIS EVENING. IF YOU A CALL-IN-ONLY USER, PLEASE PRESS STAR NINE TO RAISE YOUR HAND.

OKAY. OUR NEXT SPEAKER THIS EVENING IS TERRY AUSTIN. TERRY, I'M GOING TO ASK YOU TO UNMUTE.

MS. AUSTIN: CAN YOU HEAR ME?

JENNIFER: WE CAN HEAR YOU. GO AHEAD. YOU

HAVE TWO MINUTES.

OC2-1

MS. AUSTIN: THANK YOU. I'VE BEEN FOLLOWING THE LA PLANNING DEPARTMENT'S MANY, MULTIPLE ZOOMS ABOUT THE NEW COMMUNITY PLANS FOR OUR CITY, AND MY CONCERN AND MY QUESTION IS WHEN YOU WERE MAKING YOUR PRESENTATION, DID I UNDERSTAND THAT AT THE END OF THE DAY, THAT NO MATTER WHAT YOU'VE PLANNED, THAT THE CITY, THE INDIVIDUAL CITIES, CAN OVERRIDE YOUR VERY THOUGHTFUL PLANS FOR THE LA RIVER AND ITS DEPENDANT ON INDIVIDUAL CITIES, OR DO YOU HAVE THE ULTIMATE SAY IN WHAT HAPPENS WITH OUR RIVER AND WATERSHEDS ON EITHER SIDE OF IT?

THAT'S IT.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS. OUR NEXT SPEAKER THIS EVENING IS ANDREW LEWIS. MR. LEWIS, I'M GOING ASK YOU TO UNMUTE.

MR. LEWIS: HI. CAN YOU HEAR ME?

JENNIFER: YES, WE CAN HEAR YOU. GO AHEAD. YOU HAVE TWO MINUTES.

OC3-1

MR. LEWIS: OKAY. I'M GOING TO PASS ON COMMENT FOR THE MOMENT, BUT THANK YOU.

MS. PIGGOTT: OKAY. THANK YOU. LADIES AND GENTLEMEN, I SEE WE HAVE SOME HANDS RAISED. WE WILL GET TO YOU IN THE ORDER IN WHICH YOU'VE RAISED YOUR HAND, BUT WE WILL BE CALLING ON OTHER SPEAKERS THIS EVENING IN THE ORDER IN WHICH THEY PREREGISTERED, AS A REMINDER.

OUR NEXT SPEAKER THIS EVENING IS GRACE CORSI.
MS. CORSI, I'M NOT SEEING YOU ON THE ZOOM THIS EVENING. PLEASE SEND US A CHAT MESSAGE AND IF YOU ARE ABLE TO JOIN US, AND IF YOU ARE A CALL-IN-ONLY USER, PLEASE PRESS STAR NINE.

OUR NEXT REGISTERED SPEAKER IS ANDY HATTALA, H-A-T-T-A-L-A. I APOLOGIZE IF I'M NOT PRONOUNCING THAT CORRECTLY. I'M NOT SEEING MR. HATTALA ON THE CALL THIS EVENING. AGAIN, PRESS STAR NINE TO RAISE YOUR HAND IF YOU'RE A CALL-IN-ONLY USER, OR SEND A CHAT MESSAGE IF, PERHAPS, I'M NOT ABLE TO SEE YOU AND YOU'RE IDENTIFIED BY A DIFFERENT NAME.

OUR NEXT SPEAKER THIS EVENING IS JESSICA PRIETO. I'M ALSO NOT SEEING YOU ON THE LINE THIS EVENING.

OUR NEXT SPEAKER IS ADELE SLAUGHTER. MS. SLAUGHTER, I'M GOING TO ASK YOU TO UNMUTE.

MS. SLAUGHTER: CAN YOU HEAR ME?

MS. PIGGOTT: YES, WE CAN HEAR YOU. PLEASE GO AHEAD. YOU HAVE TWO MINUTES.

MS. SLAUGHTER: I ACTUALLY AM JUST GETTING UP TO SPEED ON THIS PROJECT. AND THE ONE THING THAT IT SEEMS DISTRESSING TO ME IS THAT THE CEQA DOESN'T REALLY SEEM TO HAVE A LOT OF TEETH IN TERMS OF PREVENTING, LET'S SAY, GREENHOUSE GAS EMISSIONS OR OTHER THINGS THAT

OC4-1

MIGHT BE DESTRUCTIVE TO THE RIVER, AND I JUST DIDN'T HEAR ANYTHING LIKE THAT IN ALL OF THE PRESENTATIONS, AND I REALLY APPRECIATE THE WORK YOU GUYS HAVE DONE INTO GIVING THESE PRESENTATIONS, BUT I FEEL LIKE I'M NOT SURE WHAT OUR GOALS ARE HERE. OC4-1 cont.

AND I REALLY WANT TO PRESERVE THE RIVER AND MAKE IT, YOU KNOW, IT'S NOT A STATIC THING, THIS RIVER, AND I WOULD LIKE IT TO BE MORE THAN JUST LIKE LITTLE SIDE PARKS AND MORE OF AN ECOSYSTEM, LIVING THING.

THANK YOU SO MUCH. I'M FINISHED.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. I'M GOING GO BACK TO JESSICA PRIETO. I SEE THAT YOU ARE ON THE LINE UNDER A DIFFERENT NAME. I'M GOING TO ASK YOU TO UNMUTE.

MS. PRIETO: HI. CAN YOU HEAR ME?

MS. PIGGOTT: YES. GO AHEAD. YOU HAVE TWO MINUTES.

MS: PRIETO: I WILL SAY THAT IT DOESN'T LET YOU CHANGE YOUR NAME; SO THERE MAY BE OTHER FOLKS WHO REGISTERED, BUT THEY'RE NOT GOING TO BE CALLED ON BECAUSE THIS ZOOM DOESN'T LET YOU CHANGE YOUR NAME. OC5-1

MS. PIGGOTT: THANK YOU.

MS: PRIETO: YEAH. SO MY NAME IS JESSICA PRIETO WITH EAST YARD. OUR ORGANIZATION IS THE STEERING COMMITTEE MEMBER OF THE LA RIVER MASTER PLAN. EAST YARD OC6-1

HAS PARTICIPATED IN THE COMMITTEE IN GOOD FAITH THAT COUNTY WOULD LISTEN TO OUR CONCERNS, OUR RECOMMENDS, AND OUR EXPERTISE IN DRAFTING THIS MASTER PLAN. BOTH EAST YARD AND OTHER LA ADMINISTERING COMMITTEES HAS STRESSED MULTIPLE TIMES THROUGHOUT THIS PROCESS THAT IF THE COUNTY DEVELOPS THE RIVER WITHOUT ADDRESSING THE STRUCTURE THAT CAUSED EXISTING INEQUITIES IN THE FIRST PLACE, THEN PAST LEGACIES OF RACISM AND COLONIALISM WILL JUST REPEAT THEMSELVES THROUGH NEW INEQUITIES.

OC6-1 cont.

FIRST, THE PLAN AND THE PROCESS TO CREATE THIS PLAN DOES NOT CENTER INDIGENOUS RACES. WE HAVE ADVOCATED FOR THE COUNTY TO INVITE ADMIRON MENDOSA, A FELLOW TONGVA LEADER, INTO THE LA RIVER MASTER PLAN STEERING COMMITTEE, BUT SHE HAS YET TO BE INVITED. THAT IN ITSELF SHOULD BE ENOUGH TO INVALIDATE THIS WHOLE PROCESS. HOWEVER, THERE IS MORE.

OC6-2

TWO, EAST YARD ORGANIZES AND REPRESENTS SEVERAL COMMUNITIES ALONG THE LOWER PORTION OF THE LA RIVER. THESE ARE COMMUNITIES THAT FACE ENVIRONMENTAL RACISM DUE TO GOODS MOVEMENT AND STRUCTURES THAT ENABLED THE GOODS MOVEMENT, SUCH AS, THE 710 FREEWAY, MULTIPLE RAIL YARDS, AND THE LOCAL COURTS. ALL OF WHICH ARE DIRECTLY ADJACENT TO THE LA RIVER AND COUNTLESS UNREGULATED POLLUTING INDUSTRIES. REGARDLESS, THE COUNTY FAILS TO COMMIT TO ADDRESSING THESE ISSUES IN THE PLAN. ITS

OC6-3

OC6-3 cont.

ACKNOWLEDGES THEM SOMEWHAT BUT IT DOESN'T COMMIT TO REMEDIATING THEM AND REGULATING THESE EXISTING INEQUITIES.

THREE, THIS HISTORY OF ENVIRONMENTAL RACISM LEAVES LOWER LA RIVER COMMUNITIES VULNERABLE TO NEW INEQUITIES, SPECIFICALLY, DISPLACEMENT AND GENTRIFICATION. THE COUNTY FAILS TO ADDRESS LAND SPECULATION AND GENTRIFICATION CAUSED BY THE PROPOSED PLAN. IT TALKS ABOUT AFFORDABLE HOUSING, PRODUCING AFFORDABLE HOUSING, BUT MANY WHO ORGANIZE AROUND HOUSING POLICY --

MS. PIGGOTT: 30 SECONDS.

OC6-4

MS. PRIETO: YES. MANY WHO ORGANIZE AROUND HOUSING POLICY RECOGNIZE THAT THIS IS NOT THE ONLY SOLUTION. HOUSING PRODUCTION NEEDS TO BE TRYING TO PRESERVE EXISTING AFFORDABLE HOUSING AND PROTECTION FOR TENANTS. HOWEVER, THE PLANNED PROPOSED SOLUTIONS HAVE NO TEETH, NO COMMITMENTS WHATSOEVER TO PASSING POLICIES THAT WILL STOP DISPLACEMENTS, SUCH AS, RENT CONTROL OR RIGHT TO COUNSEL IN THE CITIES THAT NEED IT MOST. THE COUNTY TALKS ABOUT HOW THE COUNTY'S PASSING THESE POLICIES BUT THAT IS NOT REPRESENTATIVE OF A SMALLER JURISDICTIONS THAT ARE FAILING TO CURB DISPLACEMENT.

THANK YOU FOR YOUR TIME.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OUR NEXT SPEAKER THIS EVENING IS T. SANCHEZ. T. SANCHEZ, I'M NOT SEEING YOU ON THE LINE. PLEASE RAISE YOUR HAND OR PRESS STAR NINE OR SEND A CHAT MESSAGE IF YOU ARE ON THE LINE UNDER A DIFFERENT NAME, PERHAPS.

OUR NEXT SPEAKER IS LARRY HOFFMAN. I'M GOING TO ASK LAURIE HOFFMAN TO UNMUTE. AS I SAW YOU JOIN AT THE SAME TIME. LAURIE OR LARRY HOFFMAN, I'M GOING TO ASK YOU TO UNMUTE.

MS. HOFFMAN: I'M SORRY. CAN YOU HEAR ME NOW?

MS. PIGGOTT: YES, WE CAN HEAR YOU.

MS. HOFFMAN: I'M SO SORRY. I JUST, KIND OF, MESSED UP THERE. ANYWAY, I WOULD JUST LIKE TO SAY THAT I STAND BEHIND THE IDEA OF MAXIMIZING THE INFLUENCE OF INDIGENOUS CULTURES AND THE MASTER PLAN, AND AS A LA RESIDENT, I WELCOME ANY KIND OF CULTURAL INFLUENCE AT ALL BECAUSE WE'RE SUCH A HUGE DIVERSITY HERE, AND I THINK IT'S A GREAT IDEA. AND I CHAMPION EVERYTHING THAT YOU GUYS HAVE DONE SO FAR. I REALLY ENJOYED YOUR PRESENTATION AND LOOKING FORWARD TO BEING INVOLVED IN IT IN FUTURE.

OC7-1

KEEP UP THE GOOD WORK.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENT. AND AS A HELPFUL -- HOPEFULLY THIS WILL HELP, LADIES AND GENTLEMEN, SO WHEN I CALL ON YOU, IF YOU'RE ON LINE, I

WILL ASK YOU TO UNMUTE AND YOU WILL RECEIVE A PROMPT FROM ZOOM. SO JUST WAIT UNTIL YOU HEAR THAT PROMPT AND THEN YOU CAN UNMUTE YOU LINE. HOPEFULLY THAT HELPS.

OUR NEXT REGISTERED SPEAKER THIS EVENING IS BRANDON CONTRERAS. I'M GOING TO ASK YOU TO UNMUTE.

MR. CONTRERAS: HELLO. CAN YOU HEAR ME?

MS. PIGGOTT: YES, WE CAN HEAR YOU. GO AHEAD. YOU HAVE TWO MINUTES.

MR. CONTRERAS: ALL RIGHT. THANK YOU. MY NAME IS BRANDON. I AM A RESIDENT OF LONG BEACH, AND I JUST WANT TO COMMENT ON A LITTLE BIT ABOUT THE POLLUTION GOING ON IN THE RIVER. I DON'T KNOW WHERE TO FIND THE EXACT AMBITIONS OF THE PLAN TO REDUCE OUR POLLUTION ON THE RIVER, BUT AS A LONG BEACH RESIDENT, WE SEE A LOT OF THE TRASH COMING DOWN FROM THE UPPER CITIES ALL THE WAY DOWN TO LONG BEACH AND INTO OUR PACIFIC OCEAN. SO I'D LIKE TO KNOW WHAT WE'RE GOING TO DO ABOUT THAT AND TO JUST TRY TO TEAR OFF THE TOP FROM THE BEGINNING.

OC8-1

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OUR NEXT SPEAKER THIS EVENING IS CINDY DONIS. CINDY, I'M GOING TO ASK YOU TO UNMUTE.

MS. DONIS: HI. CAN YOU HEAR ME?

MS. PIGGOTT: YES, WE CAN HEAR YOU. YOU HAVE TWO MINUTES.

MS. DONIS: HI. MY NAME CINDY. I AM A RESIDENT HERE IN SOUTH GATE AND HAVE BEEN A LONG TIME RESIDENT OF SOUTHEAST LA. SPECIFICALLY PARTS -- SPECIFIC PARTS OF THE PLAN THAT I HAVE CONCERNS AROUND IS AROUND RECLAIMING THE FLOODPLAIN. I FEEL LIKE IT SHOULD BE PRIORITIZED ACROSS THE ENTIRE RIVER FOR ECOLOGICAL AND WILDLIFE BENEFITS, LETTING THE RIVER BREATHE AND BE, AND IF WE HAVE TO LOOK FOR OTHER BENEFITS, THERE IS ALSO EDUCATIONAL AND ENRICHMENT PROGRAMMING BENEFITS TO REBUILD A RELATIONSHIP WITH NATURE ACROSS ALL COMMUNITIES LIVING NEXT TO RIVER, PARTICULARLY IN REPAIRING THE RELATIONSHIP FOR TONGAN PEOPLE AND THE RIVER THAT HAS BEEN HINDERED SINCE COLONIZATION.

OC9-1

ANOTHER CONCERN THAT I HAVE, THAT'S SPECIFIC, IS AROUND DAY LIGHTING ACROSS THE ENTIRE RIVER. THIS DOES SOUND LIKE A WASTE OF WATER, A MISUSE OF WATER THAT SHOULDN'T BE SUGGESTED IN THIS PLAN. IT ALSO RESULTS IN LESS RELIABILITY OF CLEAN WATER AND CAN LEAD TO INCREASE OF FLOODING. I'VE HEARD OF THIS IN SEOUL, SOUTH KOREA, WHICH HAS BROUGHT AN ARRAY OF ISSUES. GENERALLY, LOOKING AT THE PLAN, IT DOESN'T ADEQUATELY ADDRESS THE CONTAMINATED SOIL, AND POTENTIALLY WATER, FROM INDUSTRY WATER -- INDUSTRY ALONG THE RIVER AND ILLEGAL DUMPING.

OC9-2

IT ALSO DOESN'T APPROPRIATELY ADDRESS THE

OC9-3

OC9-3 cont.

MITIGATION -- ANY EXCAVATION OF THESE CONTAMINATED ELEMENTS THAT CAN BE FOUND DURING CONSTRUCTION ALONG THE RIVER. THIS PLAN ALSO LACKS ANY TENANT PROTECTIONS AND WILL CAUSE DISPLACEMENT AND GENTRIFICATION IF IT PROCEEDS AND GETS APPROVED AS IS. THIS PLAN REALLY DOES NEED TO CENTER THE RIVER AND CREATE A PLAN FOR THE RIVER TO BE AND EXIST AS IT SHOULD. IT NEEDS TO PROTECT THE COMMUNITIES ALONG THE RIVER WHO HAVE FACED MULTIPLE HARDSHIPS AND NEGLECT AT THE HANDS OF THE STATE AND THE COUNTY AND IT ALSO NEEDS TO BE BETTER AT REPAIRING THE HARM DONE TO TONGAN PEOPLE AND THE RIVER.

MS. PIGGOTT: 30 SECONDS.

MS. DONIS: SO I REALLY DO HOPE THAT YOU ALL TAKE THESE PUBLIC COMMENTS SERIOUSLY AND WE SEE A BETTER PLAN.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OUR NEXT REGISTERED SPEAKER IS JENNIFER CARVALHO WHO I'M NOT SEEING ON THE ZOOM. PLEASE PRESS STAR NINE IF YOU'RE A CALL-IN-ONLY USER OR SEND A CHAT MESSAGE IF YOU ARE LOGGED IN UNDER A DIFFERENT NAME, AND I WILL COME BACK TO YOU.

OUR NEXT SPEAKER ADRIANA GARCIA. I'M ALSO NOT SEEING MS. GARCIA ON THE ZOOM THIS EVENING.

OUR NEXT SPEAKER IS MAGGIE DARETT-QUIROZ. I'M

GOING TO ASK YOU TO UNMUTE.

MS. DARETT-QUIROZ: HI. GOOD EVENING. MY NAME IS MAGGIE DARETT-QUIROZ. I'M A NATIVE OF GLASSELL PARK, NORTH GLASSELL PARK, CYPRESS PARK NORTHEAST COMMUNITY. AND THANK YOU GUYS FOR ALL YOUR WORK. THIS IS REALLY GREAT. I REALLY GOT TO SEE THE KIT; I'M IMPRESSED. I'M ALWAYS WELCOMING CHANGE. I MEAN, I'VE BEEN HERE -- THIS IS ALL I KNOW, THE NORTHEAST COMMUNITY, AND I AM HAPPY TO SEE THAT FINALLY THIS -- THIS LAND -- I'M TALKING ABOUT THE LAND AROUND THE RIVER THAT IS UNDEVELOPED FOR SO MANY YEARS. I'M EXCITED TO SEE SOMETHING NEW THAT WE ALL GET TO ENJOY.

OC10-1

AS A KID, I REMEMBER THE TRAINS AND THINGS LIKE THAT, BUT I ALSO WOULD LIKE TO SEE IF WE COULD INCORPORATE SOME GARDENING FARMS. MAYBE NOT EDIBLE BECAUSE I'M NOT SURE HOW CONTAMINATED THE SOIL CAN BE, BUT AT LEAST SOME KIND OF LIKE GARDENING FARMS, TEACHING FARMS AND THINGS LIKE THAT. BUT NEVERTHELESS, I DID NOTICE THAT ON YOUR E-MAIL IT SAID THAT IT WAS THE ONLY MEETING, SO I'M NOT SURE IF THERE IS GOING OTHER MEETINGS FOR MORE COMMUNITY PEOPLE TO BE INFORMED OF WHAT IS GOING ON.

OC10-2

BUT NEVERTHELESS, I AM GRATEFUL FOR ALL YOUR EFFORT. I DID LIKE THE KIT AND HOPEFULLY WE CAN INCORPORATE A LITTLE BIT OF EVERYTHING TO BRING NEW

OC10-3

OC10-3 cont.

CHANGE AND SOMETHING THAT WE COULD ALL ENJOY IN OUR COMMUNITIES.

THANK YOU SO MUCH FOR ALL YOUR HARD WORK. MY NAME IS MAGGIE DARETT-QUIROZ.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. OUR NEXT SPEAKER IS VIC GHAZARIAN, WHO I'M NOT SEEING ON THE ZOOM THIS EVENING.

THEN, CURT HUDELSON. I'M ALSO NOT SEEING ON THE ZOOM.

SHERRY AVERY.

JOHN STARLING.

HEATHER STARLING.

THOMAS PARSEKIAN.

DEBRA PARSEKIAN.

MARGARITA MORENO. I'M NOT SEEING ON THE ZOOM THIS EVENING. AND, AGAIN, FOLKS, IF I CALL YOUR NAME AND YOU'RE BY CHANCE -- HAVE JOINED UNDER A DIFFERENT NAME, PLEASE SEND A CHAT MESSAGE OR RAISE YOUR HAND. AND IF YOU'RE A CALL-IN-ONLY USER, PRESS STAR NINE TO RAISE YOUR HAND.

NEXT IS LUIS MARTINEZ.

OKAY. OUR NEXT SPEAKER IS ELLEN DIXON. MS. DIXON, I'M GOING TO ASK YOU TO UNMUTE.

OC11-1

MS. DIXON: YES. GOOD EVENING. I JUST WANTED TO MAKE A COMMENT THAT SOME OF THE MAPS THAT I HAVE SEEN

FOR THE PROPOSED PROJECT HAVE ENDED AT THE CONFLUENCE OF TWO OF THE RIVERS NEAR CANOGA HIGH SCHOOL. AND MY COMMENT WAS THAT RIVER RUNS -- CONTINUES PAST THAT, PAST THAT 51 MILES, AND IT GOES ALL THE WAY TO THE CHATSWORTH RESERVOIR WHICH IS, OF COURSE, A DRY RESERVOIR. AND I AM CURIOUS WHY IT STOPPED AT THAT CONFLUENCE OF, YOU KNOW, OF THE TWO RIVERS THERE BEHIND THE HIGH SCHOOL AND WHY IT COULDN'T CONTINUE ALL THE WAY TO CHATSWORTH RESERVOIR WHERE YOU COULD PUT A WELCOME CENTER, YOU COULD PUT PARKING, WHICH REALLY WOULD ENCOURAGE THE LOCAL RESIDENTS TO USE IT.

OC11-1 cont.

I PERSONALLY -- THE RIVER RUNS BEHIND BY HOME. I WOULD WELCOME THAT AS, YOU KNOW, THE LANDSCAPING AND PATHWAYS, ANYTHING THAT YOU HAVE PREPARED, YOU KNOW, COULD RUN PAST OUR RESIDENTIAL PROPERTIES ALL THE WAY TO CHATSWORTH RESERVOIR. SO I WANTED TO MAKE SURE -- I KNOW I DID SUBMIT SOME COMMENTS ON THAT AND SOME E-MAILS TO SOME OF THE PEOPLE THAT WERE PROJECT MANAGERS WHEN THIS FIRST BEGAN.

BUT I WANT TO SEE THAT OPPORTUNITY, OR AT EAST I SHOULD HOPE THAT THE OPPORTUNITY HAS BEEN INVESTIGATED TO TAKE THE PROJECT ALL THE WAY TO CHATSWORTH RESERVOIR, WHICH, OF COURSE, IS STILL PART OF LA COUNTY. IT'S ACTUALLY PART OF LA CITY. SO I DON'T KNOW IF, YOU KNOW, THOSE THINGS WERE CONSIDERED IN THE --

OC11-1 cont.

MS. PIGGOTT: 30 SECONDS.

MS. DIXON: -- PLAN OF THE PROJECT OR NOT, BUT I JUST WANTED TO MAKE SURE, AGAIN, THAT, YOU KNOW, THE CONTINUATION ALL THE WAY TO CHATSWORTH RESERVOIR WAS CONSIDERED BECAUSE THERE IS ABSOLUTELY BEAUTIFUL OPPORTUNITY THROUGH WEST HILLS, CANOGA PARK, AND CHATSWORTH TO MAKE BETTER -- GREAT WALKING AREA FOR RESIDENTS.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OUR NEXT REGISTERED SPEAKER IS, AND I APOLOGIZE; I'M NOT GOING PRONOUNCE THIS NAME CORRECTLY, BUT I DO BELIEVE YOU'RE ON THE LINE. THE FIRST NAME IS Z-I-H-U-A, AND THE LAST NAME IS Z-H-A-O. I'M GOING TO ASK YOU TO UNMUTE.

MR. ZHAO: CAN YOU HEAR ME?

MS. PIGGOTT: YES. GO AHEAD. YOU HAVE TWO MINUTES.

OC12-1

MR. ZHAO: I'M A USC STUDENT. MY MAJOR IS ENVIRONMENT ENGINEER, AND I AM REALLY EXCITED TO BE HERE TO LISTEN TO A LOT OF PEOPLE'S OPINIONS ABOUT THE -- THIS PROJECT, SO THAT'S IT.

I'M OUT.

MS. PIGGOTT: OKAY. THANK YOU FOR COMMENTS.

OUR NEXT REGISTERED SPEAKER IS MARY GONNELLI.

I'M NOT SEEING ON THE LINE.

AND OUR NEXT SPEAKER IS DAISY OLIVER.

MS. OLIVER, I'M GOING TO ASK YOU TO UNMUTE.

MS. GONNELLI: HI. THIS IS MARY. CAN YOU HEAR ME?

MS. PIGGOTT: YES. IS THIS DAISY OLIVER?

MS. GONNELLI: THIS -- I'M DAISY'S PARTNER. I'M MARY GONNELLI, THOUGH. YOU JUST READ MY NAME.

MS. PIGGOTT: OH, GREAT. THANK YOU. PLEASE GO AHEAD. YOU HAVE TWO MINUTES.

MS. GONNELLI: SURE. THANK YOU. I HAVE SIMILAR COMMENTS THAT WERE ALREADY MENTIONED. I JUST WANTED TO NOTE SOME MORE HAVE AN EVALUATION OF THE POLLUTION CONTROL AND CLEANUP IN THE AREA WHERE LONG BEACH MEETS THE OCEAN. WE'RE RESIDENTS OF LONG BEACH IN DOWNTOWN BY THE COURTHOUSE, SO JUST WANTING TO KNOW A LITTLE BIT MORE ABOUT POLLUTION CONTROL, CLEANUP, AND FILTRATION PRIOR TO HITTING THE OCEAN. OC13-1

ALSO HOPING TO LEARN A LITTLE BIT MORE ABOUT IF PUBLIC GARDENS WOULD BE AN OPPORTUNITY ALONG THE RIVER AS WELL AS MAKING SURE THAT THERE IS PLENTY OF PARKING AND BIKE RACKS AND WAYS TO HAVE SOME SAFE SPACES FOR PEOPLE TO RELAX ALONG THE RIVER WALK. OC13-2

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OUR NEXT SPEAKER IS LESLIE BASHAR, WHO I'M NOT SEEING ON THE LINE THIS EVENING. AGAIN, IF I CALL YOUR NAME AND IF YOU'RE ON UNDER A DIFFERENT NAME OR A CALL-IN-ONLY USER, YOU CAN SEND A CHAT MESSAGE, RAISE YOUR HAND, OR PRESS STAR NINE.

OUR NEXT REGISTERED SPEAKER IS GUILLERMO DAVALOS. I'M NOT SEEING ON THE LINE.

OUR NEXT SPEAKER REGISTERED JUST UNDER THE LAST NAME M., AND I SEE SOMEONE ON LINE UNDER THE NAME M. SO I'M GOING TO ASK YOU TO UNMUTE IN HOPES THAT THIS IS YOU. OKAY, PARTICIPANT UNDER THE NAME M., I'M GOING TO ASK YOU TO UNMUTE. OKAY. I'M GOING TO MOVE ON TO THE NEXT PERSON. USER BY THE NAME M., IF YOU'RE WANTING TO PROVIDE A COMMENT, JUST SEND A CHAT MESSAGE AND I'LL CALL ON YOU.

OUR NEXT REGISTERED SPEAKER IS ERIK PETERSON, WHO I'M NOT SEEING ON THE LINE.

OUR NEXT SPEAKER IS ARLENE MATZA-JACKSON. ARLENE, I'M GOING TO ASK YOU TO UNMUTE. OUR NEXT SPEAKER IS ARLENE MATZA-JACKSON, AND I SEE SOMEONE ON THE LINE AS ARLENE. I'M GOING TO ASK YOU TO UNMUTE. I'M GOING TO MOVE ON. ARLENE, IF YOU -- I SEE YOUR HAND IS ALSO RAISED. IF YOU WOULD LIKE TO PROVIDE AN ORAL COMMENT, THEN JUST SEND A CHAT MESSAGE. AND, AGAIN, FOLKS, ALL LINES ARE MUTED THIS EVENING. WHEN -- OH,

M., IS THAT YOU?

MR. FOX: HELLO?

MS. PIGGOTT: HELLO. YOU HAVE TWO MINUTES.

OC14-1

MR. FOX: HI. MY NAME IS MARCUS FOX. I LIVE IN ATWATER VILLAGE, AND I'VE RECENTLY JOINED OUR RIVER COMMITTEE AND WE'VE BEEN REVIEWING ALL THIS GREAT WORK YOU GUYS ARE DOING. WE APPRECIATE IT VERY MUCH. I THINK OUR BIGGEST CONCERN -- I CAN PROBABLY SPEAK FOR MANY HERE IN ATWATER -- IS FLOOD CONTROL. SO ALTHOUGH THERE'S LOTS OF GREAT IDEAS AND REALLY IMPORTANT THINGS ABOUT ENVIRONMENTAL IMPACTS AND RECREATION, WE ARE VERY CONCERNED ABOUT FLOOD CONTROL AND HOW THAT HAS BEEN ADDRESSED.

THAT'S MY TIME. THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. OUR NEXT SPEAKER IS SERENA STEERS. MS. STEERS, I'M GOING TO ASK YOU TO UNMUTE.

MS. STEERS: SORRY. I DON'T HAVE CELL SERVICE, SO HOPEFULLY YOU CAN HEAR ME. CAN YOU HEAR ME OKAY?

MS. PIGGOTT: YES. GO AHEAD. YOU HAVE TWO MINUTES.

OC15-1

MS. STEERS: THANK YOU VERY MUCH. I WANTED TO FIRST THANK YOU ALL FOR THE WONDERFUL PRESENTATION THAT YOU HAD EARLIER, THE POWER POINT. IT WAS VERY HELPFUL IN UNDERSTANDING WHAT'S BEEN GOING ON WITH THE EIR

OC15-1 cont.

PROCESS. AND I AM A BORN AND RAISED LONG-TERM RESIDENT OF LONG BEACH, AND I'M CONCERNED WITH THE PROPERTY OVER HERE LOCATED ACROSS -- ADJACENT FROM LOS CERRITOS PARK THAT IS -- HAS ALWAYS BEEN THE 3701 (AUDIO DISTORTION) HAS ALWAYS BEEN IN THE LA MASTER -- LA RIVER MASTER PLAN AS PART OF THE CONCEPT IN THE PLAN FOR FUTURE DEVELOPMENT, AND I WAS WONDERING WHY -- AND WHY IT IS NOW BEING TURNED INTO A 580-UNIT RV STORAGE PARK AND WHAT THAT IS GOING TO BE DOING TO OUR ENVIRONMENTAL ISSUES ALREADY THAT WE'RE HAVING IN THE 710-405 DIESEL DEATH TRAP AREA WITH ALL THE TRUCKS GOING BY.

OC15-2

SO IN ADDITION TO THAT, WE HAVE FOUND GEOLOGICAL -- I'M SORRY -- THE GEOLOGICAL DEPARTMENT OF LA HAS DONE SURVEYS ACKNOWLEDGING ALL OF THE WASTE THAT WAS PUT IN THE GROUND 30 FEET BELOW AND MULTIPLE BARRELS ON THAT PROPERTY WHEN IT WAS OWNED BY OIL OPERATORS, INC., FROM 1930 TO ABOUT 1990 AND WHY IT'S OKAY TO JUST LEAVE THAT UNDER THERE AND PUT A FOUR STORY ADMINISTRATION BUILDING COVERED IN CONCRETE --

MS. PIGGOTT: 30 SECONDS.

MS. STEERS: -- AND WHAT THAT'S GOING DO TO -- IF IT'S -- IF THERE'S ANY COMPROMISING TO THE WEIGHT OF THOSE BUILDINGS UNDERNEATH, AND IF THAT IS THEN DEPLETES INTO THE SOIL.

SO THANK YOU FOR LISTENING TO MY COMMENTS.

OC15-2 cont.

WE'D REALLY LIKE TO HAVE THE SUPPORT OF LA RIVER TO GET THIS INTO A NICE GREEN SPACE AND PARK. THANK YOU VERY MUCH, AGAIN, FOR YOUR TIME AND, ONCE AGAIN, MY NAME IS SERENA STEERS.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. LADIES AND GENTLEMEN, THE NEXT SPEAKER THIS EVENING IS KIMBERLY WALTERS WHO I'M NOT SEEING ON THE LINE.

AND THEN JUAN OVALLE, O-V-A-L-L-E, WHO I'M ALSO NOT SEEING NOT THE LINE.

JENNIFER WALTON, WHO I AM NOT SEEING ON THE ZOOM THIS EVENING.

SALLIE NEUBAUER, N-E-U-B-A-U-E-R. I'M ALSO NOT SEEING ON THE LINE.

OUR NEXT SPEAKER IS TILLY HINTON. MS. HINTON, I'M GOING TO ASK YOU TO UNMUTE.

MS. HINTON: ARE YOU HEARING ME?

MS. PIGGOTT: YES. GO AHEAD. YOU HAVE TWO MINUTES.

OC16-1

MS. HINTON: THANK YOU. MY NAME IS DR. TILLY HINTON. I'M A PUBLIC HISTORIAN WHO SPECIALIZES IN THE LA RIVER'S CONTEMPORARY HISTORY AND IQ RATE, ART PROJECTS THAT INTERPRET THE RIVER THROUGH VISUAL ARTS AND COMMUNITY ENGAGEMENT. I VERY MUCH APPRECIATE THE COMPLEXITY OF THIS EFFORT, THE RICHNESS OF THE PLANNING

OC16-1 cont.

DOCUMENTATION, THE BILINGUAL MATERIALS THAT HAVE BEEN PREPARED, AND I COMMEND EACH OF YOU ON THE STAFF FOR STEERING WHAT MUST BE A COMPLEX AND MANY HEADED HIGH ROADS, AN INCREDIBLY INTRICATE PROCESS, AND I GIVE YOU MY WARMEST CONGRATULATIONS ON STEERING THAT SHIP.

I WOULD LIKE TO FIRST OF ALL ADD MY VOICE TO JESSICA'S EARLIER COMMENTS THAT APPROPRIATE AND AMPLE INDIGENOUS REPRESENTATION IS PIVOTAL TO THE PLAN'S INTEGRITY AND, LIKEWISE, TO THE INTEGRITY OF THE CONSULTATION PROCESS. I AM DISAPPOINTED TO SEE THAT

OC16-2

WHAT APPEARS TO ME TO BE THE MOST CONTROVERSIAL ASPECT OF THE PLAN AND THAT IS THE CAPPING OF THE RIVER WITH CONCRETE PLATFORMS HAS NOT BEEN ANALYZED AS ONE OF THE TWO TYPICAL PROJECTS EVEN THOUGH IT APPEARS TO BE ONE OF MOST ENVIRONMENTALLY DRAMATIC PROJECTS OF ALL OF THOSE PROPOSED, AND IT IS ONE THAT HAS RECEIVED SIGNIFICANT PUBLIC ATTENTION.

OC16-3

IT ALSO SEEMS IMPORTANT HERE TO NOTE THAT THE HIGH PROFILE ARCHITECT, FRANK GEHRY, WHOSE FIRM IS DEVELOPING THE PROPOSED PLATFORM PARK AT SOUTH GATE, A PROJECT OF MAJOR CONCERN IN BOTH ECOLOGICAL AND HOUSING JUSTICE TERMS, WAS CLOSELY INVOLVED IN THE MASTER PLANNING PROCESS AND IN THE PREPARATION OF ALL OF THE DOCUMENTS THAT WE ARE DISCUSSING THIS EVENING. THIS SEEMS TO UNDERMINE THE ARGUMENT THAT --

OC16-3 cont.

MS. PIGGOTT: 30 SECONDS.

MS. HINTON: -- NO SPECIFIC PROJECTS ARE PROPOSED BY THE MASTER PLAN. I WOULD LIKE TO SEE MORE ONLINE EXPLANATIONS ON BOTH THE MASTER PLAN AND THE PEIR WEBSITE ABOUT THE TWO SIMULTANEOUS BUT SEPARATE COMMENT PROCESSES. IT SEEMS LIKE A RECIPE FOR CONFUSION AND DILUTION OF PUBLIC INPUT.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. LADIES AND GENTLEMEN, OUR NEXT SPEAKER IS HAWK MCFADZEN WHO I'M NOT SEEING ON THE LINE THIS EVENING. AND, AGAIN, FOLKS, I'M GOING THROUGH THESE NAMES QUICKLY BECAUSE WE HAVE A VERY HIGH VOLUME OF FOLKS WHO HAVE REGISTERED TO SPEAK AND FOLKS WHO HAVE SENT MESSAGES ASKING TO BE ADDED TO THE SPEAKER LIST THIS EVENING.

SO IF I CALL ON YOU AND YOU'RE ON THE LINE UNDER A DIFFERENT NAME, PLEASE SEND ME A CHAT MESSAGE SO I CAN COME BACK TO YOU, OR PRESS STAR NINE.

OUR NEXT REGISTERED SPEAKER IS DORRIT RAGOSINE, I'M NOT SEEING ON THE LINE.

OUR NEXT SPEAKER IS SABINA SAYEGH, S-E-Y-E-G-H. OUR NEXT SPEAKER IS AMIT SHO. I'M NOT SEEING ON THE LINE. OUR NEXT SPEAKER IS NEHA YADAV. I'M NOT SEEING ON THE LINE THIS EVENING. OUR NEXT SPEAKER IS LES KAYE,

K-A-Y-E. I'M NOT SEEING ON THE LINE. OUR NEXT SPEAKER IS CAROLYN WEST WHO I'M NOT SEEING ON THE LINE THIS EVENING.

OUR NEXT SPEAKER IS MICHAEL COWLEY. MR. COWLEY, I'M GOING TO ASK YOU TO UNMUTE.

MR. COWLEY: GOOD EVENING. I LIVE IN CANOGA PARK, AND TO MR. CONTRERAS, I WOULD LIKE TO APOLOGIZE ON BEHALF OF ALL OF US AT THE BEGINNING OF THE RIVER FOR ANY POLLUTION THAT HAS MADE ITS WAY DOWN TO YOU. WE DO OUR BEST, BUT, OBVIOUSLY, IT'S NOT GOOD ENOUGH. I THANK YOU FOR TRYING TO WRITE HERE ON 17 DIFFERENT MUNICIPALITIES AND BRINGING THIS PROGRAM ALTOGETHER OVER A 25-YEAR PERIOD. OC17-1

BLESSED IS HE WHO PLANTS TREES UNDER WHOSE SHADE HE WILL NEVER SET. I WILL BE AN OLD MAN WHEN THIS IS DONE, BUT I AM PROUD TO BE PART OF THE CITY THAT IT LOOKS THAT FAR AHEAD TO THE FUTURE AND TRIES TO MAKE AN IMPROVEMENT OF THIS MAGNITUDE.

THANK YOU. THAT'S ALL.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OUR NEXT SPEAKER -- I'M GOING TO GO BACK TO ONE THAT IS ON LINE, T. SANCHEZ, I'M GOING TO ASK YOU TO UNMUTE.

MS. SANCHEZ: HI. YEAH, CAN YOU HEAR ME OKAY?

MS. PIGGOTT: YES. GO AHEAD. YOU HAVE TWO

MINUTES.

MS. SANCHEZ: THANK YOU. IT WAS RECENTLY ASKED, IMAGINE WHAT THE RIVER WOULD LOOK LIKE, YOUR WILDEST DREAMS, LIKE GO FOR IT, JUST WHATEVER YOU COULD YOU COULD THINK OF. AND MY ORIGINAL THOUGHT WAS, GOD, IT WOULD BE REALLY BEAUTIFUL IF WHEN I WALKED BY THE RIVER, I WOULD HEAR BIRDS CHIRPING, IF I HEARD RUSTLING OF TREES/LEAVES, THE SMELL THAT I WOULD SMELL WOULD BE OF WET DIRT.

IT WOULD BE NOT OF WHAT WE GREW UP SMELLING WHICH WAS SEWAGE WHICH WAS PUTRID, WHICH WAS POLLUTION AND SO FROM -- ON THAT THOUGHT, YOU KNOW, WHAT MY WILDEST DREAM WOULD BE, IT WOULDN'T BE THIS HUGE CONSTRUCTION LED BY THE GEHRY -- FRANK GEHRY'S DEVELOPMENT TEAM, IT WOULD BE GOING BACK TO NATURE. SOMETHING THAT -- ESPECIALLY COMING FROM FRAME 5, WHICH IS BOYLE HEIGHTS -- SOMETHING THAT WE NEVER EXPERIENCED. OUR CITY, OUR AREA, FRAME 5, BOYLE HEIGHTS, FRAME 4, FRAME 3, THOSE CITIES ARE COMPLETELY BUILT OUT, AND IF WE'RE TALKING IN ZONING, WE'RE TALKING ABOUT THERE IS NO SPACE AT ALL FOR ANYTHING, RIGHT?

OC18-1

SO THEN HERE YOU GUYS ARE GOING TO COME AND YOU GUYS ARE GOING TO TAKE UP AS MUCH SPACE AND YOU'RE TALKING ABOUT ACQUIRING DIFFERENT OPEN LAND USES, THERE'S NO OPEN LAND USE IN OUR AREA. YOU KNOW, WE HAVE

OC18-2

OC18-2 cont.

THE SKYLINE. WE UNDERSTAND THAT THAT'S LIKE THE APPEAL, RIGHT, OF BUILDING SOMETHING LIKE THAT. AND WHAT I WANT TO KNOW IS HOW ARE YOU GOING TO PROTECT THE NEXT GENERATION OF YOUTH THAT ARE GOING BE LOOKING FOR HOUSING THERE AND THERE'S NOTHING THERE.

SO --

MS. PIGGOTT: 30 SECONDS.

MS. SANCHEZ: -- WHAT WE WANT IS HOUSING. WE WANT THIS PROJECT TO ENSURE THAT WE'RE GOING TO HAVE SPACE FOR HOUSING, PRIMARILY. BECAUSE THERE IS GOING TO BE A GENERATION OF BOYLE HEIGHTS NATIVES THAT ARE NOT GOING TO BE ABLE TO AFFORD OR, LET ALONE, FIND ANY HOUSING. AND SO THAT'S THE REAL QUESTION. WHAT ARE YOU GUYS GOING TO DO FOR THAT?

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. OUR NEXT PREREGISTERED SPEAKER IS DELORES JONES WHO I'M NOT SEEING ON THE LINE. THEN JESSICA LEWIS. I DO SEE A JESSICA. JESSICA, I'M GOING TO ASK YOU TO UNMUTE. PARTICIPANT UNDER THE NAME JESSICA, I'M ASKING YOU TO UNMUTE, IF YOU ARE JESSICA LEWIS? OKAY. I RECEIVED YOUR MESSAGE. THANK YOU.

OUR NEXT SPEAKER IS ELIZABETH REID-WAINSCOAT WHO I'M NOT SEEING ON THE LINE. OUR NEXT SPEAKER IS GRACIE AGUILAR WHO I'M NOT SEEING ON THE LINE THIS

EVENING, FOLLOWED BY CLIFF TOWNE. CLIFF TOWNE, T-O-W-N-E, WHO I'M NOT SEEING ON THE LINE. JON MANN WHO I'M NOT SEEING ON THE LINE.

AGAIN, FOLKS, IF I CALL ON YOU AND IF YOU'RE ON THE LINE UNDER A DIFFERENT NAME, PLEASE RAISE YOUR HAND, OR PRESS STAR NINE IF YOU'RE A CALL-IN-ONLY USER.

OUR NEXT REGISTERED SPEAKER IS GAREN ADAMIAN. GAREN WHO I'M NOT SEEING ON THE LINE. OUR NEXT SPEAKER IS LAURIE HOFFMAN. OUR NEXT SPEAKER IS KATHERINE PEASE, WHO I'M NOT SEEING ON THE LINE. OUR NEXT SPEAKER IS KARLO MARCELO WHO I'M NOT SEEING ON THE LINE. OUR NEXT SPEAKER IS LUKE GINGER. MR. GINGER, I'M GOING TO ASK YOU TO UNMUTE.

MR. GINGER: HELLO. MY NAME IS LUKE GINGER. I JUST SPEAK IN PRONOUNS, AND I'M SPEAKING ON BEHALF HEAL THE BAY. FIRST, I WOULD LIKE TO THANK YOU FOR THIS OPPORTUNITY TO LEAVE COMMENT. I WOULD ALSO LIKE TO SECOND WHAT JESSICA, FROM EAST YARD COMMUNITIES FOR ENVIRONMENTAL JUSTICE, SAID EARLIER PARTICULARLY WITH REGARD TO THE LACK OF INDIGENOUS REPRESENTATION IN THIS PROCESS AND THE GREATER MASTER PLAN PROCESS OVERALL, BUT SO YOU CAN ALSO EXPECT A COMMENT LETTER FROM HEAL THE BAY A LITTLE LATER ON, A WRITTEN LETTER, BUT RIGHT NOW I WOULD LIKE TO COMMENT ON ONE THING.

AND THAT IS WE URGE THE COUNTY TO DO MORE

OC19-1

OC19-1 cont.

EDUCATION AND OUTREACH ON THIS ISSUE SO -- PEOPLE NEED MORE BACKGROUND INFORMATION ON THIS PROCESS. NONE OF WHAT IS GOING ON HERE TODAY IS COMMON KNOWLEDGE OR INTUITIVE FOR PEOPLE. IT IS MY JOB TO FOLLOW THESE ISSUES, AND EVEN I'M LEFT CONFUSED BY A LOT OF THIS. SO THE COUNTY NEEDS TO EXPLAIN HOW THIS DIFFERS FROM THE MASTER PLAN. AND THERE ALSO NEEDS TO BE AN EQUIVALENT OF THIS FOR THE MASTER PLAN ITSELF. THE COUNTY NEEDS TO EXPLAIN WHAT CEQA IS AND WHAT A PEIR IS, FOR FOLKS. THE COUNTY -- YOU KNOW, IT SOUNDS LIKE FROM THIS PRESENTATION, THAT THE COUNTY WON'T HAVE MUCH CONTROL OVER THE PROJECTS THAT ARE HAPPENING OUT OF THEIR JURISDICTION. SO IT NEEDS TO CLARIFY --

MS. PIGGOTT: 30 SECONDS.

MR. GINGER: -- WHAT'S GOING TO HAPPEN THEN. YOU KNOW, WILL THERE BE SEPARATE EIR PROCESSES FOR THOSE OTHER PROJECTS? AND THEN, FINALLY, IT'S CLEAR THE PEOPLE ARE PASSIONATE AND FRUSTRATED HERE. SO, YOU KNOW, PLEASE JUST DO MORE OUTREACH AND EDUCATION, SO PEOPLE UNDERSTAND WHAT ALL OF THIS IS.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. OUR NEXT REGISTERED SPEAKER IS ROSALIND HELFAND WHO I'M NOT SEEING ON THE LINE. FOLLOWED BY ELENA ALEMAN WHO I'M ALSO NOT SEEING ON THE LINE

TONIGHT. ACTUALLY I DO JUST SEE AN ELENA. I'M GOING TO ASK IF THIS IS YOU. ELENA, I'M GOING TO ASK YOU TO UNMUTE. ZOOM USER UNDER THE NAME JUST ELENA, I'M GOING TO ASK YOU TO UNMUTE IN CASE YOU'RE ELENA ALEMAN.

MS. ELENA: I AM AN ELENA, BUT I AM NOT THAT ELENA.

MS. PIGGOTT: OKAY. THANK YOU SO MUCH.

OKAY. OUR NEXT REGISTERED SPEAKER IS DEBRA WONG YANG WHO I'M NOT SEEING ON THE LINE THIS EVENING. OUR NEXT SPEAKER IS DAYANA PATINO WHO I'M ALSO NOT SEEING ON LINE THIS EVENING. OUR NEXT REGISTERED SPEAKER IS TIMOTHY LIPPMAN WHO I'M NOT SEEING ON THE LINE THIS EVENING.

AGAIN, FOLKS, IF I CALL YOUR NAME AND YOU'RE ON THE ZOOM UNDER A DIFFERENT NAME, JUST SEND ME A CHAT MESSAGE AND I WILL COME BACK TO YOU, OR RAISE YOUR HAND OR PRESS STAR NINE IF YOU'RE A CALL-IN-ONLY USER. BUT DUE TO THE HIGH VOLUME OF REGISTERED FOLKS THAT WE HAVE ASKING TO MAKE AN ORAL COMMENT, WE'RE GOING AS QUICKLY AS WE CAN SO WE CAN HERE FROM ALL OF YOU WHO ARE ON THE LINE WHO WANT TO MAKE A COMMENT.

OUR NEXT REGISTERED SPEAKER IS HELENE SCHPAK. HELENE, I SEE A INDIVIDUAL JUST WITH THAT FIRST NAME. I'M GOING TO ASK YOU TO UNMUTE. AND ZOOM USER UNDER THE NAME HELENE, OR PERHAPS IT'S JUST HELEN, I'M GOING TO

ASK YOU TO UNMUTE.

OKAY. MOVING ON. OUR NEXT REGISTERED SPEAKER IS CRAIG LOUIS WHO I'M ALSO NOT SEEING ON THE LINE. OUR NEXT REGISTER NENETZIN RODRIGUEZ WHO I AM ALSO NOT SEEING ON THE LINE THIS EVENING. OUR NEXT REGISTERED SPEAKER IS NINA BECKHARDT. I SEE A PARTICIPANT UNDER THE NAME NINA. I'M GOING TO ASK YOU TO UNMUTE. OKAY. ZOOM PARTICIPANT UNDER THE NAME NINA, IF YOU ARE NINA BECKHARDT, I'M GOING TO ASK YOU TO UNMUTE.

OC20-1

MS. BECKHARDT: I MISTAKENLY REGISTERED. I DON'T HAVE A COMMENT.

MS. PIGGOTT: OKAY. THANK YOU SO MUCH OKAY.

OKAY. OUR NEXT REGISTERED SPEAKER IS BRIAN BASTIEN. I'M GOING TO ASK YOU TO UNMUTE.

MR. BASTIEN: THERE WE GO.

MS. PIGGOTT: PERFECT. WE CAN HEAR YOU. YOU HAVE TWO MINUTES.

OC21-1

MR. BASTIEN: THANK YOU VERY MUCH. I APPRECIATE THIS OPPORTUNITY. I'M A LONG-TERM RESIDENT OF STUDIO CITY. AND THE PORTION OF THE RIVERSIDE YOU HAVE IMPROVED IN THIS AREA HAS BECOME A MAGNET FOR A LARGE COMMUNITY OF HOMELESS. AND SO WHAT'S HAPPENING IS AN ENVIRONMENTAL DISASTER. HUMAN FECAL MATTER IS THROUGHOUT THAT AREA. SOME IS GETTING INTO THE RIVER; SOME IS POLLUTING THE AREA.

SO LOCAL RESIDENTS DON'T GO THERE. AND THE ONES WHO HAVE -- OR EVEN ON THE OTHER SIDE OF THE RIVER -- RECENTLY, THE HOMELESS ARE BECOMING MORE HOSTILE AND MORE VIOLENT SO THAT THERE HAVE BEEN A NUMBER OF ATTACKS ON PEOPLE RECENTLY. SO LOCAL USE OF THE RIVERBED HAS PLUMMETED BECAUSE OF THIS SITUATION, AND THE MORE YOU IMPROVE IT, THE MORE HOMELESS YOU SEEM TO BRING IN.

THE ONLY THING I CAN RECOMMEND IS THE HOMELESS PROBLEM NEEDS TO BE SOLVED FIRST, TO GIVE THESE PEOPLE LIVES AND OPPORTUNITIES AND FUTURES, BUT EVERYTHING THAT HAPPENS SEEMS TO MAKE THE HOMELESS COMMUNITIES BIGGER, AND THEY'RE LEAVING DRUG REFUSE AND BROKEN GLASS AND A RAW SEWAGE. I FEEL SO SORRY FOR OUR FELLOW CITIZENS IN THE SOUTH BAY AREA, LONG BEACH, AND SO ON. I WAS BORN IN LONG BEACH SO I HAVE A SOFTNESS IN MY HEART FOR LONG BEACH, AND I HATE TO THINK OF WHAT WE'RE SENDING DOWN THE RIVER OR WHAT IS COMING OUR WAY FROM FARTHER UP.

OC21-1 cont.

SO I THINK THAT THERE ARE PROBLEMS WITH THE HOMELESS THAT MUST BE SOLVED BEFORE WE CAN IMPROVE THE SIDES OF THE RIVER, EVER, BECAUSE NOW LOCAL PEOPLE HERE IN STUDIO CITY SIMPLY AREN'T USING THE RIVER ANYMORE. THEY'RE -- OUT OF PERSONAL FEAR.

SO THANK YOU FOR THE TIME. APPRECIATE THE WORK YOU'RE DOING, BUT I THINK THAT SOME VERY NECESSARY

OC21-1 cont.

REASSESSMENT NEEDS TO GO ON BEFORE THIS PROJECT SPENDS ANY MORE OF OUR MONEY. THANK YOU VERY MUCH. GOD BLESS.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. OUR NEXT REGISTERED SPEAKER IS LAURA CORTEZ WHO I'M NOT SEEING ON THE LINE.

FOLLOWED BY MITRA FOROODI WHO I'M NOT SEEING ON THE LINE. MARIA P.G. IS OUR NEXT REGISTERED SPEAKER. MARIA, I'M GOING TO ASK YOU TO UNMUTE. ZOOM USER BY THE NAME OF JUST MARIA, IF YOU ARE MARIA P.G., I'M GOING TO ASK YOU TO UNMUTE.

OKAY. MOVING ON. JAMILA CERVANTES, I'M GOING TO ASK YOU TO UNMUTE, JAMILA.

MS: CERVANTES: CAN YOU HEAR ME?

MS. PIGGOTT: YES. GO AHEAD. YOU HAVE TWO MINUTES.

OC22-1

MS. CERVANTES: OKAY. HEY EVERYONE. MY NAME IS JAMILA. I LIVE IN THE CITY OF MAYWOOD AND I LIVE, LITERALLY, ACROSS THE LA RIVER, SO I CARE DEEPLY ABOUT THE FUTURE OF THE RIVER BEING AS VIBRANT AS POSSIBLE. RIVER AND ADJACENT COMMUNITIES LIKE MINE HAVE LONG AWAITED RESTORATION AND PARK ACCESS TO LA RIVER -- TO THE LA RIVER, BUT AS YOU ALL KNOW, IMPLEMENTING MAJOR PARK CONSTRUCTIONS IN LOW -- IN EXTREMELY LOW-INCOME COMMUNITIES LIKE MINE POSE A THREAT THAT CURRENT RESIDENTS WILL BE DISPLACED BY NEW PROJECTS.

OC22-1 cont.

SO I THINK THE COUNTY NEEDS TO INVEST HEAVILY IN ANTI-DISPLACEMENT PROGRAMS AND POLICY IN THIS PLAN BEFORE ANY PROJECT CONSTRUCTION IS UNDER WAY. LIKE WHAT MY FAMILY NEEDS AND WHAT I NEED IS A GUARANTEE THAT DISPLACEMENT HOUSING AFFORDABILITY WILL BE MEANINGFULLY ADDRESSED IN THE PLAN OR ELSE YOU ALL WILL LITERALLY DISPLACE ME, MY FAMILY, MY FRIENDS, AND MY NEIGHBORS. AND SO I HAVE CONCERNS OVER THE PLANS AS IT STANDS, AND I WANT TO SEE NEW IMPROVEMENTS MADE ON THAT.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. OUR NEXT REGISTERED SPEAKER IS DAYANA MOLINA WHO I'M NOT SEEING ON TH LINE THIS EVENING. OUR NEXT REGISTERED SPEAKER IS HAWK MCFADZEN WHO I'M NOT SEEING ON THE LINE THIS EVENING. FOLLOWED BY SYLVIE LACROIX WHO I'M NOT SEEING ON THE ZOOM TONIGHT, FOLLOWED BY ALAN WOLFE WHO I'M NOT SEEING ON THE ZOOM TONIGHT. ALYSSA BOYLE, I'M NOT SEEING ON THE LINE. WENDELL STEPHENSON, FOLLOWED BY PAUL FORMAN. I'M ALSO NOT SEEING ON THE LINE THIS EVENING.

OUR NEXT PREREGISTERED SPEAKER, AND, AGAIN, THESE ARE THE PEOPLE THAT PREREGISTERED FOR THE MEETING AND SELECTED THAT THEY WANTED TO PROVIDE AN ORAL COMMENT THIS EVENING.

OUR NEXT PREREGISTERED SPEAKER IS LAURIE ANGEL.

MS. ANGEL: HI. I'M LAURIE ANGEL, AND I LIVE IN LONG BEACH, AND I WANT TO ECHO THE COMMENTS CONCERNING POLLUTION, AIR POLLUTION FROM THE COURTS ALONG THE FREEWAY AND THEN ALSO INDUSTRIAL POLLUTION AND HOW THAT IS GOING TO BE ADDRESSED. IT'S SUCH A MASS ENTERPRISE, I WOULD EXPECT THAT THERE WOULD BE SOME KIND OF EFFORT THAT COULD BE PUT TOGETHER THAT WOULD INCLUDE SEVERAL CITIES, OR SOME CONCERTED EFFORT, BECAUSE WE HAVE EXTENSIVE OIL DUMPAGE THAT'S BEEN DONE -- THAT'S BEEN BROUGHT UP AT PARK PLACE ALONG THE 710 AND 405 FREEWAY.

OC23-1

I'M NOT SURE HOW THIS IS ALL GOING TO BE ADDRESSED AND HOW CONCRETING OVER IT IS GOING TO ENSURE THE WATER QUALITY. THERE'S A HUGE CONCERN ABUT WATER QUALITY AND POLLUTION IN THE WATER. SO THE OTHER THING -- THE OTHER CONCERN HAS TO DO WITH YOUR PUTTING TOGETHER A MASTER PLAN, AND WHAT DO THE CITIES DO, OR DO THEY INCORPORATE THAT INTO THEIR GENERAL PLAN, OR HOW DO WE GET THEM TO PARTICIPATE IN A MANNER THAT BENEFITS THE COMMUNITY RATHER THAN ALLOWING INDUSTRIALIZED USES OR BUILDINGS THAT HAVE NOTHING TO DO WITH GREEN SPACE AND OPEN SPACE AND IMPROVING ALONG THE RIVER? I MEAN, HOW DO WE MAKE THIS WORK FOR AREAS OF THE CITY THAT DO NOT HAVE ENOUGH OPEN SPACE? SO WHAT I KEEP HEARING IS THAT --

OC23-2

MS. PIGGOTT: 30 SECOND IS.

MS. ANGEL: -- THE COUNTY HAS NO TEETH TO ACCOMPLISH MUCH IN TERMS OF GETTING THIS PLAN MOVING FORWARD. I'M NOT QUITE SURE HOW WE GET THE COOPERATION. BUT ALSO I WANT TO MAKE SURE THAT THERE'S CONTINUITY IN TERMS OF TRAILS, SAFETY, AND SIGNAGE SO THAT EVERYBODY'S SAFE ALONG THE RIVER AS THEY TRAVEL.

SO THANK YOU.

OC23-2 cont.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENT. THANK YOU FOR YOUR COMMENTS.

OUR NEXT SPEAKER, JUAN OVALLE, I SEE YOU'RE ON THE LINE. I'M GOING TO ASK YOU TO UNMUTE, JUAN. JUAN OVALLE, I'M GOING TO ASK YOU TO UNMUTE. AGAIN, FOLKS, WHEN I ASK YOU TO YOU UNMUTE, IF YOU'RE A CALL-IN-ONLY USER, YOU SHOULD GET A PROMPT. JUAN, ARE YOU THERE? UNFORTUNATELY, IF YOU'RE SPEAKING, WE'RE NOT ABLE TO HEAR YOU. I WOULD RECOMMEND MAYBE HANGING UP AND THEN CALLING BACK IN. YOU SHOW UNMUTED ON OUR SIDE, BUT WE'RE NOT ABLE TO HEAR YOU IF YOU'RE SPEAKING.

OKAY. I'M GOING TO MOVE ON AND I WILL COME BACK. OKAY. OUR NEXT PREREGISTERED SPEAKER IS NAOMI ZAMAZAL. I'M GOING TO ASK YOU TO UNMUTE.

MS. ZAMAZAL: HI. SORRY. I DIDN'T EXPECT TO BE CALLED. BUT SO I DIDN'T ACTUALLY PREPARE ANY QUESTIONS EXACTLY, BUT I WANTED TO ASK WHAT THIS MEANT

OC24-1

OC24-1 cont.

FOR -- AND THANK YOU FOR THE PLAN THAT YOU PUT TOGETHER. I UNDERSTAND THAT IT MUST BE DIFFICULT. BUT I'M WONDERING WHAT DOES THIS MEAN FOR HOMEOWNERS, WHAT DOES IT ALSO MEAN FOR, YOU KNOW, PEOPLE THAT ARE LIVING ALONG THE RIVER IN -- PERMIT BUILDING, WHAT DOES THIS MEAN FROM -- CAN THE CITY STATE IMMINENT DOMAIN FROM THE HOMEOWNERS THAT IS MY QUESTION.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS. OKAY. OUR NEXT PREREGISTERED SPEAKER TOMASA OSORIO, O-S-O-R-I-O, WHO I'M NOT SEEING ON THE LINE THIS EVENING, FOLLOWED BY DAVE DAVEHALL WHO I'M NOT SEEING ON THE ZOOM TONIGHT, FOLLOWED BY CUTBERTO NEVAREZ. OKAY. OUR PREREGISTERED SPEAKER IS TORI GRUBER, I'M NOT SEEING ON THE LINE TONIGHT, FOLLOWED BY SUSAN ROCHA. WHO I'M NOT SEEING ON THE ZOOM. GABRIELLA TOVAT. GABRIELLA, I'M GOING TO ASK YOU TO UNMUTE.

MS. TOVAT: MY NAME IS GABRIELLA TOVAT, REPRESENTING COLLINS NEIGHBORHOOD ASSOCIATION AND ANDY STREET ASSOCIATION. RESIDENT OF DISTRICT 09 NORTH LONG BEACH. MY QUESTION IS:

OC25-1

WHAT IS YOUR PLAN IN REGARDS TO RELOCATION -- RELOCATING THE HOMELESS POPULATION THAT HAS ESTABLISHED THEMSELVES ON THE RIVER? DO YOU HAVE A PLAN AND WHAT IS THE PLAN? AS WELL AS ARE YOU WORKING, CONJOINING WITH

THE EPA IN REGARDS OF PRESERVING ANIMAL HABITAT? MY LAST QUESTION WOULD BE ARE THERE ANY PLANS TO IMPROVE THE LIGHTING CONDITIONS? THAT WILL BE ALL.

OC25-1 cont.

THANK YOU VERY MUCH.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS. THANK YOU FOR YOUR COMMENTS.

OKAY. OUR NEXT REGISTERED SPEAKER IS CORLISS LEE, MS. -- CORLISS LEE, I'M GOING TO ASK YOU TO UNMUTE.

MS. LEE: CAN YOU HEAR ME?

MS. PIGGOTT: YES. PLEASE GO AHEAD. YOU HAVE TWO MINUTES.

MS. LEE: THIS IS CORLISS LEE. I'M A MEMBER OF THE RIVERPARK COALITION IN LONG BEACH, AND IF YOU'RE IN LONG BEACH, PLEASE LOOK THAT UP ON THE WEB AND THINK ABOUT BECOMING A MEMBER OF RIVERPARK COALITION. WE HAVE THE DOCUMENTED SUPPORT FROM CONGRESSMAN ALAN LOLENPILE, STATE LEGISLATURE PATRICK O'DONNELL, AND SPEAKER ANTHONY RENDON. WE WOULD LIKE TO ADD JANICE HALL TO THAT, JANICE HAHN. WE HAVE PRIME PROPERTY ALONG THE RIVER FOR THIS PLAN. THE PROPERTIES BY THE 710 AND 405 FREEWAYS HAVE TREMENDOUS POTENTIAL FOR THIS PROJECT. IT'S CALLED THE JEWEL IN THE CROWN. THE PROPERTIES ARE PRIVATELY OWNED FOR THE MOST PART, BUT THE MONEY IS OUT THERE TO PURCHASE THEM.

OC26-1

HOWEVER, OUR CITY FAVORS REVENUE PRODUCING LAND

USES. THEY HAVE CLASSED THIS AS A NEO-INDUSTRIAL LOCATION AND OUR COUNCILMAN ALAN -- AL AUSTIN NEEDS THE CONNECTION TO REALIZE THAT THERE ARE BETTER USES FOR THIS PROPERTY. WE ASK FOR YOUR SUPPORT IN THAT. WE ALSO WOULD LIKE TO KNOW IF THE COUNTY IS WILLING TO EXERCISE IMMINENT DOMAIN. THERE ARE TWO MEETINGS COMING UP IN OUR CITY COUNCIL. MARCH 23RD IS FEASIBILITY STUDY, AND ON APRIL 6TH THERE IS AN APPEAL OF THE PLANNING COMMISSION DECISION --

OC26-1 cont.

MS. PIGGOTT: 30 SECONDS.

MS. LEE: -- TO PUT IN A NEO-INDUSTRIAL PROJECT THERE.

THANK YOU SO MUCH.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. OUR NEXT PREREGISTERED SPEAKER IS RENEE LAWLER. I'M GOING TO ASK YOU TO UNMUTE.

MS. LAWLER: HI. THIS IS RENEE. CAN YOU HEAR ME?

MS. PIGGOTT: YES, WE CAN. GO AHEAD. YOU HAVE TWO MINUTES.

MS. LAWLER: THANK YOU FOR THE OPPORTUNITY TO SPEAK. I'M A STAKEHOLDER RESIDENT OF LONG BEACH. I HAVE BEEN AN ADVOCATE FOR RIVER-RELATED ISSUES SINCE THE MID '90S. IN PARTICULAR, I'M INTERESTED IN THE PRESERVATION OF OUR OPEN SPACES, NOT JUST THE RIVER

OC27-1

OC27-1 cont.

LANDS BUT THE ONE-MILE ZONE ON EITHER SIDE OF THE LAND AS WAS PROMISED IN THIS LEGISLATION. WE HAVE A NUMBER OF CULTURALLY SIGNIFICANT ASSETS WITH THIS RIVER SUCH AS THE LINEAR EQUESTRIAN TRAIL. I ALSO FIND THAT WE HAVE MANY CULTURALLY SIGNIFICANT ASSETS FROM INDIGENOUS INDIAN TRIBES, AND SO THE COMBINATION OF ALL THOSE ASSETS WE'RE FINDING THERE IS NOT EQUITY. THESE LINEAR FEATURES ARE NOT BEING PROPERLY PLANNED FOR.

OC27-2

THE LANGUAGE OF THE LAW -- THE STATE LEGISLATION AB-530 IS REALLY PRIMARY IN UNDERSTANDING THE SCOPE AND OBJECTIVE FOR THIS PARTICULAR DEIR AND REALLY THAT STATE LAW INDICATED THAT THERE WOULD BE AN ALIGNMENT, A COLLABORATION OF MANY ENTITIES UNDERSTANDING THAT THERE'S JUST REALLY NO ONE ENTITY THAT CAN CONSIDER ALL OF THE COMPLEX ISSUES ALONG THE RIVER CORRIDOR. BUT THE CHOICE FOR A PROGRAM EIR IS REALLY NOT ACHIEVING THAT STATE LEGISLATIVE GOAL. SO INSTEAD WHAT YOU'RE DOING IS YOU'RE ASSUMING THAT THE LOCAL ENTITIES, SUCH AS THE CITY OF LONG BEACH, ARE GOING TO USE THE KIT OF TOOLS AND --

MS. PIGGOTT: 30 SECONDS.

MS. LAWLER: -- AND CITIES ARE NOT ADHERING TO THIS PLAN, SO THERE IS NOT EQUITY AND WE DON'T HAVE TEETH AND IF YOU CAN'T IMPLEMENT AND ENSURE THAT THE AGENCIES ALONG THE RIVER ARE GOING TO COOPERATE. SO

OC27-2 cont.

THERE NEEDS TO BE A DIFFERENT MANNER TO ENSURE EQUITY. THAT INCLUDES FLOOD CONTROL, CULTURAL SIGNIFICANCE, AND THE LINEAR NEEDS OF THE ENVIRONMENTAL CORRIDOR.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. OUR NEXT PREREGISTERED SPEAKER IS WENDY KATAGI, K-A-T-A-G-I. I'M NOT SEEING ON THE LINE THIS EVENING. FOLLOWED BY STEVEN APPLETON WHO I'M NOT SEEING ON THE LINE THIS EVENING. GLORIA PINZON. OKAY. I'M NOT SEEING GLORIA PINZON ON THE LINE.

CONNIE ELLIOT, I'M GOING TO ASK YOU TO UNMUTE.

MS. ELLIOT: HELLO.

MS. PIGGOTT: HELLO. GO AHEAD. YOU HAVE TWO MINUTES.

MS. ELLIOT: I LOOKED AT YOUR PLAN ON MY COMPUTER WHICH IS ABOUT 11-BY-14, AND THE MAP WAS REALLY TOO SMALL TO SEE A LOT OF DETAIL, BUT IT DID LOOK TO ME LIKE THE RIVER AS IT GOES -- THERE IS -- SOMEBODY DREW A BRIDGE FROM NORTH WHITTINGTON PARK SOUTH WHITTINGTON PARK VIA THE ROAD RIVERTON, I GUESS IT'S CALLED THE

OC28-1

RIVERTON OVERPASS. THIS IS MISGUIDED. I ONLY KNOW THAT ONE PERSON DREW IT IN ON ONE OF THE OPEN HOUSES, AND RIVERTON IS TOO NARROW TO RUN ANY KIND OF A PATH THROUGH IT. YOU'D HAVE TO TAKE PARK LAND FROM A VERY SMALL PARK; PARK USERS WOULD BE VERY UPSET TO RUN IT THROUGH THERE.

OC28-1 cont.

IT REALLY DOESN'T -- SHOULDN'T HAPPEN. I HAVE BEEN FOLLOWING THE LA RIVER SINCE I WAS ON MAYOR BRADLEY'S LA RIVER COMMITTEE IN THE 1980S. I CAME DOWN TO MEETING AT THE COUNTY BUILDING BEFORE SHEILA KUEHL REPRESENTED MY AREA BECAUSE UNIVERSAL STUDIOS HAD CONTRIBUTED MONEY. I'M STILL NOT CLEAR ON HOW THIS ONE JIVES WITH THAT ONE THAT WE SPENT SO MUCH TIME AT. BUT SINCE I'VE BEEN DOING THIS SINCE THE 1980S, I AM HOPING THAT THIS HAPPENS BEFORE I DIE.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. LADIES AND GENTLEMEN, OUR NEXT PREREGISTERED SPEAKER IS LUKE GINGER WHO I'M NOT SEEING ON THE LINE THIS EVENING. FOLLOWED BY CHRIS HARRIS WHO I'M ALSO NOT SEEING ON THE ZOOM TONIGHT. FOLLOWED BY ANN CANTRELL, I'M GOING TO ASK YOU TO UNMUTE.

OC29-1

MS. CANTRELL: GOOD EVENING. ANN CANTRELL, I LIVE IN LONG BEACH. I'M ALSO A BOARD MEMBER OF THE RIVERPARK COALITION. I THINK OTHERS HAVE MENTIONED THAT THIS MEETING TONIGHT IS CONFUSING TO MANY PEOPLE BECAUSE THIS IS A CEQA DOCUMENT, A PROGRAM EIR, AND MANY PEOPLE ARE -- EVIDENTLY THINK THAT THIS IS A MEETING FOR THE LA RIVER MASTER PLAN. I AM CONFUSED AS TO WHY YOU WOULD DO AN EIR WHEN THE MASTER PLAN HAS NOT BEEN COMPLETED AND APPROVED. I WOULD THINK YOU'RE DOING THIS

BACKWARDS. THE MASTER PLAN SHOULD BE APPROVED FIRST, AND THEN YOU DO CEQA ON IT. THERE'S MANY PEOPLE THAT ARE MAKING SUGGESTIONS AS TO HOW THE MASTER PLAN SHOULD BE CHANGED OR DONE, AND AS I UNDERSTAND IT, YOUR EIR IS NOT CONCERNED WITH THAT. YOU'RE TRYING TO FIND OUT IF THIS IS AN ENVIRONMENTALLY -- THE PROJECT IS ENVIRONMENTALLY CORRECT.

OC29-1 cont.

MS. PIGGOTT: 30 SECONDS.

MS. CANTRELL: I AGREE WITH THE COMMENTS OF TILLY HINTON. SHE BROUGHT UP A LOT OF GOOD POINTS. THE PEOPLE THAT HAVE SPOKEN FOR A NATURAL RIVER, AND I THINK YOU'RE SPENDING A LOT OF TIME AND EFFORT ON A CEQA DOCUMENT THAT IS NOT GOING TO BE APPLICABLE TO WHAT THE MASTER PLAN IS GOING TO, FINALLY, PRESENT.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OUR NEXT PREREGISTERED SPEAKER IS SRABANTI MISHRA WHO I'M NOT SEEING ON THE LINE. FOLLOWED BY WENDY ZIMMERMAN. I'M GOING TO ASK YOU TO UNMUTE, WENDY ZIMMERMAN.

MS. ZIMMERMAN: HI. I'M WENDY ZIMMERMAN, AND I AM A CYCLIST, AND I ATTENDED THE FRIDAY MEETING AT PIERCE. I WANT TO CONTINUE TO MAKE SURE THAT THE ENTIRE

OC30-1

LENGTH OF THE RIVER IS ACCESSIBLE TO CYCLIST AND OTHER USERS OF ACTIVE TRANSPORTATION, SCOOTERS, SKATING,

OC30-1 cont.

WALKING. WHATEVER PEOPLE HAPPEN TO PREFER OR COMES INTO THE FUTURE, BUT I ALSO WANT TO MAKE SURE THAT PUBLIC TRANSIT IN A CLEAN FORM THAT IS EASILY ACCESSIBLE FOR PEOPLE BRINGING BIKES AND SCOOTERS AND THAT KIND OF EQUIPMENT BACK WITH THEM IS READILY AVAILABLE IN BOTH DIRECTIONS ALONG THE ENTIRE LENGTH OF THE RIVER SO THAT PEOPLE CAN GO, SAY, FROM CANOGA PARK TO LONG BEACH, AND THEN THEY CAN GET A RIDE ON PUBLIC TRANSIT WITHOUT MAKING 20 DIFFERENT CHANGES TO GET BACK TO WHERE THEY STARTED. SO I WANT TO MAKE SURE THAT THERE IS A CLEAN, EASY, ACCESSIBLE PUBLIC TRANSIT NETWORK ALONG WITH THE MULTIUSE PATH ALONG THE RIVER.

OC30-2

THE OTHER THING IS I'D REALLY LOVE TO SEE THE CAPS COME BACK AND A LOT OF MY FRIENDS -- EVERY TIME I MENTIONED THE LA RIVER PROJECT, WE WANT OUR CAPS BACK ON THE MANHOLE COVERS, OR WHATEVER YOU WANT TO CALL THOSE COVERS, BECAUSE THEY WERE PART OF OUR CHILDHOOD AND THEY'RE PART OF THE TRADITION OF THE RIVER. THANK YOU.

MS. PIGGOTT: THANK YOU FOR COMMENTS.

OUR NEXT PREREGISTERED SPEAKER IS KAREN BARNETT. I'M GOING TO ASK YOU TO UNMUTE. KAREN BARNETT. KAREN, YOU SHOW UNMUTED ON MY END, BUT WE'RE NOT HEARING YOU. OKAY. I'M GOING TO MUTE YOU, KAREN AND WE'LL TRY AGAIN.

MS. BARNETT: NOW I CAN HERE. HELLO.

MS. PIGGOTT: YEP, THERE WE ARE. YOU HAVE TWO MINUTES.

MS. BARNETT: WE'RE USING TWO COMPUTERS. OKAY. THANK YOU FOR THIS OPPORTUNITY TO SPEAK. I'LL MAKE IT AS QUICK AS POSSIBLE. FIRST, THERE ARE A LOT OF NEIGHBORS -- I LIVE IN ATWATER VILLAGE. I WANT TO SECOND WHAT MARCUS SAID ABOUT FLOOD, TOP PRIORITY. IF THE AREA FLOODS, ALL YOUR PROJECTS GO DOWN RIVER. REGARDING THE NOISE, YOUR STATION IN ATWATER VILLAGE, ST8 LOS FELIZ GOLF COURSE, IT WAS FOUND ON MAY 14 AT THE VERY BEGINNING OF THE PANDEMIC, SO YOUR 6.3 IS PROBABLY LOW. YOU SHOULD INCREASE THAT BY THE AMOUNT OF TURRET TRAFFIC THAT WAS MISSING BECAUSE IT'S NOT REFLECTIVE OF REALITY. YOU HAVE MULTIPLE PROJECTS ALONG THE RIVER, AND ALSO IT WOULD TAKE CARE OF OUR EARLIER COMMENT ON THE DRAFT ABOUT THE DIESEL PARTICULATES.

OC31-1

I ALSO NOTICED THAT LARIVERWORKS SAID -- ASKED THAT THE SCOPE OF ANALYSIS WOULD INCLUDE USE OF SOUND BARRIERS ALONG THE FREEWAY TO MITIGATE THE IMPACTS TO HUMANS AND WILDLIFE AT THE RIVER. ALSO, UNDER LAND CHANGE, WE JUST DISCOVERED IN READING THE DRAFT MASTER PLAN THAT ABOUT TWO MILES ON OUR NEIGHBOR SIDE, THE EAST BANK, AND I THINK YOU CALL IT THE LEFT, ALL OUR ACCESS POINTS ARE NOT IN THE PLAN AND YOU ALSO HAVE ERRORS ON THE RIGHT BANK CALLING OUT FOR ACCESS POINTS WHEN THEY

OC31-2

OC31-2 cont.

ARE NOT THERE AND YOU MISSING PARK SPACES -- IDENTIFYING PARK SPACES. SO FOR YOU TO TRULY UNDERSTAND AND PROPOSE NEW PROJECTS, YOU NEED TO HAVE THAT IN YOUR DATABASE WHICH WOULD IMPACT YOUR SCOPING.

MS. PIGGOTT: 30 SECONDS.

OC31-3

MS. BARNETT: AND THEN WE HAVE -- WE HAVE TO DISAGREE ON PLANNED PROJECTS AND PROPOSED PROJECTS BECAUSE WE HAVE ONE AT LOS FELIZ BRIDGE WHICH DOES NOT FIT THE MASTER PLAN'S CALL OUT, AND IT WOULD IMPEDE ANY FLOOD MITIGATION MEASURES.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS. OKAY. LADIES AND GENTLEMAN, AT THIS POINT WE'RE GOING TO TAKE A QUICK FIVE-MINUTE BREAK FOR OUR TRANSLATOR TO BE ABLE TO GET A SIP OF WATER, AND WE WILL RESUME IN FIVE MINUTES. WHEN WE COME BACK, THE NEXT SPEAKER IS FELICIA BANDER. AGAIN, WE'LL RESUME THE MEETING IN FIVE MINUTES.

(RECESS).

MS. PIGGOTT: OKAY. FELICIA, CAN YOU HEAR US? YOU'RE UNMUTED. FELICIA BANDER, YOU'RE UNMUTED. AND, FELICIA, IF YOU ARE SPEAKING, WE ARE UNABLE TO HEAR YOU. I ALSO GOT A NOTE THAT YOU'RE USING AN OLDER VERSION OF ZOOM, SO I RECOMMEND CALLING IN, AND THEN WE CAN HEAR YOUR COMMENTS THAT WAY. THE CALL IN INSTRUCTIONS ARE ON

THE SCREEN, THE 877-853-5247.

OKAY. OUR NEXT PREREGISTERED SPEAKER IS MARILYN WEINTRAUB WHO I DO NOT SEE ON THE LINE. AGAIN, FOLKS, AS A REMINDER, ANY OF THE QUESTIONS OR COMMENTS IN THE CHAT FEATURE THIS EVENING ARE NOT CONSIDERED OFFICIAL COMMENTS, SO IF YOU HAVE PUT A QUESTION OR COMMENT IN THE CHAT FEATURE, PLEASE BE SURE TO EITHER PROVIDE THAT AS AN ORAL COMMENT TONIGHT, PROVIDE IT ELECTRONICALLY OR IN WRITING.

OKAY. OUR NEXT PREREGISTERED SPEAKER IS TOM WILLIAMS. I'M NOT SEEING MR. WILLIAMS ON THE LINE THIS EVENING. OUR NEXT PREREGISTERED SPEAKER IS MARCUS FOX WHO I'M ALSO NOT SEEING ON THE ZOOM TONIGHT. OKAY. OUR NEXT PREREGISTERED SPEAKER IS RAE GABELICH. I'M GOING TO ASK YOU TO UNMUTE. RAE GABELICH, I'M GOING TO ASK YOU TO UNMUTE. OKAY. RAE, IT'S SHOWING -- IT IS NOT UNMUTING YOU. AGAIN, YOU SHOULD GET A PROMPT FROM ME LETTING YOU UNMUTE, OR IF YOU'RE A CALL-IN USER, YOU HAVE TO LISTEN TO THE PROMPT, AND THEN YOU'LL PUSH STAR NINE TO UNMUTE. OKAY?

OUR NEXT PREREGISTERED INDIVIDUAL TONIGHT IS MICHAEL CONNOR WHO I AM NOT SEEING ON THE LINE TONIGHT. FOLLOWED BY JASMINE GONZALEZ. JASMINE, I'M GOING TO ASK YOU TO UNMUTE.

OC32-1 MS. GONZALEZ: YEAH, HI. MY NAME IS JASMINE.

I LIVE IN SOUTHEAST LOS ANGELES. MY CONCERN WITH THE PEIR IS THAT IT IS PROPOSING A PHYSICAL CHANGE TO THE ENVIRONMENT WITHOUT TAKING INTO ACCOUNT THE IMPACT IT WILL HAVE ON HUMAN LIVES AND ALL OF OUR COMMUNITIES ALONG THE LA RIVER. THE PEIR DOES NOT SUBSTANTIALLY ADDRESS HOMELESSNESS NOR DOES IT ADDRESS HOW A PROJECT LIKE THIS COULD ACCELERATE DISPLACEMENT OF OUR COMMUNITY MEMBERS. OUR COMMUNITIES ARE A PART OF THIS ENVIRONMENT, AND WHAT YOU DO AFFECTS US. IT AFFECTS OUR EMOTIONAL HEALTH, OUR MENTAL HEALTH, OUR PHYSICAL HEALTH, AS WELL AS OUR ABILITY TO THRIVE. SO I RECOMMEND THERE BE A THOROUGH ANALYSIS ON THE HEALTH IMPACTS TO US AND OUR COMMUNITIES AS A WHOLE, AND ALSO AN ANALYSIS ON WHETHER THIS PROJECT WILL INCREASE HOMELESSNESS.

OC32-1 cont.

THIS IS A DREAM PROJECT FOR DEVELOPERS HUNGRY TO MAKE A BUCK, MEANWHILE, US RENTERS HAVE NO REAL PROTECTIONS FROM RISINGS RENTS. I SPEAK CANDIDLY WHEN I SAY THAT, AS A RENTER, I FEEL AS THOUGH I AM IN CONSTANT ATTACK BY BOTH MY CITY AND MY COUNTY. THE APARTMENT DIRECTLY NEXT ME IS ALREADY 55 PERCENT MORE EXPENSIVE THAN MINE, AND THIS AFFECTS ME AND MY WELLBEING AS I AM ALREADY RENT BURDENED. THREE OUT OF FOUR PEOPLE IN LA COUNTY ARE RENT -- ARE ALREADY RENT BURDENED. MY POINT IS, I WISH THAT YOU, PUBLIC WORKS CARED ENOUGH TO

OC32-2

INCLUDE AN ANALYSIS OF THIS IN THE PEIR. ALSO, IT IS NAIVE TO THINK THAT ANY ENVIRONMENTAL IMPACTS WOULD BE LIMITED TO A TWO-MILE WIDE AREA ALONG THE RIVER, WHICH IS THE STUDY AREA IN THE PEIR. THE REPORTS --

MS. PIGGOTT: 30 SECONDS.

OC32-2 cont.

MS. GONZALEZ: THE REPORT DOESN'T TAKE INTO ACCOUNT THAT DISPLACED COMMUNITY MEMBERS MAY HAVE TO HAVE LONGER COMMUTES CAUSING AN INCREASE IN TRAFFIC. MY RECOMMENDATION IS TO EXPAND THE STUDY AREA AND INCLUDE A STUDY ON THE INCREASES IN TRAFFIC CAUSED BY A GENTRIFYING PROJECT SUCH AS THIS.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OUR NEXT SPEAKER THIS EVENING IS SEYMOUR. I'M GOING TO ASK YOU TO UNMUTE. OKAY. ZOOM PARTICIPANT UNDER THE NAME SEYMOUR, YOU'RE NEXT TO SPEAK. I'M GOING TO ASK YOU TO UNMUTE.

MR. LIAO: HELLO MY NAME IS SEYMOUR LIAO. I LIVE IN ATWATER VILLAGE, AND I WOULD VERY MUCH ENCOURAGE THE PEIR STUDY TO AGGRESSIVELY TAKE INTO CONSIDERATION THE CONNECTIVITY IN AND AROUND THE LA RIVER BOTH UP AND

OC33-1

DOWN ITS BANKS, MOST NOTABLY ON THE EAST SIDE AND ALL OF THE CONNECTIVITY POINTS COMING INTO THE RIVER AND HOW WELL THE NON-VEHICULAR TRAFFIC WILL FEED THROUGH THE RIVER, SO WELL CONNECTED BIKE LANES AND ADA ACCESSIBLE

OC33-1 cont.

ACCESS POINTS.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. OUR NEXT PREREGISTERED SPEAKER IS ERICA RICH. I SEE A PARTICIPANT UNDER THE NAME JUST ERICA. I'M GOING TO ASK YOU TO UNMUTE IN CASE THIS IS YOU. ZOOM USER UNDER THE NAME ERICA -- OH, THERE YOU GO. YOU'RE UNMUTED.

MS. RICH: HI. YEAH, THAT WASN'T ME, BUT I AM ALSO -- I'M JUST GOING TO SPEAK, I GUESS. I'M ALSO A RESIDENT OF THE ATWATER VILLAGE AREA, AND I DEFINITELY CONCUR WITH THE COMMENTS THAT HAVE BEEN MADE BY KAREN AND MARK FOX AND ALSO SEYMOUR. I AM A RESIDENT, ACTUALLY, THAT LIVES RIGHT AT THE, I WOULD SAY, ONE OF ENTRY POINTS TO THE LA RIVER, AND I WOULD CONCUR WITH A LOT PEOPLE WHERE IT'S TRUE THAT THERE HAVE BEEN MANY

OC34-1

HOMELESS PEOPLE THAT HAVE BEEN, I GUESS, MIGRATING TO THAT PART OF THE RIVER, AND THEY'VE BEEN SLEEPING ON BENCHES THAT YOU GUYS HAVE CREATED. ALL THE, I WOULD SAY, PLANTATIONS THAT YOU GUYS HAVE ALSO -- NOT YOU GUYS PER SE, BUT OTHER PEOPLE FROM PAST TIMES HAVE DONE SO THAT, YOU KNOW, LIKE, YOU GUYS DON'T REALLY MAINTAIN THE STUFF THAT YOU ALREADY PUT INTO THE AREA. SO MY CONCERN IS, IF YOU HAVEN'T MAINTAINED WHAT YOU'VE ALREADY ESTABLISHED, WHAT IS THE LIKELIHOOD THAT YOU WILL

OC34-1 cont.

CONTINUE TO MAINTAIN WHATEVER YOU PUT IN UNESTABLISHED RIGHT NOW? SO THAT'S A VERY BIG CONCERN FOR ME AS WELL AS THE ADDITIONAL NOISE THAT WILL BE BROUGHT IN TO THE AREA.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. OUR NEXT PREREGISTERED SPEAKER IS ALICE HOWELL WHO I AM NOT SEEING ON THE LINE TONIGHT. FOLLOWED BY VERONICA SOTO WHO I'M NOT SEEING ON THE ZOOM. FOLLOWED BY BILL DEWITT. BILL DEWITT I'M NOT SEEING ON THE LINE TONIGHT.

LENA, I'M GOING TO ASK YOU TO UNMUTE.

MS. LENA: HELLO. CAN YOU HEAR ME?

MS. PIGGOTT: YES. GO AHEAD. YOU HAVE TWO MINUTES.

OC35-1

MS. LENA: I LIVE IN CANOGA PARK, THE AREA -- IT'S CALLED THE RIVER DISTRICT AND THE WARNER CENTER 2035 PROJECT, AND I DO FEEL WITH SEVERAL OF THE COMMENTS REGARDING APARTMENTS AND HOUSING AND SO FORTH, HERE ALONE IT'S GOING TO BE 24,000 NEW APARTMENTS, NONE OF WHICH ARE OWNER OCCUPIED THAT IS CONSISTING OF ABOUT 80,000 HOMES. MINE -- MY PARTICULAR HOME -- CONDOS DIRECTLY BEHIND AND ADJACENT TO THE RIVER WHICH IS -- MY WALL IS ACTUALLY ABOUT FIVE FEET IN HEIGHT AND THAT'S IT. THAT'S WHAT STOPS ME AND A SMALL PARKING STRUCTURE

WHICH IS GOING TO TURN INTO A PARK AND THEN THE RIVER IS RIGHT BEHIND IT. LAST YEAR WE HAD A HORRIBLE -- AND EVERY YEAR, BUT LAST YEAR WAS ONE OF THE WORST -- WITH STENCH, VERY MUCH LIKE A SEWER STENCH, TO THE POINT WHERE AN ODOR WAS CAUSING SEVERAL PEOPLE TO THROW UP, TO VOMIT, AND IT LASTED FOR ABOUT THREE WEEKS. I'M NOT SURE WHAT THE LA RIVER IS, IN CONJUNCTION WITH THE AIR QUALITY CONTROL, IS DOING ABOUT ALL OF THIS. YES, I AGREE WITH THE PERSON -- THE GENTLEMAN THAT SPOKE ABOUT THE STUDIO CITY AREA WITH THE HUMAN FECES AND THE HOMELESS BACK HERE.

OC35-1 cont.

IN ADDITION, THERE'S SO MANY MOSQUITO ISSUES HERE ALONG WITH THE RIVER. THAT ALONE IN REGARDS TO THE ENVIRONMENT NEEDS TO BE TAKEN CARE OF. THE HEALTH PANDEMIC -- THE BORDERS BETWEEN OUR OWN HOMES -- IN A DISTANCE OF SIX FEET. I'M NOT SURE IF THAT'S ALL BEING TAKEN CARE OF BUT THERE SHOULD BE NO PUBLIC SPACE IN THAT AREA.

MS. PIGGOTT: 30 SECONDS.

OC35-2

MS. AYVAZIAN: NOT ONLY NOW, BUT ALSO FOR FUTURE PANDEMICS. SO WE DEFINITELY -- FOR HOMEOWNERS WE NEED THAT SIX FEET OF SPACE BETWEEN US AND THE PUBLIC. I'M NOT SURE WHICH DEPARTMENT IS ALSO TAKING ON AND TAKING A RISK IN MANAGEMENT OF THAT. SO THANK YOU SO MUCH FOR YOUR TIME.

THANK YOU SO MUCH FOR YOUR TIME.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS. OKAY.

VERONICA SOTO, I'M GOING TO UNMUTE YOUR LINE.

MS. SOTO: GREAT. GOOD EVENING. I JUST WANT TO -- FIRST OF ALL, I WANTED TO RECOGNIZE -- YOU KNOW, RECOGNITION OF WOMEN'S HISTORY MONTH. I JUST THOUGHT IT WAS GREAT TO SEE SO MANY FEMALE PLANNERS, YOU KNOW, GIVING THE PRESENTATION TONIGHT. THAT WAS A BIG WIN FOR US WOMEN. I ALSO WANT TO BASICALLY SHARE THAT THE COMMUNITY SESSIONS I THOUGHT WERE VERY SUCCESSFUL. I DID ATTEND ABOUT A COUPLE OF YEARS AGO AND PROVIDED COMMENT, AND I SEE THOSE COMMENTS REFLECTED IN THE PRIORITIES SO I'M VERY PLEASED ABOUT THAT. BUT I STILL DO HAVE THREE CONCERNS. ONE, IS THE NEED FOR CONSISTENT OVERSIGHT OF THE RIVER AND ITS APPROVED USES AND POLLUTION CONTROL. ALSO, DISPLACEMENT AND GENTRIFICATION SPECIFICALLY FOR THOSE THAT RESIDE IN THE SOUTHEAST CITIES. AND THEN ALSO, I WOULD SAY, GREATER RESPECT AND ACKNOWLEDGEMENT OF THE INDIGENOUS CULTURES THAT THRIVED ALONG THE RIVER NEED TO BE LIFTED UP.

I THINK THAT WOULD SAY A LOT TO THE COMMUNITIES THAT RESIDE THERE, ESPECIALLY A PERSON WHO HAS BEEN IN CALIFORNIA FOR MULTIPLE GENERATIONS.

THANK YOU.

OC36-1

OC36-2

OC36-3

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. OUR NEXT PREREGISTERED SPEAKER JEFF ABRAMSON WHO I'M NOT SEEING ON ZOOM TONIGHT. FOLLOWED BY MICHAEL BERG. MR. BERG, I'M GOING TO ASK YOU TO UNMUTE.

MR. BERG: THANK YOU MS. PIGGOTT. I WANTED TO LET YOU KNOW THAT I AM FROM THE LOS ANGELES COMMUNICATION HISTORICAL SOCIETY; I AM A BOARD MEMBER. I'M ALSO ON THE BOARD OF THE ALISO STREET MANUFACTURED GAS PLANT HISTORICAL SOCIETY AND THE CHINESE HISTORICAL SOCIETY OF SOUTHERN CALIFORNIA, AND I AM COMMENTING ON THIS PROJECT -- THE IMPACT OF THE ENVIRONMENT -- ON THE PROJECT, NOT THE ENVIRONMENT, BUT THE PROJECT ON THE ENVIRONMENT ON SITE OF THE LARGEST INDIGENOUS TRIBE'S CITY TONGVA IN THE LA RIVER BETWEEN WHAT IS ALISO STREET, 101 FREEWAY, EAST CESAR CHAVEZ OR MACY'S STREET THAT LOCATION WAS THE SITE OF THE LARGEST CITY IN THE TONGVA NATION. IT ALSO HELD THE EL ALISO TREE. IT WAS SUBSEQUENTLY TURNED INTO A MANUFACTURED GAS PLANT AND IS NOW ON EPA GROUND FIELD OF HISTORIC PROPORTIONS 64 ACRES OF TOXIC ACID WASTES AWAITS ANYBODY WHO ENTERS THAT AREA AND THAT SHOULD BE RAISED AND CREATED AS AN OPEN PARK OR EQUITABLE ACCESS TO THE LA RIVER FROM LEADING STATION AND TO ALSO CELEBRATE THE FACT THAT THE ORIGINAL INDIGENOUS PEOPLE HAVE THE LARGEST CITY AND THE EL ALISO

OC37-1

TREE IN THAT LOCATION WHICH WAS KNOWN TO INDIGENOUS PEOPLE IN THE UNITED STATES AS FAR AWAY AS --

MS. PIGGOTT: 30 SECONDS.

MR. BERG: -- AS FAR AWAY AS PIMA, ARIZONA. THIS SITE HAS -- CAUSE OF INJURY AND DEATH OF MANY PEOPLE DUE TO POLLUTION AND HAS TO BE CLEANED UP BEFORE ANY PROJECT CAN BE DONE THERE TO ENSURE THE SAFETY OF THE PEOPLE WHO WOULD LIKE TO USE IT IN THE FUTURE.

OC37-1 cont.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OUR NEXT PREREGISTERED SPEAKER IS SCOTT EDWARDS WHO I AM NOT SEEING ON THE ZOOM TONIGHT, FOLLOWED BY MARIANNE BENDER. MS. BENDER, I'M GOING TO ASK YOU UNMUTE.

MS. BENDER: YES, HI. THIS IS MARIANNE BENDER. I'M A STAKEHOLDER WITH THE ATWATER VILLAGE NEIGHBORHOOD COUNCIL RIVER COMMITTEE. MY MASTER PLAN PEER COMMENT IS ABOUT PUBLIC SAFETY ALONG THE RIVER. IN THE CURRENT MASTER PLAN, PAGE 161, IT SAYS, COMMUNITY MEMBERS NAMED SAFETY AS THE TOP REASON THEY DO NOT USE THE LA RIVER. IF SAFETY IS THE TOP REASON WHY THE PUBLIC IS NOT USING THE RIVER, THEN WE FEEL THAT THE PLAN DOES NOT DO ENOUGH TO PRIORITIZE PUBLIC SAFETY. IN THE PEIR, SECTION 3.14, POLICE PROTECTION, IT READS, PUBLIC SERVICES, SUCH AS LAW ENFORCEMENT AND FIRE, HAVE BEEN ACTIVELY DEVELOPING

OC38-1

OC38-1

IN TANDEM WITH GROWTH IN THE COMMUNITIES AND THE REGION. I HAVE TO SAY THAT THIS ABOVE STATEMENT IS SIMPLY NOT CORRECT. LAW ENFORCEMENT AGENCIES HAVE NOT BEEN ACTIVELY DEVELOPING IN TANDEM WITH GROWTH. ACCORDING TO LAPD THEMSELVES THERE IS CURRENTLY NO ACTIVE LAW ENFORCEMENT ON THE LA RIVER ITSELF. AND THE DEFUNDING/RECONSTRUCTING STRUCTURING OF LAPD, THERE ARE CURRENTLY NO PLANS OR BUDGET INCREASES TO HAVE ANY ACTIVE ENFORCEMENT ON THE RIVER.

OC38-2

IN ADDITION, THE LA RIVER IS NOT MAPPED IN THE 311 SYSTEMS OF LA RESIDENT CALL SYSTEM. THEREFORE, WHEN A RESIDENT TRIES TO PLACE A SERVICE REQUEST, CITY AGENCIES OFTEN ARE NOT EVEN ABLE TO FIND THE PROBLEM, SUCH AS TRASH, GRAFFITI, HOMELESS CAMPS, AND THE LIKE. ARE YOU GOING TO SAY 30 SECONDS? WE STRONGLY RECOMMEND --

MS. PIGGOTT: 30 SECONDS.

MS. BENDER: -- WE STRONGLY RECOMMEND THAT THE MASTER PLAN PRIORITIZES A THOROUGH MAPPING WITH MILAGE MARKERS AND THE LIKE ON BOTH BANKS OF THE RIVER, EAST AND WEST, NORTH AND SOUTH. WE ALSO RECOMMEND THE PLAN ADVOCATES INCREASED COUNTY AND CITY FUNDING FOR LAW ENFORCEMENT TO ADDRESS THE RIVER AREA.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. SCOTT EDWARDS, I SEE YOU NOW. I'M GOING TO ASK YOU TO UNMUTE.

MR. EDWARDS: HI. ARE YOU ABLE TO HEAR ME?

MS. PIGGOTT: YES. GO AHEAD. YOU HAVE TWO MINUTES.

MR. EDWARDS: YEAH. I LIVE IN BURBANK -- I'VE LIVED ALSO IN LOS FELIZ, ATWATER VILLAGE, AND LASSEN VALLEY. I RIDE A BICYCLE FREQUENTLY ALONG THE LA RIVER BIKE PATH BOTH TO COMMUTE, SHOP, AND IT'S A LIFESTYLE CHOICE TO IMPROVE HEALTH AND WELLNESS IN THE COMMUNITY OF THE PEOPLE THAT I LIVE WITH. I WOULD LIKE TO SEE MORE ASSESSMENT IN THE ENVIRONMENTAL IMPACT REVIEW OF THE AVAILABILITY OF PUBLIC SPACES. THIS BECOMES ESPECIALLY IMPORTANT NOW BECAUSE WE NEED TO GATHER TOGETHER AND YET STAY APART, AND SO THE RIVER PRESENTS AN OPPORTUNITY FOR LARGE PUBLIC EVENTS, SPACES INCLUDING ARTWORKS, ENTERTAINMENTS, AND SO ON.

OC39-1

THE OTHER THING I WOULD LIKE TO HEAR MORE ABOUT IN THE ENVIRONMENTAL IMPACT REVIEW IS THE IMPACT ON THE COMMUNITIES AND INDIGENOUS PEOPLES AND THOSE THAT ARE ECONOMICALLY IMPACTED DIRECTLY BY THEIR INVOLVEMENT IN THESE PROJECTS AS THEY MOVE FORWARD. I'VE READ THE NINE OBJECTIVES AND AGREE WITH ALL OF THEM. HOWEVER, NINE OBJECTIVES IS ONE -- WHAT IS THAT ONE MISSION STATEMENT FOR THE LA RIVER? IS IT A WAY OF CONNECTING THE ENTIRE

OC39-2

51 MILES OF THE CITY FROM THAT UNFORTUNATE CONFLUENCE AT THE FAR NORTH END OF THE WEST VALLEY ALL THE WAY DOWN INTO LONG BEACH, OR DO WE RECOGNIZE THE SPECIAL AND PARTICULAR NEEDS OF EACH OF THE COMMUNITIES THAT LIVE ALONG THAT RIVER AND THOSE CITIES THAT MAY PREFER PROJECTS THAT ARE REVENUE PRODUCING AND OTHER COMMUNITIES THAT MAY PRODUCE PROJECTS THAT ARE MORE CONCRETE SLABS AND BRIDGES AND ACCESS POINTS.

OC39-2 cont.

MS. PIGGOTT: 30 SECONDS.

MR. EDWARDS: EACH OF THESE CONCERNS, I THINK, ARE IMPORTANT, AND I'M HOPEFUL TO CONTINUE TO PARTICIPATE IN THE PLANNING AND DEVELOPMENT PROJECT OVER THE, YOU KNOW, LET'S SEE SOME CHANGE ON THE RIVER. LET'S MAKE IT HAPPEN NOW. I'M READY; LET'S GO.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OUR NEXT SPEAKER IS AIDA ASHOURI. I'M GOING TO ASK YOU TO UNMUTE.

MS. ASHOURI: HI. THANK YOU SO MUCH FOR HAVING ME. MY NAME IS AIDA ASHOURI, AND I HAVE -- I WOULD LIKE TO ECHO THE COMMENTS OF THE EAST YARD COMMUNITIES. I THINK THAT THIS PLAN NEEDS TO HAVE INDIGENOUS COMMUNITIES AT THE FOREFRONT. CALIFORNIA HAS A HISTORY OF IGNORING INDIGENOUS PRACTICES. THIS WAS EMBLEMATIC IN THE ISSUES WITH THE WILDFIRES, AND LA SHOULD LEARN

OC40-1

OC40-1 cont.

FROM THE MISTAKES OF COMMUNITIES THAT HAVE IGNORED INDIGENOUS KNOWLEDGE. MEXICO CITY IS A GOOD EXAMPLE WHERE THEY IGNORED THE PRACTICES AND NOW FACE DROUGHT BECAUSE IT HAS PAVED OVER THEIR WATER SOURCES.

OC40-2

THE OTHER THING I WOULD ASK IS THAT THE RIVER BE TREATED, NOT JUST AS A RECREATION POINT BUT ACTUALLY A POINT OF USE FOR THE LAND AND IT BE USED BASICALLY TO MITIGATE CARBON FOOTPRINT AND USED AS A, BASICALLY, A BIKE FREEWAY AND THAT DEPARTMENT OF TRANSPORTATION WOULD BE INCORPORATED IN TERMS OF USING THE LA RIVER AS ACCESS POINT FOR BICYCLISTS AND FEEDING INTO THE -- THE COMMUNITIES ALL ALONG THE RIVER SO PEOPLE CAN USE IT AS A TRANSPORTATION POINT AND THIS SHOULD BE WORKED IN TO SUSTAINABILITY PLAN AS WELL. AS A MEMBER OF THE LOS FELIZ NEIGHBORHOOD COUNCIL COMMITTEES, THE ENVIRONMENTAL AND CULTURAL AFFAIRS, WE'RE PLANNING TO GET AN EVENT ON THE LA RIVER HOMELESSNESS FOR EARTH DAY. YOU CAN LEARN MORE AT MY INSTAGRAM AT AIDAFORLOSFELIZ. I'M ALSO RUNNING FOR THE LOS FELIZ NEIGHBORHOOD COUNCIL THIS --

MS. PIGGOTT: 30 SECONDS.

OC40-3

MS. ASHOURI: -- IF YOU'RE -- APPLY FOR YOUR BALLET AND LEARN MORE ON MY INSTAGRAM OR MY WEBSITE AIDAFORLOSFELIZ.COM AND PLEASE JOIN US ON EARTH DAY. AND IF YOU KNOW OF ANY INDIGENOUS REPRESENTATION, WE'D LOVE TO HAVE THEM AT OUR MEETING, AND PLEASE CONTACT ME.

OC40-3 cont.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OUR NEXT PREREGISTERED SPEAKER IS CHRISTINA ROWE. I'M GOING TO ASK YOU TO UNMUTE.

MS. ROWE: HI. THANK YOU. CAN YOU HEAR ME?

MS. PIGGOTT: YES, WE CAN. GO AHEAD. YOU HAVE TWO MINUTES.

MS. ROWE: I AM CHRISTINE ROWE. I WANT TO THANK YOU FOR THE PRESENTATION. I WANT TO SAY I WISH IT WAS -- THERE WAS MORE TO IT. I WANT TO THANK ALL THE SPEAKERS WHO HAVE SPOKEN TODAY BECAUSE I REALLY HAVE NOT DISAGREED WITH ANY OF THEM. I WOULD LIKE TO REFERENCE, IN TERMS OF THE INDIGENOUS PEOPLE, THAT WHERE THIS

OC41-1

BEGINS ON CANOGA PARK THAT I WOULD RECOMMEND THAT THERE ARE ACTUALLY FOUR TRIBES THAT ARE HISTORIC, THE CHUMASH, TONGVA, FERNANDEÑO, AND GABRIELEÑO ALL AND THAT THERE SHOULD BE A PHASE 1 SURVEY, ARCHEOLOGICAL SURVEY OF THE WHOLE ROUTE; THAT THERE SHOULD BE -- ANY WORK THAT'S GOING TO BE DONE, WOULD REQUIRE ARCHEOLOGICAL AND NATIVE AMERICAN MONITORING.

BUT IN TERMS OF THE ONE PERSON THAT I DISAGREED WITH, WAS SOMEONE REFERENCING CARRYING THE RIVER ALL THE

OC41-2

WAY OUT TO NATURE PRESERVE. AS A FORMER MEMBER OF THE WEST HILLS NEIGHBORHOOD COUNCIL, THIS ISSUE OF THE RIVER GOING BEYOND THE CONFLUENCE AT CANOGA PARK WAS DISCUSSED

AND WOULD IMPACT THE SINGLE FAMILY RESIDENCES; THAT THEY WOULD HAVE BEEN OBLIGATED TO GET ACCESS THROUGH THEIR PRIVATE BACKYARDS AND HAVE TO PAY FOR CERTAIN -- THERE WAS REQUIREMENTS UNDER THE GUIDELINES FOR MITIGATION THAT -- THAT THEY WOULD HAVE TO DO THINGS TO THEIR OWN PRIVATE PROPERTY. AND WITH THE CONCERNS ABOUT THE HOMELESS AND GANG ACTIVITY THAT I'VE HEARD ABOUT HISTORICALLY IN CANOGA PARK, ALONG THE RIVER THERE --

OC41-2 cont.

MS. PIGGOTT: 30 SECONDS.

MS. ROWE: -- I WOULD NOT LIKE TO SEE THAT IN WEST HILLS. AGAIN, IT WOULD BE BEHIND SINGLE FAMILY RESIDENCES. SO I DO -- I KNOW THAT THERE ARE VARIOUS CREEKS THAT LEAVE OFF THE CONFLUENCE AT CANOGA HIGH, BUT THE RIVER STOPS THERE, AND I WOULD LIKE IT TO STOP THERE FOR THE REASONS THAT I MENTIONED.

THANK YOU FOR YOUR TIME.

MS. PIGGOTT: THANK YOU FOR COMMENTS.

OKAY. FELICIA BANDER, I'M GOING TO UNMUTE YOUR CALL-IN LINE, CALL-IN LINE ENDING IN 6509.

MS. BANDER: CAN YOU HEAR ME?

MS. PIGGOTT: YES, WE CAN HEAR YOU. GO AHEAD. YOU HAVE TWO MINUTES.

MS. BANDER: THANK YOU SO MUCH. I THINK THAT THE PRIMARY GOAL IN THE LA RIVER MASTER PLAN SHOULD BE THAT WE NEED TO USE THIS RIVER AS THE WATERSHED THAT IT

OC42-1

OC42-1 cont.

IS MEANT TO BE FOR LOS ANGELES. WE HAVE SUCH A PROBLEM AND WILL ONLY GET WORSE IN THE FUTURE WITH NOT ENOUGH WATER TO SUSTAIN OURSELVES, AND WATER CAPTURED AND BEING ABLE TO USE THE WATER THAT FALLS AS RAIN AND, YOU KNOW, INTO LOS ANGELES, IT'S GOT TO BE THE PRIMARY FOCUS OF REVAMPING THE RIVER.

OC42-2

SECONDARILY, I'M INTERESTED IN THE RIVER AS A NATURAL SPACE. I AM NOT -- I AM NOT A SUPPORTER OF THE CONCRETE PARKS ABOVE THE RIVER. MY UNDERSTANDING IS THAT THAT IS NOT AN ENVIRONMENTALLY GOOD SOLUTION. I'M PERSONALLY NOT IMPRESSED THAT WE HAVE A WORLD-RENOWNED ARCHITECT, FRANK GEHRY, HAVING SO MUCH INVOLVEMENT IN THIS PLAN. TO ME THAT'S LIKE GENTRIFICATION OF THE RIVER AND NOT MY VISION FOR WHAT WE SHOULD BE DOING AT THIS TIME. I'M VERY CONCERNED ABOUT DISPLACEMENT OF LOWER INCOME PEOPLE ALONG THE SIDES OF THE RIVER AND --

MS. PIGGOTT: 30 SECONDS.

MS. BANDER: -- WHERE THAT MAY BE NECESSARY, WE'VE GOT TO SATISFACTORILY REHOUSE THOSE PEOPLE. AND

OC42-3

LASTLY, YES, I AM IN SUPPORT OF MORE INDIGENOUS INPUT. WE NEED TO FOLLOW THE INDIGENOUS PEOPLE HERE AND GET THEIR INPUT INTO THIS PROJECT.

THANK YOU SO MUCH FOR ALLOWING ME TO SPEAK TO.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. REGISTERED SPEAKER LEWIS, I'M GOING TO

ASK YOU TO UNMUTE AGAIN AND SEE IF WE CAN HAVE SUCCESS, LEWIS. LEWIS, YOU JUST EITHER NEED TO TOGGLE OVER THE UNMUTE BUTTON OR PRESS STAR NINE IF YOU'RE A CALL-IN LISTENER.

OKAY. THAT IS ALL OF OUR PREREGISTERED SPEAKERS THIS EVENING, LADIES AND GENTLEMEN. I'M NOW GOING TO GO TO THOSE HAVE REQUESTED TO SPEAK OR BE ADDED TO THE LIST. SO CALL-IN USER ENDING IN 3713, I'M GOING TO ASK YOU TO UNMUTE.

UNIDENTIFIED SPEAKER: HELLO. CAN YOU HEAR ME?

MS. PIGGOTT: YES. GO AHEAD. YOU HAVE TWO MINUTES.

UNIDENTIFIED SPEAKER: OKAY. THANK YOU. I'M A TURTLE AND I'VE LIVED IN THE LA RIVER WITH THE UNSHELTERED HUMAN RESIDENTS OF THE WASH, AKA THE RIVER PEOPLE, FOR MANY YEARS. AND I'M WORRIED ABOUT THE OBVIOUS LACK OF INPUT FROM THE UNSHELTERED RIVER RESIDENTS AS WELL AS THE ABSENCE OF TURTLE COMPLICATIONS IN YOUR UPDATED PLANS. THESE POPULATIONS WILL BE THE MOST IMPACTED BY THE CONSEQUENCES OF THIS DOCUMENT WHICH AS IT STANDS, IS OFFERING NO REASSURANCES THAT THEY WON'T BE DISAPPEARED. IT ALSO MAKE NO EFFORT TO REACH THEM, CONNECT THEM HERE FOR THE RIVER WHICH THEY KNOW MORE INTIMATELY THAN MOST OF THE PEOPLE INVOLVED WITH THE DRAFTING PLAN. THEY SLEEP ON ITS BANKS, FISH IN ITS

OC43-1

OC43-1 cont.

WATER, AND FIND HOMES IN THE OVERGROWTH AND BRIDGES THAT PUNCTUATE ITS 104 MILES GREEN LAND.

LIKE TURTLES, UNSHELTERED HUMANS ARE VULNERABLE AND NEED PROTECTION. EVEN BEFORE THE PANDEMIC, THEIR AVERAGE LIFE EXPECTANCY WAS IN THEIR 40S IN LA COMPARED TO IN THEIR 80S FOR THE OVER 99 PERCENT OF ANGELINOS THAT ARE HOUSED. AND DISPLACEMENT IS WHAT BROUGHT THEM TO THE LA RIVER. SOME OF THEM CAME FROM OVERPASSES AND UNDERPASSES THANKS TO JUDGE CARTER EVICTING ALL THE HIGHWAYS. AND THEIR RIGHTS TO THE LA RIVER IS GUARANTEED IN THE CALIFORNIA CONSTITUTION. DISPLACEMENT

OC43-2

IS A HUGE REASON WHY THEY AREN'T LIVING FULL LIVES AND I WOULD LIKE TO SEE IT ADDRESSED IN THE PLAN WITH LIKE -- I WOULD LIKE TO SEE IT ACTUALLY ADDRESSED IN THE PLAN AND NOT JUST -- THEY SAY THAT IT IS GOING TO GO TO THE AUTHORITIES THAT HAVE ALREADY FAILED THESE PEOPLE.

SO --

MS. PIGGOTT: 30 SECONDS.

CALLER 3713: -- THEY CAN DO BETTER THAN THAT.

SO THANK YOU FROM THE UNSHELTERED HUMAN AND CUSTODIAN RESIDENTS OF THE LOS ANGELES RIVER.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. LEWIS, I'M GOING TO TRY ONE MORE TIME. IT'S GOING TO PROMPT YOU TO UNMUTE, AND THEN YOU'LL PUSH STAR SIX. CALL-IN USER LEWIS.

OKAY. LADIES AND GENTLEMEN, I'LL NOW GO TO THOSE WHO HAVE THEIR HANDS RAISED.

R.B., I SEE YOUR HAND IS RAISED. I'M GOING TO ASK YOU TO UNMUTE. AGAIN, LADIES AND GENTLEMEN, THIS IS NOT A QUESTION-ANSWER SESSION. AS I UNMUTE YOU, YOU'LL HAVE TWO MINUTES TO PROVIDE AN ORAL COMMENT. R.B.? PARTICIPANT UNDER THE NAME R.B., I SEE YOUR HAND IS RAISED. I'M GOING TO ASK YOU TO UNMUTE.

MS. BALLHAUS: YES. HELLO. MY NAME IS RAMONA BALLHAUS, AND I'M LONG-TERM RESIDENT IN THE NORTHEAST. WHAT I WOULD REALLY LIKE IS ACCOUNTABILITY FOR THE CLEANUPS OF DIFFERENT BROWN SITES THAT RUN ALONG THE LA RIVER AND TO ENSURE MORE EQUITABLE HOUSING. THAT ALSO CONTAINS LOW-INCOME HOUSING NOT JUST WHAT YOU SO-CALLED AFFORDABLE HOUSING BECAUSE THIS IS ONLY ENCOURAGING GENTRIFICATION. IN OUR AREA IT HAS ALREADY STARTED. AND IT'S LUXURY APARTMENTS INSTEAD OF PROVIDING HOUSING TO THE MOST NEEDED. BUT MOST OF ALL, BECAUSE OF ALL THE CITIES AND ENTITIES INVOLVED, THERE IS NO MENTION OF WHO THE LEAD PERSON OR AGENCY IS GOING TO BE THAT'S GOING TO OVERSEE THIS PROJECT. EVERY TIME YOU TRY -- AND YOU MENTION YOU HAVE LIKE 100-AND-SOMETHING PROJECTS ALONG THE RIVER, BUT THERE IS NO ONE PERSON TAKING ACCOUNTABILITY FOR ANYTHING THAT IS HAPPENING OR ONE AGENCY OR LEAD PERSON THAT THE

OC44-1

OC44-1 cont.

COMMUNITY CAN REACH OUT TO.

I ALSO AGREE WITH WHAT'S BEEN SAID IN THE PAST THAT THERE SHOULD BE MORE OUTREACH IN THE COMMUNITY, AND WHEN I'M TALKING ABOUT OUTREACH, I'M NOT TALKING ABOUT

OC44-2

PRESENTING PLANS THAT HAS ALREADY BEEN AGREED UPON. I'M TALKING ABOUT ACTUALLY INVOLVING COMMUNITY MEMBERS OF WHAT THEY WANT TO SEE IN THEIR OWN COMMUNITIES. ALSO, WE NEED SAFETY AND ACCOUNTABILITY AND THAT IS ONE OF MAIN PROBLEMS WITH THE RIVER. BECAUSE IT IS OWNED AND OVERSEEN BY SO MANY DIFFERENT CITIES, THERE IS NO SAFETY AND THERE IS NO POLICE FORCE OR ANYTHING --

OC44-3

MS. PIGGOTT: 30 SECONDS.

MS. BALLHAUS: -- IF YOU ARE IN TROUBLE ALONG ANY OF THE PATHS THAT YOU'RE PLANNING TO CREATE. SO THEY NEED TO CREATE A POLICE FORCE IN ORDER TO OVERSEE THAT. IT IS GREATLY NEEDED.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS. AGAIN, LADIES AND GENTLEMEN, WE HAVE CALLED ON EVERYONE WHO PREREGISTERED THIS EVENING. I SEE THERE'S A COUPLE OF HANDS RAISED, SO I'M GOING TO ASK -- I'M GOING TO CALL ON YOU IN THE ORDER THAT YOUR HANDS ARE RAISED. IF ANYONE ELSE WOULD LIKE TO PROVIDE AN ORAL COMMENT THIS EVENING, WE WILL HAVE TIME TO HEAR FROM A FEW MORE PEOPLE. YOU CAN RAISE YOUR HAND. IF YOU'RE A

CALL-IN-ONLY USER, YOU CAN PRESS STAR NINE, OR YOU CAN SEND A CHAT MESSAGE TO THE MEETING HOST.

THE NEXT SPEAKER IS KESHAV, K-E-S-H-A-V. I'M GOING TO ASK YOU TO UNMUTE.

MR. KESSHAV: HELLO. THANK YOU. YEAH, I'M KESHAV. VERY GOOD PRESENTATION. THANK YOU FOR ALL YOUR EFFORTS AND WORK. I'M FROM ORANGE COUNTY, BREA. RIGHT NOW, I'M ACTUALLY IN INDIA, THOUGH. BUT, YEAH, I WANTED TO ESPECIALLY DRAW ATTENTION TO THE GENTRIFICATION ISSUE WHICH IS A BIG PROBLEM. SO JUST A FEW THINGS TO CONSIDER ESPECIALLY FROM, LIKE, ENVIRONMENTALLY SUSTAINABLE PRIORITY. SO I ADVOCATE FOR LIKE -- MORE LIKE URBAN TO RURAL MIGRATION. ONE THING -- I SAW THIS YOUTUBE VIDEO, COMPLETE HISTORY OF THE LA AQUEDUCT, AND THEY WERE TALKING ABOUT IT'S LIKE -- IN TERMS OF THE CARRYING CAPACITY OF THE LOS ANGELES RIVER, IT'S LIKE 1,000 PERCENT BEYOND, WHICH I THINK IS LIKE 20 TIMES. SO IN TERMS OF -- YEAH, LIKE, THERE'S TOO MANY PEOPLE LIVING IN THAT AREA, SO ECOLOGICALLY THINK ABOUT THE IMPACT FOR THAT, FOR THE GENTRIFICATION THING.

OC45-1

AND, YET, I'M ALSO OPPOSED TO GENTRIFICATION OR, LIKE, YOU KNOW, THAT ONE PERSON OR, LIKE, THAT GREEDY, LIKE, CORPORATE TYPE OF MINDSET. LIKE MORE FOR US, LESS FOR -- YOU KNOW, THAT THAT'S UNJUST. BUT IN TERMS OF, LIKE, ECOLOGICALLY SEEING IT -- AND OF COURSE,

OC45-2

OC45-2 cont.

YEAH, THERE'S A SENTIMENT TOO, YOU KNOW, LIKE, YOU'VE BEEN LIVING IN THOSE -- I CAN'T EVEN RELATE TO THAT AS MUCH, BUT, YOU KNOW, THAT CAN'T BE DISCOUNTED EITHER.

ANYWAY, THEN, ONE MORE THING. ALSO, FOLAR IS A GREAT RESOURCE, FRIENDS OF THE LOS ANGELES RIVER, THEIR WEBSITE AND SO MUCH GOOD INFORMATION FROM THEM AND THEIR PERSPECTIVE, THEIR VALUES. AND ONE OTHER THING, THE EXECUTIVE SUMMARY ES 1.1.1, AT THE END --

MS. PIGGOTT: 30 SECONDS.

CALLER KESHAV: SURE. -- AT THE END REGARDING

OC45-3

THE CHANNELIZATION, I WOULD THINK THAT IT SHOULD ALSO INCLUDE, AT THE END OF THE -- THAT PART ALSO INCLUDE, HOW EVEN FOLAR INCLUDES THE -- IT'S A VERY PERTINENT EXPLANATION OF THE DEVELOPMENT PROPERTY BEING IN THE FLOOD PLAIN TO BEGIN WITH, AGAIN, FOR GENTRIFICATION, LIKE. SO THE PLAN TO BEGIN WITH, SO MANY PROPERTY AND HOUSES, DEVELOPMENTS WERE IN THE FLOOD PLAIN TO BEGIN WITH WHICH IS NOT ECOLOGICALLY A VERY GOOD IDEA.

SO THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. THE NEXT HAND RAISED, I SEE IS CAPTAIN OBVIOUS. I'M GOING TO ASK YOU TO UNMUTE.

MR. CAPTAIN OBVIOUS: OKAY. I JUST WANT TO

OC46-1

ADDRESS THIS ENTIRE PROCESS AND SAY THAT THIS A COMPLETE WASTE OF RESOURCES AND WE SHOULD BE FOCUSING ON POOR

OC46-1 cont.

ISSUES NOT DEVELOPING AN AREA THAT SERVES A FUNCTIONAL PURPOSE TO NOT FLOOD OUR ENTIRE CITY. YES, THERE WAS A RIVER THERE AT ONE TIME WHEN WE WERE ON A BARTER SYSTEM IT WOULD BE GREAT TO GO BACK TO TRADING FIRST AND WE WOULD HAVE FAR LESS TRAFFIC IT WOULD BE GREAT FOR THE ENVIRONMENT AS WELL, BUT WE'RE NOT DOING THAT BECAUSE WE LIKE WHOLE FOODS. SO LET'S NOT CONVERT OUR POWER PLANTS AND OUR AQUEDUCTS TO SOMETHING THAT IT'S NOT. LET IT SERVE THAT PURPOSE. SPEND THE RESOURCES ON ADDRESSING ISSUES LIKE THE RAMPANT HOMELESSNESS, FECES, AND URINE THAT PLAGUES OUR CITY. PUT THE HOMELESS PEOPLE AT THE TOP OF THE WALKWAY, BUILD THEM A REAL SHELTER THAT'S NOT TENT CITIES AND GIVE THEM A PLACE TO LIVE. IF THEY WANT TO PEE ON THE STREET, IT GOES WHERE IT'S GOING TO END UP ANYWAY. AND IT WILL BE A FRACTION OF THE PRICE. I STILL HAVE 56 SECONDS SO WE CAN TALK ABOUT MOSQUITOS OR WHATEVER, BUT, YEAH, THERE YOU GO. JUST STOP WASTING

OC46-2

RESOURCES. DO YOUR JOB. PROVIDE SOME BENEFIT TO EVERYBODY IN THE CITY. ALSO, YES, LET'S TALK ABOUT GENTRIFICATION. IT IS NOT A BAD THING. IT MEANS THAT WE ARE DEVELOPING AN AREA. THINGS ARE GETTING BETTER. IF THE PEOPLE THERE --

MS. PIGGOTT: 30 SECONDS.

MR. CAPTAIN OBVIOUS: -- DON'T KNOW BETTER, TO ASK FOR MORE THAN THEY SHOULD THINK A LITTLE BIT FARTHER

OC46-2 cont.

OUT ABOUT WHERE THEY CAN GO AND ASK FOR MORE. NOBODY'S FORCING THEM TO SELL. YOU CANNOT POLICE THE CITY. YOU CAN'T EVEN KEEP MALLS SAFE AND SANTA MONICA SAFE FROM RIOTS. WHY DO YOU THINK YOU CAN POLICE HUNDREDS OF MILES OF A PARK THAT IS TOTALLY UNPOLICED NOW? WHAT ARE YOU THINKING?

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. LADIES AND GENTLEMEN, THAT IS ALL THE PREREGISTERED SPEAKERS AND THOSE THAT HAVE REQUESTED TO SPEAK THIS EVENING AND HAVE RAISED THEIR HANDS. IF THERE'S ANYBODY ELSE ON THE LINE WHO WOULD LIKE TO PROVIDE AN ORAL COMMENT THIS EVENING, PLEASE RAISE YOUR HAND. IF YOU'RE A CALL-IN-ONLY USER, PRESS STAR NINE, OR YOU CAN SEND A CHAT MESSAGE TO THE MEETING HOST, AND I WILL UNMUTE YOUR LINE.

OKAY. CALL-IN USER ENDING IN 1364, I'M GOING TO ASK YOU TO UNMUTE.

UNIDENTIFIED SPEAKER: HI. CAN YOU HEAR ME?

MS. PIGGOTT: YES, WE CAN HEAR YOU. GO AHEAD. YOU HAVE TWO MINUTES.

OC47-1

UNIDENTIFIED SPEAKER: OKAY. I AM A RESIDENT OF SOUTH GATE, AND I WANT TO EXPO THE HEAL THE BAY PERSON WHO SAID THAT THERE NEEDS TO BE A BETTER JOB OF OUTREACHING OUT TO COMMUNITIES. I LIVE IN SOUTH GATE,

AND I HEARD ABOUT THIS MEETING LITERALLY 30 MINUTES IN TO THE MEETING. AND SO I THINK THERE NEEDS TO BE SOME WAY TO EXPAND WHERE YOU'RE REACHING OUT TO. I HEARD ABOUT THE MEETING THROUGH EAST YARD. AND TO THE POINT TO THE PREVIOUS GENTLEMAN ABOUT GENTRIFICATION, IT WOULD BE INTERESTING TO KNOW WHERE HE LIVES, AND WHY HE THINKS THAT GENTRIFICATION IS NOT IMPORTANT OR IS SOMETHING THAT JUST NATURALLY HAPPENS; IT DOESN'T. IT'S PUSHED BY DEVELOPERS WHO WANT TO PICK UP AND EAT UP THE LAND AND DISPLACE OUR COMMUNITIES.

OC47-1 cont.

SO I JUST WOULD REALLY LIKE FOR THIS PLANNING COMMITTEE TO THINK ABOUT THE OUTREACH AND THE LACK OF OUTREACH THAT THEY'RE DOING IN OUR COMMUNITIES REGARDING THIS PROJECT.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

LADIES AND GENTLEMEN, IS THERE ANYBODY ELSE WHO WOULD LIKE TO MAKE AN ORAL COMMENT THIS EVENING?

I SEE, CALL-IN USER ENDING IN 8947, YOUR HAND IS RAISED. I'M GOING TO ASK YOU TO UNMUTE.

UNIDENTIFIED SPEAKER: HI. CAN YOU HEAR ME?

MS. PIGGOTT: YES, WE CAN. GO AHEAD. YOU HAVE TWO MINUTES.

UNIDENTIFIED SPEAKER: COOL. HI. YEAH, SO I WANTED TO ECHO WHAT THE PREVIOUS -- SOME OF THE CONCERNS

OC48-1

THAT THE PREVIOUS CALLER FROM SOUTH GATE BROUGHT UP ABOUT THE GENTRIFICATION PROCESS THAT IS CURRENTLY GOING -- ONGOING IN THE SOUTHEAST LA AREA, AND I ACTUALLY WANTED TO ADDRESS AND BRING UP THIS -- BRING THIS UP TO EVERYONE LISTENING AND TO YOU ALL SPECIFICALLY SOMETHING THAT IS HAPPENING. RIGHT NOW IN THE CITY OF BELL THERE ARE MOBILE HOMES -- THERE ARE TWO DIFFERENT PARKS THAT ARE FULL OF MOBILE HOMES AND SOME OF THEM ARE EVEN OWNED BY THESE -- THESE HOMES ARE OWNED BY THE PEOPLE. THEY ARE BEING EVICTED THE BY BELL CITY COUNCIL BECAUSE THEY WANT TO SELL OFF THESE MOBILE HOMES IN ORDER TO, YOU KNOW, BUILD SOMETHING NICER, ADD THIS LA RIVER REVITALIZATION PROJECT IS HAPPENING AT THE SAME TIME.

OC48-1 cont.

SO I INVITE CAPTAIN OBVIOUS TO ACTUALLY, YOU KNOW, GO ON INSTAGRAM AND -- THIS INFORMATION IS PUBLICLY AVAILABLE AND I INVITE EVERYONE TO GO ON INSTAGRAM AND LOOK UP THE INSTAGRAM PAGE SELLATCHEESESMITH, AND THEY HAVE BEEN PRODUCING INFORMATION AND MEDIA ABOUT THIS FOR MONTHS BECAUSE THIS MAP TUITION THAT BELL CITY COUNCIL IS PLANNING TO DO RIGHT NEXT TO THE LA RIVER IS GOING TO AFFECT HUNDREDS OF FAMILIES WHO ARE CURRENTLY LIVING IN BELL AND LIKE MANY OF THE POINTS THAT HAVE BEEN BROUGHT UP BEFORE ABOUT THE PROBLEMS OF GENTRIFICATION THIS WHOLE

OC48-2

DISPLACEMENT OF COMMUNITY NETWORKS, IMMIGRANT FAMILIES. THIS WILL MAKE PEOPLE, YOU KNOW -- IT WILL DECREASE EVERYONE'S QUALITY OF LIFE. SO IT -- OBVIOUSLY, THIS MASTER PLAN OR, YOU KNOW, WHATEVER IT HAS NO, YOU KNOW, APPARENTLY IT DOES NOT HAVE ANY, YOU KNOW, QUOTE, UNQUOTE, SAFEGUARDS FOR --

OC48-2 cont.

MS. PIGGOTT: 30 SECONDS.

UNIDENTIFIED SPEAKER: I THINK MOST OF US ARE KEENLY AWARE THAT THE MASTER PLAN WILL BE THE FACILITATOR AFTER GENTRIFICATION. SO I, YOU KNOW, WANT TO ECHO SOME SOLUTIONS THAT OTHER PEOPLE HAVE BROUGHT IN HERE WHICH IS, YOU KNOW, SPEND THE MONEY ON THE REAL ISSUES, SUCH AS THE HOMELESS IN THIS CRISIS THAT HAS, YOU KNOW, BEEN ONGOING IN LOS ANGELES AND THE MANY OTHER CRISIS THAT AFFECT OUR CITY AND OUR COUNTY.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. OUR NEXT SPEAKER IS CALL-IN USER ENDING IN 3890. I'M GOING TO ASK YOU TO UNMUTE.

UNIDENTIFIED SPEAKER: HELLO. IS ANYBODY THERE?

MS. PIGGOTT: YES, WE CAN HEAR YOU. YOU HAVE TWO MINUTES.

OC49-1

UNIDENTIFIED SPEAKER: HI. I WOULD LIKE TO -- OKAY. THANK YOU. I HAVE SOMETHING TO SAY ABOUT THE

OC49-1 cont.

DISPLACEMENT OF PEOPLE THAT LIVE ON THE RIVER. AND I HAVE DOZENS OF -- ABOUT A DOZEN PEOPLE I KNOW, MOST OF THEM ARE GOOD PEOPLE THAT LIVE IN THE RIVER. AND THIS IS THEIR LAST HOUSE ON THE BLOCK. IF YOU TAKE THEIR LAST HOUSE ON THE BLOCK AWAY FROM THEM, A GOOD PERSON, ESPECIALLY DURING A PANDEMIC THAT WE'RE HAVING RIGHT NOW, I WOULD CONSIDER YOU GUYS MURDERS. THANK YOU. THAT'S ALL I HAVE TO SAY.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

LADIES AND GENTLEMEN, THAT APPEARS TO BE ALL OF THE -- THAT'S ALL OF OUR REGISTERED SPEAKERS AND THAT'S EVERYONE WHO'S RAISED THEIR HAND. IF ANYONE ELSE WOULD LIKE TO MAKE AN ORAL COMMENT, YOU CAN RAISE YOUR HAND, SEND A CHAT MESSAGE, OR IF YOU'RE A CALL-IN-ONLY USER, YOU CAN PRESS STAR TO RAISE YOUR HAND.

OKAY. REKI, R-E-K-I, I'M GOING TO ASK YOU TO UNMUTE.

MR. REKI: HI, THERE. JUST A QUICKIE ABOUT WHAT THE ACTUAL PURPOSE OF THIS WAS. I, LIKE MOST OTHERS, APPARENTLY DIDN'T REALLY DO OUR HOMEWORK. I'M JUST NOW REVIEWING THE PDF ON THE PEIR AND IT'S GIVEN ME A LOT OF GOOD HISTORY ON THE WHOLE DEAL. SO I THINK THAT'S SOMETHING THAT WE ALL NEED TO TAKE CARE OF.

OC50-1

THANK YOU. BYE.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

LADIES AND GENTLEMEN, WOULD ANYBODY ELSE LIKE TO MAKE AN ORAL COMMENT THIS EVENING? TO DO SO YOU CAN RAISE YOUR HAND. FOR CALL-IN-ONLY USERS, YOU CAN PRESS STAR NINE, OR YOU CAN SEND A COMMENT TO THE MEETING HOST VIA THE CHAT FUNCTION. OKAY. NOT SEEING ANY HANDS RAISED OR ADDITIONAL PEOPLE WISHING TO MAKE AN ORAL COMMENT THIS EVENING, WHILE WE WILL STAY ON THE LINE UNTIL 9:00 O'CLOCK LIKE WE PREVIOUSLY STATED, WE WILL GO ON TO TALKING ABOUT HOW TO PROVIDE ORAL COMMENTS.

AS PREVIOUSLY STATED, ALL COMMENTS, WHETHER SUBMITTED ORALLY, IN WRITING THROUGH THE US MAIL, OR VIA E-MAIL, WILL RECEIVE EQUAL CONSIDERATION IN PREPARING THE FINAL PEIR. PLEASE SUBMIT COMMENTS BY THE CLOSE OF THE COMMENT PERIOD WHICH HAS BEEN EXTENDED TO APRIL 2, 2021. WE INVITE YOU TO SUBMIT YOUR COMMENTS IN WRITING VIA REGULAR E-MAIL TO GRACE KOMJAKRAPHAN-TEK, LOS ANGELES COUNTY PUBLIC WORKS STORM WATER QUALITY DIVISION, 900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803, OR E-MAIL COMMENTS TO LARIVERCEQA, C-E-Q-A, @PW.LACOUNTY.GOV.

I SEE WE HAVE ANOTHER HAND RAISED. OKAY, CAPTAIN OBVIOUS, DO YOU HAVE AN ADDITIONAL COMMENT? I'M GOING TO ASK YOU TO UNMUTE.

MR. CAPTAIN OBVIOUS: THANK YOU, JENNIFER. THIS IS CAPTAIN OBVIOUS AGAIN. I JUST WANT TO POINT OUT

OC51-1

THAT THIS IS -- THAT WE STILL HAVE 20 MINUTES LEFT, SO I'M BASICALLY ON HERE WHERE NOBODY IS LISTENING ANYWAY; SO IT DOESN'T REALLY MATTER. GENERALLY PROJECTS WITH IMPORTANCE THAT REPRESENT -- TRULY IN THE CITY'S INTEREST OF 10-, 14-MILLION PEOPLE THE LA RIVER AREA THAT THIS AFFECTS REPRESENTED BY THE HANDFUL OF 20 OR 30 SOLE PREREGISTERED PEOPLE AND VERY -- YOU NEED CITIZENS LIKE MYSELF THAT -- I WANT TO BRING UP WHAT ARE WE DOING FOR PEOPLE WITH CHIHUAHUAS THAT LIVE NEAR THE RIVER, LIKE, HOW COME NOBODY'S TALKING ABOUT THAT? WE HAVE 20 MINUTES, AND I WANT TO KNOW BECAUSE I GOT CHIHUAHUAS. THERE INDIGENOUS AND IT'S IMPORTANT TO ME. SO I KNOW THAT THAT WAS REALLY IMPORTANT, SO JUST THINK ABOUT IT. OKAY?

OC51-1 cont.

THANK YOU FOR YOUR TIME.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. CHRISTINA -- SORRY, CHRISTINE ROWE, I SEE YOUR HAND IS RAISED. I'M GOING TO ASK YOU TO UNMUTE.

MS. ROWE: THANK YOU. I AM WEIGHING IN NOW FOR A POINT OF CLARIFICATION. I KNOW YOU CAN'T RESPOND TO ME. BUT, AGAIN, I WANT TO REFERENCE THAT ABOUT A DECADE AGO IN THE WEST HILLS NEIGHBORHOOD COUNCIL THERE WAS A DISCUSSION ABOUT -- THERE WAS ANOTHER NAME FOR THE LA RIVER MASTER PLAN AT THE TIME, AND WHAT IT

OC52-1

SAID -- THE PLAN STATED THAT IF YOU HAD PROPERTY WITHIN ABOUT A MILE, PERSONAL PROPERTY, FAMILY RESIDENCES, THAT, AGAIN, YOU WOULD HAVE TO GIVE ACCESS, LITERALLY SET UP BENCHES SO PEOPLE COULD GO ONTO YOUR PROPERTY TO VIEW THE RIVER. AND SO THIS IS WHY OUR NEIGHBORHOOD COUNCIL VOTED AGAINST CONTINUING THE RIVER THROUGH WEST HILLS. THE -- THERE ARE MANY TRIBUTARIES. THERE ARE TRIBUTARIES THAT GO, AS SOMEONE MENTIONED, TO CHATSWORTH. THERE'S TRIBUTARIES THAT GO TO CALABASAS. AND A TRIBUTARY THAT IS BELL CREEK THAT GOES ALL THE WAY UP TO THE SANTA SUSANA FIELD LABORATORY.

OC52-1 cont.

AND THIS HAS BEEN DISCUSSED WITH, I THINK, FEDERAL PARKS AND STATE PARKS. I KNOW MEMBERS, FORMER MEMBERS OF THE WEST HILLS NEIGHBORHOOD COUNCIL, THAT HAVE ACTUALLY HIKED THE RIVER QUITE SOME DISTANCE THROUGHOUT WEST HILLS. I KNOW THERE ARE PEOPLE THAT WOULD LIKE TO SEE THE TRAIL CONTINUE THROUGH WEST HILLS, AND I KNOW PEOPLE THAT, AGAIN, WHO OWN THE PROPERTY, THAT BACK TO THERE, WHO DID NOT WANT THE POTENTIAL ACCESS BY GANG MEMBERS OR WHATEVER INTO THEIR BACKYARDS BECAUSE THIS WAS LIKE ANOTHER --

OC52-2

MS. PIGGOTT: 30 SECONDS.

MS. ROWE: -- ROAD ESSENTIALLY LEADING UP BEHIND THEIR HOUSES THAT COULD ALLOW PEOPLE ACCESS TO THEIR BACKYARDS.

OC52-2 cont.

THANK YOU FOR YOUR TIME.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. LADIES AND GENTLEMEN, IS THERE ANYONE ELSE WHO HASN'T ALREADY PROVIDED AN ORAL COMMENT THIS EVENING THAT WOULD LIKE TO PROVIDE AN ORAL COMMENT?

LADIES AND GENTLEMEN, I JUST RECEIVED A CHAT MESSAGE ASKING ME HOW MANY PEOPLE WERE STILL IN ATTENDANCE, AND THERE'S STILL 96 PEOPLE ON THE CALL TONIGHT.

AGAIN, LADIES AND GENTLEMEN, IF THERE IS ANYONE WHO HASN'T ALREADY PROVIDED AN ORAL COMMENT THIS EVENING, WHO WOULD LIKE TO PROVIDE AN ORAL COMMENT ON THE CEQA PROCESS, PLEASE RAISE YOUR HAND OR PRESS STAR NINE TO UNMUTE IF YOU'RE A CALL-IN-ONLY USER.

OKAY. CAPTAIN OBVIOUS, I SEE YOUR HAND IS RAISED. I'M GOING TO ASK YOU TO UNMUTE.

MR. CAPTAIN OBVIOUS: THANK YOU, JENNIFER AND CHRISTINE. I -- THANK YOU, JENNIFER, FOR GIVING ME THE OPPORTUNITY TO RESPOND TO CHRISTINE. SO NOW WE CAN HAVE A REAL DISCOURSE ON THIS TOPIC. A BAD -- I JUST WANT TO

OC53-1

ADDRESS A BUNCH OF THINGS THAT WERE SAID -- A BAD DECISION TEN YEARS AGO THAT DIDN'T GO ANYWHERE FOR TEN YEARS AND WAS REBRANDED AS SOMETHING ELSE, DOESN'T MEAN IT'S A GOOD DECISION TODAY. THAT'S ONE. TWO, YOU HAVE THE SAME PROBLEMS YOU DID TEN YEARS AGO. THEY'RE

PROBABLY WORSE. SO HOW IS THIS THE SOLUTION? I DON'T GET IT, AND I JUST THINK THERE'S A FAR BETTER USE OF THE RESOURCES THAT IT SEEMS LIKE WE ALL AGREE IS NEEDED IN THE COMMUNITIES THAT EVERYBODY'S HERE TRYING TO REPRESENT, BUT LET'S BE HONEST. PARKS AND CONCERNS OF GENTRIFICATION THIS ISN'T THE ANSWER. THIS IS A COMPLETE WASTE OF RESOURCES, A WASTE OF TIME, AND IT'S EXHIBITED BY THE FACT WE HAVE 15 MINUTES OF DEAD AIR BECAUSE OF A CHIHUAHUA COMMENT. I GET IT. IT WAS TO MAKE A POINT. THESE ARE NOT COMING BACK ON, BUT YOU STILL HAVE 10 MINUTES OF DEAD AIR. SO I'M GOING TO LOG OFF, ALLOW CHRISTINE TO RESPOND IF SHE WANTS TO, AND NOW WE CAN HAVE A REAL CONVERSATION, SINCE WE HAVE SO MUCH TIME.

OC53-1 cont.

THANKS.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

JESSICA, I SEE YOUR HAND IS RAISED. I'M GOING TO ASK YOU TO UNMUTE.

MS. JESSICA: HI. MY NAME IS JESSICA. SINCE CAPTAIN OBVIOUS GETS TO SUBMIT THREE DIFFERENT PUBLIC COMMENTS, I GUESS I CAN CONTINUE MINE SINCE I WASN'T ABLE TO FINISH IT. LIKE I SAID, I REPRESENT EAST YARD COMMUNITIES FOR ENVIRONMENTS OF JUSTICE. I LIVE ALONG THE LOWER LA RIVER COMMUNITIES ALONG WITH A WHOLE BUNCH OF OUR MEMBERS AND, AS OTHER FOLKS FROM THE SOUTHEAST LA

OC54-1

OC54-1 cont.

COMMUNITIES MENTIONED ALREADY, GENTRIFICATION IS A VERY REAL ISSUE IN OUR COMMUNITIES. IT MAY NOT BE IN WHATEVER COMMUNITY WEALTHIER, WHITE, AFFLUENT, RESIDENTS, HOMEOWNERS ARE LIVING IN, BUT IT IS VERY REAL IN OUT COMMUNITY. AND I WANT TO HIGHLIGHT THAT THIS IS AN ATTACK. OKAY? THIS IS AN ATTACK ON OUR LIVELIHOOD. THIS IS AN ATTACK ON UNHOUSED FOLKS. AS SOMEONE ALREADY, PREVIOUSLY MENTIONED, THIS IS THEIR LAST STOP. THEY ARE NOT BEING GIVEN THE SERVICES AND THE SUPPORT THAT THEY NEED FROM THE COUNTY, AND THAT IS A FAILURE ON THE COUNTY, NOT A FAILURE ON THEM.

OC54-2

SO IT IS ONTO THE COUNTY TO HOUSE THESE PEOPLE AND TO GIVE THEM THE SUPPORT THAT THEY NEED AND NOT TO JUST KICK THEM OUT BECAUSE THAT'S WHAT A WHOLE BUNCH OF ATWATER RESIDENTS WANT. THE COUNTY NEEDS TO COMMIT TO THIS. NOT JUST BY SAYING THAT OH, WE'RE GOING TO SEND A WHOLE BUNCH OF COPS, AND WE'RE GOING TO INCREASE POLICING IN THE COMMUNITY, AND WE'RE GOING TO HAVE THOSE COPS TALK TO HOMELESS RESIDENTS. THAT'S NOT ADDRESSING THE HOMELESS ISSUE; THAT'S MAKING IT WORSE. YOU NEED TO ACTUALLY COMMIT TO BUILDING LOW-INCOME, EXTREMELY LOW-INCOME, VERY LOW-INCOME HOUSING. PLUS SUPPORTIVE HOUSING. YOU NEED TO COMMIT TO IMPLEMENTING RENT CONTROL. YOU NEED TO COMMIT TO IMPLEMENTING RIGHT TO COUNSEL. YOU NEED TO COMMIT TO ACTUALLY PROTECTING THE

RENTERS AND THE UNHOUSED COMMUNITIES ALONG THE LOWER LA RIVER AND THE UPPER LA RIVER BECAUSE THOSE ARE THE PEOPLE WHO ARE GOING TO BE MOST DIRECTLY IMPACTED BY FURTHER CONCRETIZING THE RIVER, BY HAVING PROJECTS THAT ARE GOING TO INCREASE PROPERTY VALUES WITHOUT ANY OF THAT VALUE BEING CAPTURED BY THE LOCAL COMMUNITIES --

OC54-2 cont.

MS. PIGGOTT: 30 SECONDS.

MS. JESSICA: -- BY HAVING MORE POLICING AND HAVING MORE COPS IN THE NAME OF SAFETY. NO. NO. NO. YOU NEED TO ACTUALLY ADDRESS THE ACTUAL CONCERNS OF THE LOCAL COMMUNITY, AND YOU NEED TO -- INSTEAD OF GIVING PEOPLE WHO ARE VERY WELL REPRESENTED, AKA WHITE AFFLUENT FOLKS, MORE TIME. YOU NEED TO, ONCE AGAIN, OUTREACH AND EDUCATE LOW-INCOME COMMUNITIES WHO ARE NOT BEING HEARD IN THESE MEETINGS.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENT.

TILLY HINTON, I SEE YOUR HAND IS RAISED. I'M GOING TO ASK YOU TO UNMUTE.

MS. HINTON: HI. GIVEN THIS UNEXPECTED OPPORTUNITY FOR A ROUND TWO OF COMMENTS, LIKE JESSICA, I'M GOING TO JUMP IN HERE AND FINISH. MY FINAL POINT IS TO SAY THAT GIVEN THESE EXTRAORDINARY TIMES AND THE PANDEMIC CONDITIONS THAT ARE DISCONNECTING US FROM THE USUAL SOCIAL FABRIC THROUGH WHICH CONVERSATIONS AND

OC55-1

UNDERSTANDING OF PROCESSES LIKE THIS ONE WOULD TRAVEL, I WOULD ASK THAT THE COUNTY MAKE AND, IN THE REVISED EIR DOCUMENTATION, THE EXTRAORDINARY EFFORTS TO ENSURE THAT A DIVERSE ARRAY OF COMMUNITY STAKEHOLDERS ARE BOTH AWARE OF THESE DUAL COMMENT PROCESS THE COMMENTARY ON THE PLAN ITSELF AND ON THE EIR, THAT PEOPLE ARE EMPOWERED TO READ THE EXTENSIVE DOCUMENTATION THAT PERTAINS TO BOTH AND ENABLED TO GIVE COMMENTS ON BOTH THE PLAN AND THE PROGRAM ENVIRONMENTAL IMPACT REPORT. TO MERELY REPLACE PUBLIC MEETINGS WITH ZOOM MEETINGS IS NEITHER EQUIVALENT NOR SUFFICIENT. AND ANY OF US WHO HAVE BEEN TO A PUBLIC MEETING ABOUT THE RIVER WILL KNOW THAT MEETING TOGETHER ON ZOOM IS NOT THE SAME THING AS BEING IN A LARGE ROOM OF PEOPLE, WITH VISUAL AIDES, WITH LARGE SCALE MAPS, WITH PROFESSIONALS ABLE TO EXPLAIN IN DETAIL AND RESPOND TO QUESTIONS. THIS IS NOT THE SAME AS THAT PROCESS. AND THE COMMENTS TONIGHT WERE DEMONSTRATIVE OF A MASSIVE NEED, I WOULD SAY, FOR --

OC55-1 cont.

MS. PIGGOTT: 30 SECONDS.

MS HINTON: -- QUESTIONS -- ANSWERING QUESTIONS, A NEED FOR MORE OUTREACH, A NEED FOR MORE AFFECTIVE MESSAGING, AND A NEED FOR THE COUNTY TO DO A LOT MORE THAN HAS BEEN DONE SO FAR IN EXPLAINING BOTH THE PLAN AND THE POLICY FRAMEWORKS. OTHERWISE, IT COULD VERY EASILY LOOK LIKE THE COUNTIES ARE ATTEMPTING TO

OC55-1 cont.

RACE THESE DOCUMENTS THROUGH THE PROCESS WITHOUT PAYING DUE ATTENTION TO PEOPLE WHOSE OPINIONS ARE SO CRUCIAL.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

OKAY. LENA, I SEE YOUR HAND IS RAISED. I'M GOING TO ASK YOU TO UNMUTE.

MS. AYVAZIAN: HELLO. CAN YOU HEAR ME?

MS. PIGGOTT: YES, YOU'RE VERY SOFT. CAN YOU SPEAK UP? YOU HAVE TWO MINUTES.

MS. AYVAZIAN: HELLO. I LIVE IN THE CANOGA PARK AREA WHICH IS PART OF THE WERNER'S CENTER PROJECT WHICH, AGAIN, I'M HEARING SO MANY ISSUES RELATIVE TO RENTAL AND RISK AND SAFETY, AND SO FORTH. FIRST, FOR THE RENTAL PROPERTIES, I -- YES, WE OWN OUR CONDOS BUT NEXT DOOR IS A COMPLEX -- AN APARTMENT COMPLEX THAT WAS

OC56-1

JUST BUILT. AND THAT ALONE IS $2700 FOR A TWO BEDROOM/ TWO BATH. IN FRONT OF US THE BUILDING IS GOING TO BE TORN DOWN AND THAT IS GOING TO START OFF AS RENTALS AT $3,000 A MONTH FOR TWO BEDROOMS/TWO BATHS. AND THIS IS IN CANOGA PARK. WERNER'S CENTER IS HAVING 24,000 APARTMENTS WHICH IS 80,000 NEW FOLKS COMING INTO THIS AREA, AND ZERO -- ZERO REGARDING NEW POLICE, FIRE DEPARTMENTS, SCHOOL DISTRICTS, ANYTHING TO DO WITH RISK OR ENVIRONMENTAL.

OC56-2

WE ALSO KNOW THAT THE RIVER ITSELF HAD WATER

OC56-2 cont.

COMING IN FROM THE PROPERTY IN FRONT OF US THAT'S COMING INTO THE RIVER DIRECTLY THAT NOBODY IS REALLY ADDRESSING. THAT ALONE IS AN ENVIRONMENTAL HAZARD, AND THAT ALONE IS A ONE-BILLION DOLLAR PROJECT THAT'S UNDERWAY WITH AN ARENA AND WOULD ALLOW HOUSES COMING UP WITH A 7500-DOLLAR -- 7500 SEATINGS. AND, AGAIN, IF YOU ALL REMEMBERED THAT ONE CITY, PROMISE, THAT BURNED DOWN. WHAT HAPPENED? 80,000 FOLKS WERE MISPLACED, 80,000. HERE ALONE IN A ONE-AND-A-HALF-MILE RADIUS IN THE WERNER'S CENTER 2035 PROJECT 80,000 RENTERS ARE COMING IN. ZERO OWNER OCCUPIED. THIS CITY HAS SOLD OUT TO INVESTORS ALL OVER. AND I'M --

MS. PIGGOTT: 30 SECONDS.

OC56-3

MS. AYVAZIAN: -- WE HAVE ONE-AND-A-HALF MILE RADIUS ADJACENT TO THIS RIVER IN WERNER'S CENTER PROJECT THAT IS BRINGING IN 80,000 FOLKS. THIS IS A MAGNET FOR HOMELESS, A MAGNET FOR MANY OTHER ISSUES, INCLUDING MOSQUITOS, INCLUDING ALL KINDS OF ODORS, AND SO FORTH. WE NEED TO ADDRESS THESE FIRST.

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

AND RENEE LAWLER, I SEE YOUR HAND IS RAISED. I'M GOING TO ASK YOU TO UNMUTE.

MS. LAWLER: CAN YOU HEAR ME NOW?

MS. PIGGOTT: YES. GO AHEAD. YOU HAVE TWO

MINUTES.

MS. LAWLER: THANK YOU. THANK YOU FOR THIS SECOND ROUND OPPORTUNITY TO JUST REALLY EMPHASIZE THE IMPORTANCE OF COLLABORATIVE EFFORT THAT'S NECESSARY FOR PLANNING ALONG THE RIVER. I MEAN, IT'S REALLY, REALLY IMPORTANT THAT IT BE LOOKED AT IN A LINEAR NATURE, THAT ALL THE COMMUNITIES THAT ARE BEING AFFECTED BE TAKEN INTO CONSIDERATION. IN THIS EIR PROCESS THAT FLOOD CONTROL RISKS ARE ADDRESSED THAT SAFE, EQUITABLE, INCLUSIVE PARKS AND OPEN SPACE AND TRAILS ARE CONSIDERED THAT WE SUPPORT HEALTHY CONNECTED ECOSYSTEMS, THAT WE CONSIDER THAT LARGER LINEAR ENVIRONMENTAL CORRIDOR THAT YOU CAN'T JUST SEGMENT IT OUT IN FIVE MINUTE -- FIVE-MILE SEGMENTS. IT'S REALLY ALL RELATED. WE HAVE TO ENHANCE OPPORTUNITIES FOR EQUITABLE ACCESS. WE HAVE TO EMBRACE AND ENHANCE OPPORTUNITIES FOR ARTS AND CULTURE. WE DO HAVE TO ADDRESS THE POTENTIAL ADVERSE IMPACTS ON HOUSING AFFORDABILITY AND HOMELESSNESS. WE HAVE TO FOSTER OPPORTUNITIES FROM THE COMMUNITY ENGAGEMENT. ALL OF THESE INDIVIDUALS WHO HAVE SPOKEN TONIGHT, THE VARIOUS GROUPS THAT HAVE VERY VALID CONCERNS, WE HAVE TO BE IN A COLLABORATION TO CONSIDER ALL OF OUR NEEDS.

THE PROGRAM EIR IS ASSUMING THAT THE LOCAL ENTITIES ARE GOING TO DO THE RIGHT THING, BUT THEY'RE

OC57-1
OC57-2
OC57-3
OC57-4
OC57-5

OC57-5 cont.

NOT, AND SO WE HAVE TO HAVE ACCOUNTABILITY WITH THIS EFFORT, AND WE HAVE TO ENSURE THAT THE COMMENTS AND THE CONCERNS OF STAKEHOLDERS THAT HAVE SPOKEN TONIGHT --

MS. PIGGOTT: 30 SECONDS.

MS. LAWLER: -- ARE CONSIDERED. SO I THANK YOU FOR THE OPPORTUNITY. I THINK THAT THIS HAS BEEN A WONDERFUL EFFORT. I DO THINK, THOUGH, THAT WE CONTINUE TO REPEAT HISTORY, AND PLANS OCCUR EVERY DECADE, AND YET WE'RE NOT ACCOMPLISHING AS MUCH AS WE NEED TO. SO WE NEED TO WORK HARDER AS A COMMUNITY.

OC57-6

THANK YOU.

MS. PIGGOTT: THANK YOU FOR YOUR COMMENTS.

LADIES AND GENTLEMEN, THAT IS ALL TIME WE HAVE THIS EVENING TO RECEIVE ORAL COMMENTS. AGAIN, AS A REMINDER, ALL COMMENTS, WHETHER SUBMITTED ORALLY, IN WRITING THROUGH THE US MAIL, OR VIA E-MAIL WILL RECEIVE EQUAL CONSIDERATION IN PREPARING THE FINAL PEIR. PLEASE SUBMIT COMMENTS BY THE CLOSE OF THE COMMENT PERIOD WHICH HAS BEEN EXTENDED TO APRIL 2, 2021. WE INVITE YOU TO SUBMIT COMMENTS VIA REGULAR MAIL, E-MAIL AS SHOWN ON THE SLIDE IN FRONT OF YOU.

I WILL NOW TURN THE MEETING BACK OVER TO GRACE FOR SOME CLOSING COMMENTS. GRACE.

MS. KOMJAKRAPHAN-TEK: THANK YOU, JENNIFER. LADIES AND GENTLEMEN, THANK YOU ALL FOR PARTICIPATING

THIS EVENING AND PROVIDING YOUR ORAL COMMENTS. WE TRULY DO APPRECIATE YOUR INPUT AND INVOLVEMENT IN THE CEQA PROCESS. FOR ADDITIONAL INFORMATION, PLEASE VISIT THE PROJECT WEBSITE AT PW.LACOUNTY.GOV/GO/LARMPCEQA FOR ADDITIONAL INFORMATION. WITH THAT, THIS MEETING IS ADJOURNED. THANK YOU.

(END TIME: 9:00 P.M.)

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$3,000 106:19

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0782 6:4

09 60:20

0933 6:4

1

1 83:17

1,000 90:17

1-MILE 12:7

1.1.1 91:8

10 102:11

10- 99:5

100-AND-SOMETHING 88:23

101 77:16

104 87:2

107 14:10

11 23:13

11-BY-14 64:15

13 23:7

1364 93:17

13TH 11:15

14 68:10

14-MILLION 99:5

15 102:8

16 22:17

161 78:19

17 12:8,22 15:5 20:25 21:1,11,14 48:11

18 20:24

19 19:22

1930 44:17

1970 9:15

1980S 65:3,8

1990 44:17

1996 10:19 24:9

1ST 10:9

2

2 25:9 98:14 109:19

20 67:9 90:17 99:1,6,10

2018 10:19

2020 5:6 14:4 20:7,23 21:3 23:15,24 24:25 25:2

2021 5:1 25:9 98:15 109:19

2035 74:18 107:10

23RD 62:7

24,000 74:20 106:21

25-YEAR 14:12 48:13

3

3 5:1 23:5 49:19

3.14 78:23

30 26:14 32:12 36:12 40:1 44:15,20 47:1 50:7 52:14 59:1 62:10 63:21 66:8 69:5 72:5 75:19 78:3 79:15,17 81:9 82:20 84:9 85:17 87:18 89:12 91:9 92:23 94:1 96:7 99:6 100:22 104:7 105:19 107:13 109:4

311 79:11

3701 44:4

3713 86:8 87:19

3890 96:19

4

4 49:18

405 58:10 61:20

40S 87:5

42 16:14

45-DAY 10:10 25:7

5

5 49:16,18

51 39:4 81:1

51-MILE 12:7

55 71:21

56 92:16

580-UNIT 44:8

6

6.3 68:11

60 25:8

60-DAY 11:14

626-458-3974 6:19

64 77:20

6509 84:19

6:00 5:2,5

6TH 62:8

7

710 31:21 58:10 61:20

710-405 44:10

7500 107:6

7500-DOLLAR 107:6

8

80,000 74:22 106:21 107:8,10,16

80S 87:6

822 6:4

877-853-5247 6:3 70:1

8947 94:19

9

9 7:24

900 98:18

90S 62:24

91803 98:19

9229 6:4

96 101:8

9699 6:4

99 87:6

9:00 25:20 98:8 110:7

@

@PW.LACOUNTY.GOV 98:20

A

AB-530 63:10

AB52 25:3

ABILITY 71:11

ABRAMSON 77:3

ABSENCE 14:19 86:18

ABSOLUTELY 40:5

ABUT 58:14

ACCELERATE 71:7

ACCEPTING 10:16

ACCESS 13:13 15:20,25 16:3,7,13,20 17:3,22 18:15 56:21 68:23,25 73:1 77:23 81:8 82:10 84:2 100:3,20,24 108:15

ACCESSIBLE 66:24 67:3,11 72:25

ACCOMMODATE 15:23

ACCOMMODATES 16:11

ACCOMPLISH 59:3

ACCOMPLISHING 109:9

ACCORDANCE 19:20 24:9,15

ACCOUNT 71:3 72:7

ACCOUNTABILITY 88:11,24 89:8 109:1

ACHIEVING 63:17

ACID 77:21

ACKNOWLEDGEMENT 76:20

ACKNOWLEDGES 32:1
ACKNOWLEDGING 44:14
ACQUIRING 49:24
ACRES 15:10 77:20
ACT 6:23 9:14
ACTIONS 11:19
ACTIVE 66:25 79:5,9
ACTIVELY 78:25 79:4
ACTIVITIES 11:23 12:3,25 17:17 18:12 21:22
ACTIVITY 14:16 84:7
ACTUAL 97:19 104:10
ADA 72:25
ADAMIAN 51:7
ADD 7:24 46:6 61:18 95:12
ADDED 47:15 86:7
ADDITION 20:5 44:12 75:12 79:10
ADDITIONAL 7:19 8:10 17:17 74:3 98:6,22 110:3,5
ADDITIONALLY 6:8 7:9
ADDRESS 13:15 15:17 16:25 18:18 32:7 35:22,25 71:6 79:23 91:24 95:4 101:21 104:10 107:19 108:17
ADDRESSED 43:13 57:6 58:5, 13 87:13,14 108:9
ADDRESSES 10:14
ADDRESSING 31:6,25 92:9 103:19 107:3
ADELE 29:16
ADEQUATELY 35:22
ADHERING 26:1 63:22
ADJACENT 19:1 20:9 31:23 44:3 56:20 74:23 107:15
ADJOURNED 110:6
ADMINISTERING 31:4
ADMINISTRATION 44:19
ADMIRON 31:12
ADOPTED 9:15 25:13
ADOPTING 12:23
ADOPTION 12:21
ADRIANA 36:23
ADVERSE 13:15 19:13 108:17
ADVOCATE 62:23 90:12
ADVOCATED 31:12
ADVOCATES 79:22
AFFAIRS 82:16
AFFECT 95:22 96:15
AFFECTED 19:14 108:7
AFFECTIVE 105:22
AFFECTS 71:9, 22 99:6
AFFLUENT 103:3 104:12
AFFORD 50:12
AFFORDABILITY 13:16 57:5 108:18
AFFORDABLE 32:9,10,16 88:15
AGENCIES 9:16 10:1,12 63:25 79:3,13
AGENCY 8:25 88:20,25
AGGRESSIVELY 72:20
AGREE 27:1 66:9 75:9 80:23 89:2 102:3
AGREED 89:5
AGUILAR 50:25
AHEAD 27:25 28:17 29:20 30:16 34:7 40:17 41:10 43:20 45:18 48:17,25 56:14 61:10 62:19 64:12 74:14 80:4 83:6 84:21 86:11 93:20 94:22 107:25
AIDA 81:17,20
AIDAFORLOSFELIZ 82:18
AIDAFORLOSFELIZ.COM 82:23
AIDES 105:14
AIMS 15:21
AIR 10:2 19:15, 23 58:3 75:7 102:8,11
AKA 86:15 104:12
ALAN 57:17 61:16 62:2
ALEMAN 52:25 53:4
ALHAMBRA 98:18
ALICE 74:7
ALIGNMENT 63:13
ALISO 77:9,15, 18,25
ALLOWING 58:20 85:23
ALTERNATIVE 24:4,7,8,11,16, 19,20
ALTERNATIVES 6:25 12:18 20:6 23:19,20 24:2,6, 17,18
ALTOGETHER 48:12
ALYSSA 57:18
AMBIENT 19:16
AMBITIONS 34:13
AMENITIES 15:17 18:5,17
AMERICAN 83:20
AMIT 47:23
AMOUNT 68:12
AMPLE 46:7
ANALYSES 19:8 20:8
ANALYSIS 11:3 13:6,8 14:5,18, 22 17:15,18 19:5 20:1,12,14,22 22:24 23:21 24:3 68:18 71:12,14 72:1
ANALYZED 6:25 7:11 14:3 15:2 16:14 17:13 19:21 20:6 46:13
ANDREW 28:14
ANDY 29:6 60:19
ANGEL 57:25 58:1 59:2
Angeles 5:1,12 8:24 15:23 19:2 25:3 71:1 77:7 85:1,5 87:21 90:16 91:5 96:14 98:17
ANGELINOS 87:6
ANIMAL 61:1
ANN 65:16,17
ANNOUNCED 16:4
ANSWERING 105:20
ANTHEA 26:17, 18
ANTHONY 61:17
ANTI-DISPLACEMENT 57:2
ANTICIPATE 7:19 25:12
ANTICIPATED 14:10
ANYMORE 55:22
APARTMENT 71:20 106:15

APARTMENTS 74:19,20 88:17 106:21
APOLOGIZE 29:7 40:12 48:7
APPARENTLY 96:5 97:20
APPEAL 50:1 62:8
APPEARS 46:11,14 97:10
APPENDIX 19:21
APPLETON 64:7
APPLICABLE 20:24 66:13
APPLIES 9:16
APPLY 82:21
APPROACH 6:24 11:17 18:23 20:3,13
APPROACHES 18:19
APPROPRIATELY 35:25
APPROVAL 9:17
APPROVED 36:5 65:25 66:1 76:16
APPROXIMATELY 14:10 16:14, 21
APPS 6:10
APRIL 25:9 62:8 98:14 109:19
AQUEDUCT 90:14
AQUEDUCTS 92:8
ARCHEOLOGICAL 83:17,19
ARCHITECT 46:19 85:12
AREA 12:6,7,11, 22 14:24 15:5 19:14 20:24 21:11 40:7 41:14 44:11 49:18,25 54:21,24,25 55:15 65:5 68:8 72:3,4,9 73:11, 23 74:4,16 75:10,18 77:21 79:23 88:16 90:19 92:1,21 95:3 99:5 106:11,22
AREAS 10:2 58:23
ARENA 107:5
ARGUMENT 46:25
ARIANA 9:5 13:25 19:6
ARIZONA 78:4
ARLENE 42:18, 19,20,21,22
ARRAY 35:21 105:4
ART 45:22
ARTS 13:15 45:23 108:16
ARTWORKS 80:17
ASHOURI 81:17,19,20 82:21
ASPECT 46:11
ASSESSMENT 80:12
ASSETS 63:3,5, 7
ASSIST 26:12
ASSISTANCE 5:18 26:1
ASSOCIATION 60:19,20
ASSUMES 14:23 18:7
ASSUMING 63:18 108:24
ASSUMPTIONS 15:4
ATTACK 71:20 103:6,7
ATTACKS 55:5
ATTEMPTING 105:25
ATTEND 76:12
ATTENDANCE 101:8
ATTENDED 66:22
ATTENTION 26:23 46:17 90:9 106:2
ATWATER 43:5,9 68:6,9 72:19 73:11 78:16 80:7 103:15
AUDIO 44:4
AUSTIN 27:23, 24 28:2 62:2
AUTHORITIES 87:16
AVAILABILITY 10:11 17:11 80:13
AVENUE 98:18
AVERAGE 87:5
AVERY 38:10
AVOID 12:18
AVOIDANCE 24:11,19
AVOIDED 21:4 24:5
AWAITED 56:21
AWAITS 77:21
AWARE 96:9 105:4
AYUAZIAN 106:7,10
AYVAZIAN 75:20 107:14

B

BACK 24:21 26:3 30:12 36:22 47:19 48:21 49:15 53:16 59:18,21 67:5,9, 14,15 69:16 75:11 92:4 100:19 102:10 109:22
BACKGROUND 52:2
BACKWARDS 66:1
BACKYARDS 84:3 100:20,25
BAD 92:20 101:20,21
BALLET 82:22
BALLHAUS 88:9,10 89:13
BANDER 69:17, 21 84:18,20,23 85:18
BANDWIDTHS 6:9
BANK 14:25 24:13 68:23,25
BANKS 72:22 79:20 86:25
BARNETT 67:21,22,25 68:3 69:6
BARRELS 44:15
BARRIERS 68:19
BARTER 92:3
BASED 10:23 15:3 24:2 25:6
BASHAR 42:1
BASICALLY 76:10 82:7,8 99:2
BASTIEN 54:14, 15,18
BATH 106:17
BATHS 106:19
BAY 51:16,23 55:15 93:23
BEACH 34:10, 14,16 41:15 44:2 55:15,16,17 58:2 60:21 61:13,14 62:22 63:19 65:18 67:7 81:3
BEAUTIFUL 40:5 49:6
BECKHARDT 54:6,9,10
BEDROOM/TWO 106:17
BEDROOMS/TWO 106:19
BEGAN 39:19
BEGIN 7:4 91:15,16,17
BEGINNING 25:17 34:18 48:8 68:11
BEGINS 83:14
BEHALF 48:8 51:15
BELL 95:7,10, 21,23 100:10
BENCHES 15:12 18:3 73:19 100:4
BENDER 78:13,

15 79:18
BENEFIT 92:18
BENEFITS 35:7, 9,10 58:19
BERG 77:4,6 78:4
BICYCLE 80:8
BICYCLISTS 82:11
BIG 74:2 76:9 90:10
BIGGER 55:12
BIGGEST 43:8
BIKE 16:1,11,17 41:22 72:25 80:9 82:9
BIKER/ EQUESTRIAN 17:21
BIKES 67:4
BILINGUAL 46:1
BILL 74:10
BIOLOGICAL 10:3 19:24
BIRDS 49:7
BIT 34:11 37:25 41:17,19 92:25
BLESS 56:2
BLESSED 48:14
BLOCK 97:4,5
BOARD 12:21 65:18 77:8,9
BORDERS 75:15
BORN 44:1 55:15
BOTTOM 5:20
BOYLE 49:17,18 50:11 57:18
BRADLEY'S 65:3
BRANDON 34:5,10
BREA 90:7
BREAK 69:14
BREATHE 35:8
BRIAN 54:13
BRIDGE 64:18 69:8
BRIDGES 81:8 87:1
BRING 18:5 37:25 55:8 95:4 99:8
BRINGING 27:3 48:12 67:4 107:16
BROKEN 55:13
BROUGHT 35:21 58:10 66:10 74:3 87:7 95:1,24 96:11
BROWN 88:12
BUCK 71:17
BUDGET 79:8
BUFFER 16:17, 18
BUFFERS 16:16
BUILD 92:12 95:12
BUILDING 44:19 50:2 60:5 65:4 103:21 106:17
BUILDINGS 44:23 58:21
BUILT 26:24 49:19 106:16
BUNCH 101:21 102:24 103:14, 17
BURBANK 80:6
BURDENED 71:23,24
BURNED 107:7
BUTTON 86:3
BYE 97:24

C

C-E-Q-A 98:19
CADENCE 14:8 15:17
CALABASAS 100:9
California 5:1 6:23 9:13 76:24 77:11 81:23 87:11 98:18
CALL 6:6 26:23 29:8 33:25 38:16 42:2,15 47:17 51:4 53:14 67:16 68:23 69:9,25 79:11 89:22 101:8
CALL-IN 7:23 27:12 70:18 84:19 86:3,8 87:25 93:17 94:19 96:18
CALL-IN-ONLY 27:8,17,20 29:4, 10 36:20 38:19 42:4 51:6 53:17 59:14 90:1 93:14 97:14 98:3 101:14
CALLED 7:17 8:2 11:10,11 30:20 59:24 61:21 64:19 74:17 89:19
CALLER 87:19 91:10 95:1
CALLING 28:24 59:18 68:25 69:24
CAMPS 79:14
CANDIDLY 71:18
CANOGA 39:2 40:6 48:6 67:7 74:16 83:14,25 84:8,13 106:10, 20
CANTRELL 65:16,17 66:9
CAPACITY 90:16
CAPPING 46:12
CAPS 67:14,15
CAPTAIN 91:21, 23 92:24 95:15 98:22,24,25 101:15,17 102:20
CAPTURED 85:3 104:6
CARBON 82:8
CARE 56:18 68:15 75:14,17 97:23
CARED 71:25
CAROLYN 48:2
CARRIED 21:8, 13,20,22 22:2,3, 5,8,12,13,20,21 23:10,12,17
CARRYING 83:22 90:16
CARTER 87:9
CARVALHO 36:19
CASE 53:4 73:6
CASES 12:12
CATEGORIES 17:19 20:18
CATEGORIZED 17:2
CAUSED 31:7
32:8 72:10
CAUSING 72:8 75:5
CELEBRATE 77:24
CELL 43:18
CENTER 31:11 36:6 39:9 74:17 106:11,20 107:10,15
CEQA 6:23 9:1, 4,14,18,23 10:3, 8 11:17,18,22 12:2,5,14 14:1,3 19:10,20 20:8,23 22:23 24:15,25 25:10 29:23 52:9 65:21 66:2,12 101:13 110:2
CERRITOS 44:3
CERVANTES 56:11,13,16
CESAR 77:16
CHAMPION 33:18
CHANCE 8:11 38:17
CHANGE 19:13, 17 20:9 30:19,21 37:7 38:1 68:21 71:2 81:13
CHANGED 66:4
CHANNEL 17:4, 5 24:11,12,19
CHANNELIZATION 91:11
CHAPTER 23:5
CHAPTERS 18:15
CHARACTERIZED 11:20
CHAT 5:19 7:10, 21 29:3,10 33:3 36:20 38:18 42:4,14,24 47:18

53:15 70:5,7 90:2 93:15 97:14 98:5 101:6

CHATSWORTH 39:4,8,16,22 40:4,7 100:9

CHAVEZ 77:16

CHECKLIST 19:21 22:23

CHIHUAHUA 102:9

CHIHUAHUAS 99:9,11

CHILDHOOD 67:17

CHINESE 77:10

CHIRPING 49:7

CHOICE 63:16 80:10

CHRIS 65:14

CHRISTINA 83:3 99:17

CHRISTINE 83:8 99:17 101:18,19 102:12

CHUMASH 83:15

CINDY 27:14,15 34:21,22 35:1

CITIES 12:8 21:1,11,14 28:8, 10 32:20 34:15 49:19 58:8,17 63:22 76:19 81:5 88:19 89:10 92:13

CITIZENS 55:14 99:7

CITY 28:4,7 39:24 48:16 49:18 54:20 55:22 56:17 58:23 60:6 61:25 62:7 63:19 71:20 75:10 77:15,17, 25 79:12,22 81:1 82:2 92:2,11,19 93:2 95:7,10,21 96:15 107:7,11

CITY'S 99:4

CLARIFICATION 99:21

CLARIFY 52:13

CLASSED 62:1

CLEAN 13:20 35:19 67:3,10

CLEANED 78:6

CLEANUP 41:14,17

CLEANUPS 88:12

CLEAR 52:17 65:6

CLEARANCE 12:3

CLEARANCES 18:21

CLIFF 51:1

CLOSE 98:13 109:18

CLOSELY 5:25 46:22

CLOSING 6:10 109:23

COALITION 61:13,15 65:19

COLLABORATION 13:22 63:13 108:22

COLLABORATIONS 10:20

COLLABORATIVE 108:4

COLLINS 60:19

COLONIALISM 31:8

COLONIZATION 35:14

COMBINATION 15:11 17:25 63:6

COMBINED 18:1

COMFORT 15:15

COMMEND 46:2

COMMENT 7:1, 21 8:3 25:7 26:7, 15 27:5 28:19 33:23 34:11 38:25 39:3 42:14,24 47:5 51:17,22,24 53:19,21 54:11 57:23 59:9 68:15 70:7,8 76:13 78:17 88:6 89:23 93:13 94:18 97:13 98:2,4,7, 14,22 101:4,5, 11,12 102:9 104:17 105:5 109:18

COMMENTARY 105:5

COMMENTER 26:8

COMMENTERS 7:17 25:21 26:10

COMMENTING 77:11

COMMENTS 7:2,7,9,11,15 8:1,4,8,17,18 10:13,16 23:22 25:6,9,19,22,23 26:9 28:13 30:11 32:25 34:20 36:14,17 38:5 39:17 40:10,24 41:12,25 43:15 44:25 45:5 46:7 47:9 48:20 50:15 52:22 56:3 57:11 58:2 59:10 60:9 61:5,6 62:14 64:4 65:11 66:9, 16 67:19 69:12, 25 70:4,6 72:13 73:3,12 74:6,18 76:2,13 77:1 78:10 79:25 81:16,21 83:2 84:17 85:24 87:22 89:18 91:20 93:8 94:16 96:17 97:9,25 98:9,10,13,15,19 99:16 101:2 102:16,21 104:21 105:8,17 106:4 107:21 109:2,12,14,15, 18,20,23 110:1

COMMISSION 62:9

COMMIT 31:25 32:1 103:15,21, 23,24,25

COMMITMENTS 32:18

COMMITTEE 10:21 30:25 31:1,14 43:6 65:3 78:17 94:12

COMMITTEES 31:4 82:15

COMMON 11:11 15:8,9,13 17:25 18:2 52:3

COMMUNICATION 77:8

COMMUNITIES 19:2 31:18,19 32:5 35:11 36:8 38:2 51:18 55:12 56:20,24 71:4,8, 13 76:22 79:1 80:20 81:4,7,21, 23 82:1,12 89:7 93:25 94:10,13 102:4,23,24 103:1,2 104:1,6, 14 108:7

COMMUNITY 10:21,22,23 11:2,4 13:5,8,18 14:15 17:1,10,25 28:4 37:4,8,21 45:24 54:22 58:20 71:7 72:7 76:11 78:19 80:11 89:1,3,6 96:1 103:3,5,18 104:11 105:4 108:19 109:10

COMMUTE 80:9

COMMUTES 72:8

COMPARED 87:5

COMPLETE 90:14 91:24 102:7

COMPLETED 25:2 65:24

COMPLETELY 49:19

COMPLETION 10:11

COMPLEX 46:3 63:15 106:15

COMPLEXITY 45:25

COMPLIANCE 10:3

COMPLICATED 26:22

COMPLICATIONS 86:18

COMPONENT 9:23

COMPONENTS 17:8

COMPRISE 14:7

COMPRISED 16:15

COMPROMISING 44:22
COMPUTER 64:15
COMPUTERS 68:3
CONCEPT 44:6
CONCERN 28:4 35:15 43:8 46:21 58:14,16 71:1 73:23 74:2
CONCERNED 43:12 44:2 66:5 85:15
CONCERNS 31:2 35:4 57:8 76:15 81:10 84:6 94:25 102:5 104:10 108:22 109:3
CONCERTED 58:8
CONCLUDED 25:4
CONCLUDES 21:18 25:15
CONCRETE 44:19 46:13 81:8 85:9
CONCRETING 58:13
CONCRETIZING 104:4
CONCUR 73:12, 15
CONDITIONS 5:23 11:3 19:14 61:3 104:24
CONDOS 74:22 106:14
CONDUCT 5:25 6:20
CONDUCTED 20:2,12 23:23 24:3
CONFLUENCE 39:1,6 81:1 83:25 84:13
CONFUSED 52:5 65:23
CONFUSING 65:20
CONFUSION 47:6
CONGRATULATIONS 46:5
CONGRESSMAN 61:16
CONJOINING 60:25
CONJUNCTION 75:7
CONNECT 15:21 86:23
CONNECTED 13:12 72:25 108:11
CONNECTING 80:25
CONNECTION 6:5 62:3
CONNECTIONS 6:8
CONNECTIVITY 72:21,23
CONNIE 64:10
CONNOR 70:22
CONSEQUENCES 86:20
CONSERVATION 18:20
CONSIDERATION 24:7 72:20 98:12 108:8 109:17
CONSIDERATIONS 11:8
CONSIDERED 6:25 9:20 19:18 23:20 24:2,17 39:25 40:5 70:5 108:10 109:5
CONSISTED 10:20
CONSISTENCY 18:5
CONSISTENT 12:9 18:8,23 76:15
CONSISTING 74:21
CONSISTS 12:7
CONSTANT 71:19
CONSTITUTE 7:11
CONSTITUTION 87:11
CONSTRUCTION 15:1,3 36:2 49:14 57:3
CONSTRUCTIONS 56:23
CONSULTATION 46:10
CONSULTATIONS 25:3,4
CONSULTING 9:7
CONTACT 6:17 82:25
CONTAMINATED 35:23 36:1 37:16
CONTEMPORARY 45:22
CONTENT 10:13
CONTEXT 19:9
CONTINUATION 40:4
CONTINUE 39:8 66:23 74:1 81:11 100:17 102:21 109:7
CONTINUED 13:17 24:9
CONTINUES 39:3
CONTINUING 100:6
CONTINUITY 59:5
CONTINUOUS 16:1
CONTRACTOR 5:13
CONTRERAS 34:5,6,9 48:7
CONTRIBUTED 65:6
CONTROL 32:19 41:14,17 43:9,12 52:11 64:2 75:8 76:17 103:24 108:9
CONTROVERSIAL 46:11
CONVERSATION 102:13
CONVERSATIONS 104:25
CONVERT 92:7
COOL 94:24
COOPERATE 63:25
COOPERATION 59:4
COPIES 5:15
COPS 103:17,19 104:9
CORLISS 61:7, 8,12
CORPORATE 90:23
CORRECT 66:7 79:3
CORRECTLY 29:8 40:12
CORRIDOR 13:14 63:16 64:3 108:12
CORSI 29:1,2
CORTEZ 56:5
COUNCIL 62:7 78:17 82:15,19 83:24 95:11,21 99:23 100:6,14
COUNCILMAN 62:2
COUNSEL 32:20 103:25
COUNTIES 105:25
COUNTLESS 31:23
COUNTY 5:12 6:21 8:20,24 12:9 13:22,23 15:6,23 19:3 20:14,25 21:9, 13,15,20,22 22:3,6,8,13,14, 20,21 23:10,12, 17,18,23 25:2 31:2,6,12,24 32:7,21 36:10 39:23 51:25 52:6,8,10,11 57:1 59:2 62:5 65:4 71:20,24 79:22 90:7 96:15 98:17 103:10,11, 12,15 105:2,22
COUNTY'S 32:21
COUNTY-WIDE 21:10
COUPLE 76:12 89:20
COURTHOUSE 41:16

COURTS 31:22 58:3
COVERED 44:19
COVERS 67:16, 17
COWLEY 48:4, 5,6
CRAIG 54:3
CREATE 11:11 15:22 31:10 36:6 89:14,15
CREATED 73:19 77:22
CREEK 100:10
CREEKS 84:13
CRISIS 96:13,15
CRITERIA 22:24 23:2
CRITERION 22:25
CROSS-SECTION 16:10
CROSS-SECTIONS 16:8
CROSSINGS 17:4
CROWN 61:22
CRUCIAL 106:2
CULTURAL 33:16 64:2 82:16
CULTURALLY 63:3,5
CULTURE 13:15 108:17
CULTURES 33:15 76:20
CUMULATIVE 20:1
CURB 32:23
CURIOUS 39:6
CURRENT 5:23 56:24 78:18
CURT 38:8
CUSTODIAN 87:21
CUTBERTO 60:13
CYCLIST 66:22, 24
CYPRESS 37:4

D

DAISY 41:2,6
DAISY'S 41:7
DARETT-QUIROZ 36:25 37:2,3 38:4
DATA 11:2
DATABASE 13:5 69:3
DATE 25:8
DAVALOS 42:7
DAVE 60:12
DAVEHALL 60:12
DAY 28:6 35:16 82:17,23
DAYANA 53:10 57:12
DAYS 25:8
DEAD 102:8,11
DEAL 97:22
DEATH 44:11 78:5
DEBRA 38:14 53:8
DECADE 99:22 109:8
DECISION 9:18, 20 14:15 62:9 101:22,24
DECREASE 96:2
DEEPLY 56:18
DEFINITION 19:9
DEFUNDING/RECONSTRUCTING 79:7
DEIR 63:12
DELORES 50:17
DEMONSTRATIVE 105:17
DEPARTMENT 8:20,25 44:13 75:23 82:9
DEPARTMENT'S 28:3
DEPARTMENTS 13:23 106:23
DEPEND 17:9
DEPENDANT 28:9
DEPLETES 44:23
DEPUTY 9:5
DESCRIPTION 6:22,24
DESIGN 11:7,8, 11 17:1,7,8,21 18:8,9,11,14,19, 22
DESTRUCTIVE 30:1
DETAIL 64:16 105:15
DETAILED 24:6
DETAILS 11:15 12:1 14:1 23:4
DETERMINATION 22:1 25:13
DETERMINATIONS 20:15,22
DETERMINE 12:4
DETERMINED 11:22 15:13 17:9 22:18,25 23:8,14
DEVELOPED 13:2,5
DEVELOPERS 71:16 94:9
DEVELOPING 46:20 78:25 79:4 92:1,21
DEVELOPMENT 13:18 44:7 49:15 81:12 91:14
DEVELOPMENTS 91:17
DEVELOPS 31:6
DEWITT 74:10
DIE 65:9
DIESEL 44:10 68:16
DIFFERS 52:6
DIFFICULT 60:2
DIFFICULTY 6:5
DILUTION 47:7
DIRECTION 13:3 17:11
DIRECTIONS 11:6 67:6
DIRECTLY 31:22 71:21 74:23 80:21 104:3 107:2
DIRT 49:9
DISAGREE 69:7
DISAGREED 83:12,21
DISAPPEARED 86:22
DISAPPOINTED 46:10
DISASTER 54:23
DISCLOSE 9:18
DISCLOSURE 14:18
DISCONNECTING 104:24
DISCOUNTED 91:3
DISCOURSE 101:20
DISCOVERED 68:21
DISCRETION 9:17
DISCUSS 10:6 24:22
DISCUSSED 83:25 100:12
DISCUSSING 46:24
DISCUSSION 99:24
DISPLACE 57:7 94:10
DISPLACED 56:25 72:7
DISPLACEMENT 32:6,23 36:4 57:5 71:7 76:17 85:15 87:7,11 96:1 97:1
DISPLACEMENTS 32:19
DISTANCE 75:16 100:15
DISTANCES 18:20

DISTORTION 44:4
DISTRESSING 29:23
DISTRICT 60:20 74:17
DISTRICTS 106:23
DIVE 19:7
DIVERSE 19:2 105:4
DIVERSIONS 17:5
DIVERSITY 33:17
DIVISION 98:18
DIXON 38:22,23, 24 40:2
DOCUMENT 10:4 11:19,22 12:15 20:16 65:21 66:13 86:20
DOCUMENTATION 46:1 105:3,7
DOCUMENTED 61:16
DOCUMENTS 46:24 106:1
DOLLAR 107:4
DOMAIN 60:6 62:6
DONIS 34:21,23 35:1 36:13
DOOR 106:15
DORRIT 47:20
DOWNLOADS 6:11
DOWNTOWN 41:16
DOZEN 97:2
DOZENS 97:2
DRAFT 5:7 6:25 8:16 9:1,3 10:6, 8,13 11:13 19:8, 21 20:4 25:5,9, 11 68:16,21
DRAFTING 31:3 86:25
DRAMATIC 46:15
DRAW 90:9
DREAM 49:13 71:16
DREAMS 49:4
DREW 64:17,21
DRIVEN 10:25 11:2,4 14:14 24:3
DROUGHT 82:3
DRUG 55:13
DRY 39:5
DUAL 20:15 105:5
DUE 26:9 31:19 53:18 78:6 106:2
DUMPAGE 58:9
DUMPING 35:24

E

E-MAIL 10:14 25:25 37:19 98:12,16,19 109:16,20
E-MAILS 39:17
EARLIER 18:2, 10 43:24 46:7 51:19 68:15
EARLY 25:13
EARTH 82:17,23
EASILY 67:3 105:25
EAST 30:24,25 31:3,17 39:20 51:18 68:22 72:22 77:16 79:20 81:21 94:4 102:22
EASY 16:2 67:11
EAT 94:9
ECHO 58:2 81:21 94:25 96:11
ECOLOGICAL 35:7 46:21
ECOLOGICALLY 90:19,25 91:18
ECOLOGY 18:16
ECONOMIC 19:17
ECONOMICALLY 80:21
ECOSYSTEM 30:9
ECOSYSTEMS 13:12 108:11
EDIBLE 37:15
EDUCATE 104:14
EDUCATION 13:18 52:1,19
EDUCATIONAL 35:9
EDWARDS 78:11 80:1,3,6 81:10
EFFECT 9:21 19:11,18
EFFECTS 12:17,19 19:10 21:3
EFFORT 8:7 26:25 27:2 37:24 45:25 58:7,8 66:12 86:22 108:4 109:2,7
EFFORTS 90:7 105:3
EIGHT-FOOT 16:16,18
EIR 9:3 10:4 11:18 12:2,6,14, 19,24 20:4,5,12, 14 21:6,17,18 23:6,21 24:7 25:7 43:25 52:16 63:16 65:21,24 66:4 105:2,6 108:8,24
EL 77:18,25
ELECTRONICALLY 8:6 70:9
ELEMENTS 11:10,11 14:5,17 15:8,9,11,13 18:1,2,3 36:2
ELENA 52:25 53:1,2,3,4,5,6
ELIZABETH 50:23
ELLEN 38:22
ELLIOT 64:10, 11,14
EMAIL 8:4
EMBLEMATIC 81:24
EMBRACE 13:14 108:16
EMISSIONS 29:25
EMOTIONAL 71:10
EMPHASIZE 108:3
EMPOWERED 105:6
ENABLED 31:20 105:8
ENCOURAGE 9:21 26:22 39:10 72:19
ENCOURAGED 12:23
ENCOURAGING 88:16
END 8:9 10:15 28:6 67:22 81:2 91:8,10,12 92:14 110:7
ENDED 25:12 39:1
ENDING 84:19 86:8 93:17 94:19 96:18
ENERGY 18:20
ENFORCE 21:15 22:8
ENFORCEMENT 78:25 79:3,6,9, 23
ENFORCING 26:10
ENGAGEMENT 11:2 13:18 17:10 45:24 108:20
ENGINEER 40:20
ENGLISH 5:16
ENHANCE 13:12,14 108:15, 16
ENJOY 37:12 38:1
ENJOYED 33:19
ENRICHMENT 35:9
ENSURE 9:20 50:9 58:13 63:24 64:1 78:7 88:13 105:3 109:2
ENTERPRISE 58:6
ENTERS 77:21

ENTERTAINMENTS 80:17

ENTIRE 35:6,16 66:23 67:6 80:25 91:24 92:2

ENTITIES 63:14,19 88:19 108:25

ENTITY 63:15

ENTRIES 16:4

ENTRY 73:15

ENVIRONMENT 9:21 12:16 19:12,19 40:20 71:3,9 75:14 77:12,13,14 92:6

ENVIRONMENTAL 5:7 6:23 8:12 9:2,14,15,19,25 10:2 14:5 18:15 19:22 20:2,9,17 21:3 22:17,22 23:1,6,7,13 24:22,24 31:19 32:4 43:11 44:9 51:19 54:23 64:3 72:2 80:12,19 82:15 105:9 106:24 107:3 108:12

ENVIRONMENTALLY 24:16 46:15 66:6,7 85:10 90:11

ENVIRONMENTS 102:23

ENVISIONED 16:7

EPA 61:1 77:20

EQUAL 98:12 109:17

EQUALLY 8:5 25:24

EQUESTRIAN 16:2,12,19 63:4

EQUIPMENT 67:5

EQUITABLE 13:10,13 77:23 88:13 108:9,15

EQUITY 63:7,23 64:1

EQUIVALENT 52:7 105:10

ERICA 73:4,5,7

ERIK 42:16

ERRORS 68:24

ES 91:8

ESSENTIAL 9:22

ESSENTIALLY 24:8 100:23

ESTABLISH 11:3

ESTABLISHED 10:25 60:23 73:25

ESTHETIC 19:16

ESTHETICS 19:23

EVALUATE 10:1

EVALUATION 41:13

EVENING 5:11 6:10,17 7:20 8:3 19:7 25:16,19 26:17 27:6,7,11, 15,17,19,22 28:14,24 29:1,2, 9,13,15 33:1 34:4,21 36:24 37:2 38:7,16,24 42:2,25 45:7,12 46:24 47:12,16, 25 48:3,6 51:1 53:9,11,13 54:5 57:13,15,20,24 60:12 64:7,8 65:14,17 70:5,12 72:14 76:5 86:6 89:20,24 93:11, 13 94:18 98:2,7 101:5,12 109:14 110:1

EVENING'S 7:5 8:8

EVENT 82:16

EVENTS 10:22 80:16

EVERYBODY'S 59:6 102:4

EVERYONE'S 5:24 96:3

EVICTED 95:10

EVICTING 87:9

EVIDENTLY 65:22

EXACT 34:13

EXAMINED 12:4

EXAMPLES 16:6 18:19

EXCAVATION 36:1

EXCITED 25:16 37:11 40:20

EXECUTIVE 23:5 91:8

EXERCISE 62:6

EXHIBITED 102:8

EXIST 36:7

EXISTING 11:3 31:7 32:2,16

EXPAND 72:9 94:3

EXPECT 51:22 58:6 59:23

EXPECTANCY 87:5

EXPECTING 26:19

EXPENSIVE 71:21

EXPERIENCE 6:4,9

EXPERIENCED 49:17

EXPERIENCING 13:16

EXPERTISE 31:3

EXPLAIN 52:6,9 105:15

EXPLAINED 13:7

EXPLAINING 105:23

EXPLANATION 91:14

EXPLANATIONS 47:4

EXPO 93:23

EXPRESSIONS 19:1

EXTENDED 25:8 98:14 109:19

EXTENSION 25:10

EXTENSIVE 23:22 58:9 105:7

EXTERNAL 13:23

EXTRAORDINARY 104:23 105:3

EXTREMELY 56:23 103:21

F

FABRIC 104:25

FACE 31:19 82:3

FACED 36:8

FACILITATE 9:22

FACILITATED 7:1 26:7

FACILITATES 14:18

FACILITATOR 5:11 96:10

FACILITIES 18:16

FACT 77:24 102:8

FACTORS 17:9

FAILED 87:16

FAILING 32:23

FAILS 31:24 32:7

FAILURE 103:10,11

FAITH 31:1

FALL 20:18 25:13

FALLS 85:4

FAMILIES 95:23 96:1

FAMILY 57:4,7 84:1,11 100:2

FARMS 37:15, 17,18

FARTHER 55:18 92:25

FAUNA 19:15

FAVORS 61:25

FEAR 55:23

FEASIBILITY 62:7

FEASIBLE 9:24 12:16

FEATURE 5:19 70:5,7

FEATURES 11:11 63:8

FEBRUARY 10:9
FECAL 54:23
FECES 75:10 92:10
FEDERAL 100:13
FEED 72:24
FEEDING 82:11
FEEDS 6:15
FEEL 30:4 35:5 55:14 71:19 74:18 78:22
FEET 16:14 44:15 74:24 75:16,22
FELICIA 69:17, 20,21,22 84:18
FELIZ 68:10 69:8 80:7 82:15, 19
FELLOW 31:13 55:14
FEMALE 76:8
FENCE 14:25
FERNANDEÑO 83:16
FIELD 77:20 100:11
FIGURE 15:12
FIGURES 16:6
FILTRATION 41:18
FINAL 25:11,12 98:13 104:22 109:17
FINALLY 6:13 37:9 52:17 66:14
FIND 16:3 34:12 50:12 63:4 66:5 79:13 87:1
FINDING 15:15 18:6 63:7
FINISH 102:22 104:22
FINISHED 30:10
FIRE 78:25 106:22
FIRM 11:5 46:19
FISH 86:25
FIT 69:9
FIVE-MILE 108:14
FIVE-MINUTE 69:14
FLEXIBILITY 18:25
FLOOD 13:9 17:5 43:9,12 64:2 68:7 69:10 91:15,17 92:2 108:8
FLOODING 35:20
FLOODPLAIN 35:5
FLOODS 68:8
FLORA 19:15
FOCUS 85:5
FOCUSING 91:25
FOLAR 91:4,13
FOLKS 30:19 38:16 42:25 47:12,14 51:4 52:9 53:14,18 59:13 70:4 102:25 103:7 104:13 106:21 107:8,16
FOLLOW 52:4 85:21
FOODS 92:7
FOOTPRINT 82:8
FORCE 89:11, 15
FORCING 93:2
FOREFRONT 81:23
FORM 19:21 67:3
FORMAN 57:19
FORMED 11:4
FOROODI 56:6
FORWARD 33:20 59:4 80:22
FOSTER 13:17 108:19
FOUND 36:2 44:12 68:10
FOUNDATION 11:1
FOX 43:2,4 70:12 73:13
FRACTION 92:15
FRAME 12:12 49:16,18,19
FRAMES 12:11 18:18
FRAMEWORK 10:25 11:4,8 18:11
FRAMEWORKS 105:24
FRANK 46:19 49:14 85:12
FRASHER 6:17
FRASHER@PW.LACOUNTY.GOV 6:18
FREEWAY 31:21 58:4,11 68:19 77:16 82:9
FREEWAYS 61:20
FREMONT 98:18
FREQUENTLY 80:8
FRIDAY 66:22
FRIENDS 57:7 67:14 91:5
FRONT 106:17 107:1 109:21
FRUSTRATED 52:18
FULL 26:15 87:12 95:8
FUNCTION 7:10 98:5
FUNCTIONAL 92:1
FUNDING 17:11 79:22
FUTURE 11:6 13:3,6 33:21 44:6 48:17 56:19 67:2 75:21 78:8 85:2
FUTURES 55:11

G

GABELICH 70:14,15
GABRIELEÑO 83:16
GABRIELLA 60:16,18
GANG 84:7 100:20
GARCIA 36:23, 24
GARDENING 37:15,17
GARDENS 41:20
GAREN 51:7,8
GAS 29:25 77:10,19
GATE 35:2 46:20 93:23,25 95:1
GATEWAYS 15:20,25 16:3,7, 13,21 17:3,22
GATHER 10:12 80:15
GEHRY 46:19 49:14 85:12
GEHRY'S 49:14
GENERAL 58:18
GENERALLY 35:21 99:3
GENERATION 50:4,11
GENERATIONS 76:24
GENEVEIVE 8:22
GENEVIEVE 8:19
GENTLEMAN 69:13 75:9 94:5
GENTLEMEN 25:15 26:16 28:22 33:25 45:6 47:10 65:12 86:6 88:1,4 89:19 93:9 94:17 97:10 98:1 101:3,6,10 109:13,25
GENTRIFICATION 32:7,8 36:4 76:18 85:13 88:16 90:9,20,21 91:15 92:20 94:5,7 95:2,25 96:10 102:6 103:1
GENTRIFYING 72:11

GEOGRAPHICALLY 11:21,24
GEOLOGICAL 44:13
GHAZARIAN 38:6
GINGER 51:12, 14 52:15 65:13
GIVE 46:4 55:10 92:13 100:3 103:13 105:8
GIVING 30:4 76:9 101:18 104:11
GLAD 8:13
GLASS 55:13
GLASSELL 37:3,4
GLORIA 64:8,9
GOAL 10:25 11:4 63:17 84:24
GOALS 11:5 13:21 30:5
GOD 49:5 56:2
GOLF 68:10
GONNELLI 40:25 41:4,7,8, 11
GONZALEZ 70:23,25 72:6
GOOD 19:6 31:1 33:22 37:2 38:24 48:6,10 65:17 66:10 76:5 82:2 85:10 90:6 91:6, 18 97:3,5,22 101:24
GOODS 31:20
GRACE 8:23 14:2 24:21 26:5 29:1 98:16 109:22,23
GRACIE 50:25
GRAFFITI 79:14
GRAPHIC 16:10
GRAPHICS 18:15
GRATEFUL 37:23
GREAT 19:6 26:19 33:18 37:6 40:7 41:9 43:6, 10 76:5,8 91:4 92:4,5
GREATER 18:24 51:21 76:19
GREATLY 89:16
GREEDY 90:23
GREEN 16:5 45:2 58:21 87:2
GREENHOUSE 29:25
GREW 49:10
GROUND 7:5 26:2 44:15 77:20
GROUPS 108:21
GROWTH 20:9 79:1,4
GRUBER 60:14
GUARANTEE 21:15 22:9 57:4
GUARANTEED 87:11
GUESS 64:19 73:10,17 102:21
GUIDE 20:13 22:24
GUIDELINES 18:8,9,10,14,19, 22 19:10,11,20 24:15 84:4
GUILLERMO 42:6
GUYS 30:3 33:19 37:5 43:7 49:22,23 50:14 73:19,20,22 97:7

H

H-A-T-T-A-L-A 29:7
HABITAT 18:16 61:1
HAHN 61:19
HALL 61:18
HALLS 10:24
HAND 7:22,23, 24 13:25 27:9, 13,16,21 28:23 29:9 33:3 38:18, 20 42:5,22 51:5 53:16 88:3,7 89:25 91:21 93:14 94:19 97:12,13,15 98:3,21 99:18 101:13,15 102:17 104:18 106:5 107:22
HANDFUL 99:6
HANDS 28:22 36:9 88:2 89:21, 22 93:11 98:5
HANGING 59:17
HAPPEN 52:15 65:1 67:1 81:14
HAPPENED 107:8
HAPPENING 52:12 54:22 88:25 95:6,13
HAPPY 37:8
HARD 26:21 38:3
HARDER 109:10
HARDSHIPS 36:9
HARM 36:11
HARRIS 65:14
HATE 55:17
HATTALA 29:6, 8
HAWK 47:11 57:14
HAZARD 107:3
HEADED 46:3
HEAL 51:15,22 93:23
HEALTH 5:24 71:10,11,12 75:14 80:10
HEALTHY 13:12,20 108:11
HEAR 7:16,19 9:2,10 25:16,20, 22 27:24,25 28:16,17 29:18, 19 30:2,15 33:10,11 34:2,6, 7,23,24 40:16 41:4 43:19 48:24 49:7 54:16 56:13 59:17,19 61:9 62:17 69:20,22, 24 74:13 80:3,18 83:5 84:20,21 86:10 89:24 93:19,20 94:21 96:22 106:7 107:24
HEARD 35:20 49:7 84:7 94:1,3 104:14
HEARING 45:17 58:24 67:23 106:12
HEART 55:16
HEATHER 38:12
HEAVILY 57:1
HEIGHT 74:24
HEIGHTS 49:17, 18 50:11
HELD 77:18
HELEN 53:25
HELENE 53:22, 23,25
HELFAND 52:24
HELPFUL 33:24 43:24
HELPS 34:3
HEROIC 27:2
HEY 56:16
HIGH 7:14 12:2 17:13 25:18 26:9 39:2,7 46:3,19 47:13 53:18 84:13
HIGHLIGHT 103:5
HIGHLIGHTED 25:1
HIGHWAYS 87:10
HIKED 100:15
HILLS 40:6 83:24 84:11 99:23 100:7,14, 16,17
HINDERED 35:13
HINTON 45:15, 17,20,21 47:2 66:10 104:18,20 105:20
HISTORIAN 45:21
HISTORIC 19:16 77:20 83:15
HISTORICAL 77:8,10

HISTORICALLY 84:8

HISTORY 32:4 45:22 76:7 81:23 90:14 97:22 109:8

HITTING 41:18

HOFFMAN 33:6,7,8,10,12 51:9

HOME 39:12 74:22

HOMELESS 54:22 55:3,7,9, 12,20 60:23 73:17 75:11 79:14 84:7 92:11 96:13 103:19,20 107:17

HOMELESSNESS 13:17 71:6,15 82:17 92:10 108:18

HOMEOWNERS 60:3,7 75:21 103:4

HOMES 74:22 75:15 87:1 95:7, 8,9,11

HOMEWORK 97:20

HONEST 102:5

HOPE 36:13 39:21

HOPEFUL 81:11

HOPES 42:10

HOPING 41:19 65:8

HORIZON 14:12

HORRIBLE 75:2

HOST 5:20 6:15 7:7,22 90:2 93:15 98:4

HOSTED 10:22

HOSTILE 55:4

HOUSE 97:4,5 103:12

HOUSED 87:7

HOUSES 64:21 91:17 100:24 107:5

HOUSING 13:16 32:9,10,14,15,16 46:21 50:5,8,10, 13 57:5 74:19 88:13,14,15,18 103:22,23 108:18

HOWELL 74:8

HUDELSON 38:8

HUGE 33:17 49:13 58:14 87:12

HUMAN 54:23 71:4 75:10 86:15 87:20

HUMANS 68:20 87:3

HUNDREDS 93:4 95:22

HUNGRY 71:16

I

ICF 5:11 9:7

ICON 7:23

ID 6:3

IDEA 33:14,18 91:18

IDEAS 27:4 43:10

IDENTIFIED 9:24 15:4 20:6 21:2,6 22:6 24:16,19 29:11

IDENTIFY 9:23 12:15,16,17

IDENTIFYING 69:1

IDENTITIES 19:2

IDENTITY 11:12

IGNORING 81:24

ILLEGAL 35:24

IMAGINE 49:3

IMMIGRANT 96:1

IMMINENT 60:6 62:6

IMPACT 5:7 6:9 9:2 20:17,19,20, 21 21:19,21,24, 25 22:1,6,15,25 23:1,9 69:4 71:3 77:12 80:12,19 84:1 90:20 105:9

IMPACTED 80:21 86:20 104:3

IMPACTS 9:19, 25 10:1 12:16 13:15 14:19 15:1 17:12 19:8,22 20:1,6,10,11,14, 15,22 21:2 22:4, 11,18,19,24 23:3,4,11,15 24:5 43:11 68:19 71:13 72:2 108:18

IMPEDE 69:9

IMPLEMENT 63:24

IMPLEMENTATION 15:2

IMPLEMENTATIONS 22:14

IMPLEMENTED 14:8,11 18:8 21:6,7,17 22:10

IMPLEMENTING 56:22 103:23, 24

IMPORTANCE 99:4 108:4

IMPORTANT 9:12 43:10 46:18 80:14 81:11 94:7 99:12,13 108:6

IMPRESSED 37:6 85:11

IMPROVE 13:9, 10,19 55:7,20 61:2 80:10

IMPROVED 54:21

IMPROVEMENT 48:18

IMPROVEMENTS 11:7 13:4 24:9, 13 57:9

IMPROVING 58:22

INACTIVE 13:6

INAPPROPRIATE 7:13

INCLUDE 15:10, 25 17:3 18:3,20 58:7 68:18 72:1, 9 91:12

INCLUDED 20:10

INCLUDES 11:9 15:5 20:22,25 64:2 91:13

INCLUDING 17:10 19:15 80:17 107:17,18

INCLUSIVE 13:11 108:10

INCOME 85:16

INCORPORATE 9:24 37:15,25 58:18

INCORPORATED 17:20 18:4 82:10

INCREASE 35:19 68:12 71:14 72:8 103:17 104:5

INCREASED 79:22

INCREASES 72:10 79:8

INCREDIBLY 46:4

INDEPENDENT 5:13

INDIA 90:8

INDIAN 63:6

INDIGENOUS 31:11 33:15 46:8 51:20 63:6 76:20 77:14,25 78:1 80:20 81:22,24 82:2,24 83:13 85:20,21 99:12

INDIVIDUAL 6:8 28:8,9 53:23 70:21

INDIVIDUALS 108:20

INDUSTRIAL 58:4

INDUSTRIALIZED 58:20

INDUSTRIES 31:24

INDUSTRY 35:23,24

INEQUITIES 31:7,9 32:3,6

INFLUENCE 33:14,16

INFORMATION 5:24 6:18 8:16, 17 9:8 10:6 14:20 27:3 52:2

91:6 95:16,20 110:3,5

INFORMED 14:13 23:21 37:21

INFRASTRUCTURE 17:2

INITIAL 12:2

INITIATED 25:3

INITIATIVES 11:7 13:4

INJURY 78:5

INPUT 10:12 13:8 47:7 85:20, 22 86:17 110:2

INSTAGRAM 82:18,22 95:16, 18

INSTITUTIONAL 13:24

INSTRUCTIONS 69:25

INTEGRITY 46:9

INTENDED 18:25

INTENDS 15:23

INTENSIVE 10:20

INTEREST 99:5

INTERESTED 7:2 10:12 62:24 85:7

INTERESTING 94:6

INTERNET 6:5, 8

INTERPRET 45:23

INTERVALS 15:14

INTIMATELY 86:24

INTRICATE 46:4

INTRODUCE 8:19

INTRODUCTORY 8:21

INTUITIVE 52:4

INVALIDATE 31:15

INVEST 57:1

INVESTIGATED 39:21

INVESTORS 107:12

INVITE 31:12 95:15,17 98:15 109:19

INVITED 31:14

INVOLVED 33:20 46:22 86:24 88:19

INVOLVEMENT 80:21 85:12 110:2

INVOLVING 89:6

IQ 45:22

IRREVERSIBLE 20:9

ISSUE 10:2 52:1 83:24 90:9 103:2,20

ISSUES 6:24 31:25 35:21 44:10 52:5 62:23 63:15 75:12 81:25 92:1,10 96:13 106:12 107:17

J

JAMILA 56:11, 12,17

JANICE 61:18, 19

JANUARY 11:14 25:4

JASMINE 70:23, 25

JEFF 77:2

JENNIFER 5:10 9:8 10:5 25:17 26:4 27:25 28:17 36:18 45:11 98:24 101:17,18 109:24

JENNY 11:13

JESSICA 29:14 30:12,23 50:18, 20,21 51:18 102:17,19 104:8, 21

JESSICA'S 46:7

JEWEL 61:22

JIVES 65:7

JOB 52:4 92:18 93:24

JOHN 38:11

JOIN 29:4 33:7 82:23

JOINED 6:16 38:17 43:5

JOINING 8:24

JON 51:2

JONES 50:17

JUAN 45:9 59:11,12,15

JUDGE 87:9

JUMP 9:12 104:22

JURISDICTION 52:13

JURISDICTIONS 12:12,22 15:6 20:24 21:1 32:23

JUSTICE 46:22 51:19 102:23

K

K-A-T-A-G-I 64:6

K-A-Y-E 48:1

K-E-S-H-A-V 90:3

KAREN 67:20, 21,22,23 73:12

KARLO 51:11

KATAGI 64:6

KATHERINE 51:9

KAYE 47:25

KEENLY 96:9

KESHAV 90:3,6 91:10

KESSHAV 90:5

KICK 103:14

KICKED 10:9

KID 37:13

KIMBERLY 45:7

KIND 33:12,16 37:17 58:6 64:22 67:4

KINDS 107:18

KIT 11:10 14:6, 13 15:12 16:23, 24 17:7,12,15, 17,19,22,24 18:1 37:6,24 63:20

KNOWLEDGE 52:3 82:2

KOMJAKRAPHAN-TEK 8:22,23 24:23 98:16 109:24

KOREA 35:20

KUEHL 65:4

L

LA 5:6 6:21,22 8:20 9:1 10:7,18, 19 11:1,6,12,13, 17,23,24 12:1,7, 9,10,20,24 13:22 14:4,7,25 15:6, 16,20 16:4,8,23 18:7 20:7,23 21:4 23:15,24,25 24:10,14,25 28:3,9 30:25 31:4,13,18,23 32:5 33:15 35:3 39:23,24 44:5,14 45:1,22 56:18, 21,22 65:2,3,23 67:15 71:5,23 72:21 73:15 75:7 77:15,23 78:20 79:6,10,11 80:8, 25 81:25 82:10, 17 84:24 86:14 87:5,8,10 88:13 90:14 95:3,13,22 99:5,25 102:24, 25 104:2

LABORATORY 100:11

LACK 51:20 86:17 94:12

LACKS 36:3

LACROIX 57:16

LADIES 25:15 26:16 28:21 33:24 45:6 47:10 65:12 69:13 86:6 88:1,4 89:19 93:9 94:17 97:10 98:1 101:3,6,10 109:13,25

LAL 9:6 19:6

LAND 17:6 19:15 32:7 37:9, 10 49:24,25 61:25 63:1 64:23 68:20 82:7 87:2

94:9
LANDS 63:1
LANDSCAPE 18:10
LANDSCAPING 39:13
LANES 72:25
LANGUAGE 7:13 63:9
LAPD 79:5,7
LARGE 11:20 54:22 80:16 105:13,14
LARGER 108:12
LARGEST 77:14,17,25
LARIVERCEQA 98:19
LARIVERMASTERPLAN.ORG 11:16
LARIVERWORKS 68:17
LARRY 33:6,8
LAS 25:3
LASSEN 80:7
LASTED 75:6
LASTLY 20:8 22:11 24:15 85:20
LAURA 56:4
LAURIE 33:7,8 51:9 57:25 58:1
LAW 9:15 63:9, 12 78:25 79:3,5, 22
LAWLER 62:16, 17,21 63:22 107:22,24 108:2 109:5
LEAD 8:25 35:19 88:20,25
LEADER 31:13
LEADING 77:23 100:23
LEARN 41:19 81:25 82:17,22
LEAVE 44:18 51:17 84:13
LEAVES 32:5
LEAVING 55:13
LED 49:14
LEE 61:8,9,12 62:11
LEFT 20:19 52:5 68:23 99:1
LEGACIES 31:8
LEGISLATION 63:2,10
LEGISLATIVE 63:17
LEGISLATURE 61:17
LENA 74:12,13, 16 106:5
LENGTH 12:7 15:22 16:20 66:24 67:6
LES 47:25
LESLIE 42:1
LETTER 25:25 51:22,23
LETTING 35:7 70:18
LEVEL 12:2,5 14:19 17:13 21:5
LEVELS 26:23
LEWIS 28:14,16, 19 50:18,21 85:25 86:2 87:23,25
LIAO 72:18
LIFE 87:5 96:3
LIFESTYLE 80:9
LIFTED 76:21
LIGHT 12:4
LIGHTING 35:16 61:3
LIKELIHOOD 73:25
LIKEWISE 46:9
LIMIT 26:2,11
LIMITED 17:23 72:3
LIMITING 6:11
LINEAR 63:4,8 64:3 108:6,12
LINES 42:25
LIPPMAN 53:12
LIST 7:25 17:23 47:15 86:8
LISTED 20:18
LISTEN 6:6 31:2 40:21 70:19
LISTENER 86:4
LISTENING 44:25 95:5 99:2
LITERALLY 56:18 57:6 94:1 100:3
LIVE 43:4 48:6 56:17 58:1 65:18 68:6 71:1 72:19 74:16 80:6,11 81:4 92:13 93:25 97:1,3 99:9 102:23 106:10
LIVED 80:7 86:14
LIVELIHOOD 103:6
LIVES 55:11 71:4 73:14 87:12 94:6
LIVING 30:9 35:11 60:4 87:12 90:19 91:2 95:23 103:4
LOCAL 5:6 9:16 13:19 31:22 39:11 55:1,5,21 63:19 104:6,11 108:24
LOCATED 5:19 14:16,24 44:3
LOCATION 17:7 62:2 77:17 78:1
LOG 102:11
LOGGED 36:21
LOLENPILE 61:16
LONG 34:10,14, 16 35:2 41:14,15 44:2 55:15,16 56:20 58:2 60:20 61:13,14 62:22 63:19 65:18 67:7 81:3
LONG-TERM 44:1 54:19 88:10
LONGER 72:8
LOOKED 64:14 108:6
Los 5:1,12 8:24 15:23 19:2 44:3 68:10 69:8 71:1 77:7 80:7 82:14, 19 85:1,5 87:21 90:16 91:5 96:14 98:16
LOT 9:8 27:3 29:24 34:14 40:21 52:5 64:16 66:10,12 67:14 68:5 73:16 76:22 97:22 105:23
LOTS 43:10
LOUIS 54:3
LOVE 67:13 82:25
LOW 56:23 68:12
LOW-INCOME 56:23 88:14 103:21,22 104:14
LOWER 31:18 32:5 85:16 102:24 104:1
LUIS 38:21
LUKE 51:12,14 65:13
LUXURY 88:17

M

MACY'S 77:16
MADE 5:16 48:9 57:9 73:12
MAGGIE 36:25 37:3 38:4
MAGNET 54:21 107:16,17
MAGNITUDE 48:18
MAIL 8:4 10:14 98:11 109:16,20
MAIN 89:9
MAINTAIN 73:22 74:1
MAINTAINED 73:24
MAINTENANCE 18:10,22
MAJOR 40:19 46:21 56:22
MAKE 6:2 8:7 9:9 26:9 30:7 38:25 39:16 40:3,7 48:17 53:19,21 55:12 58:23 59:5 66:23 67:2,10 68:4 71:17 81:14 86:22 94:18 96:2

97:13 98:2,6 102:10 105:2

MAKERS 9:18

MAKING 28:5 41:21 66:3 67:9 103:20

MALLS 93:3

MAN 48:15

MANAGEMENT 75:24

MANAGER 9:4, 5,6

MANAGERS 39:18

MANHOLE 67:16

MANN 51:2

MANNER 14:14 58:19 64:1

MANUFACTURED 77:9,19

MAP 12:5 64:15 95:21

MAPPED 79:10

MAPPING 79:19

MAPS 38:25 105:14

MARCELO 51:11

March 5:1 62:7

MARCUS 43:4 68:7 70:12

MARGARITA 38:15

MARIA 56:7,8,9

MARIANNE 78:13,15

MARILYN 70:3

MARK 73:13

MARKERS 79:20

MARTINEZ 38:21

MARY 40:25 41:4,8

MASS 58:5

MASSIVE 105:17

MASTER 5:7 6:22 9:1 10:7,18, 19 11:1,5,8,13, 15,17,23 12:1,3, 10,20,24 14:4,7, 11,17 15:16,20 16:23 18:7,13 20:7,23 21:4,8, 10,12 23:15,24, 25 24:10,25 30:25 31:3,13 33:15 44:5 46:22 47:3,4 51:21 52:7,8 58:17 65:23,24 66:1,3, 14 68:21 69:9 78:17,19 79:19 84:24 96:4,9 99:25

MATERIALS 46:1

MATTER 28:7 54:23 99:3

MATZA-JACKSON 42:18,20

MAXIMIZE 9:9

MAXIMIZING 33:14

MAYOR 65:2

MAYWOOD 56:17

MCFADZEN 47:11 57:14

MEANINGFULLY 57:5

MEANS 9:24 19:12 92:20

MEANT 17:24 59:25 85:1

MEASURES 12:16 21:5,7,16 22:9,15 69:10

MEDIA 6:16 95:20

MEET 17:25

MEETING 5:8, 14,19,20,22 6:1, 3,6,7,12,13,15, 20 7:5,8,10,12, 15,22 8:8,16 9:12 10:6 25:18 26:7 37:20 57:22 65:4,20,22 66:22 69:17 82:25 90:2 93:15 94:1,2,4 98:4 105:12 109:22 110:5

MEETINGS 10:22 37:21 62:6 104:15 105:10

MEETS 41:15

MELANIE 27:6

MEMBER 30:25 61:12,15 65:18 77:8 82:14 83:23

MEMBERS 71:8 72:7 78:19 89:6 100:13,14,20 102:25

MENDOSA 31:12

MENTAL 71:10

MENTION 88:20,22

MENTIONED 9:8 10:5 11:13 25:17 41:12 65:19 67:15 84:15 100:8 103:1,8

MENU 11:9 17:20

MESSAGE 5:20 7:22 29:3,10 33:4 36:21 38:18 42:4,14,24 47:18 50:21 53:16 90:2 93:15 97:14 101:7

MESSAGES 47:15

MESSAGING 105:22

MESSED 33:13

MET 24:4

MEXICO 82:2

MICHAEL 48:4 70:22 77:4

MID 62:24

MIGRATING 73:17

MIGRATION 90:13

MILAGE 79:19

MILE 15:10 100:2 107:14

MILES 16:22 39:4 68:22 81:1 87:2 93:5

MILESTONES 24:22,25

MINDSET 90:23

MINE 56:20,24 71:22 74:22 102:21

MINERALS 19:15

MINIMIZE 12:18

MINIMIZED 24:5

MINIMUM 18:20

MINUTE 108:13

MINUTES 26:8 28:1,18 29:20 30:17 34:8,25 40:18 41:10 43:3,21 45:19 49:1 54:17 56:15 61:11 62:20 64:13 68:2 69:16,18 74:15 80:5 83:7 84:22 86:12 88:6 93:21 94:1,23 96:23 99:1,11 102:8,11 106:9 108:1

MISGUIDED 64:20

MISHRA 66:18

MISPLACED 107:8

MISSING 68:13 69:1

MISSION 80:24

MISTAKENLY 54:10

MISTAKES 82:1

MISUSE 35:17

MITIGATE 12:17 68:19 82:8

MITIGATION 20:21 21:5,7,16, 19,25 22:5,9,15 23:3,9 36:1 69:10 84:4

MITRA 56:6

MOBILE 95:7,8, 11

MOBILITY 15:22 18:15

MODIFICATIONS 17:4 24:12

MOLINA 57:13

MOMENT 28:20

MONEY 56:2 61:23 65:6 96:12

MONICA 93:3

MONITORING 18:21 83:20

MONTH 76:7 106:19

MONTHS 95:20
MORENO 38:15
MOSQUITO 75:12
MOSQUITOS 92:16 107:18
MOVE 23:19 42:12,22 59:20 80:22
MOVEMENT 31:20,21
MOVING 54:2 56:11 59:3
MULTI 15:19,24 16:6,11,12
MULTIPLE 12:12 16:1 22:23 28:3 31:5,21 36:8 44:15 68:14 76:24
MULTIUSE 16:20 67:12
MUNICIPALITIES 48:12
MURDERS 97:7
MUTE 67:23
MUTED 42:25
MUTES 6:14

N

N-E-U-B-A-U-E-R 45:13
NAIVE 72:2
NAMED 78:19
NAMES 47:13
NAOMI 59:22
NARROW 64:22
NATION 77:18
NATIVE 37:3 83:19
NATIVES 50:11
NATURAL 66:11 85:8
NATURALLY 94:8
NATURE 35:11 49:15 83:23 108:6
NEEDED 88:18 89:16 102:3
NEGLECT 36:9
NEHA 47:24
NEIGHBOR 68:22
NEIGHBORHOOD 60:19 78:16 82:15,19 83:24 99:23 100:5,14
NEIGHBORS 57:7 68:6
NENETZIN 54:4
NEO-INDUSTRIAL 62:1,11
NETWORK 15:22 67:11
NETWORKS 96:1
NEUBAUER 45:13
NEUTRAL 5:11
NEVAREZ 60:13
NICE 45:2
NICER 95:12
NINA 54:6,7,8
NOBODY'S 93:1 99:10
NOISE 19:16 68:9 74:3
NON-VEHICULAR 72:24
NONCOUNTY 20:15,25
NOP 25:1
NORTH 37:4 60:20 64:18 79:21 81:2
NORTHEAST 37:4,8 88:10
NOTABLY 72:22
NOTE 6:2 7:9,14 22:22 24:17 41:13 46:18 69:23
NOTICE 10:11 25:13 37:19
NOTICED 68:17
NOTICES 25:9
NUMBER 6:2,3, 6 7:14 17:9 55:5 63:3
NUMEROUS 13:22

O

O'DONNELL 61:17
O-S-O-R-I-O 60:11
O-V-A-L-L-E 45:9
OBJECTIVE 13:4 63:11
OBJECTIVES 11:6 13:2,9 24:4 80:23,24
OBJECTS 19:16
OBLIGATED 84:2
OBVIOUS 86:17 91:22,23 92:24 95:15 98:22,24, 25 101:15,17 102:20
OCCUPIED 74:21 107:11
OCCUR 24:12, 13 109:8
OCEAN 34:16 41:15,18
ODOR 75:5
ODORS 107:18
OFFERING 86:21
OFFICER 6:18
OFFICIAL 7:11 70:6
OFFSETS 17:6
OIL 44:16 58:9
OLDER 69:23
OLIVER 41:2,3, 6
ONE-AND-A-HALF 107:14
ONE-AND-A-HALF-MILE 107:9
ONE-BILLION 107:4
ONE-MILE 63:1
ONGOING 95:3 96:14
ONLINE 5:8,14, 21 6:20 7:5 8:15 26:7 47:4
OPEN 13:11 49:24,25 58:22, 24 62:25 64:21 77:22 108:10
OPERATIONS 15:1,3
OPERATORS 44:16
OPINIONS 40:21 106:2
OPPORTUNITIES 11:9 13:13, 14,17 55:11 108:15,16,19
OPPORTUNITY 26:20 39:20,21 40:6 41:20 51:17 54:19 62:21 68:4 80:16 101:19 104:21 108:3 109:6
OPPOSED 90:21
OPTIONS 17:20
ORAL 7:2,7,15, 21 8:2,8,18 10:16 25:19 42:23 53:19 57:23 70:8 88:6 89:23 93:13 94:18 97:13 98:2,6,9 101:4,5, 11,12 109:14 110:1
ORALLY 8:5 98:11 109:15
ORANGE 90:7
ORDER 7:18 28:23,25 89:15, 22 95:12
ORGANIZATION 12:10 30:24
ORGANIZATIONS 10:23
ORGANIZE 32:10,13
ORGANIZED 12:11 14:6 18:14,17
ORGANIZES 31:17
ORGANIZING 14:17
ORIGINAL 49:5 77:24
ORTIZ 27:14,15

OSMENA 8:19
OSORIO 60:10
OUTLINED 26:25
OUTREACH 23:23 52:1,19 89:3,4 94:12,13 104:13 105:21
OUTREACHING 93:25
OVALLE 45:9 59:11,13
OVERGROWTH 87:1
OVERPASS 64:20
OVERPASSES 87:8
OVERRIDE 28:8
OVERSEE 88:21 89:15
OVERSEEN 89:10
OVERSIGHT 76:16
OVERVIEW 6:22
OWNED 44:16 61:23 89:9 95:9
OWNER 74:21 107:11

P

P.G. 56:7,9
p.m. 5:2 25:20 110:7
PACIFIC 34:16
PANDEMIC 68:11 75:15 87:4 97:6 104:24
PANDEMICS 75:21
PARK 37:3,4 40:6 44:3,8 45:2 46:20 48:7 56:21,23 58:10 64:18,19,23,24 67:7 69:1,2 74:16 75:1 77:22 83:14,25 84:8 93:5 106:11,20
PARKING 39:10 41:21 74:25
PARKS 13:11 16:5 30:9 85:9 95:8 100:13 102:5 108:10
PARSEKIAN 38:13,14
PART 10:7 23:20 26:6 39:23,24 44:6 48:16 61:23 67:17,18 71:8 73:18 91:12 106:11
PARTICIPANT 42:11 50:19 54:6,8 72:15 73:5 88:7
PARTICIPANTS 6:14
PARTICIPATE 58:19 81:12
PARTICIPATED 31:1
PARTICIPATING 5:9 109:25
PARTICIPATION 5:21 9:22 10:8
PARTICULATES 68:16
PARTIES 7:2 10:12
PARTNER 41:7
PARTNERS 13:24
PARTNERSHIP 10:22
PARTS 6:21 11:10 14:7,14 16:23,24 17:8, 12,16,17,19,22, 24 18:1 35:3,4
PASS 19:4 24:21 28:19
PASSING 32:18,21
PASSIONATE 52:18
PASSWORD 6:4
PAST 8:9 31:8 39:3,15 73:21 89:2
PATH 16:1,12, 17 64:22 67:12 80:9
PATHS 15:21 16:1 89:14
PATHWAYS 39:14
PATINO 53:10
PATRICK 61:17
PAUL 57:19
PAVED 82:4
PAVILIONS 15:12 18:4
PAY 26:23 84:3
PAYING 106:1
PDF 97:21
PEASE 51:9
PEDESTRIAN 16:2,12,15
PEE 92:14
PEER 78:17
PEIR 5:8 7:1 8:16 9:3 10:7,8, 13 11:21 12:4 14:3,17,22 16:14 17:14,16 18:7 19:5,8,21 20:10, 22 25:5,9,11,12 47:4 52:9 71:2,5 72:1,4,20 78:23 97:21 98:13 109:17
PEOPLE 13:16 25:18 26:3 35:13 36:11 37:21 39:18 41:23 52:1,4,18,20 55:5,10,21 57:22 60:4 65:20,21 66:2,11 67:1,4,7 71:23 73:16,17, 21 75:5 77:25 78:2,6,8 80:11 82:12 83:13 85:16,19,21 86:16,24 87:16 89:25 90:18 92:11,22 95:10 96:2,11 97:1,2,3 98:6 99:5,7,9 100:4,16,18,24 101:7,8 103:12 104:3,12 105:6, 14 106:2
PEOPLE'S 27:4 40:21
PEOPLES 80:20
PERCENT 71:21 87:6 90:17
PEREZ 27:18
PERFECT 54:16
PERIOD 10:10 14:12 25:1,7,12 48:13 98:14 109:18
PERMIT 60:5
PERSON 5:22 6:1 8:13 42:13 64:21 75:9 76:23 83:21 88:20,24, 25 90:22 93:24 97:5
PERSONAL 55:23 100:2
PERSONALLY 39:12 85:11
PERSPECTIVE 91:7
PERTAINS 105:7
PERTINENT 91:13
PETERSON 42:16
PHASE 83:17
PHONE 6:2,3
PHYSICAL 19:13 71:2,10
PICK 94:9
PIERCE 66:23
PIGGOTT 5:5, 10 26:5 27:5 28:13,21 29:19 30:11,16,22 32:12,25 33:11, 23 34:7,20,24 36:12,17 38:5 40:1,10,17,24 41:6,9,25 43:3, 15,20 44:20 45:5,18 47:1,9 48:20,25 50:7,15 52:14,22 53:7 54:12,16 56:3,14 57:11 59:1,9 60:9 61:5,10 62:10,14,19 63:21 64:4,12 65:11 66:8,16 67:19 68:1 69:5, 12,20 72:5,13 73:3 74:6,14 75:19 76:2 77:1, 6 78:3,10 79:17, 25 80:4 81:9,16 82:20 83:2,6 84:9,17,21 85:17,24 86:11 87:18,22 89:12, 18 91:9,20 92:23 93:8,20 94:16,22 96:7,17,22 97:9, 25 99:16 100:22

101:2 102:16 104:7,17 105:19 106:4,8 107:13, 21,25 109:4,12

PIMA 78:4

PINZON 64:8,9

PIVOTAL 46:8

PLACE 31:8 58:10 79:12 92:13

PLAGUES 92:11

PLAIN 17:5 91:15,17

PLAN 5:7 6:22 9:1 10:7,18,19 11:1,8,14,15,17, 23 12:1,3,10,20, 24 14:4,8,11,12, 17 15:17,21 16:24 18:7,13 20:7,23 21:4,8, 11,12 23:16,24, 25 24:10,25 30:25 31:3,10, 11,13,25 32:9 33:15 34:13 35:4,18,22 36:3, 5,6,15 40:2 44:5, 6 46:12 47:3,4 51:21 52:7,8 57:2,6 58:17,18 59:3 60:1,22,24, 25 61:20 63:23 64:14 65:23,24 66:1,3,14 68:22, 24 78:17,19,22 79:19,21 81:22 82:14 84:24 85:13 86:25 87:13,14 91:16 96:4,9 99:25 100:1 105:5,8,24

PLAN'S 11:5 46:8 69:9

PLANNED 12:22 28:7 32:17 63:8 69:7

PLANNERS 76:8

PLANNING 13:1 18:18 23:25 28:3 45:25 46:23 62:9 81:12 82:16 89:14 94:11 95:21 108:5

PLANS 28:4,9 57:8 61:2 79:8 86:19 89:5 109:8

PLANT 77:10,19

PLANTATIONS 73:20

PLANTING 15:12 18:16

PLANTS 48:14 92:7

PLATFORM 46:20

PLATFORMS 17:4 46:13

PLAY 22:1

PLEASED 76:14

PLENTY 41:21

PLUMMETED 55:6

PM 5:5

POINT 6:5 43:24 69:13 71:24 75:4 82:6,7,11,13 94:4 98:25 99:21 102:10 104:22

POINTS 66:10 68:24,25 72:23 73:1,15 81:8 95:24

POLICE 78:24 89:11,15 93:2,4 106:22

POLICIES 32:18,22

POLICING 103:18 104:8

POLICY 32:11, 14 57:2 105:24

POLLUTING 31:24 54:25

POLLUTION 34:11,13 41:14, 17 48:9 49:11 58:3,4,15 76:17 78:6

POOR 91:25

POPULATION 60:23

POPULATIONS 86:19

PORTION 31:18 54:20

POSE 56:24

POTENTIAL 9:19,25 10:1 11:9 12:15 13:15 14:18 17:12 19:22 61:21 100:19 108:17

POTENTIALLY 19:12 35:23

POWER 43:24 92:7

PRACTICES 18:23 81:24 82:3

PRE-REGISTER 7:20

PREFER 67:1 81:5

PREPARATION 46:23

PREPARE 10:3 59:24

PREPARED 10:7 11:19 25:11 39:14 46:2

PREPARING 98:12 109:17

PREREGISTERED 28:25 50:16 57:21,22,25 59:21 60:10,14 62:15 64:5 65:13 66:17 67:20 70:2,10,12,14,21 73:4 74:7 77:2 78:11 83:3 86:5 89:20 93:10 99:7

PRESENT 20:11 66:14

PRESENTATION 7:6 9:10 10:16 25:16 28:5 33:20 43:23 52:11 76:9 83:9 90:6

PRESENTATIONS 5:15 30:2,4

PRESENTED 12:20 20:3,15 21:16 23:5

PRESENTING 89:5

PRESENTS 20:5,13 22:17 23:7,13 80:16

PRESERVATION 62:25

PRESERVE 30:6 32:16 83:23

PRESERVING 61:1

PRESS 7:24 27:8,12,16,20 29:5,9 33:3 36:19 38:19 42:5 47:19 51:6 53:17 86:3 90:1 93:14 97:15 98:3 101:13

PREVENTING 29:24

PREVIOUS 94:5,25 95:1

PREVIOUSLY 7:6 98:8,10 103:8

PRICE 92:15

PRIETO 29:14 30:12,15,18,23, 24 32:13

PRIMARILY 50:10

PRIMARY 63:10 84:24 85:5

PRIME 61:19

PRIOR 41:18

PRIORITIES 76:14

PRIORITIZE 78:23

PRIORITIZED 35:6

PRIORITIZES 79:19

PRIORITY 13:6 68:7 90:12

PRIVATE 13:24 84:3,6

PRIVATELY 61:22

PROBLEM 55:10 79:13 85:1 90:10

PROBLEMS 55:19 89:9 95:25 101:25

PROCEEDS 36:5

PROCESS 8:12 9:23 10:8,18 11:2 13:1 23:23 24:1 25:1,6 26:22 31:5,10,16 44:1 46:4,10,23 51:21 52:2 91:24 95:2 101:13 105:5,16 106:1 108:8 110:3

PROCESSES 47:6 52:16 105:1

PRODUCE 81:7

PRODUCING

32:9 61:25 81:6 95:19

PRODUCTION 32:15

PROFESSIONALS 105:15

PROFILE 46:19

PROGRAM 5:7 9:1,3 11:18 12:2, 6,19,24 14:19 19:8 20:4,5,12, 14 21:16,18 23:6,21 24:7 25:7 26:24 48:12 63:16 65:21 105:9 108:24

PROGRAMMING 35:10

PROGRAMS 6:10 18:22 57:2

PROJECT 5:17 6:24 8:11 9:3,5, 6,17,20 11:10, 20,25 14:1,3,5, 16,20 15:9,20,25 16:13,21 17:10, 15,21,23 18:3,5 19:14 23:16 24:4,6,8,18 29:22 39:1,18,22 40:2,22 46:21 50:9 56:1 57:3 61:21 62:11 66:6 67:15 71:6,14,16 72:11 74:18 77:12,13 78:7 81:12 85:22 88:21 94:14 95:13 106:11 107:4,10,15 110:4

PROJECTIONS 20:3

PROJECTS 12:19 14:6,11, 12,13,23 15:2,16 17:14,16 18:12 21:8,12,20 22:2, 5,7,12,20 23:10, 11 45:23 46:14, 15 47:2 52:12,17 56:25 68:8,14 69:3,7 80:22 81:6,7 88:23 99:3 104:4

PROMISE 107:7

PROMISED 63:2

PROMOTE 13:20 18:22,23

PROMPT 34:1,2 59:15 70:17,19 87:24

PRONOUNCE 40:12

PRONOUNCING 29:7

PRONOUNS 51:15

PROPERLY 63:8

PROPERTIES 39:15 61:20,22 106:14

PROPERTY 44:2,16 61:19 62:4 84:6 91:14, 16 100:1,2,4,18 104:5 107:1

PROPONENT 17:11

PROPORTIONS 77:20

PROPOSE 69:2

PROPOSED 9:20 12:1,19 14:1,3,5 21:3 32:8,17 39:1 46:16,20 47:3 69:7

PROPOSING 71:2

PROTECT 36:7 50:3

PROTECTING 5:24 103:25

PROTECTION 32:16 78:24 87:4

PROTECTIONS 36:3 71:18

PROUD 48:16

PROVIDE 5:23 6:21 7:2,6,15,20 8:2,3,17 13:10 15:15 18:25 19:9 25:19 42:14,23 57:23 70:8 88:6 89:23 92:18 93:13 98:9 101:5,12

PROVIDED 10:10 76:12 101:4,11

PROVIDING 88:18 110:1

PUBLIC 5:8,12, 14,21 6:1,17,20, 21 7:5 8:15,20, 25 9:4,6,18,22, 25 10:9,10 11:14 13:23 15:4 25:5, 7,11 26:7 36:14 41:20 45:21 46:17 47:7 67:2, 8,11 71:25 75:17,22 78:18, 21,23,24 80:13, 16 98:17 102:20 105:10,11

PUBLICLY 95:17

PUNCTUATE 87:2

PURCHASE 61:24

PURPOSE 8:15 9:13,17 10:5 12:14 92:2,9 97:19

PURPOSES 12:10 14:4

PUSH 70:19 87:24

PUSHED 94:8

PUT 39:9,10 44:15,18 58:7 60:1 62:11 70:6 73:23 74:1 92:11

PUTRID 49:11

PUTTING 58:16

PW.LACOUNTY.GOV/GO/LARMPCEQA 110:4

Q

QUALITATIVELY 17:13

QUALITY 6:23 9:14 10:2 19:23 58:14,15 75:8 96:3 98:17

QUESTION 28:5 50:13 60:7, 21 61:2 70:6

QUESTION-AND-ANSWER 7:8

QUESTION-ANSWER 88:5

QUESTIONS 7:9 22:23 59:25 70:4 105:16,20, 21

QUICK 20:13 68:5 69:14

QUICKIE 97:18

QUICKLY 47:13 53:19

QUOTE 96:5

R

R-E-K-I 97:16

R.B. 88:3,6,7

RACE 106:1

RACES 31:11

RACISM 31:8,19 32:4

RACKS 41:22

RADIUS 107:9, 15

RAE 70:14,15,16

RAGOSINE 47:20

RAIL 31:21

RAIN 85:4

RAISE 7:22,23, 24 27:8,13,16,20 29:9 33:3 38:18, 20 42:4 51:5 53:16 89:25 93:13 97:13,15 98:3 101:13

RAISED 28:22, 23 42:23 44:1 77:22 88:2,3,8 89:21,22 91:21 93:11 94:20 97:12 98:6,21 99:18 101:16 102:17 104:18 106:5 107:22

RAMONA 88:9

RAMPANT 92:10

RANGING 19:23

RATE 45:22

RATIONALE 13:7

RAW 55:14

RAYMOND 26:17,19

REACH 86:22 89:1

REACHED 26:6

REACHING 94:3

READ 41:8 80:22 105:6
READILY 67:5
READING 68:21
READS 78:24
READY 81:14
REAL 50:13 71:17 92:12 96:12 101:20 102:13 103:2,4
REALITY 68:14
REALIZATION 13:21
REALIZE 62:3
REASON 78:20, 21 87:12
REASONABLE 12:18 15:3
REASONS 84:15
REASSESSMENT 56:1
REASSURANCES 86:21
REBRANDED 101:23
REBUILD 35:10
RECEIVE 7:7 8:1,7,18 34:1 98:12 109:14,16
RECEIVED 8:5 23:22 25:6,18 46:16 50:21 101:6
RECENTLY 43:5 49:2 55:3,5
RECESS 69:19
RECIPE 47:6
RECLAIMING 35:5
RECLAMATION 17:5
RECOGNITION 76:7
RECOGNIZE 32:14 76:6 81:3
RECOMMEND 6:10 55:9 59:17 69:24 71:12 79:16,18,21 83:14
RECOMMENDATION 72:9
RECOMMENDS 31:2
RECORD 7:3 26:15
RECORDED 5:14 7:12
RECREATION 43:11 82:6
REDUCE 9:24 34:13
REDUCED 21:4
REFERENCE 83:12 99:22
REFERENCING 83:22
REFERRED 9:2
REFLECT 19:1
REFLECTED 76:13
REFLECTIVE 68:13
REFUSE 55:13
REGARD 51:20
REGION 79:1
REGISTER 54:4
REGISTERED 7:17,18 25:22 26:10 29:6 30:20 34:4 36:18 40:11,25 42:6,8, 16 47:14,20 51:7 52:23 53:8,11, 18,22 54:2,5,10, 13 56:4,7 57:12, 14 61:7 85:25 97:11
REGISTRANTS 7:14
REGULAR 8:4 98:16 109:20
REGULATING 32:2
REHOUSE 85:19
REID-WAINSCOAT 50:23
REIMAGINED 13:2
REKI 97:16,18
RELATE 91:2
RELATED 11:7, 21,24 13:3 108:14
RELATIONSHIP 35:10,12
RELATIVE 106:12
RELAX 41:23
RELEASED 10:9 11:14
RELIABILITY 13:19 35:19
RELOCATING 60:23
RELOCATION 60:22
REMAIN 22:13, 15
REMAINING 26:14
REMAINS 22:1
REMARKS 8:21
REMEDIATING 32:2
REMEMBER 7:12 37:13
REMEMBERED 107:7
REMINDER 26:8 28:25 70:4 109:15
RENDON 61:18
RENEE 62:15,17 107:22
RENT 32:19 71:23,24 103:23
RENTAL 106:13,14
RENTALS 106:19
RENTER 71:19
RENTERS 71:17 104:1 107:10
RENTS 71:18
REPAIRING 35:12 36:10
REPEAT 31:9 109:8
REPLACE 105:9
REPORT 5:7 9:2 72:6 105:9
REPORTS 72:4
REPRESENT 99:4 102:5,22
REPRESENTATION 46:8 51:20 82:24
REPRESENTATIVE 32:22
REPRESENTATIVES 6:16
REPRESENTED 65:5 99:6 104:12
REPRESENTING 60:19
REPRESENTS 31:17
REQUEST 11:2 79:12
REQUESTED 7:15 86:7 93:10
REQUESTING 25:18
REQUIRE 13:22 83:19
REQUIRED 10:1 12:5 15:16 18:9
REQUIREMENTS 84:4
RESERVOIR 39:5,9,16,22 40:4
RESIDE 76:18, 23
RESIDENCES 84:1,12 100:2
RESIDENT 33:16 34:10,14 35:2,3 44:1 54:19 60:20 62:22 73:11,13 79:11,12 88:10 93:22
RESIDENTIAL 39:15
RESIDENTS 39:11 40:8 41:15 55:1 56:25 86:15,18 87:21 103:4,15,19
RESILIENCY 13:10 18:24
RESOURCE 20:18 22:22 23:2 91:5
RESOURCES 10:3 19:23,24,25 20:2 22:18 23:6,

8,14 91:25 92:9, 18 102:3,7

RESPECT 76:20

RESPECTIVE 20:3

RESPOND 99:21 101:19 102:12 105:15

RESTORATION 56:21

RESTRICTIONS 26:12

RESTRICTS 6:14

RESULTS 35:18

RESUME 69:15, 17

REVAMPING 85:6

REVENUE 61:25 81:6

REVIEW 7:4 9:4 10:9,10 11:14 25:5,12 80:13,19

REVIEWING 43:6 97:21

REVISED 105:2

REVITALIZATION 95:13

RICH 73:5,9

RICHNESS 45:25

RIDE 67:8 80:8

RIGHTS 87:10

RIOTS 93:4

RISINGS 71:18

RISK 75:24 106:13,23

RISKS 13:10 108:9

RIVER 5:6 6:22 9:1 10:7,18,19 11:1,6,12,13,17, 23,24 12:1,7,8, 10,20,24 13:2,3, 7,13 14:4,7,9,25 15:1,14,16,20,22 16:4,8,23 17:2 18:6,7 20:7,23 21:4 23:15,24,25 24:10,14,25 28:9,11 30:1,6,7, 25 31:6,13,18,23 32:5 34:12,14 35:6,7,11,13,16, 24 36:3,6,8,11 37:10 39:3,12 41:20,23 43:5 44:5 45:1,23 46:12 48:8 49:3, 7 54:24 55:3,18, 21,22 56:18,19, 20,21,22 58:22 59:7 60:5,24 61:19 62:25 63:3,16,25 64:17 65:2,3,23 66:11, 24 67:6,12,15,18 68:8,14,20 71:5 72:3,21,23,25 73:15,18 74:17, 23 75:1,7,13 76:16,21 77:15, 23 78:17,18,20, 22 79:6,9,10,20, 23 80:8,15,25 81:5,13 82:5,10, 12,17 83:22,24 84:8,14,24,25 85:6,7,9,14,16 86:14,15,17,23 87:8,10,21 88:13,23 89:9 90:16 91:5 92:3 95:13,22 97:1,3 99:5,9,25 100:5, 6,15 102:24 104:2,4 105:12 106:25 107:2,15 108:5

RIVER'S 45:22

RIVER-RELATED 62:23

RIVERBED 55:6

RIVERPARK 61:13,15 65:19

RIVERS 39:2,7

RIVERSIDE 54:20

RIVERTON 64:19,20,22

ROAD 64:19 100:23

ROADS 46:4

ROCHA 60:15

RODRIGUEZ 54:4

ROOM 105:13

ROSALIND 52:23

ROUND 104:21 108:3

ROUTE 83:18

ROWE 83:4,5,8 84:10 99:17,20 100:23

RUDY 27:18

RULES 7:5 26:2

RUN 39:15 64:22,24 88:12

RUNNING 6:13 82:19

RUNS 39:3,12

RURAL 90:13

RUSTLING 49:7

RV 44:8

S

S-E-Y-E-G-H 47:22

SABINA 47:22

SAFE 13:11,20 41:22 59:7 93:3 108:9

SAFEGUARDS 96:6

SAFELY 15:24 16:11

SAFETY 15:15 59:6 78:7,18,20, 21,23 89:8,10 104:9 106:13

SALLIE 45:13

SANCHEZ 33:1, 2 48:22,24 49:2 50:8

SANTA 93:3 100:11

SATISFACTORILY 85:19

SAYEGH 47:22

SCALE 105:14

SCENARIO 15:3

SCHEDULED 8:9

SCHOOL 39:2,7 106:23

SCHPAK 53:22

SCOOTERS 66:25 67:4

SCOPE 63:11 68:18

SCOPING 23:23 25:1 69:4

SCOTT 78:11 80:1

SCREEN 5:20 10:15 26:13 70:1

SCREENING 23:20 24:3

SCRUTINY 26:24

SEATINGS 107:6

SECONDARILY 85:7

SECONDS 26:14 32:12 36:12 40:1 44:20 47:1 50:7 52:14 62:10 63:21 66:8 69:5 72:5 75:19 78:3 79:15,17 81:9 82:20 84:9 85:17 87:18 89:12 91:9 92:16,23 96:7 100:22 104:7 105:19 107:13 109:4

SECTION 78:23

SECTIONS 20:4

SEGMENT 108:13

SEGMENTS 108:14

SELECTED 12:14 24:6 57:23

SELL 93:2 95:11

SELLATCHEESESMITH 95:19

SEND 7:21 29:3, 10 33:3 36:20 38:18 42:4,14,24 47:18 53:15 90:2 93:15 97:14 98:4 103:16

SENDING 55:17

SENTIMENT 91:1

SEOUL 35:20

SEPARATE 47:5 52:16

SERENA 43:16 45:4

SERIES 11:19

SERVE 5:10 92:9

SERVES 92:1

SERVICE 19:25 43:18 79:12

SERVICES 78:24 103:9
SESSION 7:1,8 26:7 88:5
SESSIONS 76:11
SET 16:25 19:8 48:15 100:4
SETBACKS 18:21
SEWAGE 49:11 55:14
SEWER 75:4
SEYMOUR 72:14,16,18 73:13
SHADE 18:4 48:15
SHARE 8:11,16 76:10
SHARED 25:10, 24
SHEILA 65:4
SHELTER 92:12
SHERRY 38:10
SHIP 46:5
SHO 47:23
SHOP 80:9
SHOW 10:15 59:18 67:22
SHOWING 26:12 70:16
SHOWN 15:11 16:24 109:20
SHOWS 15:8 16:10
SIDE 12:6,8 14:25 16:16 20:19 21:23 28:11 30:9 55:2 59:18 63:1 68:22 72:22
SIDES 55:21 85:16
SIGN 18:10
SIGNAGE 59:6
SIGNIFICANCE 19:17 64:2
SIGNIFICANT 9:19,25 12:15, 17,19 19:10,11, 18 20:20,21 21:2,3,5,19,21, 25 22:4,6,11,16, 19 23:1,3,4,9,10, 14 24:5 46:16 63:3,5
SIMILAR 17:14 41:12
SIMPLY 55:22 79:2
SIMULTANEOUS 47:5
SINGLE 84:1,11
SIP 69:15
SITE 11:25 14:15,19 15:5 17:14 18:18 77:14,17 78:5
SITES 11:9 88:12
SITUATION 55:6
SIX-FOOT 16:15
SIZE 15:10
SKATING 66:25
SKYLINE 50:1
SLABS 81:8
SLAUGHTER 29:16,17,18,21
SLEEP 86:25
SLEEPING 73:18
SLIDE 9:7,11 10:4,17 11:16 12:13,25 14:21 15:6,8,18 16:6,9, 10,22,24 17:18 18:6 20:10,12,19 21:24 22:17 23:7,13 24:24 25:14 109:21
SMALL 64:16,23 74:25
SMALLER 32:22
SMELL 49:8
SMELLING 49:10
SO-CALLED 88:15
SOCIAL 19:17 104:25
SOCIETY 77:8, 10,11
SOFT 106:8
SOFTNESS 55:16
SOIL 35:23 37:16 44:24
SOLD 107:11
SOLE 99:7
SOLUTION 32:15 85:10 102:1
SOLUTIONS 18:12 32:17 96:11
SOLVED 55:10, 20
SOTO 74:9 76:4, 5
SOUND 35:17 68:18
SOUNDS 52:10
SOURCES 82:4
SOUTH 35:2,20 46:20 55:15 64:18 79:21 93:23,25 95:1 98:18
SOUTHEAST 35:3 71:1 76:19 95:3 102:25
SOUTHERN 77:11
SPACE 13:11 45:2 49:21,23 50:10 58:21,22, 24 75:17,22 85:8 108:10
SPACES 41:22 62:25 69:1,2 80:13,16
SPACING 15:14
SPANISH 5:16
SPANS 12:8
SPEAK 26:3 43:8 47:14 51:15 62:22 68:4 71:18 72:16 73:10 85:23 86:7 93:11 106:9
SPEAKER 7:25 26:16 27:6,10, 14,18,22 28:14 29:1,6,13,16 33:1,6 34:4,21 36:18,23,25 38:6,22 40:11,25 41:2 42:1,6,8,16, 18,20 43:16 45:6,15 47:10, 15,20,22,23,24, 25 48:1,4,21 50:16,23,24 51:7,8,9,10,12 52:23 53:8,10, 12,22 54:2,6,13 56:4,7 57:12,14, 21,25 59:11,21 60:10,14 61:7,17 62:15 64:5 65:13 66:17 67:20 69:16 70:2,10, 12,14 72:14 73:4 74:7 77:2 78:11 81:17 83:3 85:25 86:10,13 90:3 93:19,22 94:21, 24 96:8,18,20,24
SPEAKERS 7:17,19 8:10 25:22 28:24 83:11 86:6 93:10 97:11
SPEAKING 25:25 51:15 59:16,19 69:22
SPECIAL 81:3
SPECIALIZES 45:21
SPECIFIC 11:25 12:1 14:15,20 17:7,15 18:18,24 35:4,15 47:2
SPECIFICALLY 32:6 35:3 76:18 95:6
SPECULATION 32:8
SPEED 29:22
SPEND 92:9 96:12
SPENDING 66:12
SPENDS 56:1
SPENT 65:7
SPOKE 75:9
SPOKEN 66:11 83:11 108:20 109:3
SRABANTI 66:17
ST8 68:10
STAFF 46:2
STAGE 19:8
STAKEHOLDER 10:20 62:22 78:16

STAKEHOLDERS 105:4 109:3
STAND 33:14
STANDS 57:8 86:21
STAR 7:24 27:8, 12,17,20 29:5,9 33:3 36:20 38:19 42:5 47:19 51:6 53:17 70:19 86:3 87:25 90:1 93:14 97:15 98:4 101:13
STARLING 38:11,12
START 5:6 26:14 106:18
STARTED 10:18 67:10 88:17
STATE 9:15,16 19:20 26:15 36:9 60:6 61:17 63:10,12,17 100:13
STATED 7:6 19:10,11 98:8,10 100:1
STATEMENT 79:2 80:24
STATES 78:2
STATIC 30:7
STATION 68:9 77:23
STAY 8:9 25:19 80:15 98:7
STEERING 10:21 30:24 31:14 46:3,5
STEERS 43:16, 17,18,22 44:21 45:4
STENCH 75:4
STEPHEN 27:10
STEPHENSON 57:19
STEVEN 6:17 64:7
STOP 32:19 84:14 92:17 103:8
STOPPED 39:6
STOPS 74:25 84:14
STORAGE 44:8
STORM 98:17
STORY 44:18
STRATEGIC 11:5,6 13:3
STRATEGIES 17:1
STREAMING 6:11
STREET 60:20 77:9,16 92:14
STRESSED 31:4
STRICTLY 26:10
STRONGLY 79:15,18
STRUCTURE 31:7 74:25
STRUCTURES 31:20
STRUCTURING 79:7
STUDENT 40:19
STUDIO 54:20 55:22 75:10
STUDIOS 65:5
STUDY 12:6,11, 22 15:5 20:24 21:11 62:8 72:4, 9,10,20
STUFF 73:23
SUBCOMMITTEES 10:21
SUBMIT 25:8 39:17 98:13,15 102:20 109:18, 20
SUBMITTED 10:13 25:23 98:11 109:15
SUBSEQUENT 12:5 14:16 17:16 18:12 21:7,12,20 22:2,5,7,12,20 23:9,11,16
SUBSEQUENTLY 77:19
SUBSTANTIAL 19:12,13
SUBSTANTIALLY 71:5
SUCCESS 86:1
SUCCESSFUL 76:11
SUFFICIENT 105:11
SUGGESTED 23:25 35:18
SUGGESTIONS 66:3
SUMMARY 6:24 19:7 20:11 23:5 91:8
SUMMER 25:2
SUMMIT 10:23
SUPERIOR 24:16
SUPERVISORS 12:21
SUPPLY 13:19
SUPPORT 13:12 18:11 45:1 61:16 62:4 85:20 103:9,13 108:11
SUPPORTED 9:5
SUPPORTER 85:8
SUPPORTING 5:12
SUPPORTIVE 103:22
SURVEY 83:17
SURVEYS 44:14
SUSAN 60:15
SUSANA 100:11
SUSTAIN 85:3
SUSTAINABILITY 82:14
SUSTAINABLE 90:12
SUTTON 27:10, 11,12
SYLVIE 57:15
SYSTEM 79:11 92:3
SYSTEMS 19:25 79:11

T

T-O-W-N-E 51:2
TABLE 21:23
TAKING 71:3 75:23,24 88:24
TALK 15:19 26:20 92:16,19 103:19
TALKING 37:9 49:20,24 89:4,6 90:15 98:9 99:10
TALKS 32:9,21
TANDEM 79:1,4
TANVI 9:6 19:4 24:23
TEACHING 37:17
TEAM 9:7 49:15
TEAR 34:18
TECHNICAL 13:8 18:11 20:4
TEETH 29:24 32:18 59:2 63:24
TELEPHONE 10:24
TEN 101:22,25
TENANT 36:3
TENANTS 32:17
TENT 92:13
TERMS 29:24 46:22 59:3,6 82:10 83:13,21 90:15,18,25
TERRY 27:22,23
THING 29:22 30:7,9 51:24 55:9 58:16 67:13 80:18 82:5 90:13,20 91:4,7 92:20 105:13 108:25
THINGS 29:25 37:13,18 39:25 43:10 84:5 90:10 92:21 101:21
THINKING 93:6
THINKS 94:6
THIRD-PARTY 5:13
THOMAS 38:13
THOUGHT 49:5, 12 76:7,11
THOUGHTFUL 26:25 28:8
THREAT 56:24
THRIVE 71:11

THRIVED 76:21
THROW 75:5
TILLY 45:15,20 66:10 104:18
TIME 5:5,6 7:16 8:1,9 9:10 14:20 25:21 26:2,11,12 32:24 33:8 35:2 43:14 45:3 55:24 65:7 66:12 67:14 75:25 76:1 84:16 85:15 87:23 88:21 89:24 92:3 95:14 99:15,25 101:1 102:7,14 104:13 109:13 110:7
TIMER 26:13
TIMES 31:5 73:21 90:17 104:23
TIMOTHY 53:12
TODAY 52:3 83:11 101:24
TOGGLE 86:2
TOM 70:10
TOMASA 60:10
TOMORROW 25:10
TONGAN 35:12 36:11
TONGVA 31:13 77:15,18 83:16
TONIGHT 8:24 10:6 25:24,25 26:11 53:1 57:16,17 60:13, 15 65:15,20 70:8,13,21,22 74:8,11 76:9 77:3 78:12 101:9 105:17 108:21 109:3
TONIGHT'S 7:15
TOOLBOX 16:25
TOOLS 16:25 63:20
TOP 14:24 34:18 68:7 78:20,21 92:12
TOPIC 101:20
TORI 60:14
TORN 106:18
TOTALLY 93:5
TOVAT 60:16,18
TOWN 10:24
TOWNE 51:1
TOXIC 77:21
TRADING 92:4
TRADITION 67:18
TRAFFIC 68:13 72:8,10,24 92:5
TRAIL 16:11,12, 15,19 63:4 100:17
TRAILS 13:11 15:19,21,24 16:2,5,7,13,20 17:3,21,22 59:6 108:10
TRAINS 37:13
TRANSCRIBED 5:15 7:13
TRANSIT 67:3, 8,11
TRANSLATOR 69:14
TRANSPORTATION 66:25 82:9, 13
TRAP 44:11
TRASH 34:15 79:14
TRAVEL 59:7 105:1
TREATED 82:6
TREE 77:18 78:1
TREES 48:14
TREES/ LEAVES 49:8
TREMENDOUS 61:21
TRIBAL 25:3
TRIBAL/ CULTURAL 19:24
TRIBE'S 77:14
TRIBES 63:6 83:15
TRIBUTARIES 100:7,8,9
TRIBUTARY 100:10
TROUBLE 89:13
TRUCKS 44:11
TRUE 73:16
TUITION 95:21
TURN 26:3 75:1 109:22
TURNED 44:8 77:19
TURRET 68:12
TURTLE 86:14, 18
TURTLES 87:3
TWELVE-FOOT 16:18
TWO-FOOT 16:16,17
TWO-MILE 72:3
TWO-MINUTE 26:1
TWO-WAY 16:17
TYPE 11:18 12:15 90:23
TYPED 7:10
TYPES 15:24 16:8
TYPICAL 6:1 14:6,13,23 15:2, 8,9,20,25 16:13, 21 17:14 18:2 46:14
TYPOLOGIES 17:3

U

ULTIMATE 28:10
UNABLE 69:22
UNAVOIDABLE 20:21 21:2,21 22:7,12,16 23:4, 11,15
UNDERMINE 46:25
UNDERNEATH 44:23
UNDERPASSES 87:9
UNDERSTAND 9:13 28:6 50:1 52:20 60:2 66:4 69:2
UNDERSTANDING 26:11 43:25 63:11,14 85:9 105:1
UNDERWAY 107:5
UNDEVELOPED 37:10
UNESTABLISHED 74:1
UNEXPECTED 104:20
UNFORTUNATE 81:1
UNHOUSED 103:7 104:1
UNIDENTIFIED 86:10,13 93:19, 22 94:21,24 96:8,20,24
UNIFIED 11:12
UNINCORPORATED 12:9 15:6
UNITED 78:2
UNIVERSAL 11:10 65:5
UNJUST 90:24
UNMUTE 6:15 26:18 27:23 28:15 29:17 30:14 33:7,9 34:1,3,5,22 37:1 38:23 40:15 41:3 42:10,12,19,21 43:17 45:16 48:5,23 50:19,20 51:13 53:3,4,24 54:1,7,9,14 56:8, 10,12 59:12,13, 14,22 60:17 61:8 62:16 64:10 65:16 66:19 67:21 70:15,16, 18,20,24 72:15, 17 73:6 74:12 76:4 77:5 78:14 80:2 81:18 83:4 84:18 86:1,3,9 87:24 88:4,5,8 90:4 91:22 93:16,18 94:20 96:19 97:17 98:23 99:19 101:14,16 102:18 104:19 106:6 107:23
UNMUTED 59:18 67:22 69:21 73:8
UNMUTING 70:17
UNPOLICED 93:5

UNQUOTE 96:6
UNREGULATED 31:23
UNSHELTERED 86:15,17 87:3, 20
UPDATE 10:19 18:9
UPDATED 86:19
UPDATES 8:12
UPPER 34:15 104:2
UPSET 64:24
URBAN 17:2 90:13
URGE 51:25
URINE 92:10
USC 40:19
USER 15:24 27:8,12,17,20 29:4,10 36:20 38:19 42:4,13 51:6 53:3,17,24 56:8 59:15 70:18 73:7 86:8 87:25 90:1 93:14,17 94:19 96:18 97:14 101:14
USERS 7:24 64:24 66:25 98:3
USUAL 104:25
UTILITIES 19:25

V

VALID 108:21
VALLEY 80:8 81:2
VALUES 91:7 104:5
VEGETATIVE 16:18
VERONICA 74:9 76:4
VERSION 69:23
VIBRANT 56:19
VIC 38:6
VIDEO 6:15 90:14
VIEW 100:5
VIEWING 6:9
VILLAGE 43:5 68:6,9 72:19 73:11 78:16 80:7
VILLANEUVA 9:5
VILLANUEVA 14:2
VIOLENT 55:4
VIRTUALLY 8:14
VISION 13:1 85:14
VISIT 11:15 110:3
VISUAL 45:23 105:14
VOICE 46:6
VOLUME 25:18 26:9 47:13 53:18
VOMIT 75:6
VOTED 100:6
VULNERABLE 32:5 87:3

W

WAIT 34:2
WALK 41:23
WALKED 49:6
WALKING 40:7 67:1
WALKWAY 92:12
WALL 74:24
WALTERS 45:7
WALTON 45:11
WANTED 38:24 39:16 40:3 41:13 43:22 57:23 59:25 76:6 77:6 90:8 94:25 95:4
WANTING 41:16 42:13
WARMEST 46:5
WARNER 74:17
WASH 86:15
WASTE 35:17 44:14 91:25 102:7
WASTES 77:21
WASTING 92:17
WATER 13:19, 20 18:20 19:15 35:17,19,23,24 58:14,15 69:15 82:4 85:3,4 87:1 98:17 106:25
WATERSHED 84:25
WATERSHEDS 28:11
WAYS 16:5 41:22
WEALTHIER 103:3
WEAVES 13:7
WEB 61:14
WEBINAR 6:14
WEBSITE 5:17 11:16 47:5 82:22 91:6 110:4
Wednesday 5:1
WEEKS 75:6
WEIGHING 99:20
WEIGHT 44:22
WEIGHTED 8:5 25:24
WEINTRAUB 70:3
WELCOMING 16:3 37:7
WELLBEING 71:22
WELLNESS 80:10
WENDELL 57:18
WENDY 64:5 66:19,21
WERNER'S 106:11,20 107:10,15
WEST 40:6 48:2 79:21 81:2 83:24 84:11 99:23 100:6,14,16,17
WET 49:9
WHATSOEVER 32:18
WHITE 103:3 104:12
WHITTINGTON 64:18
WIDE 16:15,16 72:3
WILDEST 49:4, 13
WILDFIRE 19:25
WILDFIRES 81:25
WILDLIFE 35:7 68:20
WILLIAMS 70:11
WIN 76:9
WINTER 27:6,7
WISHING 98:6
WOLFE 57:17
WOMEN 76:10
WOMEN'S 76:7
WONDERFUL 43:23 109:7
WONDERING 44:7 60:3
WONG 53:9
WORK 26:21 30:3 33:22 37:5 38:3 43:6 55:24 58:23 83:18 90:7 109:10
WORKED 82:13
WORKING 60:25
WORKS 5:12 6:21 8:20,25 9:4, 6 15:4 71:25 98:17
WORLD-RENOWNED 85:11
WORRIED 86:16
WORSE 85:2 102:1 103:20
WORST 75:3
WRITE 48:11
WRITING 8:4,6 10:14 25:23 70:9 98:11,15 109:16
WRITTEN 51:23

Y

YADAV 47:24
YANG 53:9
YARD 30:24,25 31:4,17 51:18 81:21 94:4 102:22

YARDS 31:21

YEAR 25:4,14 75:2,3

YEARS 37:11 76:12 86:16 101:22,23,25

YOUTH 10:23 50:4

YOUTUBE 90:14

Z

Z-H-A-O 40:14

Z-I-H-U-A 40:14

ZAMAZAL 59:22,23

ZHAO 40:16,19

ZIMMERMAN 66:19,20,21

ZONE 63:1

ZONING 49:20

ZOOM 5:18 6:13 27:7,11,19 29:2 30:21 34:2 36:19,24 38:7,9, 15 45:12 53:3, 15,24 54:8 56:8 57:16,17 60:13, 16 65:15 69:24 70:13 72:15 73:7 74:10 77:3 78:12 105:10,13

ZOOMS 28:3

Appendix B
Updated Draft PEIR Appendices

Updated Appendix B

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ventura Fish And Wildlife Office
2493 Portola Road, Suite B
Ventura, CA 93003-7726
Phone: (805) 644-1766 Fax: (805) 644-3958

In Reply Refer To: June 23, 2020
Consultation Code: 08EVEN00-2020-SLI-0497
Event Code: 08EVEN00-2020-E-01026
Project Name: LA River Master Plan Update Program EIR

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed list identifies species listed as threatened and endangered, species proposed for listing as threatened or endangered, designated and proposed critical habitat, and species that are candidates for listing that may occur within the boundary of the area you have indicated using the U.S. Fish and Wildlife Service's (Service) Information Planning and Conservation System (IPaC). The species list fulfills the requirements under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.). Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the species list should be verified after 90 days. We recommend that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists following the same process you used to receive the enclosed list. Please include the Consultation Tracking Number in the header of this letter with any correspondence about the species list.

Due to staff shortages and excessive workload, we are unable to provide an official list more specific to your area. Numerous other sources of information are available for you to narrow the list to the habitats and conditions of the site in which you are interested. For example, we recommend conducting a biological site assessment or surveys for plants and animals that could help refine the list.

If a Federal agency is involved in the project, that agency has the responsibility to review its proposed activities and determine whether any listed species may be affected. If the project is a major construction project*, the Federal agency has the responsibility to prepare a biological assessment to make a determination of the effects of the action on the listed species or critical habitat. If the Federal agency determines that a listed species or critical habitat is likely to be adversely affected, it should request, in writing through our office, formal consultation pursuant to section 7 of the Act. Informal consultation may be used to exchange information and resolve conflicts with respect to threatened or endangered species or their critical habitat prior to a

written request for formal consultation. During this review process, the Federal agency may engage in planning efforts but may not make any irreversible commitment of resources. Such a commitment could constitute a violation of section 7(d) of the Act.

Federal agencies are required to confer with the Service, pursuant to section 7(a)(4) of the Act, when an agency action is likely to jeopardize the continued existence of any proposed species or result in the destruction or adverse modification of proposed critical habitat (50 CFR 402.10(a)). A request for formal conference must be in writing and should include the same information that would be provided for a request for formal consultation. Conferences can also include discussions between the Service and the Federal agency to identify and resolve potential conflicts between an action and proposed species or proposed critical habitat early in the decision-making process. The Service recommends ways to minimize or avoid adverse effects of the action. These recommendations are advisory because the jeopardy prohibition of section 7(a)(2) of the Act does not apply until the species is listed or the proposed critical habitat is designated. The conference process fulfills the need to inform Federal agencies of possible steps that an agency might take at an early stage to adjust its actions to avoid jeopardizing a proposed species.

When a proposed species or proposed critical habitat may be affected by an action, the lead Federal agency may elect to enter into formal conference with the Service even if the action is not likely to jeopardize or result in the destruction or adverse modification of proposed critical habitat. If the proposed species is listed or the proposed critical habitat is designated after completion of the conference, the Federal agency may ask the Service, in writing, to confirm the conference as a formal consultation. If the Service reviews the proposed action and finds that no significant changes in the action as planned or in the information used during the conference have occurred, the Service will confirm the conference as a formal consultation on the project and no further section 7 consultation will be necessary. Use of the formal conference process in this manner can prevent delays in the event the proposed species is listed or the proposed critical habitat is designated during project development or implementation.

Candidate species are those species presently under review by the Service for consideration for Federal listing. Candidate species should be considered in the planning process because they may become listed or proposed for listing prior to project completion. Preparation of a biological assessment, as described in section 7(c) of the Act, is not required for candidate species. If early evaluation of your project indicates that it is likely to affect a candidate species, you may wish to request technical assistance from this office.

Only listed species receive protection under the Act. However, sensitive species should be considered in the planning process in the event they become listed or proposed for listing prior to project completion. We recommend that you review information in the California Department of Fish and Wildlife's Natural Diversity Data Base. You can contact the California Department of Fish and Wildlife at (916) 324-3812 for information on other sensitive species that may occur in this area.

[*A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.]

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Ventura Fish And Wildlife Office
2493 Portola Road, Suite B
Ventura, CA 93003-7726
(805) 644-1766

This project's location is within the jurisdiction of multiple offices. Expect additional species list documents from the following office, and expect that the species and critical habitats in each document reflect only those that fall in the office's jurisdiction:

Carlsbad Fish And Wildlife Office
2177 Salk Avenue - Suite 250
Carlsbad, CA 92008-7385
(760) 431-9440

Project Summary

Consultation Code: 08EVEN00-2020-SLI-0497

Event Code: 08EVEN00-2020-E-01026

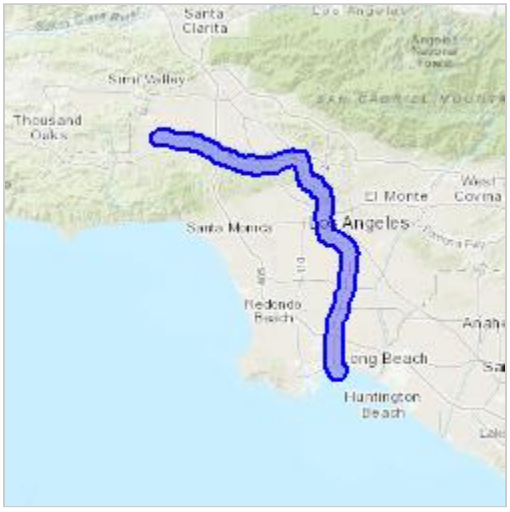
Project Name: LA River Master Plan Update Program EIR

Project Type: LAND - MANAGEMENT PLANS

Project Description: Los Angeles River Master Plan Update has nine goals: flood risk reduction; parks; ecosystems; access; arts and culture; housing affordability; education; water supply and water quality. The Program EIR (PEIR) uses a kit of parts that includes potential design strategies for locations along the LA River with each strategy associated with Master Plan goals. Each kit of part category is associated with a set of design components and these design components can be used to address a particular goal.

Project Location:

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/place/33.9755202864726N118.16931969235998W



Counties: Los Angeles, CA

Endangered Species Act Species

There is a total of 13 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

---

1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Birds

NAME	STATUS
California Condor *Gymnogyps californianus* Population: U.S.A. only, except where listed as an experimental population There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8193	Endangered
Coastal California Gnatcatcher *Polioptila californica californica* There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8178	Threatened
Least Bell's Vireo *Vireo bellii pusillus* There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5945	Endangered
Southwestern Willow Flycatcher *Empidonax traillii extimus* There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6749	Endangered

Amphibians

NAME	STATUS
California Red-legged Frog *Rana draytonii* There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/2891	Threatened

Crustaceans

NAME	STATUS
Riverside Fairy Shrimp *Streptocephalus woottoni* There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8148	Endangered
Vernal Pool Fairy Shrimp *Branchinecta lynchi* There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/498	Threatened

Flowering Plants

NAME	STATUS
Braunton's Milk-vetch *Astragalus brauntonii* There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5674	Endangered
California Orcutt Grass *Orcuttia californica* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4923	Endangered
Gambel's Watercress *Rorippa gambellii* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4201	Endangered
Lyon's Pentachaeta *Pentachaeta lyonii* There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/4699	Endangered
Marsh Sandwort *Arenaria paludicola* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/2229	Endangered
Spreading Navarretia *Navarretia fossalis* There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1334	Threatened

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Carlsbad Fish And Wildlife Office
2177 Salk Avenue - Suite 250
Carlsbad, CA 92008-7385
Phone: (760) 431-9440 Fax: (760) 431-5901
http://www.fws.gov/carlsbad/

In Reply Refer To: June 23, 2020
Consultation Code: 08ECAR00-2020-SLI-1241
Event Code: 08ECAR00-2020-E-02869
Project Name: LA River Master Plan Update Program EIR

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, and proposed species, designated critical habitat, and candidate species that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Carlsbad Fish And Wildlife Office
2177 Salk Avenue - Suite 250
Carlsbad, CA 92008-7385
(760) 431-9440

This project's location is within the jurisdiction of multiple offices. Expect additional species list documents from the following office, and expect that the species and critical habitats in each document reflect only those that fall in the office's jurisdiction:

Ventura Fish And Wildlife Office
2493 Portola Road, Suite B
Ventura, CA 93003-7726
(805) 644-1766

Project Summary

Consultation Code: 08ECAR00-2020-SLI-1241

Event Code: 08ECAR00-2020-E-02869

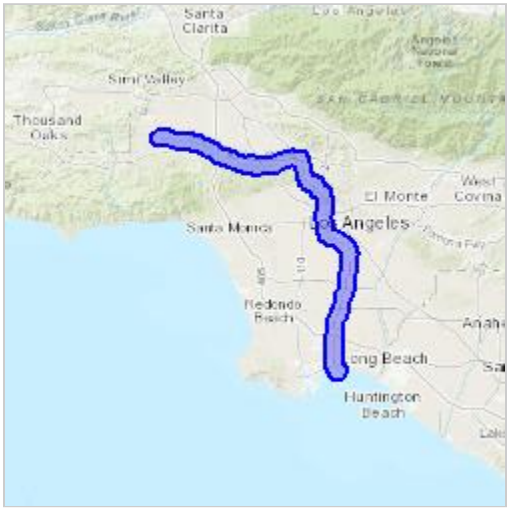
Project Name: LA River Master Plan Update Program EIR

Project Type: LAND - MANAGEMENT PLANS

Project Description: Los Angeles River Master Plan Update has nine goals: flood risk reduction; parks; ecosystems; access; arts and culture; housing affordability; education; water supply and water quality. The Program EIR (PEIR) uses a kit of parts that includes potential design strategies for locations along the LA River with each strategy associated with Master Plan goals. Each kit of part category is associated with a set of design components and these design components can be used to address a particular goal.

Project Location:

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/place/33.9755202864726N118.16931969235998W



Counties: Los Angeles, CA

Endangered Species Act Species

There is a total of 7 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Mammals

NAME	STATUS
Pacific Pocket Mouse *Perognathus longimembris pacificus* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/8080	Endangered

Birds

NAME	STATUS
California Condor *Gymnogyps californianus* Population: U.S.A. only, except where listed as an experimental population There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8193	Endangered
California Least Tern *Sterna antillarum browni* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/8104	Endangered
Coastal California Gnatcatcher *Polioptila californica californica* There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8178	Threatened
Least Bell's Vireo *Vireo bellii pusillus* There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5945	Endangered

Flowering Plants

NAME	STATUS
Gambel's Watercress *Rorippa gambellii* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4201	Endangered
Nevin's Barberry *Berberis nevinii* There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8025	Endangered

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

Dayman, Shelly

From: NMFSWCRCA Specieslist - NOAA Service Account <nmfswcrca.specieslist+canned.response@noaa.gov>
Sent: Tuesday, June 23, 2020 5:43 PM
To: Dayman, Shelly
Subject: Re: LA River Master Plan Update Program EIR

Receipt of this message confirms that NMFS has received your email to nmfswcrca.specieslist@noaa.gov. If you are a federal agency (or representative) and have followed the steps outlined on the California Species List Tools web page (http://www.westcoast.fisheries.noaa.gov/maps_data/california_species_list_tools.html), you have generated an official Endangered Species Act species list.

Messages sent to this email address are not responded to directly. For project specific questions, please contact your local NMFS office.

Northern California/Klamath (Arcata) 707-822-7201

North-Central Coast (Santa Rosa) 707-387-0737

Southern California (Long Beach) 562-980-4000

California Central Valley (Sacramento) 916-930-3600

Dayman, Shelly

From: Dayman, Shelly
Sent: Tuesday, June 23, 2020 5:42 PM
To: 'nmfswcrca.specieslist@noaa.gov'
Subject: LA River Master Plan Update Program EIR

Project Title: LA River Master Plan Update Program EIR

Los Angeles River Master Plan (LARMP) Update Program EIR (PEIR) has nine goals including: flood risk reduction; parks; ecosystems; access; arts and culture; housing affordability; education; water supply; and water quality. The LARMP Update PEIR uses a kit of parts that includes potential design strategies for locations along the LA River with each strategy associated with Master Plan goals. Each kit of part category is associated with a set of design components and these design components can be used to address a particular goal.

Quad Name **Long Beach (digital)**
Quad Number **33118-G2**

ESA Anadromous Fish

SONCC Coho ESU (T) -
CCC Coho ESU (E) -
CC Chinook Salmon ESU (T) -
CVSR Chinook Salmon ESU (T) -
SRWR Chinook Salmon ESU (E) -
NC Steelhead DPS (T) -
CCC Steelhead DPS (T) -
SCCC Steelhead DPS (T) -
SC Steelhead DPS (E) - **X**
CCV Steelhead DPS (T) -
Eulachon (T) -
sDPS Green Sturgeon (T) - **X**

ESA Anadromous Fish Critical Habitat

SONCC Coho Critical Habitat -
CCC Coho Critical Habitat -
CC Chinook Salmon Critical Habitat -
CVSR Chinook Salmon Critical Habitat -
SRWR Chinook Salmon Critical Habitat -
NC Steelhead Critical Habitat -
CCC Steelhead Critical Habitat -
SCCC Steelhead Critical Habitat -
SC Steelhead Critical Habitat -

CCV Steelhead Critical Habitat -
Eulachon Critical Habitat -
sDPS Green Sturgeon Critical Habitat -

ESA Marine Invertebrates

Range Black Abalone (E) - X
Range White Abalone (E) - X

ESA Marine Invertebrates Critical Habitat

Black Abalone Critical Habitat -

ESA Sea Turtles

East Pacific Green Sea Turtle (T) - X
Olive Ridley Sea Turtle (T/E) - X
Leatherback Sea Turtle (E) - X
North Pacific Loggerhead Sea Turtle (E) - X

ESA Whales

Blue Whale (E) - X
Fin Whale (E) - X
Humpback Whale (E) - X
Southern Resident Killer Whale (E) - X
North Pacific Right Whale (E) - X
Sei Whale (E) - X
Sperm Whale (E) - X

ESA Pinnipeds

Guadalupe Fur Seal (T) - X
Steller Sea Lion Critical Habitat -

Essential Fish Habitat

Coho EFH -
Chinook Salmon EFH -
Groundfish EFH - X
Coastal Pelagics EFH - X
Highly Migratory Species EFH - X

MMPA Species (See list at left)

ESA and MMPA Cetaceans/Pinnipeds
See list at left and consult the NMFS Long Beach office
562-980-4000

MMPA Cetaceans - **X**
MMPA Pinnipeds - **X**

Quad Name **Long Beach OE S**
Quad Number **33118-F2**

ESA Anadromous Fish

SONCC Coho ESU (T) -
CCC Coho ESU (E) -
CC Chinook Salmon ESU (T) -
CVSR Chinook Salmon ESU (T) -
SRWR Chinook Salmon ESU (E) -
NC Steelhead DPS (T) -
CCC Steelhead DPS (T) -
SCCC Steelhead DPS (T) -
SC Steelhead DPS (E) - **X**
CCV Steelhead DPS (T) -
Eulachon (T) -
sDPS Green Sturgeon (T) - **X**

ESA Anadromous Fish Critical Habitat

SONCC Coho Critical Habitat -
CCC Coho Critical Habitat -
CC Chinook Salmon Critical Habitat -
CVSR Chinook Salmon Critical Habitat -
SRWR Chinook Salmon Critical Habitat -
NC Steelhead Critical Habitat -
CCC Steelhead Critical Habitat -
SCCC Steelhead Critical Habitat -
SC Steelhead Critical Habitat -
CCV Steelhead Critical Habitat -
Eulachon Critical Habitat -
sDPS Green Sturgeon Critical Habitat -

ESA Marine Invertebrates

Range Black Abalone (E) - X
Range White Abalone (E) - X

ESA Marine Invertebrates Critical Habitat

Black Abalone Critical Habitat -

ESA Sea Turtles

East Pacific Green Sea Turtle (T) - X
Olive Ridley Sea Turtle (T/E) - X
Leatherback Sea Turtle (E) - X
North Pacific Loggerhead Sea Turtle (E) - X

ESA Whales

Blue Whale (E) - X
Fin Whale (E) - X
Humpback Whale (E) - X
Southern Resident Killer Whale (E) - X
North Pacific Right Whale (E) - X
Sei Whale (E) - X
Sperm Whale (E) - X

ESA Pinnipeds

Guadalupe Fur Seal (T) - X
Steller Sea Lion Critical Habitat -

Essential Fish Habitat

Coho EFH -
Chinook Salmon EFH -
Groundfish EFH - X
Coastal Pelagics EFH - X
Highly Migratory Species EFH - X

MMPA Species (See list at left)

ESA and MMPA Cetaceans/Pinnipeds

See list at left and consult the NMFS Long Beach office 562-980-4000

MMPA Cetaceans - **X**

MMPA Pinnipeds - **X**

Quad Name **South Gate**

Quad Number **33118-H2**

ESA Anadromous Fish

SONCC Coho ESU (T) -
CCC Coho ESU (E) -
CC Chinook Salmon ESU (T) -
CVSR Chinook Salmon ESU (T) -
SRWR Chinook Salmon ESU (E) -
NC Steelhead DPS (T) -
CCC Steelhead DPS (T) -
SCCC Steelhead DPS (T) -
SC Steelhead DPS (E) - **X**
CCV Steelhead DPS (T) -
Eulachon (T) -
sDPS Green Sturgeon (T) -

ESA Anadromous Fish Critical Habitat

SONCC Coho Critical Habitat -
CCC Coho Critical Habitat -
CC Chinook Salmon Critical Habitat -
CVSR Chinook Salmon Critical Habitat -
SRWR Chinook Salmon Critical Habitat -
NC Steelhead Critical Habitat -
CCC Steelhead Critical Habitat -
SCCC Steelhead Critical Habitat -
SC Steelhead Critical Habitat -
CCV Steelhead Critical Habitat -
Eulachon Critical Habitat -
sDPS Green Sturgeon Critical Habitat -

ESA Marine Invertebrates

Range Black Abalone (E) -
Range White Abalone (E) -

ESA Marine Invertebrates Critical Habitat

Black Abalone Critical Habitat -

ESA Sea Turtles

East Pacific Green Sea Turtle (T) -
Olive Ridley Sea Turtle (T/E) -
Leatherback Sea Turtle (E) -
North Pacific Loggerhead Sea Turtle (E) -

ESA Whales

Blue Whale (E) -
Fin Whale (E) -
Humpback Whale (E) -
Southern Resident Killer Whale (E) -
North Pacific Right Whale (E) -
Sei Whale (E) -
Sperm Whale (E) -

ESA Pinnipeds

Guadalupe Fur Seal (T) -
Steller Sea Lion Critical Habitat -

Essential Fish Habitat

Coho EFH -
Chinook Salmon EFH -
Groundfish EFH -
Coastal Pelagics EFH -
Highly Migratory Species EFH -

MMPA Species (See list at left)

ESA and MMPA Cetaceans/Pinnipeds

See list at left and consult the NMFS Long Beach office 562-980-4000

MMPA Cetaceans -
MMPA Pinnipeds -

Quad Name **Los Angeles**
Quad Number **34118-A2**

ESA Anadromous Fish

SONCC Coho ESU (T) -

CCC Coho ESU (E) -
CC Chinook Salmon ESU (T) -
CVSR Chinook Salmon ESU (T) -
SRWR Chinook Salmon ESU (E) -
NC Steelhead DPS (T) -
CCC Steelhead DPS (T) -
SCCC Steelhead DPS (T) -
SC Steelhead DPS (E) - **X**
CCV Steelhead DPS (T) -
Eulachon (T) -
sDPS Green Sturgeon (T) -

ESA Anadromous Fish Critical Habitat

SONCC Coho Critical Habitat -
CCC Coho Critical Habitat -
CC Chinook Salmon Critical Habitat -
CVSR Chinook Salmon Critical Habitat -
SRWR Chinook Salmon Critical Habitat -
NC Steelhead Critical Habitat -
CCC Steelhead Critical Habitat -
SCCC Steelhead Critical Habitat -
SC Steelhead Critical Habitat -
CCV Steelhead Critical Habitat -
Eulachon Critical Habitat -
sDPS Green Sturgeon Critical Habitat -

ESA Marine Invertebrates

Range Black Abalone (E) -
Range White Abalone (E) -

ESA Marine Invertebrates Critical Habitat

Black Abalone Critical Habitat -

ESA Sea Turtles

East Pacific Green Sea Turtle (T) -
Olive Ridley Sea Turtle (T/E) -
Leatherback Sea Turtle (E) -
North Pacific Loggerhead Sea Turtle (E) -

ESA Whales

Blue Whale (E) -
Fin Whale (E) -
Humpback Whale (E) -
Southern Resident Killer Whale (E) -
North Pacific Right Whale (E) -
Sei Whale (E) -
Sperm Whale (E) -

ESA Pinnipeds

Guadalupe Fur Seal (T) -
Steller Sea Lion Critical Habitat -

Essential Fish Habitat

Coho EFH -
Chinook Salmon EFH -
Groundfish EFH -
Coastal Pelagics EFH -
Highly Migratory Species EFH -

MMPA Species (See list at left)

ESA and MMPA Cetaceans/Pinnipeds

See list at left and consult the NMFS Long Beach office 562-980-4000

MMPA Cetaceans -
MMPA Pinnipeds -

Quad Name **Hollywood**
Quad Number **34118-A3**

ESA Anadromous Fish

SONCC Coho ESU (T) -
CCC Coho ESU (E) -
CC Chinook Salmon ESU (T) -
CVSR Chinook Salmon ESU (T) -
SRWR Chinook Salmon ESU (E) -
NC Steelhead DPS (T) -
CCC Steelhead DPS (T) -
SCCC Steelhead DPS (T) -
SC Steelhead DPS (E) - **X**
CCV Steelhead DPS (T) -

Eulachon (T) -
sDPS Green Sturgeon (T) -

ESA Anadromous Fish Critical Habitat

SONCC Coho Critical Habitat -
CCC Coho Critical Habitat -
CC Chinook Salmon Critical Habitat -
CVSR Chinook Salmon Critical Habitat -
SRWR Chinook Salmon Critical Habitat -
NC Steelhead Critical Habitat -
CCC Steelhead Critical Habitat -
SCCC Steelhead Critical Habitat -
SC Steelhead Critical Habitat -
CCV Steelhead Critical Habitat -
Eulachon Critical Habitat -
sDPS Green Sturgeon Critical Habitat -

ESA Marine Invertebrates

Range Black Abalone (E) -
Range White Abalone (E) -

ESA Marine Invertebrates Critical Habitat

Black Abalone Critical Habitat -

ESA Sea Turtles

East Pacific Green Sea Turtle (T) -
Olive Ridley Sea Turtle (T/E) -
Leatherback Sea Turtle (E) -
North Pacific Loggerhead Sea Turtle (E) -

ESA Whales

Blue Whale (E) -
Fin Whale (E) -
Humpback Whale (E) -
Southern Resident Killer Whale (E) -
North Pacific Right Whale (E) -
Sei Whale (E) -
Sperm Whale (E) -

ESA Pinnipeds

Guadalupe Fur Seal (T) -
Steller Sea Lion Critical Habitat -

Essential Fish Habitat

Coho EFH -
Chinook Salmon EFH -
Groundfish EFH -
Coastal Pelagics EFH -
Highly Migratory Species EFH -

MMPA Species (See list at left)

ESA and MMPA Cetaceans/Pinnipeds

See list at left and consult the NMFS Long Beach office 562-980-4000

MMPA Cetaceans -
MMPA Pinnipeds -

Quad Name **Pasadena**
Quad Number **34118-B2**

ESA Anadromous Fish

SONCC Coho ESU (T) -
CCC Coho ESU (E) -
CC Chinook Salmon ESU (T) -
CVSR Chinook Salmon ESU (T) -
SRWR Chinook Salmon ESU (E) -
NC Steelhead DPS (T) -
CCC Steelhead DPS (T) -
SCCC Steelhead DPS (T) -
SC Steelhead DPS (E) - **X**
CCV Steelhead DPS (T) -
Eulachon (T) -
sDPS Green Sturgeon (T) -

ESA Anadromous Fish Critical Habitat

SONCC Coho Critical Habitat -
CCC Coho Critical Habitat -
CC Chinook Salmon Critical Habitat -
CVSR Chinook Salmon Critical Habitat -
SRWR Chinook Salmon Critical Habitat -

NC Steelhead Critical Habitat -
CCC Steelhead Critical Habitat -
SCCC Steelhead Critical Habitat -
SC Steelhead Critical Habitat -
CCV Steelhead Critical Habitat -
Eulachon Critical Habitat -
sDPS Green Sturgeon Critical Habitat -

ESA Marine Invertebrates

Range Black Abalone (E) -
Range White Abalone (E) -

ESA Marine Invertebrates Critical Habitat

Black Abalone Critical Habitat -

ESA Sea Turtles

East Pacific Green Sea Turtle (T) -
Olive Ridley Sea Turtle (T/E) -
Leatherback Sea Turtle (E) -
North Pacific Loggerhead Sea Turtle (E) -

ESA Whales

Blue Whale (E) -
Fin Whale (E) -
Humpback Whale (E) -
Southern Resident Killer Whale (E) -
North Pacific Right Whale (E) -
Sei Whale (E) -
Sperm Whale (E) -

ESA Pinnipeds

Guadalupe Fur Seal (T) -
Steller Sea Lion Critical Habitat -

Essential Fish Habitat

Coho EFH -
Chinook Salmon EFH -
Groundfish EFH -
Coastal Pelagics EFH -
Highly Migratory Species EFH -

MMPA Species (See list at left)

ESA and MMPA Cetaceans/Pinnipeds
See list at left and consult the NMFS Long Beach office 562-980-4000

MMPA Cetaceans -
MMPA Pinnipeds -

Quad Name **Burbank**
Quad Number **34118-B3**

ESA Anadromous Fish

SONCC Coho ESU (T) -
CCC Coho ESU (E) -
CC Chinook Salmon ESU (T) -
CVSR Chinook Salmon ESU (T) -
SRWR Chinook Salmon ESU (E) -
NC Steelhead DPS (T) -
CCC Steelhead DPS (T) -
SCCC Steelhead DPS (T) -
SC Steelhead DPS (E) - **X**
CCV Steelhead DPS (T) -
Eulachon (T) -
sDPS Green Sturgeon (T) -

ESA Anadromous Fish Critical Habitat

SONCC Coho Critical Habitat -
CCC Coho Critical Habitat -
CC Chinook Salmon Critical Habitat -
CVSR Chinook Salmon Critical Habitat -
SRWR Chinook Salmon Critical Habitat -
NC Steelhead Critical Habitat -
CCC Steelhead Critical Habitat -
SCCC Steelhead Critical Habitat -
SC Steelhead Critical Habitat -
CCV Steelhead Critical Habitat -
Eulachon Critical Habitat -
sDPS Green Sturgeon Critical Habitat -

ESA Marine Invertebrates

Range Black Abalone (E) -

Range White Abalone (E) -

ESA Marine Invertebrates Critical Habitat

Black Abalone Critical Habitat -

ESA Sea Turtles

East Pacific Green Sea Turtle (T) -
Olive Ridley Sea Turtle (T/E) -
Leatherback Sea Turtle (E) -
North Pacific Loggerhead Sea Turtle (E) -

ESA Whales

Blue Whale (E) -
Fin Whale (E) -
Humpback Whale (E) -
Southern Resident Killer Whale (E) -
North Pacific Right Whale (E) -
Sei Whale (E) -
Sperm Whale (E) -

ESA Pinnipeds

Guadalupe Fur Seal (T) -
Steller Sea Lion Critical Habitat -

Essential Fish Habitat

Coho EFH -
Chinook Salmon EFH -
Groundfish EFH -
Coastal Pelagics EFH -
Highly Migratory Species EFH -

MMPA Species (See list at left)

ESA and MMPA Cetaceans/Pinnipeds
See list at left and consult the NMFS Long Beach office 562-980-4000

MMPA Cetaceans -
MMPA Pinnipeds -

Quad Name **Van Nuys**

Quad Number **34118-B4**

ESA Anadromous Fish

SONCC Coho ESU (T) -
CCC Coho ESU (E) -
CC Chinook Salmon ESU (T) -
CVSR Chinook Salmon ESU (T) -
SRWR Chinook Salmon ESU (E) -
NC Steelhead DPS (T) -
CCC Steelhead DPS (T) -
SCCC Steelhead DPS (T) -
SC Steelhead DPS (E) - **X**
CCV Steelhead DPS (T) -
Eulachon (T) -
sDPS Green Sturgeon (T) -

ESA Anadromous Fish Critical Habitat

SONCC Coho Critical Habitat -
CCC Coho Critical Habitat -
CC Chinook Salmon Critical Habitat -
CVSR Chinook Salmon Critical Habitat -
SRWR Chinook Salmon Critical Habitat -
NC Steelhead Critical Habitat -
CCC Steelhead Critical Habitat -
SCCC Steelhead Critical Habitat -
SC Steelhead Critical Habitat -
CCV Steelhead Critical Habitat -
Eulachon Critical Habitat -
sDPS Green Sturgeon Critical Habitat -

ESA Marine Invertebrates

Range Black Abalone (E) -
Range White Abalone (E) -

ESA Marine Invertebrates Critical Habitat

Black Abalone Critical Habitat -

ESA Sea Turtles

East Pacific Green Sea Turtle (T) -
Olive Ridley Sea Turtle (T/E) -

Leatherback Sea Turtle (E) -
North Pacific Loggerhead Sea Turtle (E) -

ESA Whales

Blue Whale (E) -
Fin Whale (E) -
Humpback Whale (E) -
Southern Resident Killer Whale (E) -
North Pacific Right Whale (E) -
Sei Whale (E) -
Sperm Whale (E) -

ESA Pinnipeds

Guadalupe Fur Seal (T) -
Steller Sea Lion Critical Habitat -

Essential Fish Habitat

Coho EFH -
Chinook Salmon EFH -
Groundfish EFH -
Coastal Pelagics EFH -
Highly Migratory Species EFH -

MMPA Species (See list at left)

ESA and MMPA Cetaceans/Pinnipeds

See list at left and consult the NMFS Long Beach office 562-980-4000

MMPA Cetaceans -
MMPA Pinnipeds -

Quad Name **Canoga Park**
Quad Number **34118-B5**

ESA Anadromous Fish

SONCC Coho ESU (T) -
CCC Coho ESU (E) -
CC Chinook Salmon ESU (T) -
CVSR Chinook Salmon ESU (T) -
SRWR Chinook Salmon ESU (E) -

NC Steelhead DPS (T) -
CCC Steelhead DPS (T) -
SCCC Steelhead DPS (T) -
SC Steelhead DPS (E) - X
CCV Steelhead DPS (T) -
Eulachon (T) -
sDPS Green Sturgeon (T) -

ESA Anadromous Fish Critical Habitat

SONCC Coho Critical Habitat -
CCC Coho Critical Habitat -
CC Chinook Salmon Critical Habitat -
CVSR Chinook Salmon Critical Habitat -
SRWR Chinook Salmon Critical Habitat -
NC Steelhead Critical Habitat -
CCC Steelhead Critical Habitat -
SCCC Steelhead Critical Habitat -
SC Steelhead Critical Habitat -
CCV Steelhead Critical Habitat -
Eulachon Critical Habitat -
sDPS Green Sturgeon Critical Habitat -

ESA Marine Invertebrates

Range Black Abalone (E) -
Range White Abalone (E) -

ESA Marine Invertebrates Critical Habitat

Black Abalone Critical Habitat -

ESA Sea Turtles

East Pacific Green Sea Turtle (T) -
Olive Ridley Sea Turtle (T/E) -
Leatherback Sea Turtle (E) -
North Pacific Loggerhead Sea Turtle (E) -

ESA Whales

Blue Whale (E) -
Fin Whale (E) -
Humpback Whale (E) -
Southern Resident Killer Whale (E) -

North Pacific Right Whale (E) -
Sei Whale (E) -
Sperm Whale (E) -

ESA Pinnipeds

Guadalupe Fur Seal (T) -
Steller Sea Lion Critical Habitat -

Essential Fish Habitat

Coho EFH -
Chinook Salmon EFH -
Groundfish EFH -
Coastal Pelagics EFH -
Highly Migratory Species EFH -

MMPA Species (See list at left)

ESA and MMPA Cetaceans/Pinnipeds
See list at left and consult the NMFS Long Beach office 562-980-4000

MMPA Cetaceans -
MMPA Pinnipeds -

Quad Name **Beverly Hills**
Quad Number **34118-A4**

ESA Anadromous Fish

SONCC Coho ESU (T) -
CCC Coho ESU (E) -
CC Chinook Salmon ESU (T) -
CVSR Chinook Salmon ESU (T) -
SRWR Chinook Salmon ESU (E) -
NC Steelhead DPS (T) -
CCC Steelhead DPS (T) -
SCCC Steelhead DPS (T) -
SC Steelhead DPS (E) - **X**
CCV Steelhead DPS (T) -
Eulachon (T) -
sDPS Green Sturgeon (T) -

ESA Anadromous Fish Critical Habitat

SONCC Coho Critical Habitat -
CCC Coho Critical Habitat -
CC Chinook Salmon Critical Habitat -
CVSR Chinook Salmon Critical Habitat -
SRWR Chinook Salmon Critical Habitat -
NC Steelhead Critical Habitat -
CCC Steelhead Critical Habitat -
SCCC Steelhead Critical Habitat -
SC Steelhead Critical Habitat -
CCV Steelhead Critical Habitat -
Eulachon Critical Habitat -
sDPS Green Sturgeon Critical Habitat -

ESA Marine Invertebrates

Range Black Abalone (E) - X
Range White Abalone (E) - X

ESA Marine Invertebrates Critical Habitat

Black Abalone Critical Habitat -

ESA Sea Turtles

East Pacific Green Sea Turtle (T) - X
Olive Ridley Sea Turtle (T/E) - X
Leatherback Sea Turtle (E) - X
North Pacific Loggerhead Sea Turtle (E) - X

ESA Whales

Blue Whale (E) - X
Fin Whale (E) - X
Humpback Whale (E) - X
Southern Resident Killer Whale (E) - X
North Pacific Right Whale (E) - X
Sei Whale (E) - X
Sperm Whale (E) - X

ESA Pinnipeds

Guadalupe Fur Seal (T) - X
Steller Sea Lion Critical Habitat -

Essential Fish Habitat

Coho EFH -
Chinook Salmon EFH -
Groundfish EFH - X
Coastal Pelagics EFH - X
Highly Migratory Species EFH -

MMPA Species (See list at left)

ESA and MMPA Cetaceans/Pinnipeds

See list at left and consult the NMFS Long Beach office 562-980-4000

MMPA Cetaceans - X
MMPA Pinnipeds - X

Non-Federal Agency Name:
County of Los Angeles, Public Works

SHELLY DAYMAN | SENIOR ASSOCIATE | +1.951.493.0654 | shelly.dayman@icf.com | icf.com
ICF | 1250 Corona Point Ct., Suite 406, Corona, CA 92879 USA | +1.619.820.0768 mobile | +1.951.905.1458 fax

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Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
Plants										
Aphanisma (*Aphanisma blitoides*)	-/-/1B.2	Annual herb found in gravelling or sandy soils within coastal bluff scrub, coastal dunes, and coastal scrub habitats; 1–305 meters (0–1,000 feet). Blooming period: February–June.	HA	HA	HA	HA	HP	HP	HP	HA
San Gabriel Manzanita (*Arctostaphylos glandulosa* ssp. *gabrielensis*)	-/-/1B.2	A perennial evergreen found in rocky chaparral habitats; 595–1,500 meters (1,950–4,920 feet). Blooming period: March.	HA	HA	HA	HA	HA	HA	HA	HA
							LA River BSA is outside of species elevation range.			
Marsh Sandwort (*Arenaria paludicola*)	E/E/1B.1	Perennial stoloniferous herb. Sandy soils and openings in marshes and swamps (freshwater or brackish); 3–170 meters (10–550 feet). Blooming period: May–August.	HP	HP	HA	HA	HP	HA	HA	HA
			Marginally suitable habitat within brackish and freshwater marsh areas. However, it is unlikely that this species would occur given the extensive							LA River BSA is outside of species elevati

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
			surrounding development and lack of extant records of occurrence.							on range.
Western Spleenwort (*Asplenium vespertinum*)	-/-/4.2	Perennial rhizomatous herb. Rocky soils in chaparral, cismontane woodland, and coastal scrub; 180–1,000 meters (600–3,300 feet). Blooming period: February–June.	HA	HA	HA	HA	HP	HP	HP	HA
Braunton's Milk-vetch (*Astragalus brauntonii*)	E/-/1B.1	Perennial herb found in recently burned or disturbed chaparral, coastal scrub, and valley and foothill grasslands; 4–640 meters (10–2,100 feet). Blooming period: January–August.	HA	HA	HA	HP	HP	HP	HP	HP
Horn's Milk-vetch (*Astragalus hornii* var. *hornii*)	-/-/1B.1	Annual herb found in lake margins and alkaline soils in meadows, seeps, and playas; 60–850 meters (195–2,790 feet). Blooming period: May–October.	HA	HA	HA	HA	HA	HA	HA	HA
Ventura Marsh Milk-vetch (*Astragalus pycnostachyus* var. *lanosissimus*)	E/E/1B.1	Perennial herb found in coastal dunes, coastal scrub, and at the edges of coastal marshes and swamps; 1–35 meters (0–	HP	HP	HA	HA	HA	HA	HA	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		115 feet). Blooming period: (June) August–October.	Marginally suitable habitat within marsh habitats. However, it is unlikely that this species would occur given the extensive surrounding development and lack of extant records of occurrence.				LA River BSA is outside of species elevation range.			
Coastal Dunes Milk-vetch (*Astragalus tener* var. *titi*)	E/E/1B.1	Annual herb found on sandy coastal bluff scrub, coastal dunes and often vernally mesic coastal prairies; 1–50 meters (0–165 feet). Blooming period: March–May.	HA	HA	HA	HA	HA	HA	HA	HA
Coulter's Saltbrush (*Atriplex coulteri*)	-/-/1B.2	Perennial herb found in coastal bluff scrub, coastal dunes, coastal scrub, and valley and foothill grassland in open sites with low lying clay or alkaline soils; 3–460 meters (32–1,443 feet). Blooming period: March–October.	HA	HA	HA	HP	HP	HP	HP	HP
South Coast Saltscale	-/-/1B.2	Annual herb found within coastal bluff scrub, coastal	HA	HA	HA	HA	HP	HP	HA	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
(*Atriplex pacifica*)		dunes and playas; 0–140 meters (0–460 feet). Blooming period: March–October.							LA River BSA is outside of species elevation range.	
Parish's Brittlescale (*Atriplex parishii*)	-/-/1B.1	Annual herb found in vernal pools, chenopod scrub, and playas. It is usually found on drying alkali flats with fine soils; 25–1,900 meters (82–6,234 feet). Blooming period: June–October.	HA	HA	HA	HA	HA	HA	HA	HA
Davidson's Saltscale (*Atriplex serenana* var. *davidsonii*)	-/-/1B.2	Annual herb found in coastal bluff scrub and coastal scrub in alkaline soils; 10–200 meters (30–655 feet). Blooming period: April–October.	HA	HA	HA	HA	HP	HP	HP	HA
Malibu Baccharis (*Baccharis malibuensis*)	-/-/1B.1	Perennial deciduous shrub. Chaparral, coastal scrub, cismontane and riparian woodland; 150–305 meters (492–1,000 feet). Blooming period: August.	HA	HA	HA	HA	HP	HP	HP	HP
Nevin's Barberry (*Berberis nevinii*)	E/E/1B.1	Evergreen shrub. Sandy or gravelly soils in chaparral, cismontane woodland, coastal scrub, and riparian	HA	HA	HA	HA	HP	HP	HP	HP

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		scrub; 274–825 meters (898–2,707 feet). Blooming period: March–June.								
Brewer's Calandrinia (*Calandrinia breweri*)	-/-/4.2	Annual herb. Sandy or loamy soils, disturbed and/or burned sites in chaparral and coastal scrub; 10–1,220 meters (32–4,001 feet). Blooming period: March–June.	HA	HA	HA	HA	HP	HP	HP	HA
Catalina Mariposa-lily (*Calochortus catalinae*)	-/-/4.2	Perennial bulbiferous herb. Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland; 32–700 meters (1,045–2,300 feet). Blooming period: February–June.	HA	HA	HA	HP	HP	HP	HP	HA
Slender Mariposa-lily (*Calochortus clavatus* var. *gracilis*)	-/-/1B.2	Perennial bulbiferous herb. Chaparral, coastal scrub, valley and foothill grassland; 15–1,000 meters (50–3,280 feet). Blooming period: March–June (November).	HA	HA	HA	HP	HP	HP	HP	HP
Late-flowered Mariposa-lily (*Calochortus fimbriatus*)	-/-/1B.3	Perennial bulbiferous herb. Chaparral, cismontane woodland, and riparian woodland habitats, often in serpentinite soils; 275–1,905 meters (902–6,250	HA	HA	HA	HA	HP	HP	HP	HA LA River BSA is outside

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		feet). Blooming period: June–August.								of species elevation range.
Palmer's Mariposa-lily (*Calochortus palmeri* var. *palmeri*)	-/-/1B.2	Perennial bulbiferous herb. Mesic areas in chaparral, lower montane coniferous forest, and meadows and seeps; 710–2,390 meters (2,329–7,841 feet). Blooming period: April–June.	HA	HA	HA	HA	HP	HP	HP	HP
Plummer's Mariposa-lily (*Calochortus plummerae*)	-/-/4.2	Perennial bulbiferous herb. Granitic and rocky areas in chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, and valley and foothill grassland; 100–1,700 meters (328–5,576 feet). Blooming period: May–July.	HA	HA	HA	HP	HP	HP	HP	HP

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
Intermediate Mariposa-lily (*Calochortus weedii* var. *intermedius*)	-/-/1B.2	Perennial bulbiferous herb. Dry chaparral, valley grassland, and coastal sage scrub habitats, often on sandstone outcrops. Soil affinities include sandy or clay soils; 105–855 meters (590–2,805 feet). Blooming period: May–July.	HA	HA	HA	HP	HP	HP	HP	HP
Lucky Morning-glory (*Calystegia felix*)	-/-/1B.1	Annual rhizomatous herb found in meadows, seeps, stream banks, and riparian scrub. Associated with somewhat poorly drained alkali silt loam substrate; 30–215 meters (98–705 feet). Blooming period: March–September.	HP	HP	HA	HA	HP	HA	HP	HP
Pierson's Morning-glory (*Calystegia peirsonii*)	-/-/4.2	Perennial rhizomatous herb found in chaparral, chenopod scrub, cismontane woodland, lower montane coniferous forest, valley and foothill grassland and coastal scrub; 30–1,500 meters (95–4,920 feet). Blooming period: April–June.	HA	HA	HA	HP	HP	HP	HP	HP
Lewis' Evening-primrose (*Camissoniopsis lewisii*)	-/-/3	Annual herb found within coastal bluff scrub, cismontane woodlands, coastal dunes, coastal	HA	HA	HA	HP	HP	HP	HP	HP

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		scrub, and valley and foothill grasslands with sandy or clay soils; 0–300 meters (0–985 feet). Blooming period: March–May (June).								
White Pygmy-poppy (*Canbya candida*)	-/-/4.2	Annual herb found in Joshua tree woodland, Mojavean desert scrub and pinyon and juniper woodland with gravelly, sandy or granitic soils; 600–1,460 meters (1,965–4,790 feet). Blooming period: March–June.	HA	HA	HA	HA	HA	HA	HA	HA
Mt. Gleason Paintbrush (*Castilleja gleasoni*)	-/R/1B.2	Perennial herb found in chaparral, lower montane coniferous forests, and pinyon and juniper woodlands with granitic soils; 1,160–2,170 meters (3,805–7,120 feet). Blooming period: May–September.	HA	HA	HA	HA	HA	HA	HA	HA
							LA River BSA is outside of species elevation range.			
Southern Tarplant (*Centromadia parryi* ssp. *australis*)	-/-/1B.1	Annual herb found in vernally wet areas along the edges of marshes and vernal pools, often in association with valley and foothill grasslands where	HP	HP	HA	HA	HP	HA	HA	HP

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		competition from other plants is limited by alkalinity, seasonal soil saturation, or the effects of human disturbance; 0–480 meters (0–1,378 feet). Blooming period: May–November.								
Smooth Tarplant (*Centromadia pungens* ssp. *laevis*)	-/-/1B.1	Annual herb. Alkaline soils in open, poorly drained flats, depressions, waterway banks and beds, grassland, disturbed sites; 0–640 meters (0–2,100 feet). Blooming period: April–September.	HP	HP	HP	HP	HP	HP	HP	HP
			Suitable habitat within annual grasslands and disturbed, ruderal open areas throughout the LA River BSAs.							
Island Mountain-mahogany (*Cercocarpus betuloides* var. *blancheae*)	-/-/4.3	Perennial evergreen found in closed coniferous forests and chaparral; 30–600 meters (95–1,970 feet). Blooming period: February–May.	HA	HA	HA	HA	HP	HP	HP	HA
Salt Marsh Bird's-beak (*Chloropyron maritimum* ssp. *maritimum*)	E/E/1B.2	Hemiparasitic annual herb. Coastal dunes and coastal salt marshes and swamps; 0–30 meters (0–90 feet). Blooming period: May–October.	HP	HP	HA	HA	HA	HA	HA	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
			Marginally suitable habitat within marsh areas. However, it is unlikely that this species would occur given the extensive surrounding development and lack of extant records of occurrence.							
San Fernando Valley Spineflower (*Chorizanthe parryi* var. *fernandina*)	PT/E/1B.1	Annual herb found in coastal scrub and valley and foothill grasslands; 150–1,220 meters (490–4,005 feet). Blooming period: April–July.	HA	HA	HA	HP	HP	HP	HP	HP
			No suitable habitat. All annual grasslands within the LA River BSAs are isolated patches that are surrounded by extensive development.			Potentially suitable habitat within the California sagebrush and grassland vegetation communities associated with the Glendale Narrows, Santa Monica Mountains, and Sepulveda Basin portions of the LA River BSAs.				
Parry's Spineflower (*Chorizanthe parryi* var. *parryi*)	-/-/1B.1	Annual herb. Sandy or rocky openings in in chaparral, coastal scrub, cismontane woodland, and valley and foothill grassland; 275–1,220 meters (902–4,001 feet). Blooming period: April–June.	HA	HA	HA	HP	HP	HP	HP	HP

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
Seaside Cistanthe (*Cistanthe maritima*)	-/-/4.2	Annual herb found within coastal bluff scrub, coastal scrub and valley and foothill grasslands with sandy soils; 5–300 meters (15–985 feet). Blooming period: February–August.	HA	HA	HA	HP	HP	HP	HP	HP
Monkey-flower Savory (*Clinipodium mimuloides*)	-/-/4.2	Perennial herb found in chaparral and north coast coniferous forests with streambanks or mesic soil; 305–1,800 meters (1,000–5,905 feet). Blooming period: June–October.	HA	HA	HA	HA	HP	HP	HP	HA
Small-flowered Morning-glory (*Convolvulus simulans*)	-/-/4.2	Annual herb. Friable clay soils or serpentine seeps in chaparral openings, coastal scrub, and valley and foothill grassland; 30–700 meters (98–2,297 feet). Blooming period: March–July.	HA	HA	HA	HP	HP	HP	HP	HP
Catalina Crossosoma (*Crossosoma californicum*)	-/-/1B.2	Perennial deciduous shrub found in chaparral and coastal scrub with rocky soils; 0–500 meters (0–1,640 feet). Blooming period: February–May.	HA	HA	HA	HA	HP	HP	HP	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
Peruvian dodder (*Cuscuta obtusiflora* var. *glandulosa*)	-/-/2B.2	Annual parasitic vine. Freshwater marshes and swamps; 15– 280 meters (49–918 feet). Blooming period: July–October.	HP	HP	HA	HA	HP	HA	HA	HP
Santa Susana Tarplant (*Deinandra minthornii*)	-/R/1B.2	Perennial deciduous shrub found in chaparral and coastal scrub with rocky soils; 280–760 meters (915–2,495 feet). Blooming period: July–November.	HA	HA	HA	HA	HP	HP	HP	HA
Johnston's Monkeyflower (*Diplacus johnstonii*)	-/-/4.2	Annual herb found in lower montane coniferous forests with disturbed or rocky soils; 975–2,920 meters (3,195–9,580 feet). Blooming period: May–August.	HA	HA	HA	HA	HA	HA	HA	HA
Beach Spectaclepod (*Dithyrea maritima*)	-/T/1B.1	Perennial rhizomatous herb found in coastal dunes and coastal scrub in sandy soils; 3–50 meters (5–165 feet). Blooming period: March–May.	HA	HA	HA	HA	HP	HP	HP	HA
Slender-horned Spineflower (*Dodecahema leptoceras*)	E/E/1B.1	Annual herb. Sandy soils in chaparral, cismontane woodland, and alluvial fan coastal scrub; 200–760 meters (656–2,493 feet). Blooming period: April–June.	HA	HA	HA	HA	HP	HP	HP	HA

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
Blochman's Dudleya (*Dudleya blochmaniae* ssp. *blochmaniae*)	-/-/1B.1	Perennial herb found in coastal bluff scrub, chaparral, valley and foothill grasslands with often clay or serpentine soils; 5–450 meters (15–1,475 feet). Blooming period: April–June.	HA	HA	HA	HP	HP	HP	HP	HP
Agoura Hills Dudleya *(Dudleya cymosa* ssp. *agourensis*)	-/-/1B.2	Perennial herb found in chaparral and cismontane woodland with rocky or volcanic soils; 200–500 meters (655–1,640 feet). Blooming period: May–June.	HA	HA	HA	HA	HP	HP	HP	HA
Marcescent Dudleya (*Dudleya cymosa* ssp. *marcescens*)	T/R/1B.2	Perennial herb. Rocky and volcanic soils in chaparral; 150–520 meters (492–1,706 feet). Blooming period: April– July.	HA	HA	HA	HA	HP	HP	HP	HA
Santa Monica Dudleya (*Dudleya cymosa* ssp. *ovatifolia*)	T/-/1B.1	Perennial herb found in chaparral and coastal scrub with rocky soils sometimes volcanic or sedimentary; 150–1,675 meters (490–5,495 feet). Blooming period: March–June.	HA	HA	HA	HA	HP	HP	HP	HA
Many-stemmed Dudleya (*Dudleya multicaulis*)	-/-/1B.2	Perennial herb found in chaparral, coastal scrub, and valley and foothill grassland. This species is often associated with heavy	HA	HA	HA	HP	HP	HP	HP	HP

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		clay soils in barrens, dry stony places, or thinly vegetated openings; 15–790 meters (49–2,592 feet). Blooming period: April–July.								
Island Green Dudleya (*Dudleya virens* ssp. *insularis*)	-/-/1B.2	Perennial herb found in chaparral and coastal scrub with rocky soils; 5–300 meters (15–985 feet). Blooming period: April–June.	HA	HA	HA	HA	HP	HP	HP	HA
San Diego Button-celery (*Eryngium aristulatum* var. *parishii*)	E/E/1B.1	Annual or perennial herb found in coastal scrub and valley and foothill grassland habitats with mesic soils; 20–620 meters (65–2,035 feet). Blooming period: April–June.	HA	HP	HA	HP	HP	HP	HP	HA
Johnston's Bedstraw (*Galium johnstonii*)	-/-/4.3	Perennial herb. Chaparral, lower montane coniferous forest, pinyon and juniper woodland, riparian woodland; 1,220–2,300 meters (4,001–7,544 feet). Blooming period: June–July.	HA	HA	HA	HA	HP	HP	HP	HP
Palmer's Grapplinghook (*Harpagonella palmeri*)	-/-/4.2	Annual herb associated with clay soils in open grassy areas within chaparral, coastal scrub, and valley and foothill	HA	HA	HA	HP	HP	HP	HP	HP

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		grassland habitat; 20–955 meters (66–3,133 feet). Blooming period: March–May.								
Los Angeles Sunflower (*Helianthus nuttallii* ssp. *parishii*)	-/-/1A	Perennial rhizomatous herb. Marshes and swamps (coastal salt and freshwater); 10–1,675 meters (30–5,500 feet). Blooming Period: August–October.	HP	HP	HA	HA	HP	HA	HA	HP
Urn-flowered Alumroot (*Heuchera caespitosa*)	-/-/4.3	Perennial rhizomatous herb. Rocky soils in cismontane woodland, lower montane coniferous forest, riparian forest (montane), upper montane coniferous forest; 1,155–2,650 meters (3,800–8,700 feet). Blooming Period: May–August.	HA	HA	HA	HA	HA	HA	HA	HA
Vernal Barley (*Hordeum intercedens*)	-/-/3.2	Annual herb found coastal dunes, coastal scrub, valley and foothill grasslands and vernal pools; 5– 1,000 meters (15 to 3,281 feet). Blooming period: March–June.	HA	HA	HA	HP	HP	HP	HP	HP
Mesa Horkelia (*Horkelia cuneata* var. *puberula*)	-/-/1B.1	Perennial herb. Sandy and gravelly soils within maritime chaparral, cismontane woodland, and	HA	HA	HA	HA	HP	HP	HP	HA

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		coastal scrub; 70–810 meters (229–2,657 feet). Blooming period: February–September.								
San Gabriel Mountains Sunflower (*Hulsea vestita* ssp. *gabrielensis*)	-/-/4.3	Perennial herb found in lower montane coniferous forests with rocky soils; 1,500–2,500 meters (4,920–8,200 feet). Blooming period: May–July.	HA	HA	HA	HA	HA	HA	HA	HA
California Satintail (*Imperata brevifolia*)	-/-/2B.1	Perennial rhizomatous herb. Mesic soils in chaparral, coastal scrub, Mojavean desert scrub, riparian scrub, meadows and seeps (often alkali); 0–1,215 meters (0–3,985 feet). Blooming period: September–May.	HA	HP	HA	HA	HP	HP	HP	HP
Decumbent Goldenbush (*Isocoma menziesii* var. *decumbens*)	-/-/1B.2	Perennial shrub found in the South Coast, Southern Channel Islands, and Peninsular Ranges in disturbed chaparral and coastal scrub habitats; 10–135 meters (32–443 feet). Blooming period: April–November.	HA	HA	HA	HA	HP	HP	HP	HA
Southern California Black Walnut	-/-/4.2	Perennial deciduous tree found in chaparral, cismontane woodland, coastal scrub, and riparian	HA	HA	HA	HA	HP	HP	HP	HP

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
(*Juglans californica*)		woodland on slopes, and in canyons and alluvial habitats; 50–900 meters (164–2,952 feet). Blooming period: March–August.								
Coulter's Goldfields (*Lasthenia glabrata* ssp. *coulteri*)	-/-/1B.1	Annual herb. Coastal salt marsh, coastal salt swamps, playas, vernal pools; 1–1,220 meters (3–4,001 feet). Blooming period: February–June.	HP	HP	HA	HA	HA	HA	HA	HA
Fragrant Pitcher Sage (*Lepechinia fragrans*)	-/-/4.2	Perennial shrub found in chaparral; 20–1,310 meters (65–4,300 feet) Blooming period: March–October.	HA	HA	HA	HA	HP	HP	HP	HA
Robinson's Pepper-grass (*Lepidium virginicum* var. *robinsonii*)	-/-/4.3	Annual herb. Openings in chaparral and sage scrub; below 885 meters (2,900 feet). Blooming Period: January–July.	HA	HA	HA	HA	HP	HP	HP	HA
Sea Dahlia (*Leptosyne maritima*)	-/-/2B.2	Perennial herb found in coastal bluff scrub and coastal scrub habitats; 5–150 meters (15–490 feet). Blooming period: March–May.	HA	HA	HA	HA	HP	HP	HP	HA
Ocellated Humboldt Lily (*Lilium humboldtii* ssp. *ocellatum*)	-/-/4.2	Perennial bulbiferous herb. Openings in chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest,	HA	HA	HA	HA	HP	HP	HP	HP

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		and riparian woodland; 30–1,800 meters (98–5,904 feet). Blooming period: March–August.								
San Gabriel Linanthus (*Linanthus concinnus*)	-/-/1B.2	Annual herb found in chaparral, lower and upper montane coniferous forests with rocky soils; 1,520–2,800 meters (4,985–9,185 feet). Blooming period: April–July.	HA	HA	HA	HA	HP	HP	HP	HA
Payne's Bush Lupine (*Lupinus paynei*)	-/-/1B.1	Perennial shrub found in coastal scrub, riparian scrub and valley and foothill grasslands with sandy soils; 220–420 meters (722–1,378 feet). Blooming period: March–July.	HA	HA	HA	HP	HP	HP	HP	HP
Santa Catalina Island Desert-thorn (*Lycium brevipes* var. *hassei*)	-/-/3.1	Perennial deciduous shrub found in coastal bluff scrub and coastal scrub habitats; 65–300 meters (210–985 feet). Blooming period: June–August.	HA	HA	HA	HA	HP	HP	HP	HA
California Box-thorn (*Lycium californicum*)	-/-/4.2	Perennial shrub found in coastal bluff scrub and coastal scrub habitats; 5–150 meters (15–490 feet). Blooming period: March–August.	HA	HA	HA	HA	HP	HA	HA	HA

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
								LA River BSA is outside of species elevation range.		
Davidson's Bush-mallow (*Malacothamnus davidsonii*)	-/-/1B.2	Perennial deciduous shrub found in chaparral, cismontane woodland, coastal scrub, riparian woodland; 185–1,140 meters (605–3,740 feet). Blooming period: June–January.	HA	HA	HA	HA	HP	HP	HP	HP
White-veined Monardella (*Monardella hypoleuca* ssp. *hypoleuca*)	-/-/1B.3	Perennial herb found in chaparral and cismontane woodland; 50–1,525 meters (160–5,005 feet). Blooming period April–August.	HA	HA	HA	HA	HP	HP	HP	HA
California Muhly (*Muhlenbergia californica*)	-/-/4.3	Perennial rhizomatous herb. Mesic soils in seeps, streambeds, and meadows within chaparral, yellow pine forest, coastal sage scrub, and wetland-riparian habitats; 100–2,000 meters (328–6,560 feet). Blooming period: June–September.	HP	HP	HA	HA	HP	HP	HP	HP
Mud Nama (*Nama stenocarpa*)	-/-/2B.2	Annual or perennial herb found in marshes and swamps and on edges of waterways; 5–500 meters	HP	HP	HA	HA	HP	HA	HA	HP

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		(15–1,640 feet). Blooming period: January–July.								
Gambel's Water Cress (*Nasturtium gambelii*)	E/T/1B.1	Perennial rhizomatous herb. Freshwater to brackish marshes and swamps; 5–330 meters (15–1,200 feet). Blooming period: April–October.	HP	HP	HA	HA	HP	HA	HA	HP
Spreading Navarretia (*Navarretia fossalis*)	T/-/1B.1	Annual herb. Associated with vernal pools and depressions and ditches in areas that once supported vernal pools; 30–655 meters (95–2,150 feet). Blooming period: April–June.	HA	HA	HA	HA	HA	HA	HA	HA
Ojai Navarretia (*Navarretia ojaiensis*)	-/-/1B.1	Annual herb found in chaparral openings, coastal scrub openings, and valley and foothill grasslands; 275–620 meters (900–2,035 feet). Blooming period: May–July.	HA	HA	HA	HP	HP	HP	HP	HP
Prostrate Vernal Pool Navarretia (*Navarretia prostrata*)	-/-/1B.2	Annual herb. Occurs in wetlands and vernal pools with alkaline soils within coastal scrub, meadows and seeps, and valley and foothill grassland habitats; 3–1,210 meters (9–3,970 feet). Blooming period: April–July.	HP	HP	HA	HA	HP	HA	HA	HP

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
Coast Woolly-heads (*Nemacaulis denudata* var. *denudata*)	-/-/1B.2	Annual herb found in coastal dunes; 0–100 meters (0–328 feet). Blooming period: April–September.	HA	HA	HA	HA	HA	HA	HA	HA
Chaparral Nolina (*Nolina cismontana*)	-/-/1B.2	Perennial evergreen shrub. Inhabits mountainous areas with sandstone or gabbro soils in chaparral and coastal scrub habitats along the coast; 140–1,275 meters (459–4182 feet). Blooming period: March–July.	HA	HA	HA	HA	HP	HP	HP	HA
California Orcutt Grass (*Orcuttia californica*)	E/E/1B.1	Annual herb found in vernal pools; 15–660 meters (49–2,165 feet). Blooming period: April–August.	HA	HA	HA	HA	HA	HA	HA	HA
Lyon's Pentachaeta (*Pentachaeta lyonii*)	E/E/1B.1	Annual herb. Occurs only in the Santa Monica Mountains in eastern Ventura and western Los Angeles counties and in the western Simi Hills in Ventura County. Found on exposed, compact, clay soils of volcanic origin that exhibit a microbiotic crust. Prefers areas with little disturbance; 30–690 meters (98 to 2,263 feet).	HA	HA	HA	HA	HP	HP	HP	HA

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		Blooming period: February–August.								
Hubby's Phacelia (*Phacelia hubbyi*)	-/-/4.2	Annual herb found in chaparral, coastal scrub, and valley and foothill grassland in gravelly or rocky slopes, and talus slopes, mostly away from the immediate coast; 0–1,000 meters (0–3,280 feet). Blooming period: April–July.	HA	HA	HA	HA	HP	HP	HP	HA
Brand's Star Phacelia (*Phacelia stellaris*)	/-/1B.1	Annual herb. Coastal dunes and coastal scrub habitats; 1–400 meters (3–1,312 feet). Blooming period: March–June.	HA	HA	HA	HA	HP	HP	HP	HA
Woolly Chaparral-pea (*Pickeringia montana* var. *tomentosa*)	-/-/4.3	Evergreen shrub. Gabbroic, granitic, or clay soils in chaparral; 0–1,700 meters (0–5,577 feet). Blooming period: May–August.	HA	HA	HA	HA	HP	HP	HP	HA
White Rabbit-tobacco (*Pseudognaphalium leucocephalum*)	-/-/2B.2	Perennial herb found in riparian woodland, cismontane woodland, coastal scrub and chaparral. Occurs in sandy, gravelly benches, dry stream bottoms, canyon bottoms, and arroyos in areas of oak-sycamore, oak-pine to pine	HA	HA	HA	HA	HP	HP	HP	HP

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		woodlands, and commonly in riparian vegetation; 0–2,100 meters (0–6,890 feet). Blooming period: July–December.								
Nuttal's Scrub Oak (*Quercus dumosa*)	-/-/1B.1	Perennial evergreen shrub found in closed coniferous forest, chaparral, and coastal scrub with sandy, clay, or loam soils; 15–400 meters (45–1,310 feet). Blooming period: February–May.	HA	HA	HA	HA	HP	HP	HP	HA
San Gabriel Oak (*Quercus durata* var. *gabrielensis*)	-/-/4.2	Perennial evergreen shrub found in chaparral and cismontane/foothill woodland; 450–1,000 meters (1,475–3,280 feet). Blooming period: April–May.	HA	HA	HA	HP	HP	HP	HP	HP
Engelmann Oak (*Quercus engelmannii*)	-/-/4.2	Perennial deciduous tree that is found in chaparral, cismontane woodland, riparian woodland, and valley and foothill grassland habitats; 50–1,300 meters (164–4,265 feet). Blooming period: March–June.	HA	HA	HA	HP	HP	HP	HP	HP
Parish's Gooseberry (*Ribes*	-/-/1A	Perennial deciduous shrub. Riparian woodland; 65–300 meters (200–1,000	HA	HA	HA	HA	HP	HP	HA	HP

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
divaricatum var. *parishii*)		feet). Blooming Period: February–April.								
Coulter's Matilija Poppy (*Romneya coulteri*)	-/-/4.2	Perennial rhizomatous herb. Chaparral and coastal scrub; often in burned areas; 20–1,200 meters (65–3,936 feet). Blooming period: March–July.	HA	HA	HA	HA	HP	HP	HP	HA
Gambel's Watercress (*Rorippa gambellii*)	E/T/1B.1	Perennial rhizomatous herb. Freshwater to brackish marshes and swamps; 5–330 meters (15–1,200 feet). Blooming period: April–October.	HP	HP	HA	HA	HP	HA	HA	HP
Parish's Rupertia (*Rupertia rigida*)	-/-/4.3	Perennial herb found in chaparral, cismontane woodland, lower montane coniferous forest, meadows and seeps, pebble plain, and valley and foothill grasslands; 700–2,500 meters (2,295–8,200 feet). Blooming period: June–August.	HA	HA	HA	HP	HP	HP	HP	HP

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
Southern Mountains Skullcap (*Scutellaria bolanderi* ssp. *austromontana*)	-/-/1B.2	Perennial rhizomatous herb. Moist embankments of montane creeks, mesic chaparral, mesic cismontane woodland, and mesic lower montane coniferous forest; 425–2000 meters (1394–6,562 feet). Blooming period: June–August.	HA	HA	HA	HA	HP	HP	HP	HP
San Gabriel Ragwort (*Senecio astephanus*)	-/-/4.3	Perennial herb. Rocky slopes in coastal bluff scrub and chaparral; 400–1,500 meters (1,300–5,000 feet). Blooming Period: May–July.	HA	HA	HA	HA	HP	HP	HA LA River BSA is outside of species elevation range.	HA
Salt Spring Checkerbloom (*Sidalcea neomexicana*)	-/-/2B.2	Perennial herb. Alkaline and mesic soils within chaparral, coastal scrub, lower montane coniferous forest, Mojavean desert scrub, and playas; 15–1,530 meters (49–5,020 feet). Blooming period: March–June.	HA	HA	HA	HA	HP	HP	HP	HA
Western Bristly Scaleseed	-/-/2A	Annual herb found in Sonoran desert scrub with rocky or sandy soils; 365–670 meters (1,195–2,200	HA	HA	HA	HA	HA	HA	HA	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
(*Spermolepis laterfolia*)		feet). Blooming period: May–April.								
Estuary Sealblite (*Suaeda esteroa*)	-/-/1B.2	Perennial herb found in marshes and swamps along the coast; 0–5 meters (0–15 feet). Blooming period: July–October.	HP	HP	HA	HA	HA	HA	HA	HA
Woolly Sealblite (*Suaeda taxifolia*)	-/-/4.2	Perennial evergreen shrub found in coastal bluff scrub, coastal dunes, marshes and swamps near the coast; 0–50 meters (0–165 feet). Blooming period: January–December.	HP	HP	HA	HA	HA	HA	HA	HA
							LA River BSA is outside of species elevation range.			
San Bernardino Aster (*Symphyotrichum defoliatum*)	-/-/1B.2	Perennial rhizomatous herb. Near ditches, streams, and springs in cismontane woodland, coastal scrub, lower montane coniferous forest, meadows and seeps, marshes and swamps, and vernally mesic valley and foothill grassland; 2–2,040 meters (7–6,693 feet). Blooming period: July–November.	HP	HP	HA	HA	HP	HP	HP	HP
Greata's Aster (*Symphyotrichum greatae*)	-/-/1B.3	Perennial rhizomatous herb found in broadleafed upland forest, chaparral,	HA	HA	HA	HP	HP	HP	HP	HP

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		cismontane woodland, lower montane coniferous forest and riparian woodland; 300–2,010 meters (980–6,595 feet). Blooming period: June–October.								
Sonoran Maiden Fern (*Thelypteris puberula* var. *sonorensis*)	-/-/2B.2	Perennial rhizomatous herb. Meadows, seeps, and streams within wetlands; 50–610 meters (164–2,001 feet). Blooming period: January–September.	HA	HA	HA	HA	HP	HP	HA	HP
			LA River BSA is below species elevation range.							
Invertebrates										
Crotch Bumble Bee (*Bombus crotchii*)	–/SC/–	Nests underground. Coastal California east to the Sierra–Cascade crest and south into Mexico. Food plant genera include *Antirrhinum*, *Phacelia*, *Clarkia*, *Dendromecon*, *Eschscholzia*, and *Eriogonum*.	HA	HP	HA	HA	HP	HP	HP	HP
Vernal Pool Fairy Shrimp (*Branchinecta lynchi*)	T/-/-	Endemic to Oregon and California. Found in vernal pools and ephemeral wetlands during the wet season, more commonly in	HA	HA	HA	HA	HA	HA	HA	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		pools with mud bottoms or grass filled.								
Quino Checkerspot Butterfly (*Euphydryas editha quino*)	E/-/-	Restricted to Riverside and San Diego Counties in California and Northern Baja, Mexico. Inhabits scrublands such as coastal sage scrub and chaparral with grasslands or open areas (1-2 meters square) between patches of woody shrubs that provide high solar exposure. Primary host plant is California plantain (*Plantago erecta*).	HA	HA	HA	HA	HA	HA	HA	HA
			The LA River BSAs are outside of this species current known range.							
Palos Verdes Blue Butterfly (*Glaucopsyche lygdamus palosverdesensis*)	E/-/-	Restricted to the cool, fog-shrouded, seaward side of Palos Verdes Hills, Los Angeles County. Larval host Southern California milkvetch (*Astragalus trichopodus* ssp. *locnhus*), which is typically found on clay soils on rocky slopes. Butterflies feed on milkvetch and deerweed.	HA	HA	HA	HA	HA	HA	HA	HA
			The LA River BSAs are outside of this species current known range.							
White Abalone (*Haliotis sorenseni*)	E/-/-	Marine coastal waters. Rocky substrates alongside sand channels, which tend	HP	HA	HA	HA	HA	HA	HA	HA

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		to accumulate the algae they eat. They are usually found at depths of 50 to 180 feet, making them the deepest living abalone species.								
Black Abalone (*Haliotis cracherodii*)	E/-/-	Marine coastal waters. Rocky substrates in intertidal and shallow subtidal reefs (to about 18 feet deep) along the coast. They typically occur in habitats with complex surfaces and deep crevices that provide shelter for juveniles and adults. Critical habitat located off the coast of San Pedro.	HP	HA	HA	HA	HA	HA	HA	HA
Riverside Fairy Shrimp (*Streptocephalus woottoni*)	E/-/-	Restricted to deep seasonal vernal pools, vernal pool–like ephemeral ponds, and stock ponds as well as other human-modified depressions. Species prefers warm water pools that have low to moderate dissolved solids, are less predictable, and remain filled for extended periods of time. Basins that support Riverside fairy shrimp are typically dry a portion of	HA	HA	HA	HA	HA	HA	HA	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		the year but usually filled by late fall, winter, or the spring rains. All known habitat lies within annual grasslands, which may be interspersed through chaparral or coastal sage scrub vegetation.								
Fish										
Green Sturgeon (*Acipenser medirostris*)	T/-/-	Green Sturgeon are anadromous fish that can be found along the coastal region from Alaska to Mexico. Although, they are most commonly found north of Point Conception. Abundance increases northward of Point Conception. Spawns in the Sacramento, Klamath, and Trinity Rivers. Once adults have migrated upstream, spawning occurs in April–June. Spawns at temps between 8 and 14°C. Preferred spawning substrate is large cobble, but can range from clean sand to bedrock.	HA	HA	HA	HA	HA	HA	HA	HA
Santa Ana Sucker (*Catostomus santaanae*)	T/-/-	Occurs in stream channels with a mosaic of loose sand, gravel, cobble, and boulder	HA	HA	HA	HA	HA	HA	HA	HA

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		substrates in riffles, runs, pools, and shallow sandy stream margins with cool, running water. Historical range included the Los Angeles, San Gabriel, and Santa Ana river drainage systems in southern California. An introduced population also occurs in the Santa Clara River drainage system.								
			LA River BSAs are not within the range of this species. The nearest known occupied watercourse is Big Tujunga Creek to the east of the Los Angeles River.							
Tidewater Goby (*Eucyclogobius newberryi*)	E/CSC/-	Inhabits cool brackish water in lagoons that are ideals shallow and open water with emergent vegetation. They feed on small benthic organisms and aquatic insects.	HP	HA	HA	HA	HA	HA	HA	HA
Arroyo Chub (*Gila orcuttii*)	-/CSC/-	Occurs within warm, fluctuating streams and slow-moving sections of streams containing sandy or muddy bottoms. Scarce but present in the Sepulveda Flood Control Basin and upper LA River tributaries. Usually confined to back water	HA	HA	HA	HA	HA	HA	HA	HP

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		pooling and in low gradient areas which are scarce.								
Southern California Steelhead, Southern California Distinct Population Segment (*Oncorhynchus mykiss irideus* pop. *10*)	E/-/-	Migrate into fresh water streams when sandbars breach during winter and spring rains. Occur in coastal streams with water temperatures <15°C. Need cool, clear water with in-stream cover. Spawn in tributaries to large rivers or streams directly connected to the ocean. Spawning habitat consists of gravel substrates free of excessive silt. Thrive when dissolved oxygen concentration is at least 7 parts per million. In streams, deep low-velocity pools are important wintering habitats. They have been extirpated from at least 11 Southern California streams: San Luis Rey River, San Mateo Creek, Santa Margarita River, Rincon Creek, Maria Ygnacio River, Los Angeles River, San Gabriel River, Santa Ana River, San Onofre Creek, San Juan	HA	HA	HA	HA	HA	HA	HA	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		Creek, San Diego River, and Sweetwater River.								
			There is widespread habitat degradation to the coastal and mainstems of the watersheds in this area for this species. However, native, non-anadromous populations still persist upstream of the dams in this region, with small numbers of anadromous individuals attempting to enter and spawn in each of the watersheds when flow conditions are suitable. However, habitat impairments here are severe, including dams and surface water diversions.							
Santa Ana Speckled Dace (*Rhinichthys osculus* ssp. *3*)	-/CSC/-	Formerly widespread in mountain portions of the Santa Ana, San Gabriel, and Los Angeles watersheds. Populations were scattered in foothill areas and rare in lowlands.	HA	HA	HA	HA	HA	HA	HA	HA

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
			Found in shallow, gravel-cobble dominated riffles with overhanging riparian vegetation, in low gradient streams, with sand to boulder substrates in slow-moving water or along stream edges in fast moving water. Historically inhabited streams in the upland areas of the Santa Ana, San Gabriel and Los Angeles River systems. They have since disappeared from most of their range, including most of the Los Angeles River. Their current distribution is restricted to the headwaters of the Santa Ana and San Gabriel rivers and in Big Tujunga Creek (Los Angeles River drainage).							
Mohave Tui Chub (*Siphateles bicolor mohavensis*)	E/E, CFP/-	Deep pools or shallow outflow streams of mineralized, alkaline waters. Formerly in mainstream Mohave River; now in lakes and mineral spring pools. Dominant plants in habitat include ditchgrass, bulrush, cattail, rush, and saltgrass). Capable of surviving low oxygen (1 milligram oxygen/liter) and high alkaline (pH 9–10) environments.	HA	HA	HA	HA	HA	HA	HA	HA
			The LA River BSAs are outside of this species range.							
Reptiles and Amphibians										
Arroyo Toad (*Anaxyrus californicus*)	E/CSC/-	Inhabits washes, arroyos, sandy river banks, riparian areas with willows, sycamores, oaks, cottonwoods. Requires exposed sandy stream sides with stable terraces for burrowing with	HA	HA	HA	HA	HP	HP	HA	HP

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		scattered vegetation for shelter, and areas of quiet water or pools free of predatory fishes with sandy or gravel bottoms without silt for breeding. Young toads require moderately vegetated sandbars.								
Southern California Legless Lizard (*Anniella stebbinsi*)	-/CSC/-	Generally south of the Transverse Range, extending to northwestern Baja California. Occurs in sandy or loose loamy soils under sparse vegetation in broadleaved upland forest, chaparral, coastal dunes, and coastal scrub. Distinct populations in the Tehachapi and Piute Mountains in Kern County. Variety of habitats; generally in moist, loose soil.	HA	HP	HA	HP	HP	HP	HP	HP

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
California glossy snake (*Arizona elegans occidentalis*)	-/CSC/-	Generalist reported from a range of scrub and grassland habitats, often with loose or sandy soils. Patchily distributed from the eastern portion of San Francisco Bay, southern San Joaquin Valley, and the Coast, Transverse, and Peninsular ranges, south to Baja California.	HA	HP	HA	HP	HP	HP	HP	HP
Coastal Whiptail (*Aspidoscelis tigris stejnegeri*)	-/CSC/-	Habitats include a disturbed coastal sage scrub-chaparral mix and cleared areas of chaparral with a sandy/rocky substrate.	HA	HP	HA	HP	HP	HP	HP	HP
Loggerhead Sea Turtle *(Caretta caretta*)	E/-/-	Found throughout the world's marine ecosystems in the temperate and tropical regions of the Atlantic, Pacific, and Indian Oceans. They are the most common species of sea turtle found in U.S. coastal waters. Adult loggerheads are carnivorous and primarily feed on hard-shelled prey, like conch and whelks.	HP	HA	HA	HA	HA	HA	HA	HA
Green Turtle (*Chelonia mydas*)	T/-/-	Occur throughout the world's oceans, primarily	HP	HA	HA	HA	HA	HA	HA	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		nearshore in coastal marine communities. Migrate between nearshore foraging grounds and nesting beaches in the tropics and sub-tropics. Breeding takes place in spring-summer. They are herbivorous and need an adequate supply of seagrasses and algae.								
Leatherback Sea Turtle (*Dermochelys coriacea*)	E/-/-	Found in the Atlantic, Pacific, and Indian Oceans. Within U.S. waters, they are found in the West Pacific, East Pacific, and Northwest Atlantic. Highly migratory turtle species. Documented as traveling 3,700 miles between foraging grounds and nesting sites in tropical regions. Feed on soft ocean species, such as jellyfish, salps, and other gelatinous prey.	HP	HA	HA	HA	HA	HA	HA	HA
Western Pond Turtle (*Emys marmorata*)	-/CSC/-	A thoroughly aquatic turtle of ponds, marshes, rivers, streams, and irrigation ditches, usually with aquatic vegetation, below 6,000 feet. Needs basking sites and suitable (e.g.,	HP	HP	HP	HP	HP	HP	HP	HP

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		sandy banks or grassy open fields) upland habitat up to 0.5 kilometer from water for egg laying.								
			Suitable habitat is present within the soft bottom portions of the channel that support freshwater marsh and riparian habitat, as well as other bodies of water within the LA River BSAs that contain aquatic vegetation. Although there is no live-in habitat present within the concrete-lined portions of the channel, this species could occur as a transient moving between areas of suitable habitat.							
Olive Ridley Sea Turtle (*Lepidochelys olivacea*)	T/-/-	Most abundant sea turtle in the world. Found in the southern Atlantic, Pacific, and Indian Oceans. Prefers the oceans' warmer waters. Nest grounds are beaches found in tropical and sub-tropical regions throughout the world. Nesting season occurs in June through December. Females come ashore and nest all at once in an event called "arribada." Primarily carnivorous, feeding on hard-shelled animals, crustaceans, and gelatinous prey.	HP	HA	HA	HA	HA	HA	HA	HA
Coast Horned Lizard (*Phrynosoma blainvillii*)	-/CSC/-	Found in arid and semi-arid climates in chaparral and coastal sage scrub, primarily below 2,000 feet in elevation. Critical factors	HA	HA	HA	HP	HP	HP	HP	HP

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		are loose soils with a high percentage of sand; an abundance of native ants or other insects, especially harvester ants (*Pogonomyrmex* spp.); and the availability of both sunny basking spots and dense cover for refuge.								
California Red-legged Frog (*Rana draytonii*)	T/CSC/-	Inhabits the quiet pools of streams, marshes, and ponds up to about 4,920 feet in elevation. Adults feed on aquatic and terrestrial insects, snails, and a wide variety of other aquatic prey. Will also move up to 1 mile through riparian communities under wet conditions, such as rainfall. Prefers shorelines with extensive vegetation, and is probably very vulnerable to the introduction of exotic competitors such as bullfrogs (*Rana catesbeiana*), crayfish, and a variety of nonnative fish.	HA	HA	HA	HA	HP	HP	HA	HP
							Potentially suitable habitat within the Santa Monica			Potentially suitabl

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
							Mountains and Sennett Canyon and Creek portions of the LA River BSAs.			e habitat within Sepulveda Basin and the soft bottom portion of the LA River channel.
Southern Mountain Yellow-legged Frog (*Rana muscosa*)	E/E/-	Southern California population persists as remnants in small streams in the San Gabriel, San Bernardino, and San Jacinto Mountains. Species' historical elevation range was about 1,200–7,500 feet, with remaining populations only toward the upper end of that range. Inhabits varied lakes and streams but avoids the smallest streams. Shows a tendency toward open stream and lakeshores that slope gently for the first 2 to 3 inches of depth. Rarely	HA	HA	HA	HA	HA	HA	HA	HA

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		found far from water, though data on movement and ability to recolonize sites are lacking.								
			The LA River BSAs are outside of this species current known range.							
Western Spadefoot (*Spea hammondii)*	-/CSC/-	Found primarily in grassland habitats, but can be found in valley-foothill hardwood woodlands. Vernal pools and seasonal ponds are essential for breeding and egg laying. It is found at sea level to 4,500 feet in elevation.	HA	HA	HA	HP	HP	HP	HP	HP
Coastal Range Newt (*Taricha torosa*)	-/CSC/-	The coast range newt is found in coastal drainages from Mendocino County to San Diego County. This species nests along margins of bushes or on twigs projecting into pathways, usually willow, *Baccharis*, and mesquite in wet forests, oak forests, chaparral, and grasslands.	HA	HA	HA	HA	HP	HP	HA	HP

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		Breeding takes place in ponds, reservoirs, and streams. Terrestrial individuals will migrate up to 0.25 mile to upland habitat.								
Two-striped Garter Snake (*Thamnophis hammondii*)	-/CSC/-	Often in water and rarely found far from it, though it is also known to inhabit intermittent streams having rocky beds bordered by willow thickets or other dense vegetation. Will also inhabit large riverbeds if riparian vegetation is available and even occur in artificial impoundments if both aquatic vegetation and suitable prey (small amphibians and fish) are present (Jennings and Hayes 1994).	HA	HP	HA	HA	HP	HP	HA	HP
Birds										
Tricolored Blackbird (*Agelaius tricolor*)	-/T,CSC/-	Occurs in open country in western Oregon, California, and northwestern Baja California. Breeds near freshwater, preferably in emergent wetland with tall, dense cattails or tules, but also in thickets of willow	HA	HP	HA	HA	HP	HP	HP	HP

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		(*Salix* spp.), blackberry (*Rubus* spp.), wild rose (*Rosa* spp.), tall herbs and forages in grassland and cropland habitats. Seeks cover for roosting in emergent wetland vegetation, especially cattails (*Typha* spp.) and tules (*Scirpus* spp.), and also in trees and shrubs.								
Bald Eagle (*Haliaeetus leucocephalus)*	D/E, CFP/- /BGEPA	Occurs primarily at or near seacoasts, rivers, swamps, and large lakes (large bodies of open water with an abundant supply of fish). Requires suitable perching structures consisting of large trees or snags with heavy limbs. Wintering bald eagles may be found closer to human disturbance and may spend more time in upland habitats, sometimes quite far away from large water bodies. "Hacking" on Santa Catalina Island has led to nesting at sites that have been abandoned for decades.	HP	HP	HP	HP	HP	HP	HP	HP
			Due to the large home range of this species and known nesting sites on both ends of the project, this species could occur within any of the frames.							

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
Golden Eagle (*Aquila chrysaetos*)	-/CFP/-/BGEPA	Found in broadleaved upland forest, cismontane woodland, coastal prairie, Great Basin grassland, Great Basin scrub, lower montane coniferous forest, and pinon and juniper woodlands upper montane coniferous forest, valley and foothill grassland. Rolling foothills, mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas. Closely tied to abundant jackrabbit populations	HA	HA	HA	HP	HP	HP	HP	HP
						Foraging and wintering only; no suitable nesting habitat is present within the LA River BSAs.				
Burrowing Owl (*Athene cunicularia*)	-/CSC/-	Inhabits open, dry, nearly or quite level, grassland, prairie, desert floor, and shrubland with relatively low cover. In coastal southern California, a substantial fraction of birds are found in microhabitats highly altered by man, including flood control and irrigation basins, dikes, and	HP	HP	HP	HP	HP	HP	HP	HP

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		banks, abandoned fields surrounded by agriculture, and road cuts and margins. Strong association with burrowing mammals, especially ground squirrels (*Spermophilus* spp.); however they will also occupy man-made niches such as banks and ditches, piles of broken concrete, and even abandoned structures.								
Swainson's Hawk (*Buteo swainsoni*)	-/T/-	Suitable breeding habitat consists of areas containing Joshua trees, Fremont cottonwoods, or other large trees located adjacent to open fields, including agricultural fields. Forages in open desert, grasslands, agricultural fields, or livestock pastures. In most of southern California, this species is now limited to a spring and fall transient, with known breeding populations currently isolated to the Antelope Valley in Los Angeles and Kern counties.	HA	HA	HA	HA	HA	HA	HA	HA

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
Western Snowy Plover (*Charadrius alexandrines nivosus)*	T/CSC/-	Breeds primarily above the high tide line on coastal beaches, sand spits, dune-backed beaches, sparsely vegetated dunes, beaches at creek and river mouths, and salt pans at lagoons and estuaries. In winter, found on beaches used for nesting and other beaches, in human-made salt ponds, and on estuarine sand and mud flats.	HP	HP	HA	HA	HA	HA	HA	HA
Western Yellow-billed Cuckoo (*Coccyzus americanas occidentalis*)	T/E/-	Only a handful of tiny populations remain in all of California today. Losses are tied to the obvious loss of nearly all suitable habitat, but other factors may also be involved. Breeds and nests in extensive stands of dense, mature cottonwood/willow riparian forest along broad, lower flood bottoms of larger river systems at scattered locales in western North America. Requires large stands of riparian woodland for nesting sites, typically in	HA	HA	HA	HA	HA	HA	HA	HA

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		excess of 300 ft. in width and 25 acres in area.								
Yellow Rail (*Coturnicops noveboracensis*)	-/CSC/-	Nests along the edge of large marsh habitats. Typically found in shallow fresh or brackish water in dense grasses and sedges.	HP	HP	HA	HA	HP	HA	HA	HP
Southwestern Willow Flycatcher (*Empidonax traillii extimus*)	E/E/-	Highly restricted distribution in Southern California as a breeder. It occupies extensive riparian forests, wet meadows, and lower montane riparian habitats, primarily below 4,000 feet. Occurs in riparian habitats along rivers, streams, or other wetlands where dense growths of willows (*Salix* spp.), *Baccharis* spp., Arrowweed (*Pluchea* spp.), buttonbush (*Cephalanthus* spp.), tamarisk (*Tamarix* spp.) Russian olive (*Eleagnus* spp.), or other plants are present, often with a scattered overstory of cottonwood (*Populus* spp.).	HA	HP	HA	HA	HP	HP	HP	HP
American Peregrine Falcon	D/D,CFP/-	The American peregrine falcon breeds in open habitats from tundra and	HP	HP	HP	HP	HP	HP	HP	HP

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
(*Falco peregrinus anatum*)		seacoasts to high mountains and open forested regions, where there are rocky cliffs with ledges overlooking rivers, lakes, or coastal bays that have abundant birds, including rock pigeons in urban areas. Will also nest on electricity transmission towers, quarries, silos, skyscrapers, churches, and bridges.								
California Condor (*Gymnogyps californianus*)	E/-/-	California condor ranges from central California to parts of Southern California, from the coast to the border of Nevada. This large species is a scavenger for carrion and nests in caves on cliff faces.	HA	HA	HA	HA	HA	HA	HA	HA
			The LA River BSAs are outside of the species current known range.							
Yellow-breasted Chat (nest) (*Icteria virens*)	-/CSC/-	Summer resident; inhabits riparian thickets of willow and other brushy tangles near watercourses. Nests in low, dense riparian, consisting of willow, blackberry, wild grape; forages and nests within 10 feet of ground.	HA	HP	HA	HA	HP	HP	HP	HP

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
Belding's Savannah Sparrow (*Passerculus sandwichensis beldingi*)	-/E/-	The Belding's savannah sparrow is endemic to the upper littoral region of salt marshes and is associated with dense pickleweed, particularly *Salicornia virginica*, within which most nests are found.	HP	HA	HA	HA	HA	HA	HA	HA
California Brown Pelican (*Pelecanus occidentalis californicus*)	D/D,CFP/-	The California brown pelican is found in marine areas near piers and jetties with offshore rocks and islands important for nesting. This species forages in estuarine and inshore waters.	HP	HA	HA	HA	HA	HA	HA	HA
Coastal California Gnatcatcher (*Polioptila californica californica*)	T/CSC/-	Generally prefers open sage scrub with California sagebrush (*Artemisia californica*) as a dominant or co-dominant species. Nest placement typically in areas with less than 40% slope gradient. Monogamous pairs tend to stay in the same locale.	HA	HA	HA	HA	HP	HP	HP	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
Light-footed Ridgway's Rail (*Rallus obsoletus levipes*)	E/E, CFP/-	Resides in southern California coastal salt marshes, lagoons, and their maritime environs dominated by cordgrass (*Spartina* spp.) with some pickleweed (*Salicornia* spp.). Some freshwater use.	HP	HP	HA	HA	HA	HA	HA	HA
Bank Swallow (*Ripara ripara*)	-/T/-	Historically, species bred interruptedly along the entire coast of California as well as in the Central Valley and Great Basin portions of the state. Currently, the species breeds only in Northern California, primarily in the Sacramento Valley and far northeastern portions of the state, with a few colonies in coastal counties from Monterey through Del Norte County. This species is uncommon to fairly common migrants in spring and fall at the Salton Sea in Riverside and Imperial Counties and at other large lakes and wetlands in desert regions. They are rare migrants elsewhere in California.	HA	HA	HA	HA	HA	HA	HA	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
			No suitable breeding habitat is present; extirpated from the region.							
Black Skimmer (*Rynchops niger*)	-/CSC/-	Forages for small fish and possibly crustaceans in calm shallows of harbors, lagoons, bays, estuaries, ponds, and river channels. In winter, flocks commonly roost on urban beaches well above the tide line or on mud flats in estuaries. Beach sites that are habitually used by skimmers are often associated with estuaries or protected harbors and are near the mouths of rivers or other drainage channels.	HP	HP	HA	HA	HA	HA	HA	HA
Yellow Warbler (nest) (*Setophaga petechia*)	-/CSC/-	Inhabits riparian forest, riparian scrub, and riparian woodland Riparian plant associations in close proximity to water. Also nests in montane shrubbery in open conifer forests in Cascades and Sierra Nevada. Frequently found nesting and foraging in willow shrubs and thickets, and in other riparian plants including	HA	HP	HA	HA	HP	HP	HP	HP

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		cottonwoods, sycamores, ash, and alders.								
California Least Tern (*Sterna antillarun browni*)	E/E, CFP/-	Found within seacoasts, beaches, bays, estuaries, lagoons, lakes and rivers. Prey consists of small fish and some invertebrates. Nesting occurs on the ground is sandy or pebble areas along the coast.	HP	HP	HA	HA	HA	HA	HA	HA
Least Bell's Vireo (*Vireo bellii pusillus*)	E/E/-	Found as a summer resident of Southern California where it inhabits low riparian growth in the vicinity of water or dry river bottoms below 2,000 feet. Species selects dense vegetation low in riparian zones for nesting, most frequently in riparian stands between 5 and 10 years old. When mature riparian woodland is selected, vireos nest in areas with a substantial robust understory of willows as well as other plant species (Goldwasser 1981).	HA	HP	HA	HA	HP	HP	HP	HP
Mammals										
Pallid Bat	-/CSC/-	Throughout Southern California, from coast to	HP	HP	HP	HP	HP	HP	HP	HP

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
(*Antrozous pallidus*)		mixed conifer forest, grassland, shrubland, woodland, and forest habitats. Most common in open, dry habitats with rocky areas for roosting; year-long resident in most of range. The species is not thought to migrate; therefore, maternity colonies and winter roosts are expected to occur in the vicinity of each other. Roost sites are rock crevices, old buildings, bridges, caves, mines, and hollow trees.								
			Likely foraging only, although may roost within old buildings and bridges.				Foraging and roosting habitat present.			
Guadalupe Fur Seal (*Arctocephalus townsendii*)	T/CFP/- MMPA: D/P	Found in marine intertidal zones, splash zone communities, and protected deepwater coastal communities. Breeds on Isla de Guadalupe off of Mexico, occasionally found on San Miguel, San Nicolas, and San Clemente Islands. Prefers shallow, nearshore island water, with cool and sheltered rocky areas for haul-outs.	HP	HA	HA	HA	HA	HA	HA	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
Sei Whale (*Balaenoptera borealis*)	E/-/- MMPA: D/P	Found in subtropical, temperate, and subpolar waters throughout the world. Prefer temperate waters. Feeding usually takes place at dawn, and typical prey includes plankton, small fish, and cephalopods. Breeding grounds are unknown, but breeding behavior generally occurs in winter at lower altitudes.	HA	HA	HA	HA	HA	HA	HA	HA
Blue Whale (*Balaenoptera musculus*)	E/-/- MMPA: D/P	Occur in all of the world's oceans except the Arctic. Filter feeders that feed almost entirely on krill. Largest of all the whales, Blue whales migrate long distances spending winters towards the equator and summers foraging in the polar waters. Reproductive behavior occurs during the winter months.	HA	HA	HA	HA	HA	HA	HA	HA
Fin Whale (*Balaenoptera physalus*)	E/-/- MMPA: D/P	Found throughout the world's major oceans, primarily in waters that are deep and offshore. They mostly range from temperate to polar latitudes and are less	HA	HA	HA	HA	HA	HA	HA	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		abundant in tropical regions. Spend summers feeding in the Arctic and Antarctic waters, then heading towards more tropical waters in the winters for breeding (specific breeding grounds unknown). Diet includes krill, schooling fish, and squid.								
Townsend's Big-eared Bat (*Corynorhinus townsendii*)	-/CSC/-	Found in a variety of habitats, this species is sedentary and prefers large crevices and caves for roosting and hibernation. The species forages late and prefers to forage along the edge of vegetation for moths and other insects. Maternity colonies range in size from a few dozen to hundreds that form between March and June with pups being born in June.	HP	HP	HP	HP	HP	HP	HP	HP
			Foraging only.				Foraging habitat present. Potential roosting habitat within the Santa Monica Mountains.			Foraging only.

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
North Pacific Right Whale *(Eubalaena japonica)*	E/-/- MMPA: D/P	Rarest of whale species. Found mostly in the North Pacific and Bering Sea. Migratory patterns and specific breeding grounds are unknown, but nursery areas have been observed in shallow coastal waters. Primarily feeds in Spring–Fall, filter feeding on zooplankton and small fish.	HA	HA	HA	HA	HA	HA	HA	HA
Spotted Bat (*Euderma maculatum*)	-/CSC/-	Found in a small number of locations in the foothills, mountains, and desert regions of southern California. Prefers to roost in rock crevices, occasionally found in caves. Forages over water and washes. Known occurrences are below 3,000 meters (9,840 feet) elevation.	HP	HP	HP	HP	HP	HP	HP	HP
			Foraging only.				Foraging habitat present. Potential roosting habitat within the Santa Monica Mountains.			Foraging only.
Western Mastiff Bat	-/CSC/-	Occurs in many open, semi-arid to arid habitats, including conifer and	HP	HP	HP	HP	HP	HP	HP	HP

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
(*Eumops perotis californicus*)		deciduous woodlands, coastal scrub, grasslands, and chaparral. Roosts in the crevices in vertical cliff faces, high buildings, and tunnels and travels widely when foraging. Roosts may be communal (up to 100 individuals) or solitary. This species appears to not migrate, but performs seasonal movements.								
			Likely foraging only, although may roost within tall buildings.				Foraging and roosting habitat present.			
Western Red Bat (*Lasiurus blossevillii*)	-/CSC/-	Typically a solitary bat. Roosts primarily in trees with dense canopies, often in edge habitats adjacent to streams or open fields, and in orchards in the Central Valley. Strongly associated with intact mature riparian forest.	HP	HP	HP	HP	HP	HP	HP	HP
			Foraging only.				Foraging and roosting habitat present.			
Western Yellow Bat (*Lasiurus xanthinus*)	-/CSC/-	Found in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats. Roosts in trees, particularly palms (native and non-native).	HP	HP	HP	HP	HP	HP	HP	HP

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
			Suitable roosting habitat within palm trees throughout the LA River BSAs, as well as within riparian woodland habitat and mature trees along the river channel in Frames 6-9.							
San Diego Black-tailed Jackrabbit (*Lepus californicus bennettii*)	-/CSC/-	Common throughout state, except at high elevations in herbaceous and desert shrub areas, sage scrub, grasslands, open chaparral, and woodland/forest areas; relatively disturbance tolerant.	HA	HP	HA	HP	HP	HP	HP	HP
California Leaf-nosed Bat (*Macrotus californicus*)	-/CSC/-	Found in desert riparian, desert wash, desert scrub, desert succulent scrub, alkali scrub, and palm oasis habitats. Needs rocky, rugged terrain with mines or caves for roosting.	HA	HA	HA	HA	HA	HA	HA	HA
Humpback Whale (*Megaptera novaengliae*)	E/-/- MMPA: D/P	Found in oceans throughout the world. Heavily migratory whale species, sometimes swimming 5,000 miles between feeding and breeding grounds. Winter breeding grounds are found in more tropical regions, while summer feeding occurs in colder areas. Commonly prefer waters close to shore. Primarily filter feed on zooplankton and small fish.	HA	HA	HA	HA	HA	HA	HA	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
South Coast Marsh Vole (*Microtus californicus stephensii*)	-/CSC/-	Occurs in the area of tidal marshes in Los Angeles, Orange, and southern Ventura Counties. Spends most of life underground.	HA	HA	HA	HA	HA	HA	HA	HA
San Diego Desert Woodrat (*Neotoma lepida intermedia*)	-/CSC/-	Dry and/or sunny shrublands, especially areas with cacti and abundant rocks and crevices (but not required). Does not require a source of drinking water. Sage scrub communities are frequently occupied.	HA	HA	HA	HP	HP	HP	HP	HP
Pocketed Free-tailed Bat (*Nyctinomops femorosaccus*)	-/CSC/-	Rarely found in southwestern California. Found in southeastern deserts of California, with portions of western Riverside County apparently on the periphery of its range. Species roosts in high rock crevices and on bridges, roofs, buildings, and cliffs. Forages primarily on large moths, especially over water. Habitats are arid.	HA	HA	HA	HA	HA	HA	HA	HA
			The LA River BSAs are outside of this species range.							
Big Free-tailed Bat	-/CSC/-	Occurs within low-lying arid areas of Southern	HP	HP	HP	HP	HP	HP	HP	HP

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
(*Nyctinomops macrotis*)		California. Requires high crevices in cliffs/rock outcrops for roosting. Prefers rugged, rocky terrain. Associated with desert, arroyo, and woodland habitats. Roosts in buildings, caves, and holes in trees. Does not likely breed in California.								
			Likely foraging only, although may roost within bridges and buildings.				Roosting and foraging habitat present.			
Southern Grasshopper Mouse (*Onychomys torridus ramona*)	-/CSC/-	Wide variety of dry to moderately dry scrub, grassland, and woodland habitats across Southern California, exclusive of the more mesic coastal areas from Ventura County north.	HA	HA	HA	HP	HP	HP	HP	HP
Southern Resident Killer Whale (*Orcinus orca*)	E/-/- MMPA: D/P	Top marine predator found in all of the world's oceans. The Southern Resident occurs most often in the Pacific Northwest, but has been documented from central California to Southeast Alaska. Spring–Fall is known to be spent in/near inland waterways of Washington. Hunt in social groups called pods. Carnivores with a varied	HA	HA	HA	HA	HA	HA	HA	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		diet depending on local food availability and learned hunting tactics. No distinct breeding season.								
Los Angeles Pocket Mouse (*Perognathus longimembris brevinasus*)	-/CSC/-	Habitat requirements for this subspecies are poorly known. It inhabits areas of open ground but prefers fine sandy soils (for burrowing). Is also found commonly on gravel washes and stony soils, within brush and woodland habitats. It is rarely found on sites with a high cover of rocks.	HA	HA	HA	HP	HP	HP	HP	HP
Pacific Pocket Mouse (*Perognathus longimembris pacificus*)	E/CSC/-	The Pacific pocket mouse is found in fine, sandy soils within about 2 to 4 miles of the Pacific coast of Southern California. Historically, this species was found from the Mexican border to El Segundo in Los Angeles County. Currently, the only known populations are in Dana Point and on the Camp Pendleton Marine Base.	HA	HA	HA	HA	HA	HA	HA	HA
			The LA River BSAs are outside of the current known range of this species.							

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
Sperm Whale (*Physeter microcephalus*)	E/-/- MMPA: D/P	Found in all oceans throughout the world, but prefer deeper areas for foraging. Population's location depends on food availability and conditions that support breeding. Migratory patterns and breeding/feeding ground sites are variable and not well understood. Feeding consists of deep dives to prey on squid, sharks, skates, and other fish.	HA	HA	HA	HA	HA	HA	HA	HA
Mountain Lion (Puma concolor)	-/SC/-	The evolutionary significant unit (ESU) in southern and central California accepted as a candidate for listing as threatened or endangered under the California Endangered Species Act. Mountain lions are large carnivore found in the highly fragmented landscape within the ESU. Found in rugged terrain, naturally barren areas, chaparral, coastal scrub, and grassland, sometimes in agricultural areas, desert, riparian areas and woodland and urban areas.	HA	HA	HA	HA	HP	HP	HA	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		There are approximately 95 mountain lions in and around the Santa Monica Mountains and one known male mountain lion in Griffith Park. Present in the Santa Ana Mountains. Mountain lions prey on mule deer, coyotes and raccoons.								
Southern California Saltmarsh Shrew (*Sorex ornatus salicornicus*)	-/CSC/-	Occurs in coastal marshes in Los Angeles, Orange, and Ventura Counties. Based on other studies of shrews, may require dense ground cover, and nesting sites above mean high tide and free from inundation.	HA	HA	HA	HA	HA	HA	HA	HA
American Badger (*Taxidea taxus*)	-/CSC/-	Associated with large grassland and sparse sage scrub habitats. Occupies large dens/burrows and forages on small mammals (e.g., ground squirrels, rabbits), snakes, birds, and insects.	HA	HA	HA	HP	HP	HP	HP	HP
CDFW Sensitive Natural Communities										
California Walnut Woodland	CNDDB	California Walnut Woodlands are composed of open tree canopies locally dominated by the	HA	HA	HA	HA	HA	HA	HA	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		California black walnut (*Juglans californica*).								
Chamise Chaparral	CNDDB	Tall chaparral community at low to mid-elevations. Dominated by chamise (*Adenostoma fasciculatum*) with little herbaceous understory. Characteristic species include *Ceanothus cuneatus*, *C. papillosus*, *Eriogonum fasciculatum*, and *Lotus scoparius*.	HA	HA	HA	HA	HP	HP	HP	HA
Cismontane Alkali Marsh	CNDDB	Wetland habitats that are permanently flooded, irregularly flooded, or seasonally flooded. Dominant species can included bulrush, cattail, and ditch-grass.	HP (equivalent to CalVeg pickleweed-cordgrass)	HA	HA	HA	HA	HA	HA	HA
Coastal and Valley Freshwater Marsh	CNDDB	Riparian habitat dominated by perennial, emergent monocots, often *Scirpus* and *Typha*. *Carex*, *Cyperus*, and *Verbena* also common.	HA	HP	HA	HA	HP	HA	HA	HP
Riversidian Alluvial Fan Sage Scrub	CNDDB	Riversidian Alluvial Fan Sage Scrub communities are found in washes and on gently sloping alluvial fans. This community is made up of predominantly drought-tolerant, soft-leaved shrubs, but includes a	HA	HA	HA	HA	HA	HA	HA	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		significant number of larger perennial species typically found in chaparral in its mature phases.								
Southern California Arroyo Chub/Santa Ana Sucker Stream	CNDDB	A perennial stream in coastal Southern California with suitable habitat for Santa Ana sucker and arroyo chub. This stream community is within or connected to the Santa Ana River or Santa Margarita River.	HA	HA	HA	HA	HA	HA	HA	HA
Southern California Coastal Lagoon	CNDDB	Coastal lagoons form along gently sloping coasts and are separated from the ocean by an island, reef, or sand back. Most of the time, coastal lagoons are connected to the ocean by an inlet.	HA	HA	HA	HA	HA	HA	HA	HA
Southern California Steelhead Stream	CNDDB	Coastal rivers that support southern California steelhead DPS, including all naturally spawned anadromous *O. mykiss* populations below natural and human-made barriers in streams from the Santa Maria River, San Luis Obispo County, California (inclusive) to the Tijuana	HA	HA	HA	HA	HA	HA	HA	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		River on the U.S. – Mexico border. Steelhead are most abundant in the four largest watersheds (Santa Maria, Santa Ynez, Ventura, and Santa Clara rivers) in the northern portion of the DPS. Steelhead are sporadically present in the southernmost watersheds (Orange and San Diego counties). The Mojave Rim Biogeographic Population Group includes the Los Angeles River, San Gabriel River, and Santa Ana River.								
			There is widespread habitat degradation to the coastal and mainstems of the watersheds in this area for this species. However, native, non-anadromous populations still persist upstream of the dams in this region, with small numbers of anadromous individuals attempting to enter and spawn in each of the watersheds when flow conditions are suitable. However, habitat impairments here are severe, including dams and surface water diversions.							
Southern Coastal Bluff Scrub	CNDDB	Often considered part of coastal scrub but differ in height species that dominate in composition include sage, buckwheat, Encelia, and prickly-pear.	HA	HA	HA	HA	HA	HA	HA	HA
Southern Coastal Salt Marsh	CNDDB	Southern coastal salt marsh communities are found in bays, lagoons, and estuaries along the coast from Point	HP (equivalent to CalVeg	HA	HA	HA	HA	HA	HA	HA

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		Conception to the Mexican border. Southern coastal salt marsh communities consist of highly productive, herbaceous, and salt-tolerant hydrophytes that form moderate to dense cover. Characteristic species include *Atriplex watsonii*, *Batis maritima*, *Lycium californicum*, *Monanthochloe littoralis*, *Sueda californica*, and *Salicornica subterminalis*.	pickleweed-cordgrass)							
Southern Coast Live Oak Riparian Forest	CNDDB	An open to locally dense everygreen sclerophyllous riparian woodland dominated by coast live oak (*Quercus agrifolia*). Typically very little in shrub understory, but rich in herbs.	HA	HA	HA	HA	HA	HA	HA	HA
Southern Cottonwood Willow Riparian Forest	CNDDB	A tall, open, broadleafed winter-deciduous forest. Community is dominated by Fremont's cottonwood (*Populus fremontii*) and willow (*Salix* spp.) species. The understory typically consists of shrubby	HA	HA	HA	HA	HA	HA	HA	HP

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		willows, such as arroyo willow (*S. lasiolepis*).								
Southern Dune Scrub	CNDDB	By nature a dynamic system found on inland dunes characterized by densely packed shrubs with scattered grasses, wildflowers, and open sand. Some species found in this community include bush lupine, coyote bush, spineflower, and mock heather.	HA	HA	HA	HA	HA	HA	HA	HA
Southern Foredunes	CNDDB	Areas of sand accumulation along the coast. Dominated by suffrutescent plants, with *Abronia maritima*, *Ambrosia*, and *Cakile* in exposed sites and *Abronia umbellata*, *Calystegia*, and *Camissonia* in less exposed sites.	HA	HA	HA	HA	HA	HA	HA	HA
Southern Mixed Riparian Forest	CNDDB	Contains some large but mainly medium sized and saplings of willow, and cottonwood are more common than large trees. A denser understory of shrubs, mugwort, and vines are more common in this community	HA	HA	HA	HA	HP	HP	HA	HP

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
Southern Sycamore Alder Riparian Woodland	CNDDB	A tall, open, broadleafed, winter-deciduous streamside woodland dominated by western sycamore alder (*Alnus rhombifolia*). These stands seldom form closed canopy forests, and even may appear as trees scattered in a shrubby thicket of sclerophyllous and deciduous species. Lianas include California blackberry (*Rubus ursinus*) and poison oak (*Toxicodendron diversilobum*).	HA	HA	HA	HA	HA	HA	HA	HA
Southern Willow Scrub	CNDDB	A dense community, dominated by several willow species (*Salix* ssp.). Occasionally scattered emergent Fremont's cottonwood or western sycamore (*Platanus racemosa*). Rarely would an understory be present based on density of thickets.	HA	HA	HA	HA	HA	HA	HA	HP
Valley Needlegrass Grassland	CNDDB	Medium height grassland dominated by perennial needle grass such as *Stipa pulchra* by at least 20%.	HA	HA	HA	HA	HA	HA	HA	HA

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			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
		Native and nonnative annuals occur between perennials. Soils often consist of fines with high amounts of clay that remain wet for long periods but are very dry in the summer.								
Valley Oak Woodland	CNDDB	Canopies are almost exclusively dominated by valley oaks, but other types of oaks are associated with the community as well as box elder and poison oak. Various grasses such as wild oats, barley, and needlegrass dominate the ground cover.	HA	HA	HA	HA	HA	HA	HA	HA
Walnut Forest	CNDDB	Walnut forests are cold-deciduous woodlands dominated by California walnut. The understories are composed of coastal scrub, chaparral, and nonnative grass species.	HA	HA	HA	HA	HP	HP	HP	HA

[a] Status Codes

Federal Endangered Species Act (ESA)

E = Federally listed; Endangered
PE = Proposed Endangered
T = Federally listed; Threatened
PT = Proposed Threatened

CRPR

1A = Plants that are presumed extinct in California
1B = Plants that are rare, threatened, or endangered in California and elsewhere
2 = Plants that are rare, threatened, or endangered in California but more common elsewhere

Common Name (Scientific Name)	Status[a] Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA)[b]							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5[c, d]	Frame 6	Frame 7	Frame 8	Frame 9[d]
FC = Federal Candidate for Listing FSC = Federal Species of Concern D = Delisted **State ESA** E = State listed; Endangered T = State listed; Threatened SC = State Candidate for Listing **Other State** R = Rare (Native Plant Protection Act) CSC = California Species of Special Concern SA = California Special Animal CFP = California Fully Protected Species WL = Watch List CNDDB = California Natural Diversity Database **Marine Mammal Protection Act (MMPA)** D = Depleted P = Protected **California Department of Fish and Wildlife Sensitive Natural Communities** = communities classified as rare or threatened.			3 = Plants about which more information is needed 4 = Limited distribution (Watch List) 0.1 = Seriously endangered in California 0.2 = Fairly endangered in California 0.3 = Not very endangered in California [b] Specific Habitat Present/Absent The assessments in this table are a high-level, qualitative analysis, not a final determination. Each individual project will be required to perform site-specific field reviews and analyses to conclusively determine if suitable habitat is present or absent for all special-status species potentially occurring within the Master Plan Area. [c] Frame 5 Note The California Sagebrush habitat in Frame 5, based on USFS CalVeg mapping (USFS 2014), occurs within an area that is currently developed. As such, it was not considered in this assessment when determining potentially suitable habitat for special-status species within Frame 5. [d] Frames 5 and 9 Note Grassland habitat considered potentially suitable to support special-status plant species only includes those areas associated with the Glendale Narrows (Frame 5) and Sepulveda Basin (Frame 9) portions of the frames. The remainder of the annual grassland habitats in Frames 5 and 9 were considered unsuitable as they are isolated patches of non-native grasslands that are surrounded by extensive development, with the exception of habitat for species that tolerate disturbance (e.g., tarplant [*Centromadia* spp.]).							

Updated Appendix H

2020 LA River Master Plan Program EIR

Transportation Impact Analysis Report

Prepared for:
ICF

November 2021

LA20-3180.00 / BOA 20SABO0003 TO 01

FEHR PEERS

Table of Contents
Contents

1. Chapter 1 – Introduction 1

1.1 Introduction 1

1.2 Project Description 1

1.3 Study Area 3

1.4 Study Scope 4

1.5 Organization of Report 6

2. Chapter 2 – Existing Setting 7

2.1 Environmental Setting 7

2.1.1 Existing and Proposed Bicycle Facilities 7

2.1.2 Existing Public Transit Service and Freight Rail Service 11

2.1.3 Existing Streets and Freeways 12

2.1.4 Existing River Access Points, Trails, and Park Lands 19

2.2 Regulatory Setting 24

2.2.1 State Plans and Policies 24

2.2.2 Regional Plans and Policies 26

2.2.3 Local Plans and Policies 28

3. Chapter 3 – CEQA Analysis 42

3.1 Programs, Plans, Ordinances, or Policies Conflict Review 42

3.1.1 Assessment of Consistency with Programs, Plans, Ordinances, and Policies 43

3.2 CEQA Guidelines Section 15064.3, subdivision (b) Conflict Review (VMT Analysis) 46

3.2.1 Background 46

3.2.2 VMT Analysis 46

3.2.3 Mitigation Program 55

3.2.4 Geometric Hazards and Emergency Access 56

List of Figures

Figure 1 – Existing and Planned Bicycle Facilities, Frames 1–3 8
Figure 2 – Existing and Planned Bicycle Facilities, Frames 4–6 9
Figure 3 – Existing and Planned Bicycle Facilities, Frames 7–9 10
Figure 4 – Existing Public Transit Routes, Frames 1–3 13
Figure 5 – Existing Public Transit Routes, Frames 4–6 14
Figure 6 – Existing Public Transit Routes, Frames 7–9 15
Figure 7 – Roads and Freeways, Frames 1–3 16
Figure 8 – Roads and Freeways, Frames 4–6 17
Figure 9 – Roads and Freeways, Frames 7–9 18
Figure 10 – Trails, Parks, and Trail Access Locations, Frames 1–3 20
Figure 11 – Trails, Parks, and Trail Access Locations, Frames 4–6 21
Figure 12 – Trails, Parks, and Trail Access Locations, Frames 7–9 22

List of Tables

Table 1 – Transportation Amenities by Frame 23
Table 2 – VMT Impact Evaluation Matrix Typical Projects and Related Elements 51
Table 3 – VMT Impact Evaluation Matrix Common Elements and Kit of Parts 52

1. Chapter 1 – Introduction

1.1 Introduction

This report documents the assumptions, methodologies, and findings of a study conducted by Fehr & Peers to evaluate the potential transportation impacts of the proposed *2020 Los Angeles (LA) River Master Plan* (Project).

1.2 Project Description

The *2020 LA River Master Plan* is intended to serve as a visionary and guiding framework for the creation of 51 miles of open space with equitable access throughout to access points, gateways, and trails for the one million Los Angeles County (County) residents who live within the study area (defined in Section 1.3) and the nine million residents who live within the 834-square-mile LA River watershed. The *2020 LA River Master Plan* aims to connect to other trails and paths along the length of the river to create a mobility network across Los Angeles County for cyclists, pedestrians, and equestrians, and intends to accommodate as many user types as safely possible. Rather than requiring a one-size-fits-all approach, the *2020 LA River Master Plan* establishes a context-sensitive, flexible but consistent approach. The scale of the improvements would be sized for the surrounding neighborhoods, and the ecology, habitat, and art would reflect the physiography and culture of the area. Other elements, such as signage, access points, and lighting would be consistent along the entire stretch.

The *2020 LA River Master Plan* has nine objectives, as listed below. Achievement of the objectives presented in italics may lead to increased human activity, and therefore has the potential to affect transportation:

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

To achieve the nine objectives, the *2020 LA River Master Plan* proposes six flexible categories of improvements, or "kit of parts" (KOP categories), consisting of infrastructure and urban river design typologies. The six KOP categories cover:

- Trails and Access Gateways

- Crossings and Platforms
- Channel Modifications
- Diversions
- Floodplain Reclamation
- Off-Channel Land Assets

Each of these six KOP categories includes a recommended collection of design components that would help to achieve one or more project objectives. They can be implemented individually or in any combination as subsequent projects, driven by local jurisdictions' needs, funding, and policies. The wide-ranging possibilities for kit implementation, including the current lack of specific project sites, creates analytical challenges. Accordingly, the six KOP categories are analyzed qualitatively at a high level in this study. Once site-specific and project-specific details are available for the subsequent projects brought forth under the *2020 LA River Master Plan*, they will be examined in light of the Program Environmental Impact Report (PEIR) prepared for the *2020 LA River Master Plan* and this transportation impact analysis report to determine whether subsequent or new documentation pursuant to the California Environmental Quality Act (CEQA) must be prepared (State CEQA Guidelines Section 15168 (c)(2)).

In addition to the KOP, the *2020 LA River Master Plan* includes a suite of smaller "Common Elements," including site furnishings, amenities, and facilities such as lighting, drinking fountains, seating, pavilions, and cafés intended to provide amenities designed to support a wide range of uses within the river environs, promote safety and accessibility, and build a cohesive identity for the river corridor.

The *2020 LA River Master Plan* includes up to 107 potential types of projects on sites that range in size from extra-small (less than 1 acre) to extra-large (150+ acres/10+ miles). These potential projects include the common elements as a Typical Project that would be constructed at a specified spacing along the river to ensure equitable distribution of facilities and improve access and safety. These elements together comprise the entirety of the *2020 LA River Master Plan*. It is expected that most projects (85) would be developed on sites that are extra-small or small (up to 3 acres/1 mile) in size. Among the remaining 22 projects, 10 would be on medium sites (3–40 acres/5 miles), 11 would be large sites (40–150 acres/ 10 miles), and 1 would be an extra-large project site (150+ acres/10+ miles).

This study includes qualitative, program-level analysis of the potential environmental impacts from implementation of the *2020 LA River Master Plan* based on the following groupings:

- Two Typical Projects that include construction and operations scenario assumptions developed by the Los Angeles County Public Works (Public Works). These projects, listed below, include relatively detailed design concepts.
    - Common Elements Typical Project
    - Multi-Use Trails and Access Gateways Typical Project
- Six KOP categories, each one a category of actions and infrastructure

- Overall *2020 LA River Master Plan* implementation, which examines implementation of the entirety of the *2020 LA River Master Plan*

The two Typical Projects analyzed are the Common Elements Typical Project and the Multi-Use Trails and Access Gateways Typical Project. These projects would be sited between the top of the River levee and the fence line (edge of Los Angeles County Flood Control District [LACFCD] property) and could be accommodated at almost any location within the overall study area, which is described in Section 1.3.

The Common Elements Typical Project includes all 18 common elements, as follows: pavilions, cafés, hygiene facilities, restrooms, benches, emergency call boxes, water fountains, trash and recycling, bike racks, environmental graphics, lighting, planting, stairs/ramps, guardrails, fences and gates, stormwater best management practices (BMPs), art/performance spaces, and recreation areas. These elements could be implemented individually or in any combination at a given site of up to 3 acres/1 mile in size (extra small/small project site). For purposes of CEQA, this analysis assumes that the Common Elements Typical Project includes implementation of all 18 elements at a given location and could attract up to 500 daily visitors.

The Multi-Use Trails and Access Gateways Typical Project would include easy to find and welcoming access gateways to the river and a continuous path for multiple modes, such as bicyclists, horseback riders, and pedestrians. It is anticipated that access gateways would be placed along the river at the intersection of major access points, adjacent programming, and LA River communities. As analyzed in this study, the Multi-Use Trails and Access Gateways Typical Project consists of an approximately 5-mile-long and 40-foot-wide multi-use trail composed of a 6-foot pedestrian trail with 2-foot-wide buffers on either side, an 8-foot, two-way bicycle path with a 2-foot buffer, an 8-foot vegetated buffer, and a 12-foot equestrian trail. Actual trail widths would be dictated by their expected usage and informed by the site conditions. Additionally, design standards may change based on the latest standards applicable when projects are approved. For purposes of CEQA, this analysis assumes that the Multi-Use Trails and Access Gateways Typical Project would be implemented with the Common Elements Typical Project and could attract up to 1,000 daily visitors.

Following *2020 LA River Master Plan* approval, subsequent project-specific activities identified in the *2020 LA River Master Plan* would be designed and implemented over time by any one of the 18 jurisdictions (17 cities and the unincorporated County) that lie along the LA River Trail, tiering from the PEIR. These subsequent projects could be located anywhere in the 2-mile-wide study area corridor, including outside the river right-of-way (ROW). Implementation of the *2020 LA River Master Plan* is envisioned over a 25-year horizon period, with completion expected around 2045.

1.3 Study Area

The LA River originates in the Santa Susana Mountains in the far western San Fernando Valley and flows 51 miles east and then south, changing direction along the eastern side of Griffith Park, before terminating in the Pacific Ocean in Long Beach. On its route to the ocean, the river passes through 18 jurisdictions, including unincorporated areas of Los Angeles County. These 18 jurisdictions include:

- Bell
- Bell Gardens
- Burbank
- Carson
- Commerce
- Compton
- Cudahy
- Downey
- Glendale
- Huntington Park
- Long Beach
- Los Angeles City
- Unincorporated Los Angeles County
- Lynwood
- Maywood
- Paramount
- South Gate
- Vernon

Ownership of the ROW varies, but a majority is owned by the LACFCD. Flood management structures, such as the channel itself, as well as levees and access roads, are primarily maintained by LACFCD and the United States Army Corps of Engineers (USACE). The study area for the Project is defined as a 2-mile-wide corridor, 1 mile on each side of the centerline of the river for its entire 51-mile length. Extending the *2020 LA River Master Plan* study area beyond the river ROW, demarcated by the fence line, and channel banks provides local context for the issues impacting communities and impeding river access, and allows areas of higher need or opportunity to be identified. To support context-sensitive planning that accounts for local needs, the study area has been subdivided into nine distinct geographical sections, or planning frames. Frames are numbered 1 – 9, beginning in Long Beach with Frame 1 and ending in Canoga Park with Frame 9. Some planning frames include just one jurisdiction, while others include multiple local jurisdictions.

1.4 Study Scope

The scope of work for this study is consistent with CEQA and Senate Bill (SB) 743, and was determined in consultation with Public Works as part of the PEIR for the *2020 LA River Master Plan*.

Authorized in September 2013, SB 743 directed the Office of Planning and Research (OPR) to revise the State CEQA Guidelines (Title 14 of the California Code of Regulations) to establish new criteria for determining the significance of transportation impacts. In developing the criteria, OPR proposed, and the California Natural Resources Agency has certified and adopted, changes to the State CEQA Guidelines that identify vehicle miles traveled (VMT) as the most appropriate metric to evaluate a project's transportation impacts. With the changes to the State CEQA Guidelines, automobile delay, as measured by level of service (LOS) and other similar metrics, no longer constitutes a significant environmental effect under CEQA (Public Resources Code, Section 21099, subdivision (b)(3)). These updated criteria for transportation impact assessment better align transportation analysis with State of California (State) greenhouse gas (GHG) reduction goals set by SB 375 to encourage infill development and improve public health through increased active transportation. VMT, which had previously only been an input to other traffic-related analyses, such as air quality, energy, GHG, and noise, is now the primary metric for measuring transportation impacts. VMT completely replaces LOS as the CEQA metric of analysis of roadway capacity-based or automobile delay-based LOS, which measures a project's impact on the driving experience of other vehicle drivers (e.g., congestion, delay) and favors development in exurban areas where existing

roadway traffic is light, often leading to longer vehicle trips, or resulting in road-widening projects, which result in adverse environmental and public health impacts through induced vehicle demand and degradation of the biking or walking experience. Conversely, evaluation of a project's impact on VMT evaluates the effect on the environment of project-generated vehicle trips, such as more and/or longer vehicle trips, or projects that generate fewer vehicle trips or shorten existing trips, such as development of an infill site or facilities that improve bicycle access or walkability.

Other transportation impact criteria include (1) conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities; (2) whether a project substantially increases hazards due to a geometric design feature; and (3) whether a project will result in inadequate emergency access. Pursuant to SB 743, OPR released draft State CEQA Guidelines in November 2017, and adopted final guidelines in December 2018. SB 743 went into full effect as of July 1, 2020.

In response to SB 743, Public Works has developed new Transportation Impact Analysis Guidelines (County Guidelines) that include a comprehensive systematic approach to the assessment of transportation impacts. The County Guidelines are based on OPR technical guidance but also reflect local conditions. These new County Guidelines, methods, and impact criteria for CEQA analyses focus on VMT, roadway and intersection geometric hazards, and policy conflicts. They include guidance on VMT-based thresholds of significance and a process to screen out projects that would not require VMT analysis (due to their size, location, proximity to transit, or other factors).

The County Guidelines have been internally approved by Public Works. Board approval is expected in 2021 following an extensive public outreach effort. This study was prepared utilizing an approach consistent with the Los Angeles County Guidelines and Thresholds and uniform for all jurisdictions within the study area, which is appropriate given that the County is the lead agency for the PEIR. The decision to apply a uniform approach was based on the following considerations:

> At the time this study was prepared, among the 17 cities through whose jurisdiction the study area extends, only the City of Los Angeles has already adopted local VMT thresholds. All the other cities are at some stage in the process of transitioning from LOS to VMT and therefore do not yet have separate CEQA-compliant transportation analysis methodologies in place.
> The schedule within which the *2020 LA River Master Plan* PEIR is being prepared requires a streamlined approach to analysis. Rather than consult individually with each of the 17 individual cities within the study area to obtain formal concurrence with the methodology described above, the methodological approach has been disclosed to those agencies and to the general public in the PEIR Notice of Preparation (NOP) that was published on July 6, 2020, to seek their input.
> The VMT threshold of significance per the County Guidelines for new development projects are based on a project's land use as described in the County Guidelines. Note that the County Guidelines are subject to change prior to adoption and/or may not ultimately be adopted.

The screening criteria utilized by the County are aligned with the OPR Technical Advisory on Evaluating Transportation Impacts (December 2018) and were used to identify those design components that, under the six KOP categories, when implemented as part of a subsequent project, would not require subsequent VMT analysis and those that either may or definitely would. Because the locations where specific projects

would be developed under the *2020 LA River Master Plan* are not known, the screening criteria were also used to determine which design components under the six KOP categories may require VMT analysis or would be screened out. The following types of projects are exempt from completing VMT analysis:

- Land use projects generating fewer than 110 daily trips.
- Retail uses that exceed a net 50,000 square feet of gross floor area.
- Land use projects located within one half-mile of a major transit stop or high-quality transit corridor that also meet other design and policy-consistency characteristics.
- Residential uses composed of 100 percent affordable housing.
- Transportation projects not in conflict or inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b)(2) – that is, transportation projects that reduce or have no impact on VMT, such as an active transportation project.
- Transportation projects that do not include the addition of new through lanes on existing or new highways.

Design components under the six KOP categories that are not exempt from VMT analysis were qualitatively evaluated to identify those that have the potential to result in a significant VMT impact and those that were unlikely to. Where necessary, potential mitigation strategies are identified. Design components under the six KOP categories that need VMT analysis will require additional quantitative analysis in the future once details and specific sites are known. Project alternatives and construction period impacts were also evaluated qualitatively.

Project analysis scenarios analyzed in this study include the "with Project" scenario and the "Cumulative with Project" scenario. The Planning Horizon Year for the *2020 LA River Master Plan* is 2045. The Project VMT baseline for the Existing and Cumulative scenarios uses the current analytical framework developed by the County for analyzing transportation impacts.

Preparation of trip generation estimates and distribution of trips for individual design components under the six KOP categories and intersection operational analysis is not included in this report due to the lack of detail on design components under the six KOP categories and their locations. More detailed analysis, where necessary, of the transportation impacts of subsequent projects as proposed under the *2020 LA River Master Plan* will occur once specific project details and sites have been identified.

1.5 Organization of Report

This report is divided into five chapters, including this Introduction. Chapter 2 describes the Existing Environmental and Regulatory Settings. Chapter 3 includes the Transportation Impact Analysis for the Project. Chapter 5 discusses the Project Alternatives. Section 2.16 presents the Cumulative Impact Analysis for transportation impacts.

2. Chapter 2 – Existing Setting

This chapter describes the existing environmental setting, including a discussion of existing river access points, trails, parks, and recreation areas; the streets, freeway systems, public transit providers, and bicycle facilities that provide access to the river; as well as areas identified by the County as having VMT per service population, residential VMT per capita, or employment VMT per employee that is lower than baseline. The existing regulatory setting is also described, including a discussion of SB 743, which established VMT as the primary metric for assessing transportation impacts, as well as other applicable plans and policies.

2.1 Environmental Setting

The *2020 LA River Master Plan* project area is located within the LA River watershed, an 834-square-mile area that stretches from the far eastern border of Ventura County in the west, across the San Fernando Valley, from the San Gabriel Mountains and Angeles National Forest in the northeast, and south through Central Los Angeles down to Long Beach and the Pacific Ocean. This area includes much of urbanized South Los Angeles County, but excludes West Los Angeles and the coastal cities in the South Bay area of the County. The transportation system serving this area is a complex, built-out, multimodal network designed to carry both people and goods. It consists of major freeways, roadways, bicycle facilities, sidewalks, public transit, freight railways, airports, seaports, and intermodal terminals. There is also a network of trails through the extensive open areas and mountains that lie between the urbanized areas. Major components of the transportation network within the study area are presented in Figures 1–15. Each figure presents three river frames for visualization purposes so that information for the entire study area of nine river frames is presented in three figures for each subject area. Table 1 (at the end of this chapter) presents a comparison of transportation facilities and amenities by river frame.

2.1.1 Existing and Proposed Bicycle Facilities

Figures 1–3 present the existing and proposed bicycle facilities within the study area. Proposed facilities include all known facilities proposed by any jurisdiction within the study area. There are almost 195 miles of existing bicycle facilities within the study area, including just over 75 miles of Class I bicycle paths that run primarily along the LA River; almost 77 miles of Class II bicycle lanes; 40 miles of Class III sharrowed or signed bicycle facilities; and just over 2 miles of Class IV bicycle tracks. Class II bicycle lanes represent a plurality of the bicycle facility typologies within the study area despite the presence of bicycle paths along both sides of the river in many locations. Class I bikeways are defined as off-street bicycle paths, Class II bikeways are defined as striped lanes within streets, Class III bikeways are defined as signed or sharrowed bicycle routes, and Class IV bikeways are defined as bicycle facilities on roadways that provide a physical vertical barrier between bicyclists and vehicular traffic.

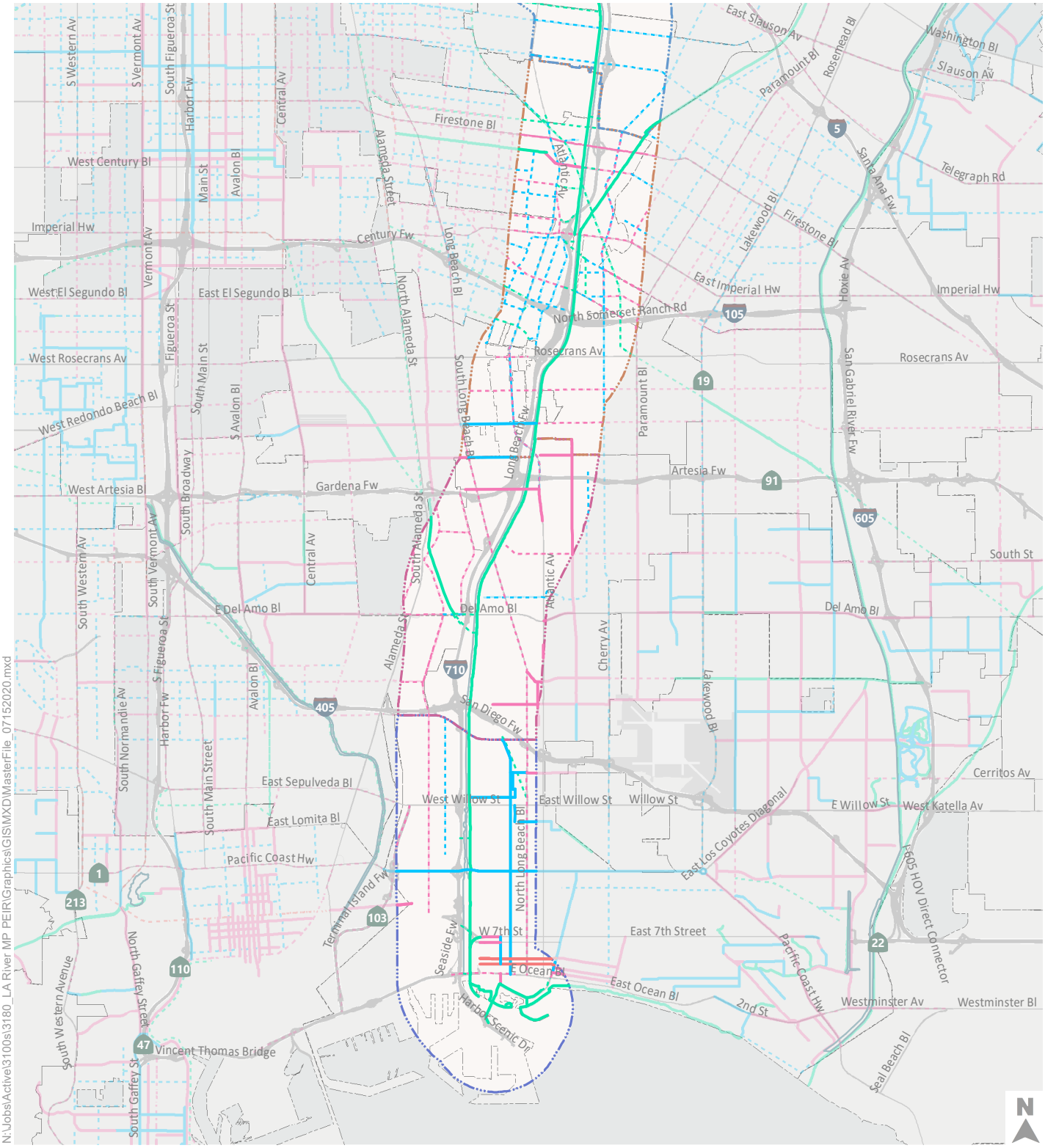
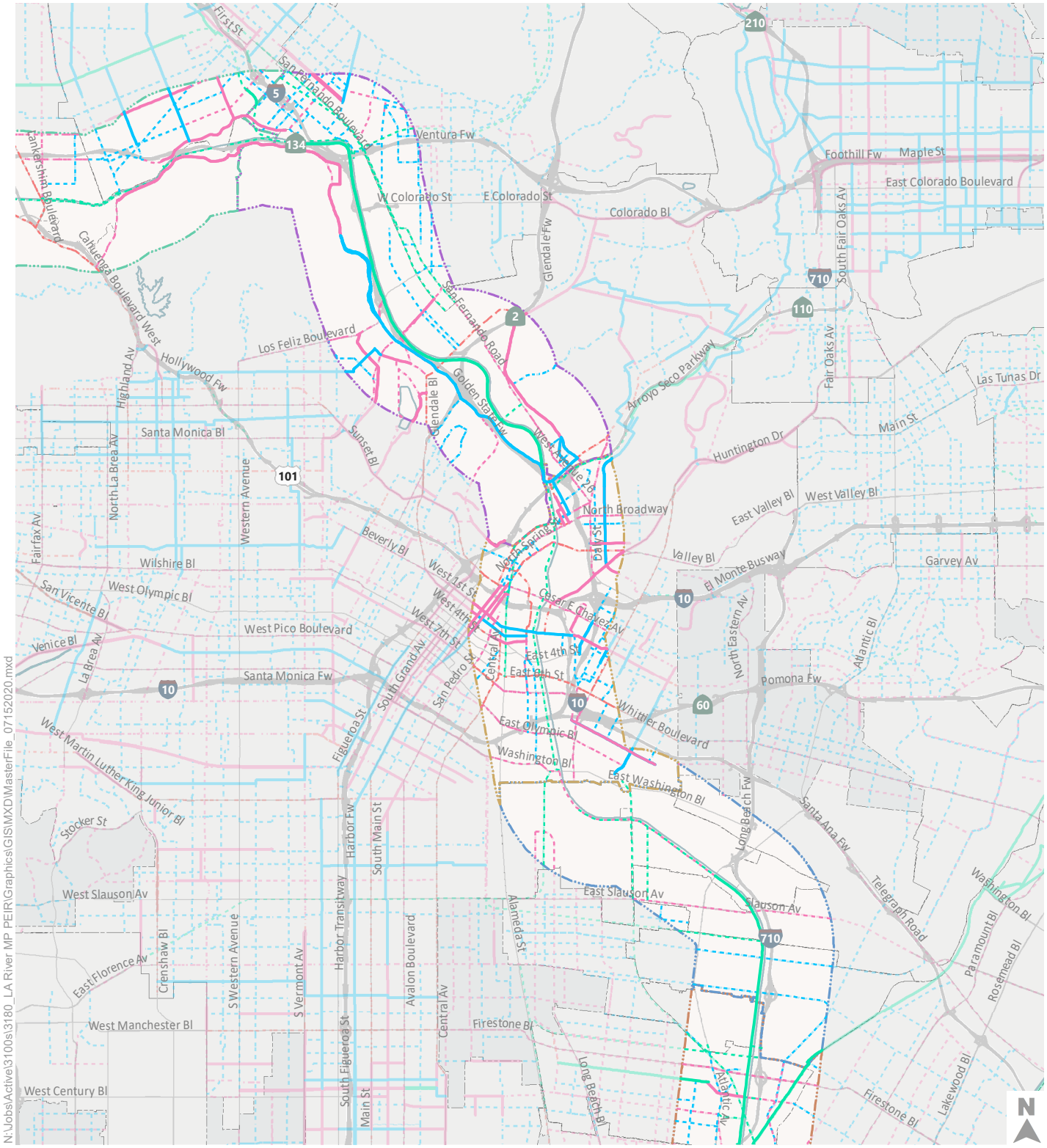


Figure 1

Existing and Planned Bicycle Facilities



Bicycle Path (Class I)
Bicycle Lane (Class II)
Bicycle Route (Class III)
Protected Bicycle Lane (Class IV)

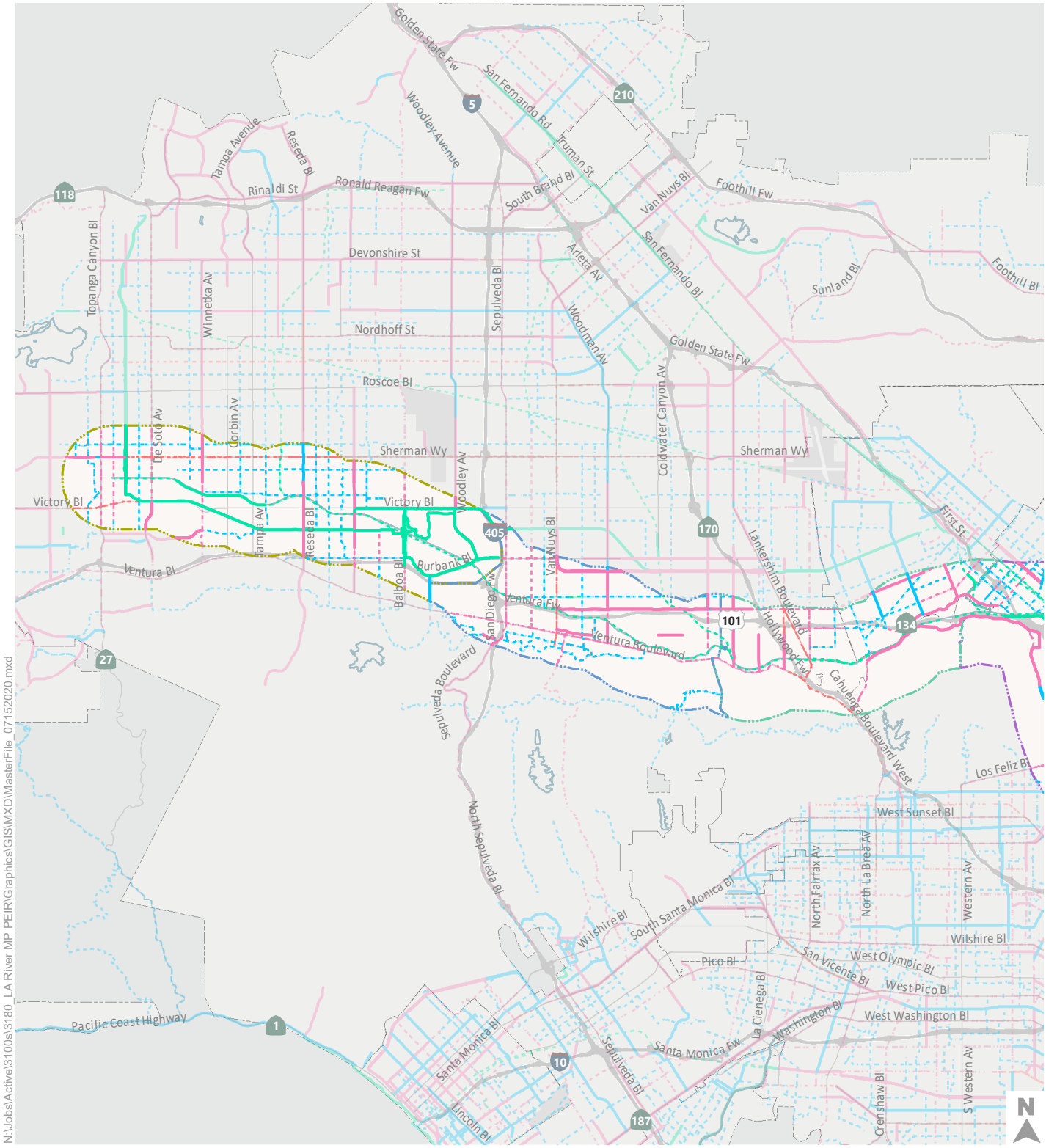
Proposed Bicycle Path (Class I)
Proposed Bicycle Lane (Class II)
Proposed Bicycle Route (Class III)
Proposed Protected Bicycle Lane (Class IV)

City Boundaries

LA River Frames
3 - Central Plain
4 - North Plain
5 - Heights
6 - Narrows
7 - East Valley

Figure 2

Existing and Planned Bicycle Facilities



Bicycle Path (Class I)
Bicycle Lane (Class II)
Bicycle Route (Class III)
Protected Bicycle Lane (Class IV)
Proposed Bicycle Path (Class I)
Proposed Bicycle Lane (Class II)
Proposed Bicycle Route (Class III)
Proposed Protected Bicycle Lane (Class IV)
City Boundaries
LA River Frames
6 - Narrows
7 - East Valley
8 - Mid Valley
9 - West Valley

Figure 3

Existing and Planned Bicycle Facilities

The bicycle network within the study area is not fully built out. Almost 365 miles of the planned bikeways in the study area are yet to be built, almost double the number of miles already on the ground. Of the planned miles of bicycle facilities, Class III sharrowed facilities represent a plurality (just over 130 miles), with Class II bicycle lanes representing an almost equal share (just under 125 miles). Planned Class I and Class IV mileage is equal to almost 110 miles.

In addition to these dedicated bicycle facilities, numerous multi-modal bridges over the LA River for exclusive use of bicyclists and pedestrians (and sometimes also for equestrians) have recently or will soon open, including the Riverwalk Bridge in Glendale, the Garden Bridge connecting to Zoo Drive, the North Atwater La Kretz Bridge, the Sunnynook Bridge, the Red Car Bridge, and the Taylor Yard Bridge farther to the south. These bridges will cross the river and connect communities on the north or east side of the river to existing segments of the LA River Bike Path.

2.1.2 Existing Public Transit Service and Freight Rail Service

The regional public transit system includes heavy rail transit operations, regional commuter rail services, regional and municipal bus operations, and local shuttles. The Los Angeles County Metropolitan Transportation Authority (Metro) is the largest provider of public transit service in the study area, and its service is supplemented by numerous municipal transit lines and local shuttle services.

Figures 4–6 present the existing transit routes within the study area. The study area is served by eight transit providers on 188 routes, including Metro, DASH (Los Angeles Department of Transportation), Antelope Valley Transit Authority, Santa Clarita Transit, Big Blue Bus (Santa Monica), Foothill Transit, Torrance Transit, and Long Beach Transit. Metro rail and bus rapid transit service within the study area includes the A Line (formerly, the Blue Line) within the Long Beach area, the C Line (formerly, the Green Line) in South Los Angeles, and the G Line (formerly, the Orange Line) in the San Fernando Valley.

The NextGen Bus Plan NextGen is a comprehensive restructuring of Metro's transit service to improve service and accessibility for riders. The project was begun in 2018 and developed through consideration of both technical data and all the priorities and personal experiences of residents. The Plan was approved by the Metro Board of Directors in October 2020 and is being implemented in phases ending in late 2021. When fully deployed the NextGen Bus Plan will give LA County a bus system that is fast, frequent, reliable and accessible. The improvements will double the number of frequent Metro bus lines, provide more than 80% of current bus riders with 10 minute or better frequency, improve and expand service throughout the day, ensure a one-quarter mile walk to a bus stop for 99% of current riders, and create a more comfortable and safer waiting environment. Within the overall framework, transit access to the LA River and other destinations in the region will be improved.

National and regional passenger rail service in the study area is operated by Amtrak and Metrolink. The two services, in some places, share use of tracks with the Union Pacific Railroad (UPRR), which operates a vast rail network that extends throughout the State and the nation. Planning is underway for development of a high-speed rail line that will link Southern California with Central California and the Bay Area, and portions of the alignments under study include segments that lie adjacent to the LA River.

2.1.3 Existing Streets and Freeways

Figures 7–9 present the existing roadway network within the study area, including freeways, arterials, secondary streets, and local roads. The network of freeways and state highways supports high-capacity limited-access travel, whereas the arterial network provides high levels of signalized street capacity and serves as a feeder system for the regional freeways and local street system. The freeway and highway system is the primary means of regional person and goods movement, providing for direct vehicular access to river access points, and to employment, services, and goods.

In many locations, arterial streets provide the only local access crossing points over the river, with many secondary and especially local roads dead-ending at the river fence line.

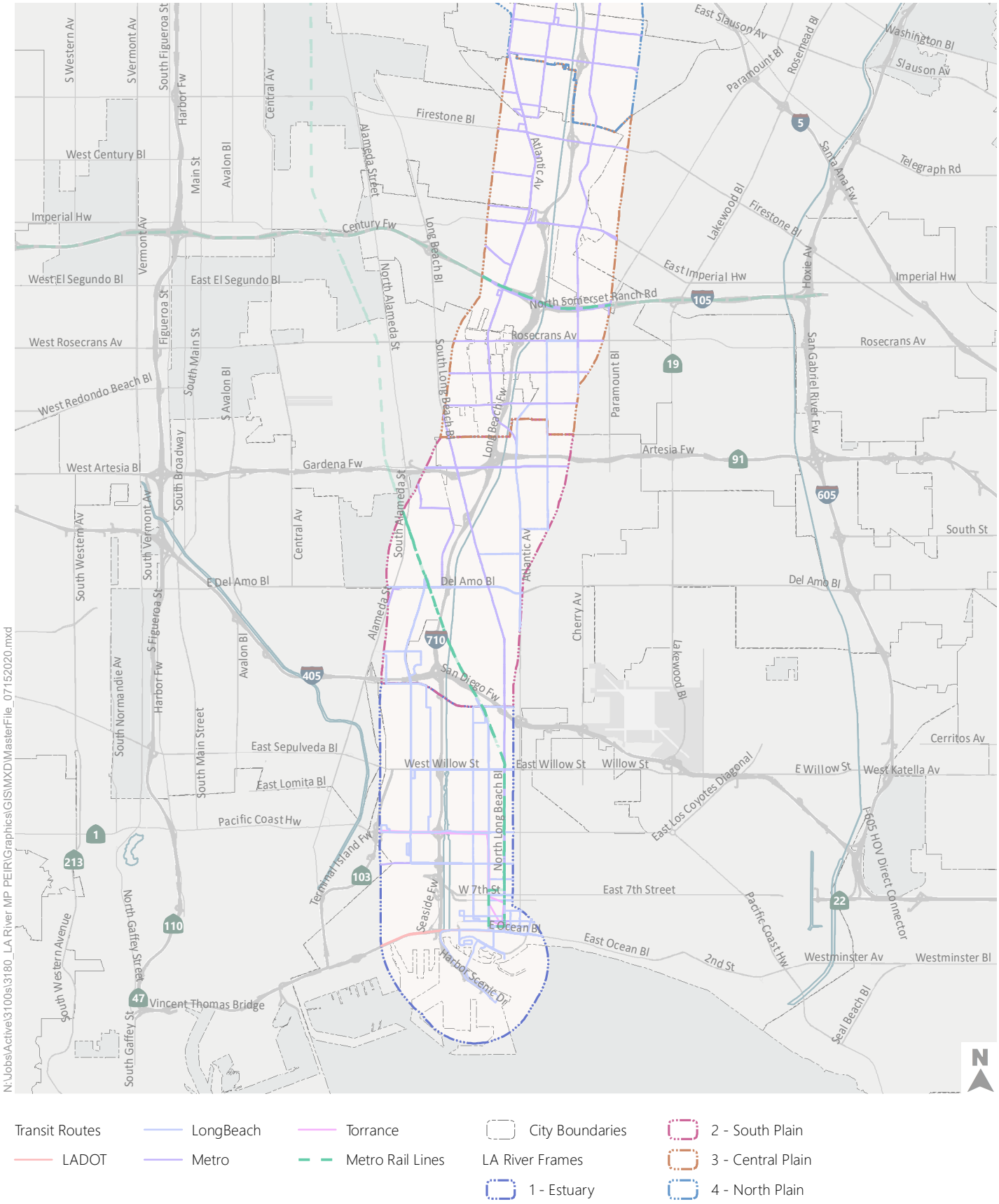
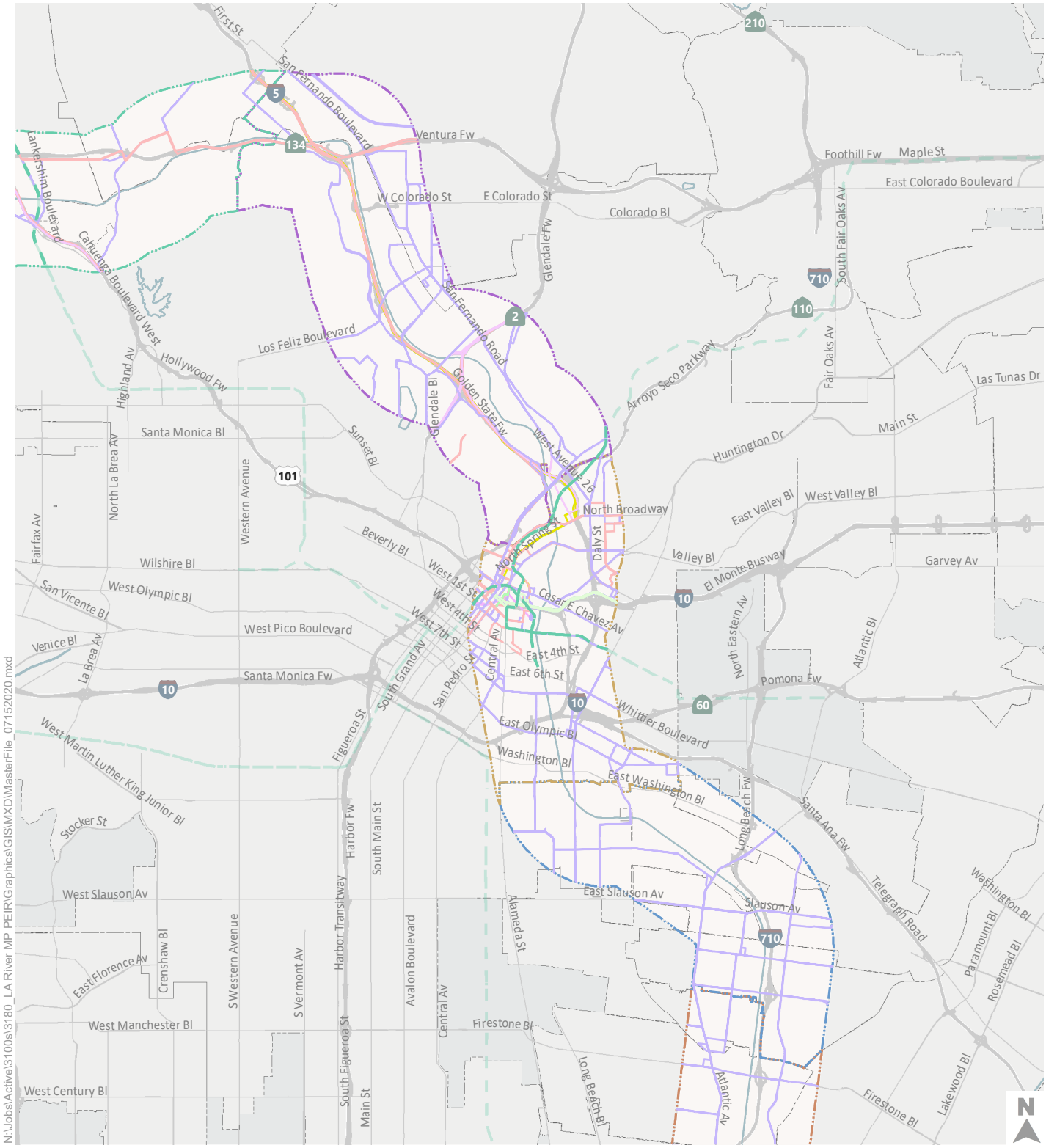


Figure 4

Existing Public Transit Routes



Transit Routes
- AVTA
- BBB
- Foothill
- LADOT
- Metro
- SantaClarita
- Torrance
- Metro Rail Lines

City Boundaries

LA River Frames
- 3 - Central Plain
- 4 - North Plain
- 5 - Heights
- 6 - Narrows
- 7 - East Valley

Figure 5

Existing Public Transit Routes

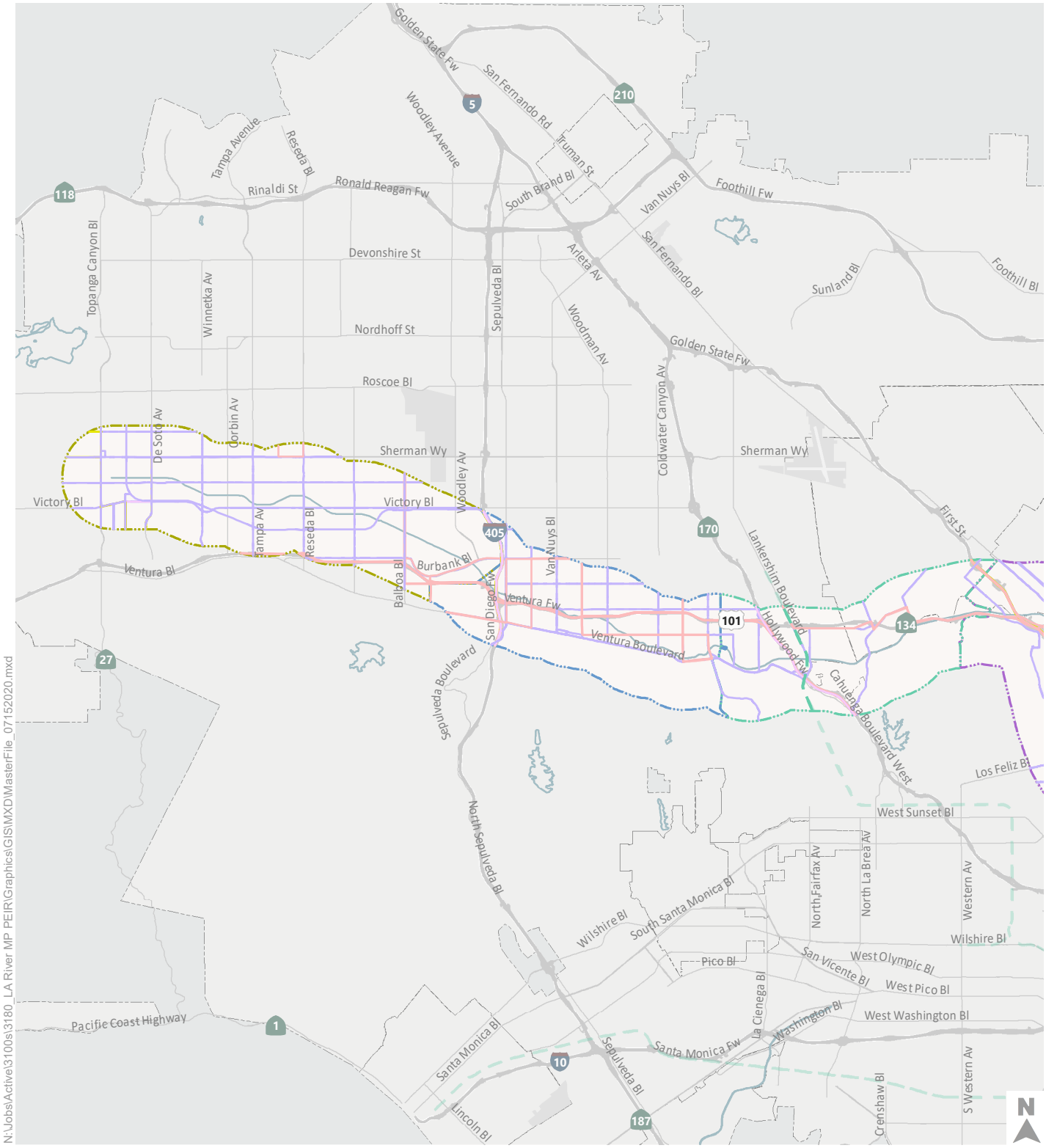


Figure 6

Existing Public Transit Routes

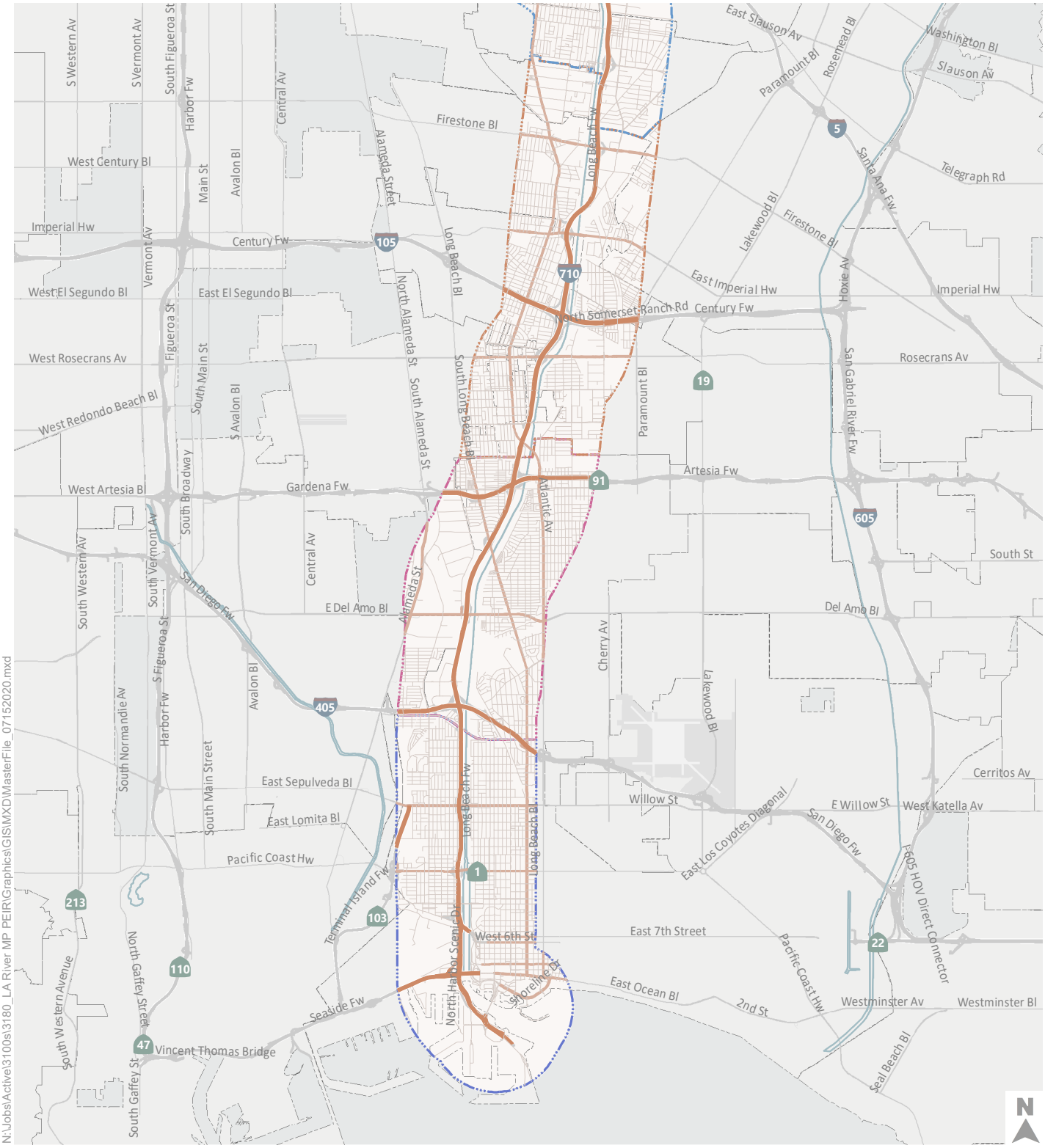
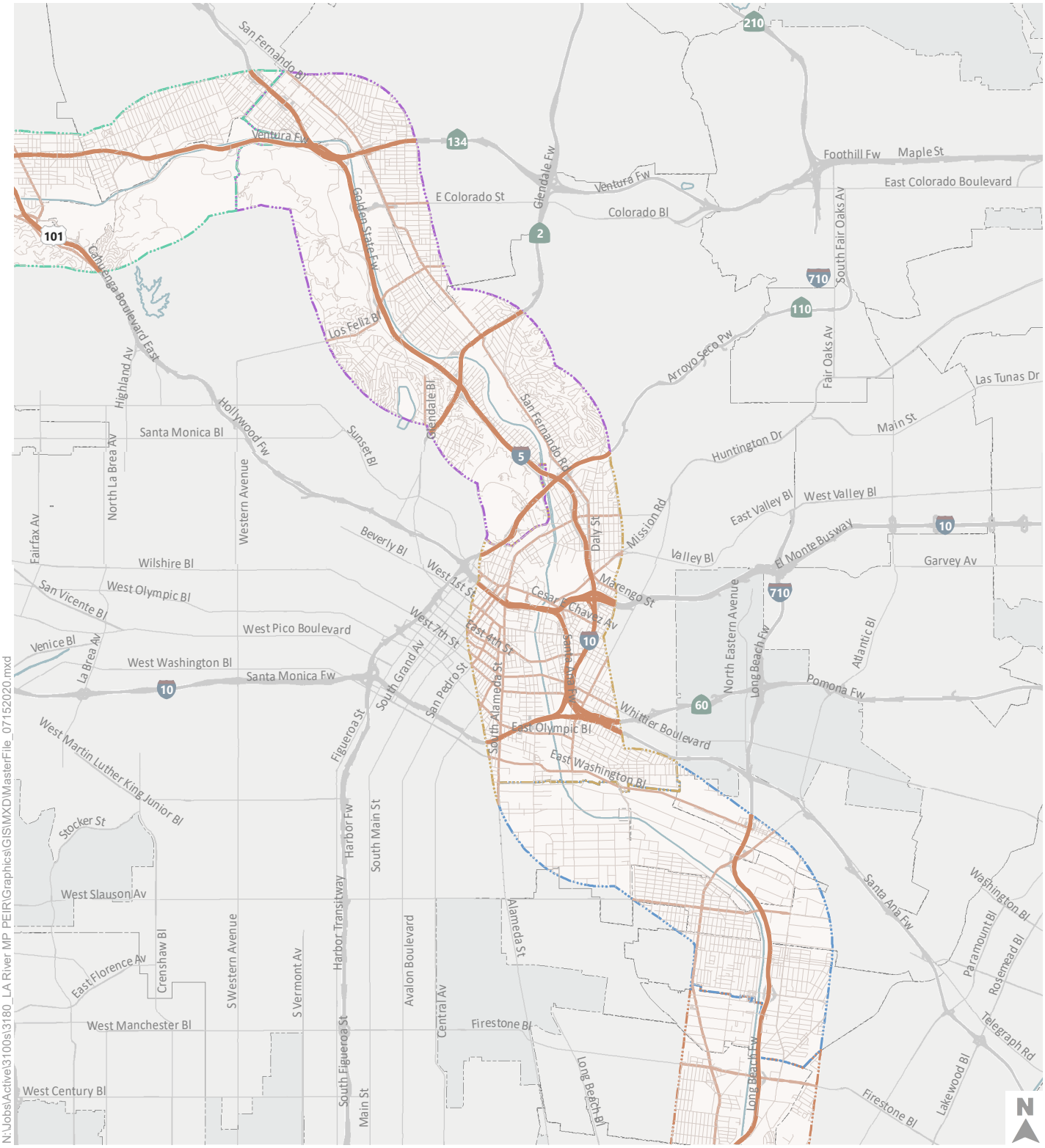


Figure 7

Roads and Freeways



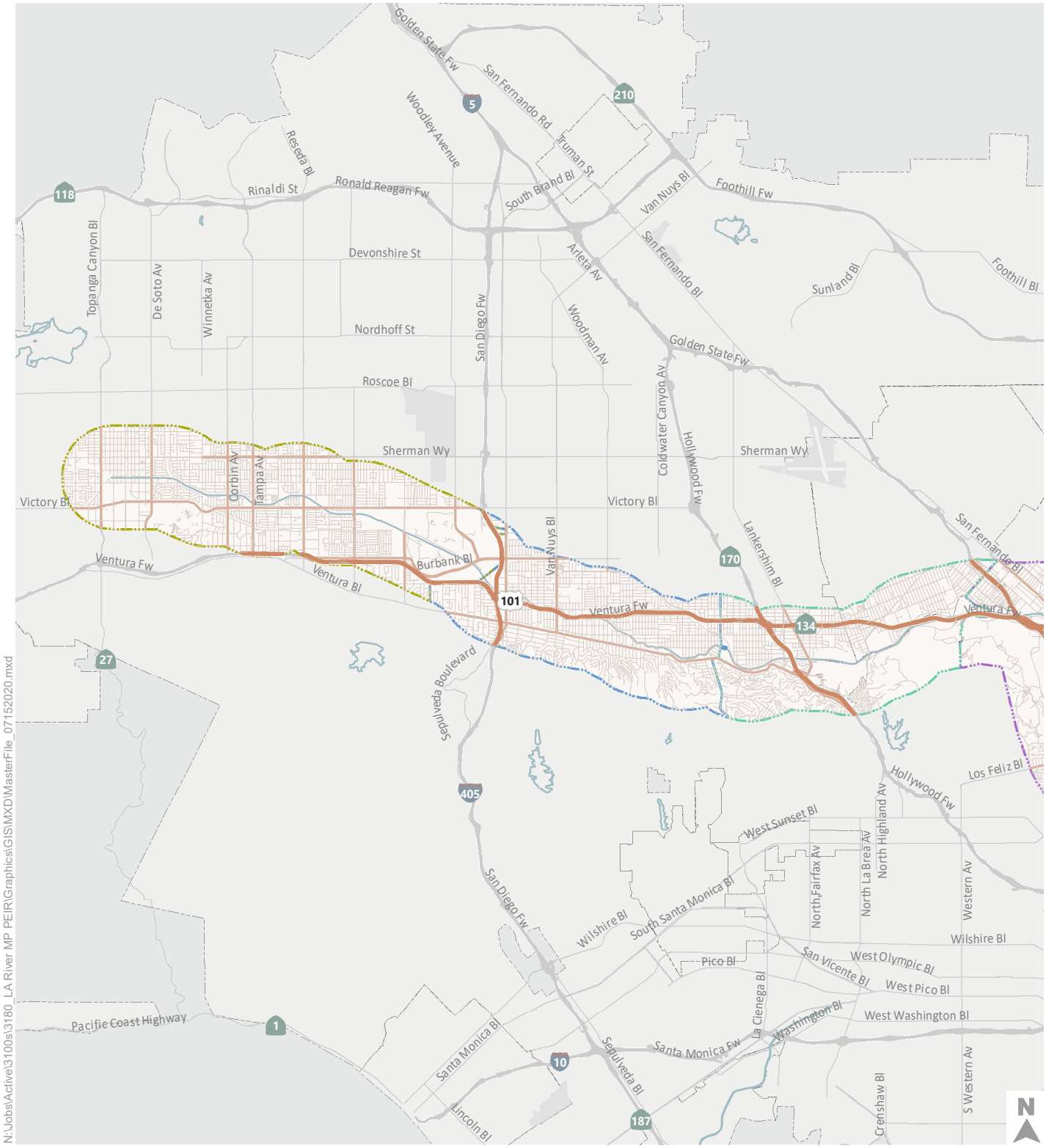
Roads & Freeways
- Freeways
- Primary Streets
- Secondary, Tertiary Streets

City Boundaries

LA River Frames
- 3 - Central Plain
- 4 - North Plain
- 5 - Heights
- 6 - Narrows
- 7 - East Valley

Figure 8

Roads and Freeways



Roads & Freeways

- Freeways
- Primary Streets
- Secondary, Tertiary Streets

City Boundaries

LA River Frames

- 6 - Narrows
- 7 - East Valley
- 8 - Mid Valley
- 9 - West Valley

Figure 9

Roads and Freeways

Los Angeles County and the City of Los Angeles both have Vision Zero plans, which aim to reduce traffic fatalities and/or injuries to zero. Each agency has identified specific roadway corridors that experience higher than average collisions, injuries, and fatalities. Within the study area, in Frame 3, Los Angeles County has identified Rosecrans Avenue and Compton Boulevard, located in the East Rancho Dominguez unincorporated area, and Santa Fe Avenue, located in the Rancho Dominguez unincorporated area, as Collision Concentration Corridors. Similarly, the City of Los Angeles has identified the following streets within the study area as being part of a High Injury Network:

- East Olympic Boulevard
- South Alameda Street
- East 7th Street
- East 6th Street
- North Broadway
- North Figueroa Street
- San Fernando Road
- Cahuenga Boulevard
- Ventura Boulevard
- Riverside Drive
- Balboa Boulevard
- Victory Boulevard
- Reseda Boulevard
- Vanowen Street
- Tampa Boulevard
- De Soto Avenue
- Sherman Avenue
- Fallbrook Avenue

Major freeways serving the study area include Interstate (I-) 710, I-105, State Route (SR) 91, SR-1, SR-60, I-10, SR-2, SR-110, I-5, SR-2, SR-134, Unites States Route (US) 101, SR-170, I-405, and SR-27. I-710 forms a spine along the river's southern reach in River Frames 1–4, while I-5 does the same in River Frame 6. US-101 runs east-west through much of the study area in Frames 6–9, but does not run as nearly parallel to or as close to the river as I-710 and I-5 do.

2.1.4 Existing River Access Points, Trails, and Park Lands

Figures 10–12 present the existing river access points, existing and planned trails, and park lands within the study area. There are 97 existing river access points along the LA River, and more than 26 miles of existing trails within the study area, with an additional almost 23 miles planned. Major existing trails in the study area include the Los Angeles County River Bike Path in the Long Beach area in Frame 1, the LA River Trail and the LA River Trail Extension in South Los Angeles in Frames 2–4, the Arroyo Seco Trail north of Downtown Los Angeles in Frame 6, and the Rim of the Valley Trail, which runs through Griffith Park, also in Frame 6.

Almost 10 square miles, or approximately 9 percent of the study area, is existing park land. Frame 6, the Narrows, where the river bends around Griffith Park, and Frame 9, the West Valley, which includes Balboa Park, have the highest percentage of land area devoted to parks, at 26 and 14 percent, respectively.

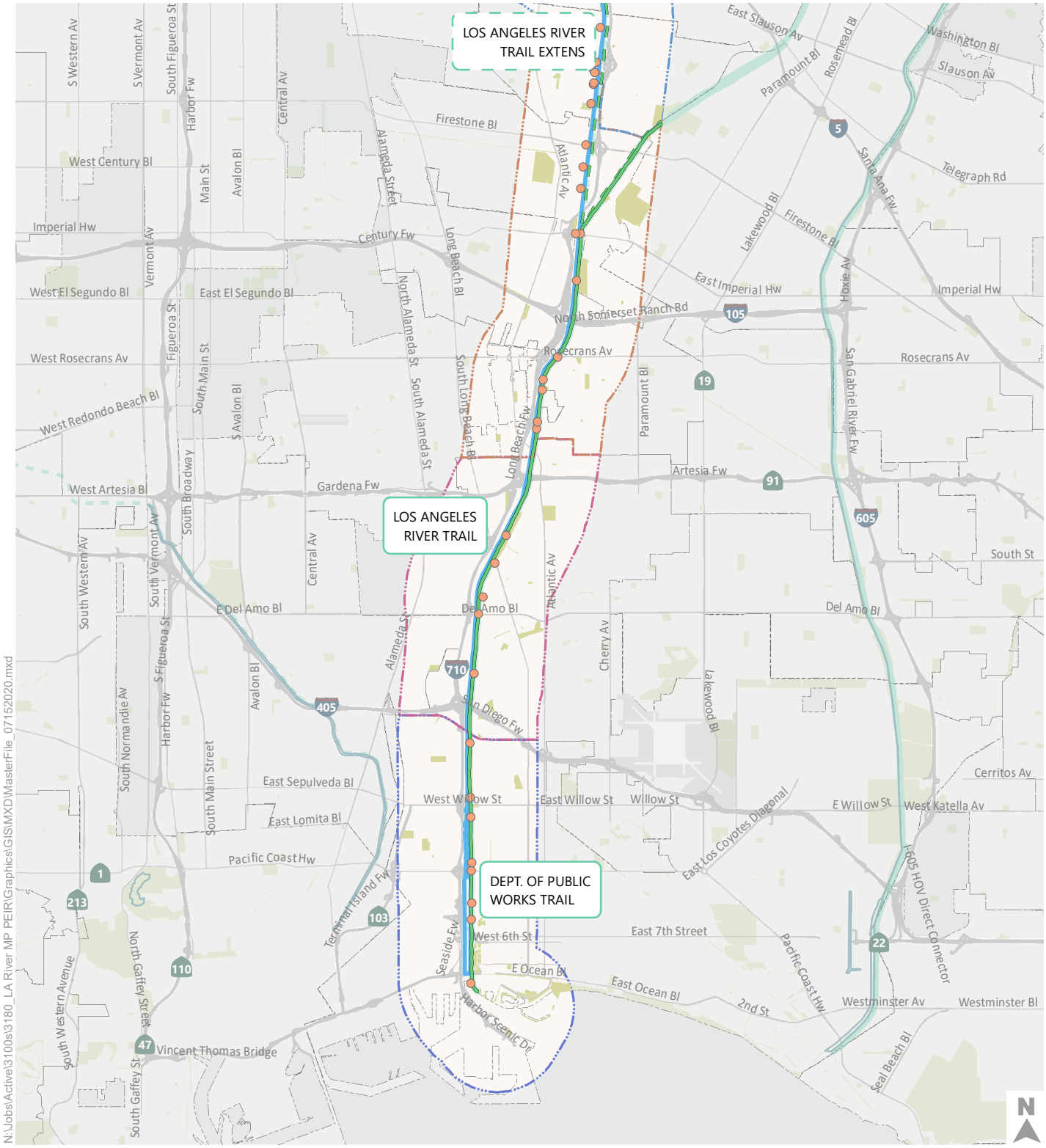


Figure 10

Trails, Parks and Trail Access Locations

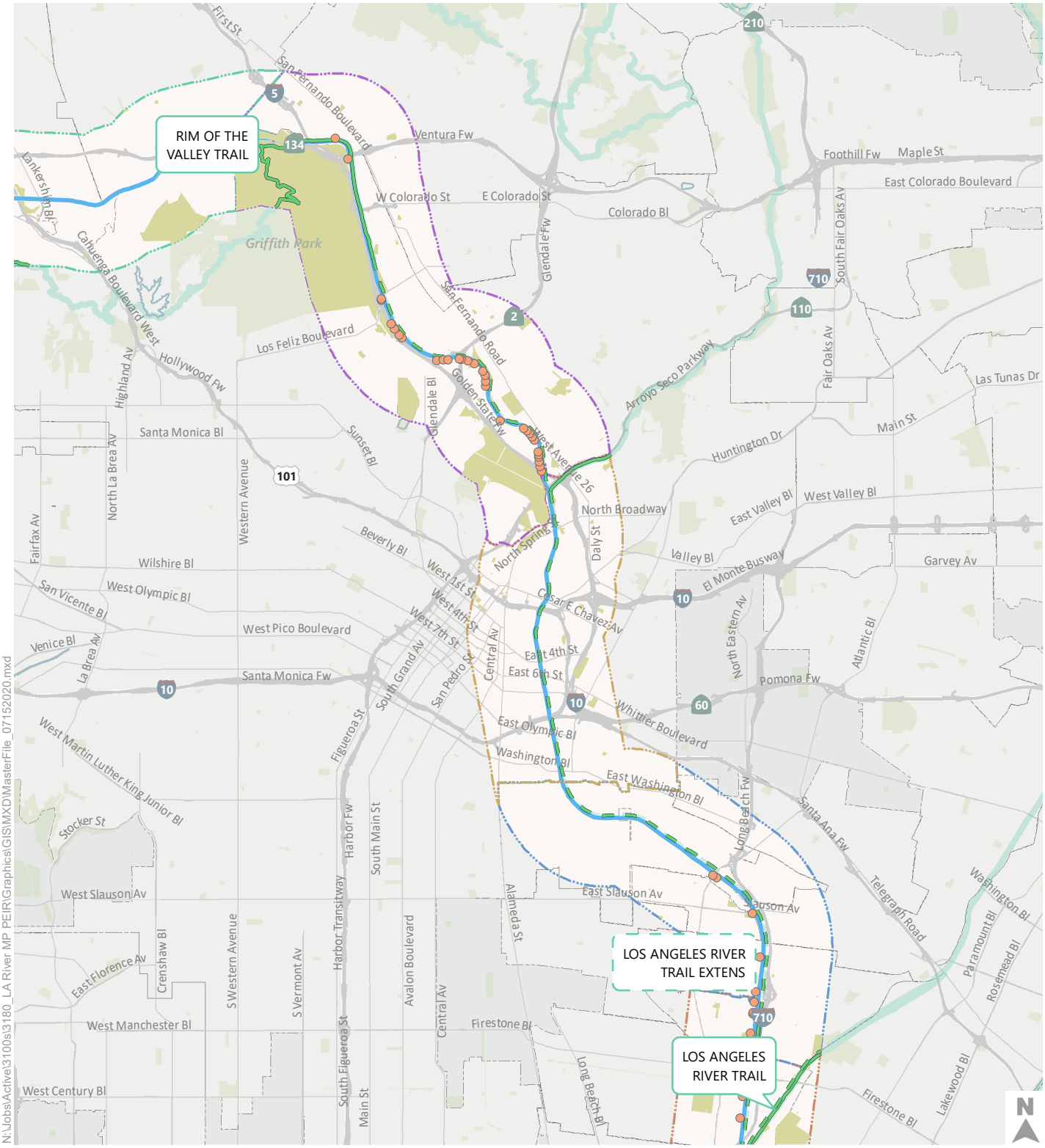


Figure 11

Trails, Parks and Trail Access Locations

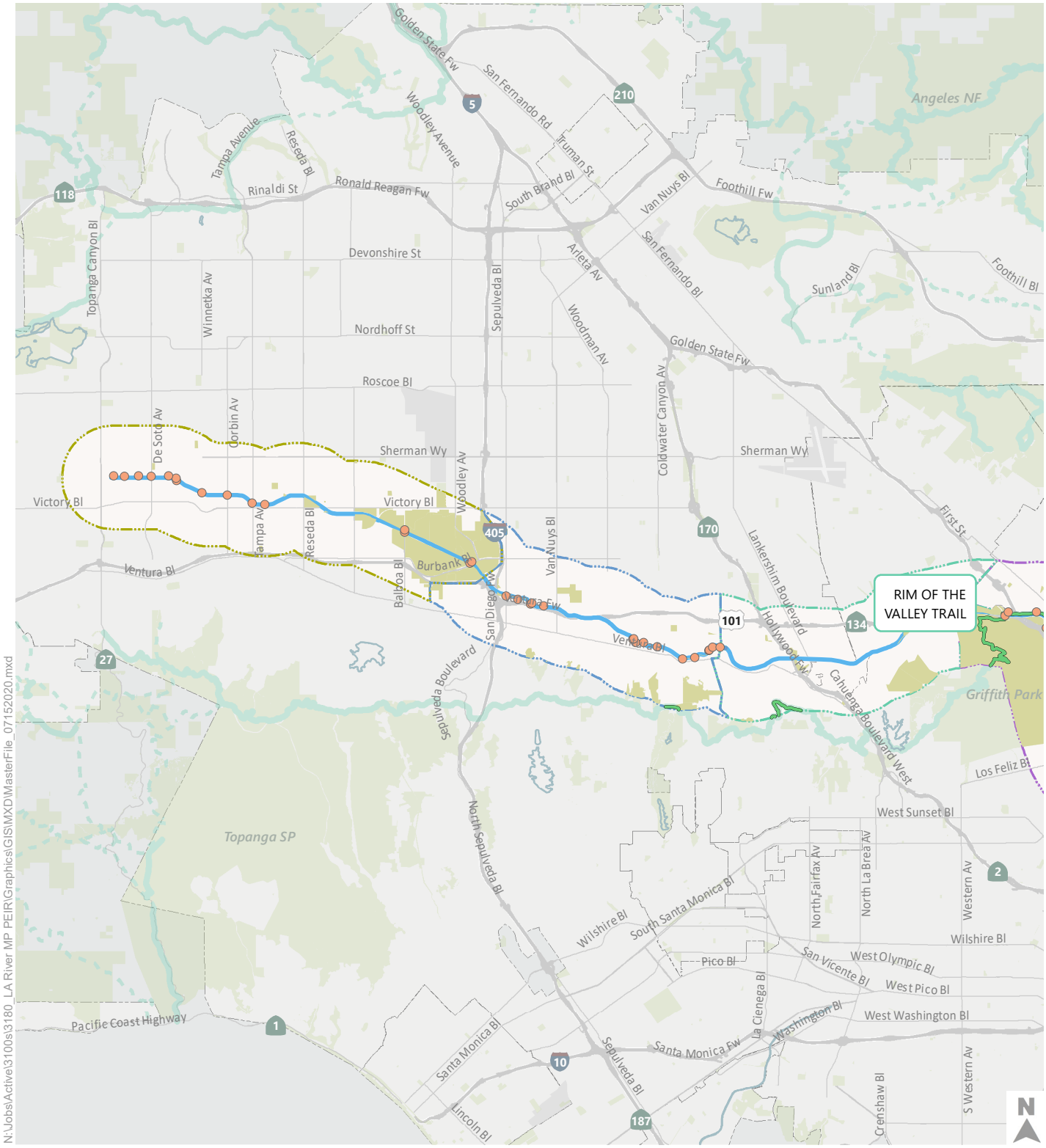


Figure 12

Trails, Parks and Trail Access Locations

TABLE 1
2020 LOS ANGELES RIVER MASTER PLAN
TRANSPORTATION AMENITIES BY FRAME

River Frame		Bicycle Facilities (Miles) Existing / *Proposed*				Trails Length (Miles)		Trail Access	Transit Routes	Parks
ID	Name	Class I	Class II	Class III	Class IV	Existing	Proposed	Points	Counts	% Land Area
1	Estuary	8.2 *1.8*	1.7 *8.5*	8.2 *2.1*	2.2 *0.2*	4.0	0.0	8	40	2%
2	South Plain	6.0 *1.1*	5.6 *15.5*	0.7 *2.7*	0.0 *0.0*	4.4	0.0	5	16	2%
3	Central Plain	8.2 *9.5*	0.7 *23.9*	1.1 *23.2*	0.0 *0.0*	5.6	4.0	15	18	5%
4	North Plain	2.5 *7.7*	0.0 *7.2*	0.0 *5.8*	0.0 *0.0*	0.0	5.5	5	18	1%
5	Heights	0.1 *9.6*	12.8 *19.8*	10.3 *18.9*	0.0 *18.1*	1.1	5.0	2	81	1%
6	Narrows	14.1 *12.3*	17.5 *19.6*	15.8 *22.1*	0.0 *7.1*	5.4	4.5	31	28	37%
7	East Valley	0.3 *7.8*	13.1 *8.5*	1.4 *10.2*	0.0 *6.2*	1.0	0.0	0	18	7%
8	Mid Valley	1.3 *7.1*	13.9 *13.2*	1.0 *15.3*	0.0 *1.8*	0.3	0.0	16	27	5%
9	West Valley	34.3 *7.1*	11.4 *8.6*	1.5 *30.0*	0.0 *10.4*	0.0	0.0	15	31	20%
	Total	**75.1**	**76.7**	**40.0**	**2.2**	**21.7**	**19.0**	**97.0**	**277.0**	**9%**

2.2 Regulatory Setting

2.2.1 State Plans and Policies

2.2.1.1 California Environmental Quality Act

State CEQA Guidelines Section 15064.3(a) establishes increases in VMT as the most appropriate measure of transportation impacts, and states that other considerations may include effects on transit and non-motorized travel. VMT as a metric for impacts is consistent with a broad range of State legislation, regional, and local programs, and plans and policies, and, as such, the State CEQA Guidelines also require consideration of whether a project may conflict either directly or indirectly with plans, policies, programs, or ordinances addressing circulation, particularly related to increases in VMT and associated reductions in GHG generation. The State has set ambitious targets for reductions in GHG generation, which in turn relates to transportation and required reductions in VMT, as transportation is the largest generator of GHGs by sector in the State (41 percent). Thus, legislation, programs, plans, and policies that target GHG generation and climate change relate directly to transportation and the need to reduce VMT.

2.2.1.2 Statewide Transportation Improvement Program

The California Transportation Commission (CTC) administers transportation programming. Transportation programming is the public decision-making process, which sets priorities and funds projects envisioned in long-range transportation plans. It commits expected revenues over a multi-year period to transportation projects. The Statewide Transportation Improvement Program (STIP) is a multi-year Capital Improvement Program of transportation projects on and off the State Highway System, funded with revenues from the State Highway Account and other funding sources. The California Department of Transportation (Caltrans) manages the operation of State Highways, including the freeways passing through Los Angeles County.

2.2.1.3 Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006

The California Global Warming Solutions Act of 2006 recognizes that California is a major contributor to U.S. GHG emissions. AB 32 acknowledges that such emissions cause significant adverse impacts on human health and the environment, and therefore must be identified and mitigated where appropriate. AB 32 also establishes a State goal of reducing GHG emissions to 1990 levels by 2020 – a reduction of approximately 30 percent from projected State emission levels and 15 percent from current State levels, with even more substantial reductions required in the future (ARB 2014). Pursuant to AB 32, the California Air Resources Board (ARB) must adopt regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. As the largest single sector of the economy that generates GHGs, changes in transportation is a focus of these efforts.

2.2.1.4 SB 32/Executive Order B-30-15

This executive order sets in place a new statewide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030. This order acts as an intermediate goal to achieving 80 percent reductions by 2050. California is on track to meet or exceed the target of reducing GHG emissions to 1990 levels by 2020, as established in AB 32. California's new emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the goal established by Executive Order S-3-05 of reducing emissions 80 percent under 1990 levels by 2050. Such reductions will require major changes in the transportation sector.

This intermediate target was codified into law by SB 32, which was signed into law by Governor Jerry Brown on September 8, 2016.

2.2.1.5 SB 375

The adoption of SB 375 on September 30, 2008, created a process whereby local governments and other stakeholders must work together within their region to achieve the GHG reductions specified in AB 32 through integrated development patterns, improved transportation planning, and other transportation measures and policies. Under SB 375, ARB is required to set regional vehicular GHG reduction targets for 2020 and 2035. Additionally, SB 375 required that those targets be incorporated within a Sustainable Communities Strategy (SCS), a newly required element within the Metropolitan Planning Organization's (MPO's) Regional Transportation Plan (RTP). On September 23, 2010, ARB adopted the vehicular GHG emissions reduction targets that require a 7–8 percent reduction by 2020 and a 13–16 percent reduction by 2035 relative to emissions in 2005 for each MPO. The Southern California Association of Governments (SCAG) is the MPO for the Southern California region and is required to work with local jurisdictions, including the City. ARB has determined SCAG's reduction target for per capita vehicular emissions to be 8 percent by 2020 and 13 percent by 2035. Achieving such reductions will require major changes in the transportation sector, travel behavior, and mobility choices.

2.2.1.6 SB 743

To further the State's commitment to the goals of SB 375, AB 32, and AB 1358, Governor Brown signed SB 743 on September 27, 2013. SB 743 adds Chapter 2.7, Modernization of Transportation Analysis for Transit-Oriented Infill Projects, to Division 13 (Section 21099) of the Public Resources Code. Key provisions of SB 743 include eliminating the measurement of vehicle delay, or LOS, as a metric that can be used for measuring traffic impacts. Under SB 743, the focus of transportation analysis shifts from LOS to the reduction of VMT through the creation of multimodal transportation networks and promotion of a mix of land uses to reduce VMT. SB 743 required the OPR to amend the State CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Particularly for areas served by transit (i.e., transit priority areas [TPAs]), those alternative criteria must "promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses" (New Public Resources Code Section 21099[b][1]). Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." OPR also has discretion to develop alternative criteria for areas that are not served by transit, if appropriate.

Pursuant to the mandate in SB 743, OPR adopted the revised State CEQA Guidelines in December 2018, recommending the use of VMT for analyzing transportation impacts under CEQA. In turn, Section 15064.3 was added to the State CEQA Guidelines, which states "generally, vehicle miles traveled is the most appropriate measure of transportation impacts." The revised guidelines require that lead agencies remove automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, as a criterion for determining a significant impact on the environment pursuant to CEQA, except in locations specifically identified in the revised guidelines, if any. In accordance with this requirement, State CEQA Guidelines Section 15064.3(a), adopted in December 2018, states "a project's effect on automobile delay does not constitute a significant environmental impact." The requirements of SB 743 went into full effect as

of July 1, 2020. Los Angeles County has developed Transportation Impact Analysis Guidelines consistent with SB 743, which have been internally approved by Public Works; adoption is expected in 2021.

2.2.1.7 Caltrans Vehicle Miles Traveled-Focused Transportation Impact Study Guide

In May 2020, Caltrans published a VMT-based *Transportation Impact Study Guide* (TISG) consistent with SB 743. The TISG replaces the *Guide for the Preparation of Traffic Impact Studies* (Caltrans 2002). A key change is that CEQA documents will now consider different types of transportation impacts than previously examined. When analyzing the impact of VMT on the State Highway System resulting from local land use projects, the focus will no longer be on traffic at intersections and roadways immediately around project sites. Instead, the focus will be on how projects are likely to influence the overall amount of automobile use. The TISG is intended for use in analyzing land use projects or plans that may impact the State Highway System. It includes screening criteria to identify projects presumed to have a less-than-significant impact on VMT. For projects without a presumption of less-than-significant impact, Caltrans suggests use of OPR's 15 percent below existing city or regional VMT per capita recommended threshold of significance for land use projects and may request mitigation from projects and plans that do not meet those thresholds.

2.2.1.8 Caltrans Interim Land Development and Intergovernmental Review (LDIGR) Safety Review Practitioner's Guide

In July 2020, Caltrans published the *LDIGR Safety Review Practitioner's Guide*. This landmark document establishes project effects on roadway safety as a potential transportation impact area under CEQA. The guidance is interim and does not establish thresholds of significance. It applies to proposed land use projects and plans affecting the State Highway System. Local agencies may also utilize the interim guidance as a model for review of local facilities. District traffic safety staff should use Caltrans' latest *Highway Safety Improvement Program Guidelines* to identify safety impacts based on traffic safety investigations generated by network screening, or initiated by the district, that may be affected by the proposed project or plan, and should assess safety improvements to mitigate potential conflicts or adverse impacts on potential or programmed remedial measures. Instructions on conducting an intergovernmental traffic safety review are provided in the interim guidance.

2.2.2 Regional Plans and Policies

2.2.2.1 *Regional Transportation Plan/Sustainable Communities Strategy*

SCAG is the designated MPO for six Southern California counties (Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial), and is federally mandated to develop plans for regional transportation, land use and growth management, and air quality. The County is one of many local and regional jurisdictions comprising SCAG.

SCAG updates its long-range (i.e., minimum 20 years) RTP/SCS every 4 years, per federal law (23 U.S. Code 134 et seq.) and State law (SB 375). SCAG's 2020–2045 RTP/SCS "Connect SoCal" was adopted in May 2020 for federal transportation conformity purposes and was adopted on September 3, 2020.

The SCS is a required element of the RTP that provides a plan for meeting GHG emissions reduction targets set forth by ARB. It provides growth forecasts that are used in the development of air quality–related land use and transportation control strategies by the South Coast Air Quality Management District (SCAQMD).

ARB has determined SCAG's reduction target for per capita vehicular emissions to be 8 percent by 2020 and 19 percent by 2035 relative to the 2005 baseline. Successfully meeting these targets will require substantial effort to reduce VMT. The 2020–2045 RTP/SCS calls for investing $638 billion over the 25-year term of the plan toward over 4,000 transportation projects, all of which collectively are expected to result in a 5 percent reduction in daily VMT per capita and a more than 25 percent decrease in traffic delay per capita. Investments will focus on maintaining and better managing the existing transportation network, expanding mobility choices, and increasing investment in transit and complete streets.

Of the 10 goals presented in the 2020–2045 RTP/SCS, 5 are applicable to transportation:

- Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.
- Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.
- Goal 4: Increase person and goods movement and travel choices within the transportation system.
- Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.
- Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel.

2.2.2.2 Metro Long Range Transportation Plan (2009) and Congestion Management Program

Metro's 2009 Long Range Transportation Plan (LRTP) provides a 30-year vision for Los Angeles County's transportation system to the year 2040. The LRTP identifies public transportation and highway projects, funding forecasts over a 30-year timeframe, multi-modal funding availability, sub-regional needs, and project performance measures. The Los Angeles County Congestion Management Program (CMP) is State-mandated and serves as the monitoring and analytical basis for transportation funding decisions made through the Federal Transportation Improvement Plan (FTIP) and Statewide Transportation Improvement Plan (STIP). The framework for the CMP is linked to the idea that congestion can be mitigated by continuing to add capacity to roadways because the primary metric that drives the program is LOS. Over the last several years, the CMP has become increasingly outdated in relation to the direction of regional, State, and federal transportation planning requirements. In 2018, the Metro Board of Directors acted to initiate the process to opt-out of the State-mandated program. The County is now exempt from the CMP.

2.2.2.3 Metro Our Next LA Long Range Transportation Plan (Draft, 2020)

Metro's 2020 Long Range Transportation Plan, titled Our Next LA, is the first update to the LRTP since 2009, and provides a vision for transportation in Los Angeles County through 2047—Our Next LA was adopted by the Metro Board of Directors on September 24, 2020. The plan aims to address population growth, changing mobility needs and preferences, technological advances, equitable access to opportunity, and adaptation to a changing environment. The plan details construction of an additional 100 miles of fixed-guideway transit, investments in arterial and freeway projects to reduce congestion, and construction of regional-scale bicycle and pedestrian projects to increase active transportation, including the 5.6-mile long Rail to Rail Active Transportation Corridor Segment A and the final two segments of the LA River Trail. Together the 8-mile Central LA gap closure project and the 13-mile San Ferando Valley extension will result in a continuous 52-mile long bicycle path from Long Beach to Warner Center. Other efforts detailed in the plan include traffic

management practices for congested roadways (e.g., ExpressLanes toll lanes), maintaining and upgrading the existing transportation system for all modes, and partnering with local, State, and federal agencies, and the private sector. Our Next LA includes transit and highway improvements funded by Measure M, as well as expansion of off-peak transit service, of the active transportation network, and of programs such as ExpressLanes, partnerships to provide bus only lanes and freight management policies, and bold policy proposals, including free transit, faster bus trips, and subregional congestion pricing.

2.2.2.4 Active Transportation Strategic Plan (2016)

The Active Transportation Strategic Plan (Metro) identifies a countywide active transportation network and provides clarity on the process of implementation. It presents best practice design resources and examples of how to integrate them into projects that improve station access. Its three main components that will help Metro and partners plan and implement improvements to the active transportation network are (1) First last mile station area access improvements, (2) Regional Active Transportation Network and (3) Support Programs, including performance metrics and monitoring.

2.2.2.5 First/Last Mile Strategic Plan (2014)

The First/Last Mile Strategic Plan (Metro and SCAG) presents planning guidelines that outline specific strategies to facilitate access to the Metro system. It introduces the "pathway" concept and shows how it can be used to focus investments and improvements to maximize multi-modal benefits around Metro Rail stations and Rapid Bus stations. The plan includes an extensive "toolbox" of possible components of for improving pathways, including crossing enhancements, signage and wayfinding, safety and comfort elements (such as street furniture, landscaping, shade, and street lighting), and others.

2.2.3 Local Plans and Policies

2.2.3.1 Los Angeles County SB 743

In response to SB 743, Public Works has developed new Transportation Impact Analysis Guidelines that include a comprehensive methodological approach to the assessment of transportation impacts. The County Guidelines are based upon OPR technical guidance, but also reflect local conditions. The updated set of guidelines, methods, and impact criteria for CEQA analyses focus on VMT, roadway and intersection geometric hazards, and policy conflicts. They include guidance on VMT-based thresholds of significance and a process to screen out projects that will not require VMT analysis (due to their size, location, proximity to transit, or other factors). The County Guidelines provide guidance on thresholds for new development projects that should be determined based on a project's land use.

2.2.3.2 Los Angeles County Bicycle Master Plan

In 2012, Los Angeles County updated it's Bicycle Master Plan. It includes a vision for a diverse regional bicycle system of interconnected bicycle corridors, support facilities, and programs to make bicycling more practical and desirable. It focused on expanding the existing network, connecting gaps, addressing constrained areas, providing greater connectivity at both the local and regional level, and encouraging more residents to bicycle more often. The plan proposed 831 miles of new bikeways over 20 years, including more

than 70 miles of Class I bicycle facilities, almost 275 miles of Class II bicycle facilities, almost 465 miles of Class III sharrowed facilities, and more than 20 miles of bicycle boulevards. It also outlines a range of recommendations to increase bicycling, including development of complete streets, improving safety, increasing public awareness, and supporting bicycling.

The County maintains a 16.7-mile portion of the LA River Bike Path extending from the Shoreline Bikeway in Long Beach to Atlantic Boulevard in the City of Vernon. The communities of Rancho Dominguez and East Rancho Dominguez are the only unincorporated communities adjacent to the LA River Bike Path. South of Imperial Highway, the LA River Bike Path runs along the east bank of the river. At Imperial Highway in South Gate, at the confluence of the LA River and Rio Hondo, the path splits into two directions. The LA River Bike Path continues north, although the path switches over to the west bank where it continues along the river until its terminus at Atlantic Boulevard. The path along the east bank becomes Rio Hondo Path north of Imperial Highway and continues northeasterly along the Rio Hondo. Relevant goals, policies, and implementation actions include:

- Goal 1 – Bikeway System – Expanded, improved, and interconnected system of county bikeways and bikeway support facilities to provide a viable transportation alternative for all levels of bicycling abilities, particularly for trips of less than five miles.
    - Policy 1.1 – Construct the bikeways proposed in 2012 County of Los Angeles Bicycle Master Plan over the next 20 years.
        - IA 1.1.1 – Propose and prioritize bikeways that connect to transit stations, commercial centers, schools, libraries, cultural centers, parks, and other important activity centers within each unincorporated area and promote bicycling to these destinations.
        - IA 1.1.2 – Coordinate with adjacent jurisdictions and Metro to implement bicycle facilities that promote connectivity.
    - Policy 1.4 – Support the development of bicycle facilities that encourage new riders.
        - IA 1.4.2 – Provide landscaping along bikeways where appropriate.
        - IA 1.4.4 – Allow the use of and promote new and/or innovative bicycle facility designs and standards on County bicycle facilities.
    - Policy 1.6 – Develop a bicycle parking policy.
        - IA 1.6.1 – Identify where bicycle parking facilities are needed and identify the appropriate type.
- Goal 2 – Safety – Increased safety of roadways for all users.
    - Policy 2.2 – Encourage alternative street standards that improve safety such as lane reconfigurations and traffic calming.

        - IA 2.2.3 – Investigate the use of reflective striping alternatives on Class I bike paths that would address concerns with slippery conditions that generally result from traditional reflective striping.
    - Policy 2.3 – Support traffic enforcement activities that increase bicyclists' safety.
        - Encourage enforcement agencies to conduct traffic enforcement on Class I Bikeways.
    - Policy 2.4 – Evaluate impacts on bicyclists when designing new or reconfiguring streets.
        - IA 2.4.2 – Conduct biennial counts of bicyclists on key bikeways to gauge the effectiveness of the county's bicycle facilities in increasing bicycle activity.
        - IA 2.4.3 – Use alternative Level of Service standards that account for bicycles and pedestrians.
- Goal 4 – Encouragement Programs
    - Policy 4.2 – Encourage non-automobile commuting.
    - Policy 4.3 – Develop maps and wayfinding signage and striping to assist navigating the regional bikeways.

2.2.3.3 Los Angeles County Vision Zero Action Plan

The Vision Zero Action plan, published in 2019, focuses County efforts for the years 2020–2025 to achieve the goal of eliminating traffic-related fatalities and severe injuries on unincorporated County roadways by 2035. The plan includes a vision for the future, objectives, and actions to enhance traffic safety. It is guided by principles of health equity, data driven processes, and transparency. It identifies Collision Concentration Corridors throughout the unincorporated County areas: any half-mile roadway segment on which three or more fatal or severe injury collisions occurred over a 5-year period. Strategies to improve roadway safety and reduce collisions include a wide range of roadway enhancements, such as lighting, curb extensions, and pedestrian signal timing, and a commitment to collaborate on data analysis and develop partnerships across jurisdictions. The plan is structured around five objectives: enhancing County processes and collaboration; addressing health inequities and protecting vulnerable users; collaborating with communities to enhance roadway safety; fostering a culture of traffic safety; and transparency, responsiveness, and accountability.

2.2.3.4 Connect US Action Plan

The Connect US Action Plan (Metro, 2015) is a strategy for encouraging people to walk and bicycle to LA Union Station and 1st/Central Regional Connector Station from the historic/cultural neighborhoods that surround them. The project concepts include esplanades, cycle tracks and bicycle lanes to unify the historic/cultural neighborhoods of El Pueblo, Chinatown, Cornfield Arroyo Seco, Boyle Heights, Arts District, Little Tokyo, and Civic Center. The study area is a one-mile radius around the LRT station at First Street & Central Avenue. Almost all of the mobility projects that are presented in the plan also include infill street trees and measures to collect and infiltrate stormwater into the soil. This plan affects areas that lie within Frame 5 of the LA River Master Plan. The plan's objectives include "improve access to open spaces, including

the Los Angeles River, parks, plazas and public spaces the project area" and "contribute to a more environmentally sustainable Los Angeles."

2.2.3.5 Municipal General Plans, Bicycle Master Plans, and Climate Actions Plans

The 18 jurisdictions (17 cities and unincorporated area) within the study area set transportation policy through the circulation or mobility element of their general plans, and through other policy documents such as bicycle master plans or climate action plans. While it is good practice for these documents to be updated regularly, there is no regulatory timeframe governing their update, and some cities have not revised their general plans or circulation elements since the early 1990s. Additionally, while almost all of the cities identify specific policy goals surrounding transportation along the LA River, not all do, and in most cases, there is little framework in place for interjurisdictional coordination between river cities toward LA River development.

The relevant policies from each city's regulatory documents are provided below.

City of Bell

The City of Bell is located in River Frame 4.

City of Bell 2030 General Plan (2018)

- No river-specific transportation policies

Bicycle Master Plan (2016)

- Goal 3 – Promote community health
    - Create connectivity to community assets (parks, schools, riverbed)

City of Bell Gardens

The City of Bell Gardens is located in River Frame 4.

City of Bell Gardens General Plan 2010 (1995)

- No river-specific transportation policies

City of Burbank

The City of Burbank is located in River Frame 7.

Burbank Bicycle Master Plan (2009)

- Objective B – Identify and implement a network of bikeways that is feasible, fundable, and that serves all bicyclists' needs, especially for travel to employment centers, schools, commercial and retail districts, transit stations, and institutions, while not excluding the needs of recreational cyclists.
    - Objective B Policy Action 8 – Create strong connections between the regional Class I bike paths (Los Angeles River, Chandler, and San Fernando), as well as Metrolink Stations.

Burbank Mobility Element 2035 (2013)

- Goal 2 – Sustainability
    - Policy 2.1 – Improve Burbank's alternative transportation access to local and regional destinations through land use decisions that support multimodal transportation.
    - Policy 2.3 Prioritize investments in transportation projects and programs that support viable alternatives to automobile use.
- Goal 5 – Bicycle and Pedestrian Mobility
    - Policy 5.2 – Implement the Bicycle Master Plan by maintaining and expanding the bicycle network, providing end-of-trip facilities, improving bicycle/transit integration, encouraging bicycle use, and making bicycling safer.
        - LA River bike bridge is a funded project

Burbank 2035 Greenhouse Gas Reduction Plan (2013)

- Measure T-1.4 – Bicycle Infrastructure Expansion
    - The Bicycle Master Plan identifies an additional 12.0 miles of Class I and Class II facilities as top priority projects. Approximately 5.0 miles of these top priority projects have already received funding and are currently in various stages of development, including the South Channel Bikeway, the San Fernando Bikeway, extension of the Verdugo bike lanes, the Keystone Bicycle Boulevard project, and the LA River Bike Bridge project. Future bicycle lane expansion should focus on connecting high-visitation sites (e.g., dense residential areas, commercial and employment centers, transit hubs, parks and recreation areas) with Class I and II facilities to encourage a travel mode shift from cars to bicycles, especially for non-commute trips.

City of Carson

The City of Carson is located in River Frame 2.

Carson General Plan – Transportation and Infrastructure Element (2004)

- Goal TI-4 – Increase the use of alternate forms of transportation generated in, and traveling through, the City of Carson.
    - Policy TI-4.3 – Provide appropriate bicycle access throughout the City by implementing the Bicycle Plan.
        - TI-IM-4.10 – Complete an approve Bicycle Plan (as defined by the MTA) and implement it as availability arises through private development, private grants, public grants (particularly the MTA call for projects) signing of shared routes, and cooperation with other agencies such as the County of Los Angeles for bicycle routes along channels.

        - Master Plan of Bikeways completed in 2013, includes a proposed facility on Del Amo Boulevard which would connect to the LA River.
    - TI-IM-4.13 – Continue coordination of bicycle route planning and implementation with adjacent jurisdictions and regional agencies.

City of Commerce

The City of Commerce is located in River Frame 4.

City of Commerce 2020 General Plan (2008)

- No river-specific transportation policies

City of Compton

The City of Compton is located in River Frames 2 and 3.

Draft Compton General Plan 2030 (2011)

- No river-specific transportation policies

City of Compton Bicycle Master Plan (2015)

- Plan Goals – Improve the health of all Compton residents by making the healthy choice the easy choice.
    - Create a comprehensive system of bikeways that connects key destinations.
- Includes a number of facilities connecting to the LA River, including a new path on the west bank, as well as participation in Metro Bike, with a station along the River.

City of Cudahy

The City of Cudahy is located in River Frame 3.

Cudahy 2040 General Plan – Circulation Element (2017)

- Goal CE-2 Improved mobility and safety through roadway, bicycle, and pedestrian facilities enhancements and increased public transit connectivity.
    - Policy CE-2.1 – Create, adopt, and implement a Bicycle Master plan.
- LA River access – increasing access points and enhancing connections to the River is a priority. Planned connections on Clara, Elizabeth, and Cecilia Streets.
- River Road repurposing – River Road will be closed to vehicular traffic and redesigned as a place for people to engage in active transportation and recreation. The River Road Green will also allow for direct pedestrian and bike connections to the LA River. The River Road Green streetscape elements include landscaping (including shade trees), pedestrian-scale lighting, and wayfinding signs.

Cudahy 2040 General Plan – Open Space and Conservation Element (2017)

- Policy OSCE-2.12 – Consider ways to improve access to the LA River Trail from Cudahy by addressing differences in grade and increasing the number of points of access.

City of Downey

The City of Downey is located in River Frame 3.

Downey Vision 2025 General Plan – Circulation Element (2005)

- Goal 2.2.2.2 – Establish a bikeway master plan to link employment centers, recreational facilities, and bikeways along the Rio Hondo River, the San Gabriel River, UPRR, and those of neighboring communities via a network of bike routes, lanes, and paths.

City of Glendale

The City of Glendale is located in River Frame 6.

City of Glendale General Plan – Circulation Element (1996)

- Goal 2 – Construct the complete bikeway system as identified in the Bikeway Master Plan.

Greener Glendale (2012)

- Urban Nature Objective UN4 – Ensure there is accessible park and recreational open space to serve residents.
    - Urban Nature Strategy UN4-C – Continue to maintain and develop recreational trails.
        - Glendale is committed to using 100% of its LA Riverfront as a recreational amenity. The riverfront will provide nearly a mile of multi-use trail, several small riverfront parks, and an equestrian facility.

Bicycle Transportation Plan (2012)

- Policy 1 – The City will develop a complete bikeway network throughout Glendale
    - Action – Implement planned citywide network of bikeway improvements.
        - Planned bikeways – Class I and Multipurpose – Glendale Narrows Riverwalk
        - Plan to build a bridge over the LA River to connect Glendale to the LA River bicycle path and Griffith Park.
        - Doran Street potential river access

City of Huntington Park

The City of Huntington Park is located in River Frame 4.

City of Huntington Park 2030 General Plan – Mobility Element (2017)

- Mobility & Circulation Element Policy 18 – The City of Huntington Park shall work with adjacent jurisdictions and Metro to develop a network of on-street bike lanes or off-street bike paths.

City of Long Beach

The City of Long Beach is located in River Frames 1 and 2.

Mobility Element of the City's General Plan (2013)

- Strategy No. 1 – Establish a network of complete streets that complements the related street type.
  - MOP Policy 1-9 – Increase mode shift of transit, pedestrians, and bicycles.
- Strategy No. 2 – Reconfigure streets to emphasize their modal priorities.
  - MOP Policy 2-16 – Close gaps in the existing bikeway system.
    - The Mobility Element planned seven bike/ped bridges across the LA River.
- Strategy No. 5 – Reduce the environmental impacts of the transportation system.
  - MOP Policy 5-2 – Reduce VMT and vehicle trips through the use of alternative modes of transportation and TDM.

Bicycle Master Plan 2040 (2017)

- Strategy 1 – Develop a comprehensive bikeway network.
  - 1.1 – Expand, improve, and connect the bikeway network to provide a viable transportation option for all levels of bicycling abilities.
  - 1.4 – Upgrade bridges, intersections, freeway ramps, tunnels, and any other obstacles that impede safe and convenient bicycle passage.

Safe Streets Long Beach, A Vision Zero Action Plan (2020)
This is a plan that strives to eliminate traffic-related fatalities and serious injuries in Long Beach by 2026 through multiple strategies, such as modifying streets to better serve vulnerable road users. The plan uses data analysis, community input, and best practice research to identify programs and policies that can make the streets safer for everyone. The plan was adopted by the City of Long Beach in July 2020 and covers part of the area within Frames 1 and 2. Specifically, the plan includes detailed mapping of a high-injury network in Long Beach, which is composed of streets and intersections where higher numbers of collisions or more severe collisions occur than at others. The study area for the 2020 Los Angeles River Master Plan Within extends one mile on each side of the riverbed. Within that area, the portions of the following streets are identified as corridors on the high-injury network: Santa Fe Avenue, Magnolia Avenue, Pine Avenue, Long Beach Boulevard, Artesia Boulevard, Market Street, Wardlow Road, Willow Street, Pacific Coast Highway, Anaheim Street, 7th Street, 6th Street, and Ocean Avenue.

City of Los Angeles

The City of Los Angeles is located in River Frames 1, 2, 5, 6, 7, 8, and 9.

Mobility Plan 2035 (2016)

- Chapter 1 – Safety First
    - Policy 1.9 – Recreational Trail Safety – Balance user needs on the city's public recreational trails.
- Chapter 2 – World Class Infrastructure
    - Policy 2.3 – Pedestrian Infrastructure – Recognize walking as a component of every trip and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.
    - Policy 2.6 – Bicycle Networks – Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.
    - Policy 2.12 – Walkway and Bikeway Accommodations – Design for pedestrian and bicycle travel when rehabilitating or installing a new bridge, tunnel, or exclusive transit right-of-way.
- Chapter 3 – Access for All Angelenos
    - Policy 3.2 – People with Disabilities – Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.
    - Policy 3.11 – Open Streets – Facilitate regular "open street" events and repurposing of the public right-of-way.
- Chapter 4 – Collaboration, Communication & Informed Choices
    - Policy 4.11 – Cohesive Regional Mobility – Communicate and partner with the Southern California Association of Governments, Metro, and adjacent cities and local transit operators to plan and operate a cohesive regional mobility system.
    - Policy 4.14 – Wayfinding – Provide widespread, user-friendly information about mobility options and local destinations, delivered through a variety of channels and including traditional signage and digital platforms.
- Chapter 5 – Clean Environments & Healthy Communities
    - Policy 5.1 – Sustainable Transportation – Encourage the development of a sustainable transportation system that promotes environmental and public health.
    - Policy 5.2 – Vehicle Miles Traveled – Support ways to reduce vehicle miles traveled per capita.
    - ENG.16 – Los Angeles River – Implement Greenway 2020 (a locally led effort to complete the bicycle path along the entire 32-mile stretch of the Los Angeles River by 2020) and Los Angeles River Greenway Trail to provide a multi-generational trail and provide active transportation options to disadvantaged communities.

County of Los Angeles

Unincorporated County areas are located in River Frames 2, 3, 4, and 7.

Mobility Plan 2035: An Element of the General Plan (2015)

- Goal M2 – Interconnected and safe bicycle- and pedestrian-friendly streets, sidewalks, paths, and trails that promote active transportation and transit use.
    - Policy M2.5 – Ensure a comfortable bicycling environment by implementing the following, whenever appropriate and feasible:
        - Appropriate lighting on all bikeways, including those in rural areas.
    - Policy M2.7 – Require sidewalks, trails, and bikeways to accommodate the existing and projected volume of pedestrian, equestrian, and bicycle activity, consider both the paved width and the unobstructed width available for walking.
    - Policy M2.8 – Connect trails and pedestrian and bicycle paths to schools, public transportation, major employment centers, shopping centers, government buildings, residential neighborhoods, and other destinations.
- Goal M4 – An efficient multimodal transportation system that serves the needs of all residents.
    - Policy M4.1 – Expand transportation options that reduce automobile dependence.
    - Policy M4.10 – Support the linkage of regional and community-level transportation systems, including multimodal networks.
    - Policy M4.12 – Work with adjacent jurisdictions to ensure connectivity and the creation of an integrated regional network.
- Goal M7 – Transportation networks that minimize negative impacts to the environment and communities.
    - Policy M7.1 – Minimize roadway runoff through the use of permeable surface materials, and other low impact designs, wherever feasible.

Community Climate Action Plan (2015)

- LUT-1 – Bicycle Programs and Supporting Facilities – Construct and improve bicycle infrastructure to increase bicycling and bicyclist access to transit and transit stations/hubs. Increase bicycle parking and "end-of-trip" facilities.
- LUT-11 – Sustainable Pavements Program – Reduce energy consumption and waste generation associated with pavement maintenance and rehabilitation.

City of Lynwood

The City of Lynwood is located in River Frame 3.

City of Lynwood General Plan (2003)

- Policy CIRC-2.2 – Lane and Trails Policy – Provide a circulation network that accommodates the safe and efficient movement of cyclists on bike lanes and bike trails.
    - CIRC Implementation Measure 25.0 – Off-street bicycle trails should use open space corridors, flood control, and utility easements where possible. Such trails shall minimize automobile cross traffic within the City.

City of Maywood

The City of Maywood is located in River Frame 4.

City of Maywood General Plan – Mobility Element (1993)

- Policy 4.3 – Support efforts to link the bicycle path system to the LA River Bicycle Trail. Coordinate with organizations such as the Northeast Trees to create regional bicycle path system.
    - Action C-12 – Coordinate with the County and Metro to improve City bicycle route connections to the Los Angeles County bicycle route system. Encourage links to transit stations and the LA River Bicycle Trail.

City of Paramount

The City of Paramount is located in River Frame 3.

Paramount General Plan – Mobility Element (2007)

- Land Use Element Policy 17 – The City of Paramount will develop new open space areas in utility rights-of-way, along the LA River, and as part of future park development.

City of South Gate

The City of South Gate is located in River Frame 3.

Bicycle Transportation Plan (2012)

- Policy 1 – The City will develop a complete bikeway network throughout South Gate.
    - The proposed bikeway network includes several new bicycle and pedestrian bridges over the I-710 and the LA River, and several access improvements to the bicycle path on the LA River.

South Gate General Plan 2035 – Mobility Element (2014)

- Policy ME 1.2 P.1 – The City should improve the street system by adding to the street grid in the north-east part of the City to relieve the Firestone/Atlantic intersection, including providing additional overcrossings of the LA River and the I-710 freeway, and an additional north-south collector street between Atlantic Avenue and the LA river.

- Policy ME 2.1 P.1 – The City should develop and maintain a citywide bicycle network of off-street bike paths, on-street bike lanes, and bike streets.
- Implementation Action ME 1.4 – Area Bounded by I-710, Tweedy Boulevard, Atlantic Avenue, UP Railroad Corridor (east-west): Conduct studies to explore/implement improvements to the currently lacking street grid in this area in order to relieve pressure on the intersection of Firestone Boulevard and Atlantic Avenue.
- Implementation Action ME 1.9 – Independence Avenue/Ardmore Avenue: Extend eastwards as a Collector Street to Atlantic Avenue, then easterly across the LA River and I-710 Freeway (with possible ramp connection) to Garfield Avenue. The cross-section should include bike lanes.
- Implementation Action ME 1.11 – Southern Avenue: Extend east, as an Avenue (four lanes), across the LA River and the I-710 Freeway to connect to Garfield Avenue.
- Action ME 21 – Improve bicycle access to the regional bike paths on the LA River and the Rio Hondo Channel.

South Gate General Plan 2035 – Green City Element (2014)

- GC 2.1 P.1 – New trails should contribute to increased connectivity across the City by reducing pedestrian and cycle travel times, integrating with existing sidewalks, bike lanes, and other bicycle/pedestrian infrastructure, and providing an alternative mode of access to goods services, and other desirable destinations.
- GC 2.1 P.3 – Whenever possible, trails should be multi-use, accommodating both cyclists and pedestrians.
- GC 2.1 P.5 – The City should enhance the existing Class I bicycle facilities that run along the east side of the Rio Hondo Channel and the west side of the LA River, transforming them from underutilized pathways to beautified, connected pedestrian and bicycle thoroughfares with amenities such as benches, tables, and lighting.
- GC 2.1 P.6 – The City will pursue a Class I trail along the LADWP right-of-way that connects the west side of the City to the LA River.
- GC 2.1 P.7 – The City will pursue a Class I trail along the railroad right-of-way between Ardmore and Independence Avenues. This trail should connect the College District with the potential Gateway Transit Village and the LA River.
- GC 2.2 P.1 – The City will plan for the continuation of equestrian facilities along the LA River and Rio Hondo Channel.

City of Vernon

The City of Vernon is located in River Frame 4.

City of Vernon General Plan – Circulation Element (2015)

- Policy CI-1.1 – Continue to improve the street system to meet the minimum standards contained in this Element.

    - Atlantic Boulevard Bridge Widening – The City of Vernon is planning to widen the Atlantic Boulevard Bridge over the LA River. The project plans to widen bridge to six lanes.

- Policy CI-1.12 – Cooperate with the Metropolitan Transportation Authority and other local agencies in their efforts to complete a bicycle path along the levee of the LA River connecting to adjacent jurisdictions.

City of Vernon General Plan – Resources Element (2015)

- Policy R-3.2 – Cooperate with regional efforts to upgrade the appearance and open space value of the LA River Channel.

Bicycle Master Plan (2017)

- Objective 1.B – Eliminate barriers and gaps in the bikeway network.
- Strategy 1.B.1 – Pursue construction of a Class I bicycle path along the LA River between the current path terminus at Atlantic Boulevard and the northern city boundary.
- Strategy 1.B.2 – Identify connections to and from the existing and planned LA River bicycle path.
- Strategy 1.B.3 – Identify opportunities to improve bicycle connectivity across the LA River and I-710.
- Strategy 1.B.4 – Coordinate with neighboring jurisdictions to construct bikeways that provide continuous connections across jurisdictional boundaries.

2.2.3.6 1996 Los Angeles River Revitalization Master Plan

The *1996 Los Angles River Revitalization Master Plan* was adopted by Los Angeles County in 1996. Its overarching goal was to improve the aesthetic, recreational, and environmental condition of the LA River and its tributary, the Tujunga Wash, while still recognizing the primary need for flood management. The plan envisioned a continuous bikeway along both the LA River and the Tujunga Wash. It included strategies to improve conditions for bicyclists using the river path for both transportation and recreational cycling, for example planting a continuous greenway of trees along the river to provide shade and visual relief along the corridor and implementation of zoning requirements and development incentives for properties along the river to potentially increase access to destinations. Plan design guidelines provided a framework for bike path landscaping, access improvements, signage, fencing, and maintenance. Plan projects fell into six groupings:

1. Aesthetic improvements
2. Economic development
3. Environmental enhancements
4. Flood management and water conservation
5. Jurisdiction and public involvement
6. Recreation

Given the primary need for flood management, all projects were to be designed in accordance with USACE and Los Angeles County flood management standards. It was assumed that impacts on the transportation system would be less than significant.

2.2.3.7 Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment

In 2016, the Los Angeles County Department of Parks and Recreation published the *Comprehensive Parks and Recreation Needs Assessment*. The assessment was designed to quantify the need for parks and recreation resources and the potential costs of meeting that need. The assessment identified parks as key urban infrastructure and utilized five metrics to identify overall park need: park condition, park access, park amenities, park land, and park pressure. Park pressure examines the effect on parks of population density by capturing the potential demand if each resident of the County were to use the park closest to them. If population density surrounding a park is high and/or park acreage is low, there is likely to be a park need that would otherwise escape detection using only park land and access metrics. Parks with a small number of acres per 1,000 nearby residents are likely to be more heavily used than parks with a larger number of acres per 1,000 residents. Areas surrounding the LA River's east-west stretch through the San Fernando Valley were identified as being park-rich, whereas almost all the areas surrounding the river's north-south stretch through Downtown Los Angeles and South Los Angeles were identified as having a high or very high park need.

2.2.3.8 Lower Los Angeles River Revitalization Plan

The *Lower Los Angeles River Revitalization Plan* seeks to achieve the LA River's potential value as a place for relaxation, discovery, recreation, tourism, and economic development. It is organized around three overarching themes: interconnectedness of the people, the culture, the river, and the watershed; nontraditional education pathways and place-based learning, engaging a wide audience; and multiple benefit thinking, leveraging education and connectedness. The *Lower Los Angeles River Revitalization Plan* describes opportunities for improving the environment and quality of life along the river. Along with specific project opportunities, the plan includes four project templates designed to enable rapid revitalization, connectivity, and consistency between new projects. It also provides tools to help prevent the displacement of residents and local businesses as revitalization-induced investments occur throughout the corridor. A Community Stabilization Toolkit (the Toolkit) was developed to highlight policies and programs that can be used to protect the existing river-adjacent communities.

3. Chapter 3 – CEQA Analysis

This chapter assess the impacts of the proposed Project in accordance with Appendix G to the State CEQA Guidelines. Transportation impacts would be considered significant if the Project were found to:

1. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
2. Conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b).
    - State CEQA Guidelines Section 15064.3, subdivision (b) includes the criteria for analyzing transportation impacts, as follows:
        - **Land Use Projects.** Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less-than-significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less-than-significant transportation impact.
        - **Transportation Projects.** Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less-than-significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
4. Result in inadequate emergency access.

As described in Chapter 1, *Introduction,* this study includes program-level analysis for the *2020 LA River Master Plan*. The two Typical Projects, the six KOP categories and related design components, and the overall *2020 LA River Master Plan* implementation in its entirety are analyzed qualitatively at a program level.

3.1 Programs, Plans, Ordinances, or Policies Conflict Review

State CEQA Guidelines Section 15064.3(a) establishes increases in VMT as the most appropriate measure of transportation impacts, and states that other considerations may include effects on transit and non-motorized travel. VMT as a metric for impacts is consistent with a broad range of State legislation, regional, and local programs, and plans and policies, and as such, the State CEQA Guidelines also require consideration of whether a project may conflict either directly or indirectly with plans, policies, programs, or ordinances addressing the circulation system, particularly related to increases in VMT and associated reductions in GHG generation, including transit, roadway, bicycle, and pedestrian facilities. The State has set ambitious targets for reductions in GHG generation, which in turn relates to transportation and required

reductions in VMT, as transportation is the largest generator of GHGs by sector in the State (41 percent). Thus, legislation, programs, plans, and policies that target GHG generation and climate change relate directly to transportation and the need to reduce VMT. The *2020 LA River Master Plan*'s objectives to provide 51 continuous miles of equitable, inclusive, and safe multi-use trails, and to enhance opportunities for equitable access to the river corridor directly support State VMT reduction goals. Its consistency with applicable legislation, plans, and policies is discussed below.

3.1.1 Assessment of Consistency with Programs, Plans, Ordinances, and Policies

Los Angeles County published a draft of the *2020 LA River Master Plan*, an update to the *1996 Los Angeles River Revitalization Master Plan*. The *2020 LA River Master Plan* was guided by three co-equal themes of water, people, and environment. It recognizes the need for resilient systems that address the most complex issues facing the Los Angeles region in order to create 51 miles of connected open space that includes clean water, native habitat, parks, recreation, multiuse trails, art, cultural resources, equity, access, mobility, and economic opportunity, while providing flood risk management. The *2020 LA River Master Plan* builds on over two decades of planning and implementation efforts for the LA River, yet offers a unique approach from previous work in that analysis work was conducted for the entire 834-square-mile watershed.

The *2020 LA River Master Plan* would guide all Los Angeles County departments in decision-making for *2020 LA River Master Plan* projects, likely over the next 25 years needed to complete implementation. Other agencies and municipalities are encouraged to adopt the *2020 LA River Master Plan* for their jurisdictions and partner with Los Angeles County in making the *2020 LA River Master Plan* a reality.

The transportation elements of the *2020 LA River Master Plan* are only one component of a much broader project with a focus on flood management, habitat restoration, biological resource preservation, and community engagement. The *2020 LA River Master Plan* Actions that directly relate to transportation include:

1. Action 2.1 Create 51 miles of connected spaces along the river.
2. Action 2.2 Complete the LA River Trail so that there is a continuous route along the entire river and encourage future routes on both sides where feasible.
3. Action 2.2.1 In places where the right of way is too narrow for a river trail, pursue easements on adjacent property to complete the trail or utilize bridges, platforms, or cantilevers.
4. Action 2.2.2 Increase the extent of multi-use trails parallel to the river with separate paths for active transport, pedestrians, and equestrians, especially in areas of high traffic.
5. Action 2.2.3 Provide bicycle parking and encourage bicycle rental facilities and bike share along the river.
6. Action 4.1 Create welcoming access points and gateways to the LA River and LA River Trail to optimize physical access along its length, on both sides.
7. Action 4.1.1. Make the river trail and gateways universally accessible and inclusive.
8. Action 4.1.2 Prioritize access for areas with limited access or areas that need improvements to existing access points.
9. Action 4.1.3 Prioritize access near major destinations, including schools, libraries, parks, transit stops, and job centers.
10. Action 4.1.4 Encourage the development of safe routes to the river.
11. Action 4.1.5 Obtain easements adjacent to the river to create access.

12. Action 4.2 Increase safe transportation routes to the river.
13. Action 4.2.1 Coordinate with Los Angeles County transportation plans, including Vision Zero, the Bicycle Master Plan, Metro plans, municipally adopted transportation plans, and the Step by Step Pedestrian Plan.
14. Action 4.2.2 Provide pedestrian and bicycle connections across the river every half mile.
15. Action 4.2.3 Encourage all new pedestrian or road bridges over the river to provide pedestrian and bicycle access to the river trail.
16. Action 4.2.4 Provide continuous pathways between the river and nearby recreation spaces.
17. Action 4.2.5 Encourage cities to adopt complete streets policies to better connect neighborhoods to the river.
18. Action 4.2.6 Increase the extent of multiuse trails that connect to the river with separate paths for active transport, pedestrians, and equestrians.
19. Action 4.2.7 Coordinate with transportation agencies to enhance public transit to and along the river.
20. Action 4.2.8 Coordinate with transportation planning to encourage transit lines that cross the river to have stops that provide access to the river trail.
21. Action 4.2.9 Promote the use of public transportation to get to and from the river trail.
22. Action 4.2.10 Develop information materials and signage that highlight the river trail as a transportation route to major job centers and destinations.
23. Action 7.5.2 Encourage existing river-adjacent development to orient its "front door" toward the river and public transportation.

These transportation-related actions can be grouped into three high-level categories:

1. The creation of a continuous trail along both riverbanks for the entirety of the LA River's 51 miles.
2. Provision of equitable, inclusive, and safe parks, open spaces, and trails.
3. Enhancement of opportunities for equitable access to the River Corridor.

For more than the last decade, transportation plans and policies at the State level have been focused on reducing GHG emissions in order to meet State climate goals, particularly by reducing VMT. Local plans and policies have focused on building and expanding bicycle and pedestrian networks, improving roadway safety and reducing collisions, expanding access to open spaces, and improving regional and local transit connectivity.

Implementation of the *2020 LA River Master Plan* would create a continuous 51-mile trail, providing a comfortable off-road backbone facility through Los Angeles County, free of conflicts with vehicles, for long-distance commuting via active transportation modes such as bicycles, scooters, and walking or running. New vehicular, bicycle, pedestrian, and equestrian bridges would increase connectivity between neighborhoods on opposite sides of the river and would reduce the distance required to travel in order to make a crossing using the more limited number of existing, mostly vehicularly focused arterial bridges. Access points would be provided every half mile along the path, increasing neighborhood connectivity to the trails and open spaces developed within the River Corridor, creating new neighborhood parks, and reducing or eliminating the need to travel extended distances via private vehicle to reach a neighborhood park for the tens of thousands of people who live adjacent to the LA River. Pedestrians, bicyclists, and other

micromobility mode users and equestrians would find space for travel and recreation along the River Corridor on multi-use trails designed to equally accommodate them.

Implementation of the *2020 LA River Master Plan* would allow for an increased share of trips to be completed via active transportation instead of by private vehicle. Of importance in a county without many long-distance Class I bicycle trails in developed areas, development of the *2020 LA River Master Plan* would allow for cross-county commuting via active transportation. Increasing the active transportation mode share and the ability to replace long-distance vehicle commute trips with an active transportation trip would reduce VMT, consistent with State and regional policy initiatives, including SB 743 and SCAG's RTP. It is also consistent with RTP Goal 6, which seeks to protect the environment and health of SCAG region residents by improving air quality and encouraging active transportation.

Locally, the Los Angeles County Bicycle Master Plan sets forth a vision for a regional bicycle system of interconnected corridors with support facilities to encourage and make bicycling more comfortable. The robust suite of Common Elements – including pavilions and benches for rest and shade, bicycle racks to lock up a bicycle, bathrooms to meet bodily needs, and cafes for refreshment – intended to be placed frequently along the path would support bicycle trips in general, particularly longer-distance ones, and encourage hesitant bicyclists to hit the trail. Implementation of the *2020 LA River Master Plan* particularly addresses Los Angeles County Bicycle Master Plan Policy 1.4, which supports the development of bicycle facilities that encourage new riders, Implementation Action 1.4.2 to provide landscaping along bikeways where appropriate, and Implementation Action 1.4.4 to allow the use of and promote new and/or innovative bicycle facility designs and standards on County bicycle facilities.

Los Angeles County's Vision Zero Action Plan seeks to achieve the goal of eliminating traffic-related fatalities and severe injuries on unincorporated County roadways by 2035. By providing a framework for construction of a 51-mile continuous off-street path for active transportation trips, implementation of the *2020 LA River Master Plan* would provide Los Angeles County residents with a safe corridor for active transportation trips free of risk from injury or death by collision with a motor vehicle.

Implementation of the *2020 LA River Master Plan* would allow the County to realize many of the goals and policies from its *Mobility Plan 2035*. Goals and policies supported by *2020 LA River Master Plan* implementation include Goal M2, Policies M2.5 and M2.7, Goal M4, Policies M4.1, M4.10, M4.12, and Goal M7 and Policy M7.1, all of which relate to active transportation and reducing automobile dependence.

Similarly, implementation of the *2020 LA River Master Plan* is consistent with active transportation-related goals, policies, and actions in the policies of the other 17 jurisdictions through which the river flows, as detailed in Chapter 2, *Existing Setting*. As such, the *2020 LA River Master Plan* would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, impacts would be less than significant.

3.2 CEQA Guidelines Section 15064.3, subdivision (b) Conflict Review (VMT Analysis)

3.2.1 Background

Authorized in September 2013, SB 743 tasked OPR with developing new guidelines for evaluating transportation impacts under CEQA using methods that no longer focus on measuring automobile delay and LOS. SB 743 directed lead agencies to revise transportation assessment guidelines to include a transportation performance metric that promotes the reduction of greenhouse gas emissions, the development of multimodal networks, and access to diverse land uses. OPR's proposed updates to the State CEQA Guidelines in support of these goals establish VMT as the primary metric for evaluating a project's impacts on the environment and transportation system. The California Natural Resources Agency certified and adopted the State CEQA Guidelines in December 2018; they are now in effect. Los Angeles County approved VMT-based guidelines in July 2020 – the County Guidelines.

SB 743 eliminated vehicle delay and LOS as a CEQA significance criterion. According to the legislative intent contained in SB 743, using VMT as the primary metric of transportation impact analysis will "[m]ore appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

3.2.2 VMT Analysis

The potential impacts on VMT associated with implementation of the *2020 LA River Master Plan* are assessed in the context of CEQA Section 15064.3 and CEQA Appendix G, as implemented in the County's Transportation Impact Analysis Guidelines.

As discussed in Chapter 1, *Introduction,* for the purposes of CEQA, greater construction and operations scenario information, along with detailed design concepts, are provided for the Common Elements Typical Project and the Multi-Use Trails and Access Gateways Typical Project. However, for the purposes of the transportation analysis, two critical pieces of detail regarding the Typical Projects are still unknown: specific project location and capacity details for some of the land use elements of the Common Elements Typical Project (for example, the performance space). Without these pieces of information, trip generation estimates and user vehicle trip lengths for the Typical Projects cannot be developed and therefore cannot be evaluated quantitatively. The Typical Projects have been evaluated qualitatively in this analysis instead, as is allowed by CEQA Section 15064.3, subdivision (b)(3). Similarly, the KOP categories and the overall *2020 LA River Master Plan* implementation have been evaluated qualitatively utilizing the same approach developed to analyze the Typical Projects. The qualitative analysis allows for the identification of the *potential* to result in a significant impact, but not for the identification of a significant impact itself, which can only be determined when subsequent projects' site specifics are known and after quantitative analysis has been done. Given the wide range of individual design components under the six KOP categories, including land use, transportation, and other infrastructure elements that are neither land use nor transportation elements, such as trail lighting or a check dam, that together form the *2020 LA River Master Plan*, each design component under the six KOP categories was evaluated individually for its *potential* to generate VMT and to result in a significant transportation impact. The two Typical Projects were evaluated for their collective *potential* as

a grouping of a specific set of elements to generate VMT and to result in a significant transportation impact, based on whether any of their individual elements were identified as having that potential.

The following screening checklist from the County Guidelines, developed by the County aligned with the OPR Technical Advisory on Evaluating Transportation Impacts (December 2018) for use in transportation impact analysis, was reviewed to help evaluate whether the *2020 LA River Master Plan* would conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b)(1) by causing substantial increases in vehicle miles traveled.

For development projects:

- **Non-Retail Project Trip Generation:** Would the land use project generate a net increase of 110 or more daily trips?
- **Retail Project Site Plan:** Would the project contain retail uses that exceed a net 50,000 square feet of gross floor area?
- **Location-based:** Would the project be located within one-half mile of a major transit stop or high-quality transit corridor?
    - This screening criteria has not been considered in this VMT impact evaluation. Locations of major transit stops or high-quality transit corridors may change over the 25-year buildout timeframe for the *2020 LA River Master Plan*. When specific locations for subsequent projects have been selected, applicability of this screening criteria should be considered based on adjacency to transit stops and corridors existing at that time. Transit accessibility is recommended as a specific criterion in site selection to ensure maximum accessibility via non-private vehicle modes.
- **Residential Land Use:** Would the project consist of 100% affordable housing?

For transportation projects:

- Would the project conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b)(2)?; AND
- Would the project include the addition of through-traffic lanes on existing or new highways, including general purpose lanes, high-occupancy vehicle lanes, peak period lanes, auxiliary lanes, and lanes through grade-separated interchanges (except managed lanes, transit lanes, and auxiliary lanes of less than one mile in length designed to improve roadway safety)?

Depending on the answer to each of the screening checklist questions above for each individual design component individually and the two Typical Projects, a no impact/less-than-significant impact on VMT determination could be made. For design components under the six KOP categories determined to have no impact or less-than-significant impact on VMT based upon the screening criteria, no further transportation impact analysis, including VMT analysis, is required when they are implemented as individual subsequent projects in the future. For those design components or Typical Projects for which the screening criteria do not automatically identify a no impact or less-than-significant impact on VMT, all that can be known at this time is that that design component or Typical Project has the *potential* to result in a significant VMT impact,

not that it definitively does. Quantitative VMT impact analysis will be required for projects that include those elements in the future when the specific locations of subsequent projects, and their configuration, size, and other project details are developed.

3.2.2.1 Impact Criteria

The County's VMT impact criteria were developed based on guidance from OPR and the California Air Resources Board.

Per the criteria, project VMT impact thresholds as described in the County Guidelines vary depending on the project type, as follows:

- For residential development land use projects, the project would generate residential VMT[1] per capita exceeding 16.8% below the existing[2] residential VMT per capita for the Baseline Area in which the project is located.
- For office land use projects, the project would generate employment VMT[3] per employee exceeding 16.8% below the existing[2] (employment VMT per employee for the Baseline Area in which the project is located.
- For regional serving retail land use projects, entertainment projects, and/or event center land uses, the project would result in a net increase in existing Total VMT.[4] Trips associated with these land uses are typically discretionary trips, which may be either substitute trips to other, closer destinations, or new trips entirely. A project-specific customized approach will be required to estimate VMT for such projects. The methodology should be developed in consultation with and approved by Public Works staff at the outset of the study.
- For unique land uses in which a land use project does not fit into any of the above categories, a project-specific customized approach may be required to estimate daily trips and VMT, but may be based on the existing employment trip element using an approach similar to that for office projects, above. The methodology and thresholds to be used in such cases should be developed in consultation with and approved by Public Works staff at the outset of the study.
- For transportation projects, a VMT impact will be found if the project would increase the project area VMT, as measurable by the SCAG RTP/SCS base year Travel Demand Forecasting model plus an induced travel elasticity factor per lane mile. Transit and active transportation projects and projects that reduce roadway capacity generally also reduce VMT and are therefore presumed to a cause a less-than-significant impact.

The impact criteria are not applicable at a qualitative level of evaluation, but are presented here for informational purposes as they will be applicable for any quantitative transportation impact evaluation required in the future for subsequent projects not screened from VMT analysis, as described above, when

[1] Residential VMT is the VMT generated by Home-Based Work and Home-Based Other trip productions.
[2] As referenced by the VMT reduction goals discussed in the California Air Resources Board, *2017 Scoping Plan-Identified VMT Reductions and Relationship to State Goals*, January 2019, Figure 3.
[3] Employment VMT is the VMT generated by Home-Based Work trip attractions.
[4] As referenced by the VMT reduction goals discussed in the Governor's Office of Planning and Research (OPR), *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018.

subsequent project-specific locations and other relevant information about them is known. Depending on the location of subsequent projects, some project sites will be wholly under County control, while others will be wholly or partly under the control of other local agencies which may choose to utilize their own local transportation impact analysis criteria to evaluate the potential for project impacts.

3.2.2.2 Impact Evaluation

The results of the *2020 LA River Master Plan* VMT impact evaluation are presented in Table 2 for the Typical Projects and Table 3 for the design components under the six KOP categories. As shown, most design components under the six KOP categories that comprise the *2020 LA River Master Plan* are screened from VMT analysis and automatically assumed to result in no impact or a less-than-significant impact. Individual design components under the six KOP categories that are not screened out and which have the potential to result in a significant VMT impact include the following:

- Tier III Pavilions *(Common Element)*
    - Tier III Pavilions are anticipated to accommodate up to 500 visitors per day. Maximum visitation is based on a conservative assumption that each visitor drove to the site alone, which would result in 1,000 daily vehicle trips, exceeding the screening criteria of 110 net daily trips. In reality, many pavilion visitors would arrive to the site via foot or bicycle, and many would be pass-by visitors stopping on their way along the LA River Trail. Once specific sites have been determined, an appropriate mode split can be identified to determine what percentage of visitors would arrive via vehicle, bicycle, foot, or transit. Local transportation characteristics and other databases can be utilized to determine an appropriate average vehicle occupancy to further refine estimates as to the number of daily vehicle trips to the site.
- Art/Performance Spaces *(Common Element)*
    - The scale of performances programmed for the Common Element Art/Performance Spaces is estimated to be small and local. However, maximum daily visitation could reach 500 visitors. Without greater detail as to programming, the potential to result in a VMT impact is unknown at this time.
- Common Elements Typical Project
    - The Common Elements Typical Project is assumed to be inclusive of all 18 Common Elements. Therefore, as two land use elements of the Common Elements Typical Project (pavilions and art/ performance spaces) have the potential to result in a significant VMT impact, the Common Elements Typical Project also has the potential to result in a significant VMT impact. For any future project configuration including one of the above project elements, quantitative VMT analysis will be required once a specific project location has been identified.
- Equestrian Facilities (*Trails and Access Gateways KOP*)
    - Programming and size of facility details will be required to determine the potential for significant VMT impacts. For example, a small equestrian facility to serve neighborhood residents and/or equestrians already on the trail would generate fewer trips than a top regional facility.

Not only would a local-serving facility attract fewer equestrians, but many may walk to a facility within their own neighborhood as opposed to driving to one farther away.

- Terraced Bank (*Channel Modifications KOP*)
    - Terraced banks could serve a variety of flood control or ecological uses, none of which would result in a significant transportation impact. They could also be used to develop amphitheaters for public performances or parks. Site-specific details regarding site programming and acreage will be required to determine the potential for these public serving uses to be eligible for screening or to result in a VMT impact.
- Platform (*Crossings and Platforms KOP*)
    - While crossings typically would provide for transport across the river for pedestrians, bicyclists, and equestrians, platforms are envisioned as wider facilities providing space for parks, recreation, and wildlife habitats. Platforms could host a range of habitat typologies and would allow for wildlife migration. Such habitat-focused uses would not generate VMT beyond incidental maintenance trips, and their impact would automatically be assumed to be less than significant. For the public-serving uses, including parks and recreation spaces, site-specific details regarding site programming and acreage will be required to determine the potential for these uses to be eligible for screening or to result in a VMT impact.
- Side Channel *(Diversions KOP)*
    - Diversions are primarily flood control measures intended to address storm event high water flows, by creating a side channel for additional water flow. During the dry season when water flows are reduced, side channels may also provide the setting for education programs, for example those focused on ecosystem function. Programming and location specifics for the educational uses will need to be provided for screening eligibility or the potential to result in a significant impact to be determined.
- Fields (*Floodplain Reclamation KOP*)
    - Fields may include play fields, farmers markets, or other uses. When more refined programmatic and acreage information is available based on a site-specific project configuration, daily trip generation estimates can be developed to determine the potential for VMT screening or impacts.

TABLE 2
2020 LA RIVER MASTER PLAN VMT IMPACT EVALUATION MATRIX
TYPICAL PROJECTS AND RELATED ELEMENTS

Project Element	Element Location *1 – In LA River Channel 2 – Between Top of Levee and Fenceline 3 – Beyond Fenceline*	Common Element or Kit of Parts Category	Project Type *Transportation / Land Use / Other*	Screened Out?		Potentially VMT Generating?	Potential to Result in a Significant VMT Impact?	Further Transportation Impact Analysis Required?
				Yes/No	Applicable Screening Criteria[1]			Yes/No
Pavilion	2	Common Element	Land Use	No	Not Screened Out	Yes	Yes	Yes
Café	2	Common Element	Land Use	Yes	Land Use	Yes	No	No
Art/Performance Space	2	Common Element	Land Use	No	Not Screened Out	Yes	Yes	Yes
Access Stairs	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Ramps	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishing- Recreation	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Benches	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Hygiene Facilities and Restrooms	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Trash and Recycling	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Drinking Fountains	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Guard Rail	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Emergency Call Box	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Bike Rack	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Environmental Graphics	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Lighting	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Plantings	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Fences and Gates	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Stormwater Best Management Practices	2	Common Element	Other (water management)	Yes	Not Applicable	No	No	No
Common Elements Typical Project (inclusive of all Common Elements)	*2*	*Common Element*		*No*	Not Screened Out	*Yes*	*Yes*	*Yes*
River Gateway	2	Trails and Access Gateways	Transportation	Yes	Transportation	Yes	No	No
Pedestrian Trail	2	Trails and Access Gateways	Transportation	Yes	Transportation	Yes	No	No
Bike Trail	2	Trails and Access Gateways	Transportation	Yes	Transportation	Yes	No	No
Equestrian Trail	2	Trails and Access Gateways	Transportation	Yes	Transportation	Yes	No	No
Multi-Use Trail	2	Trails and Access Gateways	Transportation	Yes	Transportation	Yes	No	No
Multi-Use Trails and Access Gateways Typical Project (inclusive of all Trails and Access Gateways Elements)	*2*	*Trails and Access Gateways*		*Yes*	*Transportation*	*Yes*	*No*	*No*

Notes

1: Screening criteria are as follows:

LU 3.1.2.1 – Generation of 110 or more net daily trips.

LU 3.1.2.2 – Retail uses with gross floor area > 50,000 sf.

LU 3.1.2.3 – Adjacency to transit.

LU 3.1.2.4 – 100% affordable housing.

TRANS 3.2.1 – Conflict with CEQA Guidelines Section 15064.3, subdivision (b)(2)

TRANS 3.2.2 – Addition of through-traffic lanes.

TABLE 3
2020 LA RIVER MASTER PLAN
VMT IMPACT EVALUATION MATRIX
COMMON ELEMENTS AND KIT OF PARTS

Project Element	Element Location *1 – In LA River Channel 2 – Between Top of Levee and Fenceline 3 – Beyond Fenceline*	Common Element or Kit of Parts Category	Project Type *Transportation /Land Use / Other*	Screened Out?		Potentially VMT Generating?	Potential to Result in a Significant VMT Impact?	Further Transportation Impact Analysis Required?
				Yes/No	Applicable Screening Criteria[1]			Yes/No
River Gateway	2	Trails and Access Gateways	Transportation	Yes	Transportation	Yes	No	No
Pedestrian Trail	2	Trails and Access Gateways	Transportation	Yes	Transportation	Yes	No	No
Bike Trail	2	Trails and Access Gateways	Transportation	Yes	Transportation	Yes	No	No
Equestrian Trail	2	Trails and Access Gateways	Transportation	Yes	Transportation	Yes	No	No
Equestrian Facility	2	Trails and Access Gateways	Transportation	No	Not Screened Out	Yes	Yes	Yes
Multi-Use Trail	2	Trails and Access Gateways	Transportation	Yes	Transportation	Yes	No	No
Light Tower/Water Tower	2	Trails and Access Gateways	Other (infrastructure)	Yes	Not Applicable	No	No	No
Lookout	2	Trails and Access Gateways	Transportation	Yes	Transportation	No	No	No
Boardwalk	2	Trails and Access Gateways	Transportation	Yes	Transportation	No	No	No
Channel Access	2	Trails and Access Gateways	Transportation	Yes	Transportation	No	No	No
Vehicular Access[a]	2	Trails and Access Gateways	Transportation	Yes	Transportation	No	No	No
Underpass/Overpass	2	Trails and Access Gateways	Transportation	Yes	Transportation	No	No	No
Vegetated Buffer	2	Trails and Access Gateways	Other (water management)	Yes	Not Applicable	No	No	No
Habitat Corridor	2	Trails and Access Gateways	Other (water management)	Yes	Not Applicable	No	No	No
Terraced Bank	1	Channel Modifications	Other (water management)	No	Not Screened Out	Yes	Yes	Yes
Check Dam	1	Channel Modifications	Other (water management)	Yes	Not Applicable	No	No	No
Levee	1	Channel Modifications	Other (water management)	Yes	Not Applicable	No	No	No
Armored Channel	1	Channel Modifications	Other (water management)	Yes	Not Applicable	No	No	No
Storm Drain Daylighting	1	Channel Modifications Off-Channel Land Assets	Other (water management)	Yes	Not Applicable	No	No	No
Vertical Wall	1	Channel Modifications	Other (water management)	Yes	Not Applicable	No	No	No
Channel Smoothing	1	Channel Modifications	Other (water management)	Yes	Not Applicable	No	No	No
Texturizing or Grooving	1	Channel Modifications	Other (water management)	Yes	Not Applicable	No	No	No
Concrete Bottom	1	Channel Modifications	Other (water management)	Yes	Not Applicable	No	No	No
Soft Bottom/Concrete Removal	1	Channel Modifications	Other (water management)	Yes	Not Applicable	No	No	No
Sediment Removal	1	Channel Modifications	Other (water management)	Yes	Not Applicable	No	No	No
Bridge Pier Modification	1	Channel Modifications	Other (water management)	Yes	Not Applicable	No	No	No
Access Ramp	1	Channel Modifications	Other (water management)	Yes	Not Applicable	No	No	No
Reshape Low Flow	1	Channel Modifications	Other (water management)	Yes	Not Applicable	No	No	No
Deployable Barrier	1	Channel Modifications	Other (water management)	Yes	Not Applicable	No	No	No
Pedestrian Bridge	1	Crossings and Platforms	Transportation	Yes	Transportation	Yes	No	No
Bike Bridge	1	Crossings and Platforms	Transportation	Yes	Transportation	Yes	No	No
Equestrian Bridge	1	Crossings and Platforms	Transportation	Yes	Transportation	Yes	No	No
Multi-Use Bridge	1	Crossings and Platforms	Transportation	Yes	Transportation	Yes	No	No
Cantilever	1	Crossings and Platforms	Transportation	Yes	Transportation	No	No	No
Platform	1	Crossings and Platforms	Other (infrastructure)	No	Not Screened Out	Yes	Yes	Yes

Project Element	Element Location *1 – In LA River Channel* *2 – Between Top of Levee and Fenceline* *3 – Beyond Fenceline*	Common Element or Kit of Parts Category	Project Type *Transportation /Land Use / Other*	Screened Out?		Potentially VMT Generating?	Potential to Result in a Significant VMT Impact?	Further Transportation Impact Analysis Required?
				Yes/No	Applicable Screening Criteria[1]			Yes/No
Diversion Pipe	1	Diversions	Other (water management)	Yes	Not applicable	No	No	No
Side Channel	1	Diversions Floodplain Reclamation	Other (water management)	No	Not Screened Out	Yes	Yes	Yes
Diversion Channel	1	Diversions	Other (water management)	Yes	Not applicable	No	No	No
Pump	1	Diversions	Other (water management)	Yes	Not applicable	No	No	No
Diversion Tunnel	1	Diversions	Other (water management)	Yes	Not applicable	No	No	No
Overflow Weir	1	Diversions	Other (water management)	Yes	Not applicable	No	No	No
Underground Gallery	1	Diversions	Other (water management)	Yes	Not applicable	No	No	No
Wetland (In-Channel)	1	Floodplain Reclamation Off-Channel Land Assets	Other (water management)	Yes	Not applicable	No	No	No
Wetland (Off-Channel)	3	Floodplain Reclamation Off-Channel Land Assets	Other (water management)	Yes	Not applicable	No	No	No
Naturalized Bank	1	Floodplain Reclamation	Other (water management)	Yes	Not applicable	No	No	No
Braided Channel	1	Floodplain Reclamation	Other (water management)	Yes	Not applicable	No	No	No
Field	3	Floodplain Reclamation	Land Use	No	Not Screened Out	Yes	Yes	Yes
Recreation Field	3	Floodplain Reclamation Off-Channel Land Assets	Land Use	No	Not Screened Out	Yes	Yes	Yes
Urban Agriculture/Composting	3	Off-Channel Land Assets	Land Use	No	Not Screened Out	Yes	Yes	Yes
Solar Power	3	Off-Channel Land Assets	Other (infrastructure)	Yes	Not applicable	No	No	No
Natural Treatment System	3	Off-Channel Land Assets	Other (water management)	Yes	Not applicable	No	No	No
Surface Storage	3	Floodplain Reclamation Off-Channel Land Assets	Other (water management)	Yes	Not applicable	No	No	No
Subsurface Storage	3	Off-Channel Land Assets	Other (water management)	Yes	Not applicable	No	No	No
Injection Well	3	Off-Channel Land Assets	Other (water management)	Yes	Not applicable	No	No	No
Water Treatment Facility	3	Off-Channel Land Assets	Other (water management)	Yes	Not applicable	No	No	No
Purple Pipe Connection	3	Off-Channel Land Assets	Other (water management)	Yes	Not applicable	No	No	No
Dry Well	3	Off-Channel Land Assets	Other (water management)	Yes	Not applicable	No	No	No
Spreading Ground	3	Off-Channel Land Assets	Other (water management)	Yes	Not applicable	No	No	No
Affordable Housing	3	Off-Channel Land Assets	Land Use	Yes	Land Use	No	No	No
Art and Culture Facility	3	Off-Channel Land Assets	Land Use	No	Not Screened Out	Yes	Yes	Yes

Notes

[a] Vehicular access is for maintenance vehicles.

1: Screening criteria are as follows:

LU 3.1.2.1 – Generation of 110 or more net daily trips.

LU 3.1.2.2 – Retail uses with gross floor area > 50,000 sf.

LU 3.1.2.3 – Adjacency to transit.

LU 3.1.2.4 – 100% affordable housing.

TRANS 3.2.1 – Conflict with CEQA Guidelines Section 15064.3, subdivision (b)(2)

TRANS 3.2.2 – Addition of through-traffic lanes.

- Recreation Fields (*Floodplain Reclamation KOP, Off-Channel Land Assets KOP*)
    - Programming and size of facility details will be required to determine the potential for significant VMT impacts. For example, recreation fields with four individual soccer fields supporting regional tournaments will have a very different trip generation, mode split, and trip length profile from a neighborhood park with one softball diamond.
- Urban Agriculture/Composting (*Off-Channel Land Assets KOP*)
    - Urban agriculture may include community gardens and compost facilities or plant nurseries. More refined programmatic, size, and location information will be required to determine the potential to result in a VMT impact.
- Art and Culture Facilities (*Off-Channel Land Assets KOP*)
    - Arts and culture facilities could include museums, galleries, libraries, or other public facilities. More refined programmatic and size information will be required to determine the potential to result in a VMT impact.

3.2.2.3 Construction Period Impact Evaluation

Development of subsequent projects under the *2020 LA River Master Plan* may result in short-term increases in VMT. Construction impacts, if they occur, can be discussed on a qualitative basis.

3.2.2.4 Overall 2020 LA River Master Plan Implementation

As described in the *2020 LA River Master Plan*, it is anticipated that approximately 107 projects ranging in size from extra-small (less than 1 acre) to extra-large (150+ acres/10+ miles) would be implemented under the *2020 LA River Master Plan* over the 25-year period to meet the *2020 LA River Master Plan*'s nine objectives. These would include the Typical Projects that would be implemented along the river and subsequent projects composed of the KOP categories' multi-benefit design components. These elements together comprise the entirety of the *2020 LA River Master Plan*.

Tables 2 and 3 identified that the Common Elements Typical Project, including individual Common Elements such as pavilions and art/performance spaces, have the potential to result in a significant impact on VMT, as do some design components under the six KOP categories. Given the expected cadence of Common Elements as well as the overall number of projects that could be developed under the *2020 LA River Master Plan*, the potential exists for the implementation of the entirety of the *2020 LA River Master Plan* to incrementally result in a significant impact on VMT. As noted above, each individual project's potential to result in a significant transportation impact will need to be evaluated by the project proponent when the project's exact location, configuration, and scale are known, and cannot be determined based on the current level of project specificity.

Recent County modeling efforts completed during the County process to develop SB 743 compliant CEQA thresholds and guidelines utilized the SCAG transportation demand forecasting model to identify unique average or baseline per capita and per employee VMT for the north and south areas of the County for residential vehicle trips that start within the County or employment trips that end there, and to forecast

2040 conditions. While the horizon year of the County's modeling efforts for that project are 5 years before the 2045 horizon year for the *2020 LA River Master Plan,* it is likely that the long-term VMT trends identified in that effort would continue in the years between 2040 and 2045. In general, VMT on a per capita basis is projected to go down throughout the SCAG region due to increasing population and job density, infill development, and greater active transportation and transit usage. Within the *2020 LA River Master Plan* study area, areas with residential VMT per capita lower than the baseline established in the County's SB 743 modeling efforts increase to almost a quarter of all land area from 10 percent today. Similarly, areas with employee VMT below County baseline are forecast to increase from 10 percent today to almost 20 percent by 2040. This trend of decreasing VMT in general and specifically within the study area also decreases the likelihood of finding a significant impact on VMT resulting from implementation of the full *2020 LA River Master Plan* as projects are brought forth over time.

Despite the VMT trend, 11 project elements were not screened from requiring VMT analysis and were determined to be potentially VMT generating. These elements include Tier III Pavilions; Art/Performance Spaces; Equestrian Facilities, Terraced Banks, Platforms, Side Channels, Fields; Recreation Fields; Urban Agriculture/Composting; and Art and Culture Facilities. The exact location or extent of the 107 projects that could be proposed is currently unknown, as are the Common Elements Typical Projects, which may include any of the 11 non-screened elements. Further CEQA analysis will continue to be required for any project containing one of these potentially impactful project elements. Therefore, while the likelihood of an impact arising from implementation of the full *2020 LA River Master Plan* decreases over time, its impact on VMT is determined to be potentially significant.

3.2.3 Mitigation Program

As noted in the discussion on impacts above, at the current level of analysis, it cannot be determined that implementation of the *2020 LA River Master Plan* would result in any significant impacts on VMT, only that certain design components under the six KOP categories have the *potential* to result in a VMT impact. The Project Element VMT Evaluation Matrix, presented in Tables 2 and 3, identifies those design components under the six KOP categories which are potentially significant and will require further, quantitative CEQA analysis to determine significance once specific details such as location, capacity, and operations uses are available for subsequent projects. Development of these subsequent projects could result in potentially significant impacts. Therefore, mitigation will be necessary to reduce impacts to less-than-significant levels.

3.2.3.1 Impact Determination

Impacts would be potentially significant for any projects including Pavilions, Art/Performance Spaces, Equestrian Facilities, Terraced Banks, Platforms, Diversions, Fields, Recreation Fields, Urban Agriculture/Composting, and Arts and Culture Facilities.

3.2.3.2 Mitigation Measures

Mitigation Measure TRA-1. Implement TDM Strategies and/or Enhancements to Reduce VMT.

The implementing agency (County or other jurisdictional agency) will implement a subsequent project-specific program focused on transportation demand management (TDM) strategies and neighborhood or

site enhancements to reduce VMT, and any other appropriate strategies to address identified impacts and reduce VMT to the River Corridor.

The program to reduce VMT will be based on the suite of eligible TDM strategies included in the County Guidelines, other measures with substantial evidence, or, if the subsequent project is located in an incorporated city, the program will be based on Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise) Significance after Mitigation (when carried out by County) Significance after Mitigation (when not carried out by County) that city's list of qualifying VMT mitigation strategies. Specific measures can include but are not limited to:

Increasing transit accessibility

- Relocating a project in order to be adjacent to transit
- Pricing any provided parking at river access sites to discourage vehicle trips to the River Corridor
- Providing bicycle parking
- Implementation of neighborhood or site enhancements such as pedestrian network improvements (for example, high-visibility crosswalks, continuous sidewalks, and Americans with Disabilities Act [ADA]-compliant directional curb cuts at intersections), and traffic calming measures such as speed humps or chicanes

.

3.2.3.3 Significance After Required Mitigation

Implementation of a site-specific TDM and/or site/neighborhood enhancement program would reduce VMT impacts. However, given the range in the possible size and programmatic intensity of the potentially significant design components under the six KOP categories, significant VMT impacts may not be fully mitigable. As such, impacts would remain significant and unavoidable.

3.2.4 Geometric Hazards and Emergency Access

This section discusses impacts regarding the potential increase of hazards due to a geometric design feature and/or provision of inadequate emergency access that generally relates to the design of access points and/or roadway modifications to and from *2020 LA River Master Plan* facilities, and may include safety, operational, or capacity impacts.

LA River access points would be placed approximately every half mile. The specific locations of *2020 LA River Master Plan* river access points are unknown at this time, and therefore it is also unknown whether any existing geometric design hazards exist that will need to be remediated, or whether design of specific access points may require modifications to existing roadway geometries. As such, the *2020 LA River Master Plan* would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

All access points will be required to be designed according to criteria of the County applicable at the time of subsequent project development and, where applicable, of the local agency in which they are located. Among the requirements for river access points is that they must be well-lit and provide clear lines of sight. Development of some access points may require site acquisition or easements in order to provide appropriate, safe access including clear lines of sight.

Alteration to existing or design of new service roads providing access for maintenance and emergency vehicles must meet with County approval or the relevant local agency. Service road access from arterial streets must allow for 20-foot setback of vehicular access gates where feasible and must provide a 40-foot centerline turning radius for truck ingress and egress. To ensure safety along the river during both regular use and in periodic flood events, *2020 LA River Master Plan* Design Guidelines require that the entirety of the 51 miles of the LA River maintain emergency access for first responders and emergency personnel and vehicles, including through the provision of minimum 12-foot paved or unpaved service roads along the top of the channel in a limited landscape zone. The limited landscape zone is designed to extend 17 feet from the channel wall and prohibits any structures or obstructions. Plantings in this area are restricted to low-growing species, not to exceed 5 feet in height, to provide clear lines of site and allow for emergency vehicle access, and will be pruned to maintain emergency access. Existing Los Angeles County Flood Control District Maintenance Standards for emergency vehicle ingress and egress apply to both existing trails and future *2020 LA River Master Plan* projects.

Some existing conditions along the river do not provide the level of access required by the *2020 LA River Master Plan*. Requests for variances due to right-of-way constraints shall be reviewed and approved by the appropriate jurisdiction(s).

Mile markers would be placed every half mile along the landside of the trail, facing both directions of travel. Mile markers allow people to easily locate themselves along the river for emergency responders.

Given the access point design standards and emergency vehicle access requirements described above, implementation of the *2020 LA River Master Plan* would not substantially increase hazards or conflicts or result in inadequate emergency access. Furthermore, implementation of the *2020 LA River Master Plan* would remediate or improve existing substandard conditions and would therefore contribute to overall safety improvements along the entire river corridor.

3.2.4.1 Construction Period Impacts on Geometric Design and Emergency Access

Construction of *2020 LA River Master Plan* projects may result in short-term roadway operational effects, for example localized increases in delay and traffic queuing that stems from lane closures. Subsequent project-generated roadway operational adverse effects would not be considered an impact under CEQA but are addressed in the County Guidelines under "Section 4 – Additional Non-CEQA Transportation Analysis."

Construction period operational adverse effects would be addressed through development of a construction TMP or worksite traffic control plan for each subsequent project. All *2020 LA River Master Plan* construction traffic management/control plans would be required to account for impacts on geometric design (for example, reduced sight lines due to temporary obstructions such as construction

equipment parked in the roadway) and emergency access, both along the river (for example, due to closed access ramps) and to adjacent land uses (for example, due to driveways impacted by lane closures).

Appendix C
Resumes

TANVI LAL

Project Manager

Tanvi is a managing director at ICF with almost 15 years of experience in environmental consulting focused on the development and management of environmental documents under the CEQA and NEPA.

With a background in environmental science and public affairs, Tanvi has focused her career on the delivery of environmental documents for multidisciplinary complex projects at the intersection of science, policy, and people, in water, planning, development, restoration, and transportation markets serving diverse local, state, and federal agency clients. She brings experience in the developing CEQA/NEPA strategy, and preparation and review of environmental documents pursuant to CEQA, NEPA, and related laws and authorities to facilitate informed decision-making. Tanvi is currently managing the Program EIR for the 2020 LA River Master Plan for LA County Public Works (LACPW), and serving as the contract manager for delivery of environmental services to the City of Los Angeles Bureau of Engineering (LABOE). She has served on the management and technical teams of EIRs, EISs, MND, EAs for various clients in southern California including LABOE, LACPW, LA Harbor District/Port of Los Angeles, the Port of Long Beach, U.S. Department of Transportation Maritime Administration, Federal Aviation Administration, and Department of Housing and Urban Development. Tanvi has also led and supported QA/QC efforts, technical reviews, and authored chapters of these documents.

Years of Experience

- Professional start date: 08/2006
- ICF start date: 08/2006

Education

- Master of Public Affairs, Environmental Policy, Indiana University, School of Public and Environmental Affairs, 2008
- MS, Environmental Science, Indiana University, School of Public and Environmental Affairs, 2006
- BS, Life Sciences – Biotechnology, St. Xavier's College, Mumbai University, India, 2001

Professional Memberships

- The Association of Women in Water, Energy and Environment

Professional Development

- Water 101, Water Education Foundation, 2019

Project Experience

2020 Los Angeles River Master Plan Program EIR—County of Los Angeles Department of Public Works, Los Angeles, CA.

Project Manager. The proposed Project is located along a 51-mile LA River in Los Angeles County, which encompasses an 843-square-mile watershed. The LA River Master Plan Update process began in 2016 and involves numerous stakeholders including a 40-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 2020 LA River Master Plan intends 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. A Program EIR is being prepared to disclose the environmental impacts of the master Plan; Tanvi is managing the technical team and leading client interface in the analysis of the environmental impacts of the Master Plan. As Project Manager, she is leading the development of environmental compliance strategy and approach for the Master Plan to complete the process in a streamlined and efficient manner. In addition, Tanvi is working closely with the client to develop the stakeholder & public engagement strategy for the Program EIR.

Pier B On-Dock Rail Support Facility Environmental Impact Statement—Port, California.

Project Manager. ICF is currently preparing an EIS for the expansion of the Pier B on-dock rail support facility to allow the Port to maintain its ability to manage container train activity effectively and efficiently within the Port complex by providing additional capacity to permit the arrival/departure and assembly/disassembly of container trains up to 10,000 feet in length. Three railyard layout alternatives are being considered, with differing levels of train handling capacity, as well as modifications to the existing local street system. The project has been subjected to highly technical and complex analysis requirements, with close surveillance expected by the air quality technical agencies and the neighboring community. As project manager, Tanvi is working with the Port and coordinating with the federal lead agency, MARAD, and several cooperating agencies, like the FRA, FHWA, and the U.S. Department of Transportation Build America. The Draft EIS was issued in summer 2020. ICF is currently preparing the Final EIS, General Conformity Determination, and responding to public comments.

Los Angeles River Environmental Support Services— City of Los Angeles, Bureau of Engineering, California.

Project Manager. ICF provided environmental staff services to support the City's environmental documentation workforce for the Los Angeles River program, managed by LARiverWorks in the Mayor's office. Projects include the Los Angeles River Ecosystem Restoration Study, among others. Tanvi worked onsite for almost ten months at the City's offices supporting the finalization of the EIS/EIR for the Los Angeles River Ecosystem Restoration Study Integrated Feasibility Report (IFR). She provided support for the preparation of final CEQA approval documents, including the Mitigation, Monitoring, and Reporting Program, and Statement of Overriding Considerations and Findings, to support the City's CEQA review and approval process for the EIS/EIR and led the preparation of the Readers Guide for the IFR in coordination with multiple City departments. Tanvi also led the document production of the Final EIR/EIS in coordination with City and U.S. Army Corps of Engineers, the federal lead agency on the project. While onsite, Tanvi also provided additional CEQA review and approval support for other LA River projects, including multiple categorical exemptions.

Avenue K Transmission Water Main Project CEQA Update—Los Angeles County Department of Public Works, California.

Project Manager. Tanvi led all project coordination, client communication, technical reviews, and timely submission of project deliverables. ICF prepared an Addendum with technical updates (air quality, cultural resource, GHG emissions) to an IS/MND for the Los Angeles County DPW for the Avenue K Transmission Water Main Phase IV Project. The County Water Works Division submitted a State Revolving Fund Loan application for the project, which required an updated CEQA document – the Addendum and preparation of a memorandum with brief narrative summaries addressing environmental topics identified in the SRF Loan application under CEQA-Plus.

Citywide Sidewalk Repair Program EIR—BOE, Los Angeles, CA.

Task Lead. Tanvi co-led the Alternatives Analysis and Cumulative Impacts analyses for this citywide Program EIR. ICF is preparing the EIR for the Citywide Sidewalk Repair program, involving a 30-year effort per the Safe Sidewalks LA program, including assessment and implementation of sidewalk repairs, street tree retention, removal, and replacement, and policies/ordinances to implement the project.

MARISSA MATHIAS

Deputy Project Manager

Marissa Mathias has over five years of experience in the environmental consulting field, including regulatory compliance, field work, and environmental planning. Marissa has provided project support for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) compliance in the southern California region and has provided environmental analysis for a variety of project types, including mixed-use, redevelopment, infrastructure, and commercial. Marissa's responsibilities include assisting senior project managers with large complex projects, technical writing, interfacing with clients, subconsultants, and agency staff, and proposal writing.

Marissa has served as the Deputy Project Manager for multiple projects including Los Angeles River Master Plan Update EIR, US 101 Improvement Project EIR/EIS, and Olive View Medical Campus Master Plan EIR.

Years of Experience

- Professional start date: 01/2016
- ICF start date: 01/2019

Education

- BA, Environmental Studies, University of California Santa Cruz, 2016

Professional Memberships

- AEP - LA Chapter Board Member
- The Association of Women in Water, Energy and Environment

Project Experience

Los Angeles River Master Plan Update EIR—LACDPW, Los Angeles County, California.

Deputy Project Manager. Marissa serves as the deputy project manager and manages the preparation of a PEIR for the LA River Master Plan Update. The Project was initiated to help update the LA River Master Plan, a comprehensive approach covering all 51 miles of the River. The effort was launched to update the original 1996 master plan, synthesizing more recent ideas for portions of the River and bringing a comprehensive vision to the transformation of the LA River. Marissa served not only as deputy project manager but also was the technical lead for the following sections: Population and Housing, Mineral Resources, and Wildfire.

US 101 Improvement Project EIR/EIS- Caltrans, Ventura County, California.

Deputy Project Manager. The California Department of Transportation, in coordination with the Ventura County Transportation Commission, is proposing capacity and operational improvements along US Highway 101, between State Route 23 and State Route 33, from postmile 4.1 to 30.9. As a subconsultant to WSP, ICF is currently providing environmental analysis of the US 101 Improvement Project. Marissa serves as the deputy project manager and supports the internal environmental documentation. Marissa also authored the Community Impacts Assessment.

Olive View-UCLA Medical Center EIR—LACDPW, Los Angeles County, California.

Deputy Project Manager. Marissa served as the deputy project manager and managed the preparation of an EIR for the Olive View-UCLA Medical Center Campus. The Project includes a Master Plan which is intended to guide development of the campus over a period of 20+ years and the delivery of health care services and health related community programs. Marissa was the technical lead for the Wildfire section.

Star-Kist Facility Project- Port of Los Angeles, Los Angeles, California.

Project Manager. The proposed Project involves demolition of the former Star-Kist cannery facilities on an approximately 14-acre site on Terminal Island at the Port of Los Angeles. Phase 1 would

involve demolition of one building (Plant No. 4) and a small waterside dock. Phase 2 would only occur if funding becomes available and would involve demolition of the northern portion of the East Plant and installation of a concrete pad and canopy structure at the Phase 1 site. Although the ultimate future use of the site is unknown, for purposes of analysis, it is assumed that the site would operate as a chassis repair and maintenance depot with a stop/start function. Marissa serves as the project manager.

Pier B Rail Yard Project-Maritime Administration, Long Beach, California.

Project Manager. The Project would expand the Pier B Rail Yard from 12 tracks to 48 tracks. The expanded Pier B Rail Yard would allow inbound and outbound intermodal trains to be staged and would also provide storage tracks for empty rail cars. Marissa serves as the project manager and was responsible for preparing the land use and environmental justice chapter.

East San Fernando Valley Transit Corridor EIS/EIR — Los Angeles County Metropolitan Transportation Authority, Los Angeles County, California.

Planner. Metro, in cooperation with the cities of Los Angeles and San Fernando and FTA, is proposing to develop a new transit line, the East San Fernando Valley Transit Corridor to improve mobility along the Van Nuys Boulevard Transit Corridor, from the Metro Orange Line on the south to the Sylmar/San Fernando Metrolink station on the north. As a planner, Marissa has supported the final documentation efforts.

San Diego Unified School District Capital Improvement Program -City of San Diego, San Diego, California.

Planner. The proposed project involved the establishment and implementation of the District's Capital Improvement Program to repair, renovate, and revitalize District schools and administrative facilities. The repair, renovation, and revitalization projects associated with the Proposed Program would include a wide range of future construction and operational activities on either existing school sites or administration facilities or on new, currently unidentified sites. Marissa was responsible for preparing the wildfire section.

MAGGIE TOWNSLEY (ICF)

Project Director

Years of Experience

- Professional start date: 08/1988
- ICF start date: 09/1990

Education

- MS, Community and Regional Planning, University of Texas, Austin, 1990
- BS, Geological Sciences, University of Texas, Austin, 1988
- BA, French, University of Texas, Austin, 1988

Professional Memberships

- American Planning Association
- Association of Environmental Planners

Maggie Townsley is a vice president overseeing the preparation of NEPA and CEQA documents for complex water, wastewater treatment, conveyance, and reuse systems. Maggie has managed several NEPA, CEQA, and CEQA-Plus documents for the US EPA, US Army Corps of Engineers, SWRCB, and regional and local sanitation agencies, including the Los Angeles County Sanitation Districts. Maggie has special expertise in integrating NEPA/CEQA/CEQA-Plus requirements with other federal, state, and local regulations. As part of these efforts, she has coordinated extensively with numerous federal and state agencies to develop strategies to secure related environmental permits and approvals for local agency sponsored projects, including wetland dredge and fill permits and stormwater pollution and waste discharge permits under the Clean Water Act, conformity determinations from the U.S. EPA under the Clean Air Act, biological assessments and Section 7 consultations with the U.S. Fish and Wildlife Service and NOAA Fisheries for compliance with the federal Endangered Species Act, historic evaluations under the National Historic Preservation Act, and executive orders for floodplain management, wetlands preservation, and environmental justice. Maggie provides QA/QC so that critical funding and project deadlines are achieved.

Project Experience

Clearwater Program 2050 Master Facilities Plan Program and CEQA-Plus EIR/EIS—County Sanitation Districts of Los Angeles County/U.S. Army Corps of Engineers. Developed overall compliance strategy, agency coordination and QA/QC for program-level and project-specific EIR/EIS for the 428 mgd joint outfall system master plan for the Sanitation Districts of Los Angeles County's proposed Clearwater Program. The goal of the Clearwater Program was to identify the most environmentally sound and cost-effective means of accommodating the wastewater conveyance, wastewater treatment, effluent management, solids processing and biosolids management needs of the Sanitation Districts' Joint Outfall System (JOS) through the year 2050. As part of the Clearwater Program, the Sanitation Districts prepared a new Master Facilities Plan (MFP) addressing wastewater conveyance and treatment, solids processing, biosolids management, and effluent management. A major component of the MFP included a project-level and CEQA-Plus assessment of a new tunnel under the Palos Verdes Peninsula and ocean outfall to discharge treated effluent from the Sanitation Districts' Joint Water Pollution Control Plant (JWPCP) in Carson. The Project was the recipient of the Grand Prize - Planning award from the 2013 Excellence in Environmental Engineering and Science for its highly complex, innovative, and integrated approach to planning resulting in an approved project that avoided the significant environmental impacts that saved time and costs and improved aging infrastructure.

2020 LA River Master Plan Program PEIR—Los Angeles County Public Works, Los Angeles County. Project director over the proposed 2020 LA River Master Plan Program EIR, located along a 51-mile-long, 2-mile-wide corridor of the LA River in Los Angeles County spanning 17 cities and unincorporated Los Angeles County, from its headwaters in Canoga Park (mile 51) within the city of Los Angeles to mile 0 at Long Beach, where the river meets the Pacific Ocean. The plan serves as a blueprint to improve 51 miles of connected open space along the LA River to promote health, equity, access,

mobility, and economic opportunity for the diverse communities of Los Angeles County while still providing flood risk management. The PEIR addresses all the CEQA checklist categories of the proposed improvements and allows for maximizing tiering for later activities so that any of the agencies can streamline project-level environmental reviews, saving costs and time for later design and construction of subsequent projects under the 2020 LA River Master Plan over the 25-year horizon period.

Year 2010 Master Facilities Plan Program/Project/CEQA-Plus EIR, and EIS—County Sanitation Districts of Los Angeles County/U.S. EPA. Managed a program-level, project-level, and CEQA-Plus EIR, and tiered EIS for the 428 mgd joint outfall system master plan for the Sanitation Districts of Los Angeles County's Master Facilities Plan. The project addressed a consent decree agreement between the Sanitation Districts and Heal the Bay to upgrade the outfall effluent to the Pacific Ocean to full secondary level. It also addressed expansion of the Sanitation Districts' six water reclamation plants located throughout Los Angeles County. Major environmental issues addressed San Gabriel River and marine water quality; air quality risk assessments and odors from operations, traffic, air quality and noise construction impacts, air quality impacts from shipping biosolids (via rail and trucking) to landfills and other facilities throughout California, and land use conflicts associated with sanitation district operations and nearby residential and business uses. The program EIR was the recipient of the Outstanding Environmental Analysis Document award from the Association of Environmental Professionals for its innovative approach and readability.

Water Management Plan PEIR—Mojave Water Agency, San Bernardino County. Managed a program EIR for the Mojave Water Agency's 4,900-square-mile regional water management plan in the High Desert in San Bernardino County proving long-term solutions for water demand and supply needs and groundwater management objectives throughout the MWA service area. The EIR analyzed key issues such as the effects of groundwater recharge on riparian habitat and endangered species, and growth inducement. In addition to impact analyses, oversaw scoping meetings and a community involvement program.

Sacramento Sewerage Expansion Master Plan PEIR/EIR—Sacramento County. Managed program and project-level EIR for the Sacramento Regional County Sanitation District's Sewerage Expansion Plan. The Plan was countywide sewerage service program including phasing/tiering of specific near-term interceptor extensions. Issues addressed included hazardous materials, noise, air quality, visual resources, hydrology and water quality, cumulative and growth-related impacts.

Water Program PEIR—El Dorado County Water Agency. Managed preparation of a program EIR for El Dorado County's water supply program. The EIR included a water service supply contract for Central Valley Project water stored in the Folsom reservoir. The report analyzed several alternatives for delivering water—including water rights applications, water entitlements, and storage and conveyance facilities—and analyzed effects on hydrology, water quality, and fisheries on the American River watershed and the lower American River and Delta.

Regional Wastewater Project EIR/EIS—U.S. EPA/USACE/Placer-Nevada Wastewater Authority. Managed EIR/EIS for a multi-agency comprehensive regionalization of waster sewerage service area, prompted by numerous cease-and-desist orders from the RWQCB. Major issues include receiving water impacts, effects on threatened and endangered species; and construction impacts of a 25-mile-long pipeline. As part of this effort, three smaller EA/ISs will be prepared for WWTPs with independent utility and more rapid timelines.

TERRY RIVASPLATA, AICP

CEQA Advisor

Terry Rivasplata prepares and reviews environmental analysis documents under CEQA and NEPA. He participates in land use planning projects, delivers seminars and courses on California's planning and environmental laws, and writes documents that interpret environmental regulations. He is experienced in environmental analysis at the state and local levels and has worked on CEQA documents for projects ranging from elementary schools to California high-speed rail. Also, Terry teaches CEQA classes through University of California Extension and specialized classes for clients.

Terry previously served as deputy director for the Governor's Office of Planning and Research. In this role, he managed the Planning and State Clearinghouse units, providing technical assistance to cities and counties regarding California planning laws, and offered advice on CEQA compliance. He also drafted the 1998 comprehensive update of the State CEQA Guidelines.

Terry is the editor of the Association of Environmental Professionals' (AEP) quarterly "Environmental Assessor" that summarizes current CEQA case law. He serves on the legislative review committees for both AEP and the American Planning Association.

Years of Experience

- Professional start date: 04/1978
- ICF start date: 12/1999

Education

- BS, Environmental Planning and Management, University of California, Davis, 1977

Professional Memberships

- American Planning Association
- Association of Environmental Professionals

Certifications

- American Institute of Certified Planners (AICP), No. 009405

Project Experience

2020 LA River Master Plan Program PEIR —Los Angeles County Public Works, Los Angeles County. CEQA Advisor ICF is preparing a PEIR for the 2020 LA River Master Plan Program EIR, which is located along a 51-mile-long, 2-mile-wide corridor of the LA River in Los Angeles County spanning 17 cities and unincorporated Los Angeles County, from its headwaters in Canoga Park (mile 51) within the city of Los Angeles to mile 0 at Long Beach, where the river meets the Pacific Ocean. The plan serves as a blueprint to improve 51 miles of connected open space along the LA River to promote health, equity, access, mobility, and economic opportunity for the diverse communities of Los Angeles County while still providing flood risk management. The PEIR addresses all the CEQA checklist categories of the proposed improvements and allows for maximizing tiering for later activities so that any of the agencies can streamline project-level environmental reviews, saving costs and time for later design and construction of subsequent projects under the 2020 LA River Master Plan over the 25-year horizon period.

Central El Dorado Hills Specific Plan EIR—County of El Dorado, California.

CEQA Advisor. ICF is preparing an EIR for the Central El Dorado Hills Specific Plan. The project would develop a 341-acre site that previously supported a golf course with 1,000 dwelling units at various densities, 11 acres of civic–limited commercial use, 16 acres of developed parks, and 168 acres of natural open space. The project is surrounded by existing development and has been highly controversial. Key issues have included aesthetics, energy use, greenhouse gas emissions, and transportation. ICF expects to prepare the findings, statement of overriding considerations, and mitigation monitoring program to support approval of the project.

West Sacramento General Plan EIR—City of West Sacramento, California.

Project Manager. ICF prepared the program EIR for the City's comprehensive general plan update and the "climate action plan" minimizing greenhouse gas emissions from future development. This

was the first major update to the general plan since the City's founding. Terry prepared a tailored CEQA checklist for analyzing future projects that are consistent with the General Plan in order to facilitate using the program EIR to streamline CEQA reviews. Key issues analyzed in the EIR included traffic, flood hazard, and greenhouse gas production. We also provided separate land use policy advice memos on infrastructure financing districts, flood hazard regulations, and cultural resources requirements. ICF prepared the findings, statement of overriding considerations, and mitigation monitoring program to support the project.

West Sacramento Liberty Specific Plan EIR—City of West Sacramento, California.

Project Manager. ICF prepared the program EIR for the Liberty Specific Plan, a mixed-use development including single- and multi-family residents, a small commercial center, extensive greenways, and a sports complex in a pedestrian-oriented design. The proposal also included zone changes and a development agreement. The EIR will be used to streamline future approvals, such as subdivision maps, as the site builds out. Key issues analyzed in the EIR included traffic, noise, agricultural conversion, flood risk, and greenhouse gas emissions. Terry prepared the findings and statement of overriding considerations supporting project approval.

Stanislaus County General Plan Update—Stanislaus County, California.

Project Manager. ICF prepared an EIR for the County's general plan update. The update was drafted by County staff, with the intention of bringing the general plan into compliance with new statutory requirements, including flood protection, disadvantaged unincorporated communities, and complete streets. ICF prepared technical memos on the new state requirements for county staff consideration. This included including flood control and SB 375 sustainable communities. Key issues for the EIR included agricultural resources, traffic, and growth. ICF directed a subconsultant in the parallel preparation of the updated County airport land use compatibility plan (ALUCP). The EIR included evaluations of the potential impacts of the ALUCP. ICF prepared the findings, statement of overriding considerations, and mitigation monitoring plan in support of the County's approval.

EIR for Targeted General Plan Amendments and Zoning Ordinance Update EIR—County of El Dorado, California.

Project Manager. ICF has prepared the EIR for a broad set of general plan amendments, including changes in resource conservation policies, agriculture and forestry compatible uses, and increases in housing density. The project included a comprehensive revision of the zoning ordinance simplifying its format and matching zoning designations to general plan map designations. Growth was the key issue and the EIR received substantial numbers of comments. Other issues included traffic, water supply, agricultural lands, population and housing, and growth-inducement. The California Supreme Court rendered its "Newhall Ranch" decision during the draft EIR review period, so ICF revised the greenhouse gas analysis in the draft EIR and recirculated the document. ICF prepared the findings, statement of overriding considerations, and mitigation monitoring plan in support of the County's approval.

SHELLY DAYMAN
Biology

Shelly Dayman has over 19 years of experience as a biologist, including the preparation of National Environmental Policy (NEPA) and California Environmental Quality Act (CEQA) documents. Shelly has been the key author for the biological section of environmental impact reports (EIR) and environmental impact statements (EIS). Shelly has written and evaluated measures for CEQA/NEPA documents, including measures specific to reducing avian mortality associated with large-scale utility and transportation projects.

Shelly has experience developing, managing, and conducting biological resource surveys and impact analysis, including background research, agency coordination, protocol surveys, data collection and analysis, and mitigation planning and implementation. She specializes in developing strategic and technical approaches to project permit compliance and working with regulatory agency processes for energy generation and transmission clients.

Years of Experience

- Professional start date: 05/2001
- ICF start date: 05/2016

Education

- BS, Ecology, University of Calgary, Canada, 1994

Professional Development

- Western Pond Turtle Workshop, Rohnert Park, California, 2015
- Flat-tailed Horned Lizard Biomonitoring Training, El Centro, California, 2011
- Bat Ecology and Field Techniques Workshop, Red Bluff, California, 2011
- Mohave Ground Squirrel Workshop, Ridgecrest, California, 2005
- Desert Tortoise Handling Workshop, Ridgecrest, California, 2004 and 2009
- California Burrowing Owl Symposium, Sacramento, California, 2003

Project Experience

Los Angeles River Master Plan Program EIR— Los Angeles County, California.

Senior Biologist. Shelly is a senior author for the biological section of the Program EIR for the Los Angeles River Master Plan (LARMP) update. The EIR described the existing biological conditions, natural resources, regulations, jurisdictions, policy, planning, and other relevant data relevant to the LARMP update study area. The impacts of the proposed project were then analyzed with CEQA analyses and determinations, with avoidance, minimization, and mitigation measures provided.

Upper Santa Ana River Tributaries Restoration Project and Mitigation Reserve Program EIR—San Bernardino Valley Municipal Water District, Riverside County, California.

Senior Biologist. Shelly assisted as a senior author in the review of the alternatives analysis for the Upper Santa Ana Tributaries Restoration Project and Mitigation Reserve Program EIR. Valley District proposes to construct and maintain four tributary restoration sites as an early effort to implement conservation measures of the Upper Santa Ana River Habitat Conservation Plan. The four restoration sites include Anza Drain/Old Farm Road, Lower Hole Creek, and Hidden Valley Wetlands partially within the City of Riverside. The sites are designed to mitigate impacts on species and jurisdictional aquatic resources. Main restoration efforts would include restoration of existing channels and a floodplain tributary, enhancements to riparian and floodplain habitats, limiting human disturbance, and controlling nonnative invasive species.

California High-Speed Train, Los Angeles to Anaheim Section EIS/EIR—California High-Speed Rail Authority/STV, Los Angeles, Orange and San Bernardino Counties, California.

Senior Biologist. Shelly is the key author for the biological section of the joint EIS/EIR and technical studies for the High Speed Rail (HSR) Project Alternative for the Los Angeles to Anaheim section, Lenwood Component, and the Colton Component. The EIR/EIS defined the biological resources and aquatic resources within the region, analyzed the potential impacts of the No Project Alternative and the HSR Project Alternative, and describes impact avoidance and minimization features and mitigation measures that would avoid, minimize, or reduce these impacts.

Shelly was responsible for the NEPA effects summary section where the impacts of each component was summarized and compared these impacts to the anticipated impacts of the No Project Alternative. She was also responsible for writing the CEQA significance conclusions, where a summary of CEQA determination of significance for all construction and operations impacts for each component was made.

Brighton to Roxford Double Tracking Project—LA Metro, Los Angeles County, California.
Senior Biologist. Writer for the Biological Resources Assessment for compliance with NEPA and CEQA. LA Metro is the lead agency for the Brighton to Roxford Double Tracking project, which includes construction of a second track, improvements to two stations (Hollywood Way and Sylmar/San Fernando), bridges, and all other associated infrastructure.

Oxnard To Leesdale Second Track Project—Rail Pros, Santa Barbara, California.
Senior Biologist. Writer for the Preliminary Environmental Assessment for compliance with CEQA.

Interstate-15 Express Lanes Project Southern Extension (ELPSE) —Caltrans District 8, Riverside County, California.

Senior Biologist/Lead Author. Shelly was the primary author of the natural environmental studies (NES) for the tolled Express Lanes Project Southern Extension (ELPSE) project. She was also responsible for the organization of the technical staff reporting for the NES.

JENNIFER M. PIGGOTT

Public Outreach

Jennifer Piggott is a Principal and leads ICF's Stakeholder Engagement Practice. She specializes in public outreach and engagement, facilitation, and strategic communications. Jennifer has more than 19 years of experience as both a communications consultant as well as an Air Force Public Affairs Officer. She has provided public outreach and facilitation support on more than 31 Environmental Impact Statements (EIS)/Environmental Impact Reports (EIR) on projects focused on water use, land use planning, renewable energy, transportation planning, military operations, and transmission planning. Jennifer has extensive experience across California and across the U.S. in the development of strategic communications and public outreach programs to open dialogue among contentious groups and citizens regarding complex and controversial issues. Jennifer has orchestrated over 500 public meetings and facilitated over 250 meetings, to include more than 50 virtual public meetings since the start of the COVID-19 pandemic to ensure maximum engagement all while educating and informing interested parties.

Years of Experience

- Professional start date: 06/2002
- ICF start date: 03/2008

Education

- MS, Military Operational Art and Science, Maxwell AFB, Alabama, 2016
- DOD, Defense Information School (DINFOS) Public Affairs Officer Qualification Course, Fort Meade, Maryland, 2003
- BA, Speech Communications, Baylor University, Texas, 2002

Professional Memberships

- California Air National Guard (rank of Lieutenant Colonel)
- Public Relations Society of America
- Air Force Association

Project Experience

Camp Lejeune Historic Drinking Water, U.S. Marine Corps (USMC), Washington, D.C. and Camp Lejeune, NC.
Public Outreach, Strategic Communications and Marketing Lead. The USMC was directed by Congress to operate and maintain an outreach program and a database that houses a roster of interested and affected Marines and family members who resided aboard USMC base Camp Lejeune from 1957 to 1987 to help bring awareness to the largest water contamination issue in the U.S. Jennifer lead the development of a comprehensive strategic communication, social media, and public outreach plan to assist the USMC in notifying former residents and workers and supporting research initiatives. Jennifer helped oversee this $5M contract, all communications, including public outreach, traditional and social media monitoring, website development and analysis, graphic design, past and current media research, national and regional marketing and advertising campaigns (to include multiple national digital advertising campaigns reaching more than 1.5M viewers and advertisements in USA Today and the Washington Post), and messaging support for this nationwide project, which reached a monthly stakeholder and public audience of over 250,000 individuals.

Port of Long Beach, Pier B On-Dock Rail Support Facility Project, EIS, U.S. Department of Transportation, Long Beach, CA.
Public Outreach and Facilitation Lead. Jennifer serves as the Public Involvement lead and lead facilitation, assisting the Port of Long Beach on their public outreach. Jennifer facilitated a series of online public meetings during the COVID-19 pandemic in 2020, ensuring despite restrictions on large gatherings, members of the public had an opportunity to engage on the project and provide public comment.

Caltrans District 4 and District 7 Litter Abatement Plan Strategic Development, Los Angeles, CA and the Bay Area, CA.
Facilitation Support. Jennifer provides facilitation support to both Caltrans districts for their internal meetings on the Litter Abatement Plan Strategic Development. Jennifer's groups have focused on target areas for on-system and off-system beautification projects, overall public outreach, public education campaigns, and equity and inclusion surrounding litter issues in LA and the Bay Areas.

LA River Master Plan (LARMP) Programmatic EIR—Los Angeles County Department of Public Works, Alhambra, California.
Public Outreach and Facilitation Lead. Jennifer led the public outreach efforts and facilitation for the environmental review of the LARMP. Activities included developing materials in English and Spanish and coordinating and facilitating online public meetings during the project's Scoping and Draft EIR review phases with more than 300 members of the public and various agencies.

WestConnect (WC) FERC Order 1000 Communications Support—Southwestern United States.
Project Manager, Public Outreach Lead, and Facilitator. Jennifer served as the project manager and public outreach lead on this project comprised of more than 18 utility companies providing transmission of electricity in the western U.S. (to include CAISO and LADWP), working collaboratively to assess stakeholder and market needs and develop cost-effective enhancements to the western wholesale electricity market. The WC Transmission Owners have initiated a stakeholder process to help guide the determination of appropriate filings with FERC to comply with the provisions of FERC Order 1000, which reforms electric transmission planning and cost allocation requirements for public utility transmission providers. ICF provided comprehensive meeting support, note-taking, facilitation, and communications services to WC members and more than 900 stakeholders in support of FERC Order 1000 requirements, supporting WC's goal of developing a well-formulated decision-making process that was transparent and documented, engaged and thoroughly informed stakeholders, and provided an open comment/response process for stakeholder input into the process.

Uinta Basin Railway EIS, Surface Transportation Board, Utah.
Public Outreach and Facilitation Lead. Jennifer serves as the public involvement lead and lead facilitator on this rail project across seven counties in Utah. In July 2019, Jennifer executed six public scoping meetings in six locations in one week to help inform, educate, and engage audiences and interested landowners across Utah. Leading up to the public meetings, Jennifer oversaw all notification efforts, to include a regionalized geo-targeted digital campaign, design and publication of nine newspaper advertisements, distribution of a postcard and community flyer, and development of media materials to help publicize the public scoping meetings and encourage participation and educate and inform stakeholders. In 2020, Jennifer executed a series of online virtual public meetings during COVID-19 restrictions, ensuring maximum participation, engagement, and feedback from interested parties despite a global pandemic.

B-21 Main Operating Base 1 Beddown EIS at Ellsworth AFB, SD or Dyess AFB, TX.
Public Outreach Lead. Jennifer serves as the ICF project manager, public outreach, and facilitation lead as a sub to prime, Leidos on this project working to beddown the next generation bomber aircraft, the B-21 Raider. Jennifer works with Global Strike Command to help communicate the project to the stakeholders of South Dakota and Texas. Jennifer ensured flawless execution of both scoping and public hearings during the 2020 COVID-19 global pandemic, creating an online opportunity for interested parties from SD and TX to fully participate and provide comments and questions on the proposed action.

JESSICA FELDMAN

Cultural Resources

Jessica Feldman is a federally qualified professional (36 CFR 61) in the fields of historic preservation, architectural history, and preservation planning with 20 years of professional experience. She has been extensively involved in the management of and participation in cultural resource investigations in compliance with the National Environmental Policy Act (NEPA), National Historic Preservation Act (NHPA), and other federal, state, and local cultural resource regulations. Jessica has experience in leading Section 106 reviews throughout the United States, providing subject matter expertise for large programmatic EIRs. In addition, she is an expert at research and analysis of architectural resources, with a focus on transportation, engineering and industrial resources.

Years of Experience

- Professional start date: 1996
- ICF start date: 10/2000 – 06/2006 and 05/2011 – Present

Education

- MA, Historic Preservation Planning, City and Regional Planning, Cornell University, 2001
- BA, History (minor in Art History), William Smith College, 1993

Professional Memberships

- National Trust for Historic Preservation
- California Preservation Foundation
- Los Angeles Conservancy

Professional Appointments

- Standing Committee on Historic and Archaeological Preservation in Transportation (AME 60), Transportation Research Board

Project Experience

LA River Master Plan Program PEIR —Los Angeles County Public Works, Los Angeles County.

Senior Architectural Historian. The Project was initiated to help update the LA River Master Plan, a reimaging of this water channel as a multi-use, multi-benefit resource for the 17 cities and unincorporated Los Angeles County along its 51-mile corridor. The effort was launched to update the original 1996 Master Plan, bringing a comprehensive vision to the transformation of the LA River. Jessica prepared the built environment portion of the cultural resources analysis, which was designed to establish a process for future cultural resource identification and analysis at the project level.

Venice Auxiliary Pumping Plant Project IS/MND—City of Los Angeles Bureau of Engineering (LABOE), Venice, California.

Architectural Historian. Jessica identified cultural resources present within the project area and evaluated the potential project-related impacts on those resources. The project area was in the vicinity of the locally listed Venice Canal System (Historic Cultural Monument #270), which is important for its association with developer Abbot Kinney. The project proposes to construct a supplemental pumping facility at the 1950s era Venice Pumping Plant.

Malibu Wastewater Treatment Facility Project—City of Malibu, California.

Architectural Historian. The City of Malibu is developing a centralized wastewater collection and treatment system. The majority of the project would be constructed within street rights-of-way, except for the proposed wastewater treatment plant. Although the City is the project proponent, Section 106 applies, as some funding would be provided as part of the EPA revolving funds. Jessica was responsible for preparing the appropriate reports and coordinating with the State Water Resources Control Board to ensure the documentation met their Section 106 guidelines.

I-605 Corridor Improvement Project—Caltrans District 7, in coordination with Metro, et al, Multiple Cities and Unincorporated Areas in Los Angeles County, California.

Architectural Historian. ICF is supporting the preparation of an EIR/EIS for the I-605 Corridor Improvement Project in Los Angeles, which will facilitate improvements in freeway operations,

safety, mobility, throughput, and travel times through a freeway mainline widening and improvements to interchanges and confluence areas at Interstate 105 (I-105), Interstate 5 (I-5), State Route 60 (SR-60), and Interstate 10 (I-10). Jessica is responsible for preparing evaluations of transmission lines and railroad segments within the project area.

CEQA/NEPA Environmental Services and Support (Contract PS20111)—Metro, Los Angeles County, CA.

Task Order Manager. As Project Lead and Senior Architectural Historian, Jessica is managing the cultural, paleontological and biological monitoring tasks for this extension of the Metro Purple Line from the Wilshire/Western Station to Westwood/UCLA and the Westwood/Veteran's Affairs West Los Angeles Campus stations; as of January 2021, ICF has also begun coordinating noise monitoring at the stations. This 2.56-mile corridor primarily travels under Wilshire Boulevard, which bisects the NRHP-listed West Los Angeles Veteran's Affairs Historic District; the two station locations are in proximity to NRHP-eligible and listed properties as well. Since construction began, the discovery of unknown historic features has involved supporting Metro's coordination with consulting parties and other agencies. In addition to supporting the current monitoring activities, ICF will be providing post-construction services, such as documentation of unanticipated damage and preparation a treatment plan consistent with the Secretary of the Interior's Standards for the Rehabilitation of Historic Properties in coordination with Metro.

Crenshaw/LAX Transit Corridor Project, Supplemental EA—Metropolitan Transit Authority, Los Angeles, California.

Senior Architectural Historian. Jessica served as senior architectural historian/section 106 compliance. Metro prepared a supplemental EA after design modifications and refinements to the original project were proposed. She coordinated the Section 106 effort with Metro staff and ICF archaeologists. The Section 106 documentation evaluated impacts of the proposed design modifications on historic properties, including two railroad bridges and the National-Register eligible May Company Building at the for Crenshaw Shopping Plaza, within the project APE.

Orange Line Bus Enhancement - Pedestrian Connector to North Hollywood Red Line Station—Metropolitan Transit Authority, Los Angeles, California.

Senior Architectural Historian/Section 106 Compliance. Metro proposed to construct an underground pedestrian tunnel between the Orange Line BRT Station and the North Hollywood Red Line subway stations in North Hollywood. The new entrance at the Orange Line BRT terminus is located in close proximity to the Lankershim Transit Center Depot, which is eligible for listing in the National Register. Jessica prepared documentation in compliance with Section 106 guidelines which evaluated potential impacts to historic properties in the vicinity of the project. The final document was a NEPA CE.

Olive View UCLA Medical Center EIR—Los Angeles County Department of Public Works (LACDPW), California.

Architectural Historian. The County is preparing a draft program EIR pursuant to CEQA for the Olive View-UCLA Medical Center Campus Master Plan project. Jessica was responsible for the definition of the study area, field survey, on- and off-site archival research, and determination of eligibility, in support of a Cultural Resources Technical Memorandum. Once known as the Olive View Sanatorium, the original hospital campus was only public institution for the care of tubercular patients in Los Angeles County.

MEGAN JAMESON (ICF)

Regulatory Strategy

Megan Jameson has 16 years of experience in regulatory compliance under Sections 404 and 401 of the Clean Water Act, the Porter-Cologne Water Quality Control Act, and California Fish & Game Code Sections 1600–1616, is the leader of the Southern California Natural Resources Team at ICF and an experienced project director. She has experience conducting field delineations, writing and reviewing regulatory permit applications, jurisdictional delineation reports, and restoration, mitigation and monitoring plans. Megan has managed complex permitting and permit compliance projects, restoration and mitigation projects, overseeing required maintenance, surveys, and reporting and ensuring compliance with permit requirements from various regulatory agencies.

Years of Experience

- Professional start date: 08/2005
- ICF start date: 11/2009

Education

- MS, Environmental Studies, California State University, Fullerton, 2007
- BS, Conservation and Natural Resources, University of California, Berkeley, 1999

Certifications

- Wetland Delineator Certification, Wetland Training Institute (WTI), 08/2006
- Plant Identification for Coastal Southern California Certification, WTI, 06/2006

Project Experience

Los Angeles River Master Plan Update—Los Angeles County Department of Public Works, CA. Author for Aquatic Resources. Ms. Jameson prepared the discussions and analysis of the jurisdictional waters and wetlands. Ms. Jameson conducted a desktop review of the potentially jurisdictional waters and wetlands within the project area, analyzed the potential impacts from the range of programmatic project and activities, and addressed comments received on the section.

California High Speed Rail (Palmdale to Burbank Subsection) – High Speed Rail Authority, CA. Task Lead for Regulatory Permitting. Activities included preparation and updates to the biological and aquatic resource technical reports, development of documents supporting the LEDPA determination, draft mitigation planning, qualitative assessment and watershed evaluation reports, and preparation and updates to the jurisdictional determination approach and supporting analysis and documents. This included analyzing the existing project documentation in light of regulatory changes, including but not limited to the issuance and subsequent proposed changes to the Navigable Waters Protection Rule, to propose appropriate updates and revised approaches.

San Diego Freeway I-405 Improvement Project (Measure M Project K)—OCTA, CA. Task Lead for Regulatory Permitting. Activities included obtaining aquatic resource permits in time to meet the projects stringent schedule, additional jurisdictional delineation survey work, impact analyses, permit amendments, modifications and deviations, and permit compliance. She coordinated with the USACE on the first M2 project to be authorized under Department of the Army Permit, which authorizes the specific activities associated with the construction of Measure M2 freeway projects individually with letters of permission. This included development of application content consistent with the NCCP/HCP LOP conditions that had previously been agreed to and the NCCP/HCP Appendix E Streambed Program Guidelines.

Del Puerto Canyon Reservoir Project – Del Puerto Water District, Stanislaus County, CA. Task Lead for Regulatory Permitting. Activities include preparing the permitting and

mitigation strategy for the overall project, preparing and conducting agency pre-application meetings for the project, preparing the jurisdictional delineation report for the Corps and obtaining a Preliminary Jurisdictional Determination from the Corps. She introduced the project and permitting approach to the Corps, the SWRCB, CDFW, USFWS and the Bureau of Reclamation and is conducting ongoing coordination with the Corps. The project consists of a reservoir construction project.

Tehachapi Renewable Transmission Project (TRTP) Restoration Project—SCE, Los Angeles, CA. Task Lead for Monitoring, Reporting, and Permit Compliance. Megan managed development of the restoration monitoring programs, the reporting program, and the permit compliance program, including the development of all draft program and template materials, implementation of all programs, and coordination of all staff contributing to the monitoring, reporting and permit compliance tasks. ICF assisted in SCE's restoration of the TRTP temporary impact areas. The TRTP consisted of constructing a series of transmission system improvements to deliver electricity from new wind energy projects in eastern Kern County to the Los Angeles Basin and is located in Kern, Los Angeles, and San Bernardino Counties.

San Joaquin Cross Valley Line Transmission Project—SCE, Visalia, CA. Project Manager. Activities included conducting jurisdictional delineations and impact analyses, applying for and obtaining the regulatory permits, and overseeing permit compliance for the 23-mile transmission line project that crossed over 30 features. Worked with agencies to facilitate Section 7 and 106 consultations and obtain permits in time for SCE's schedule.

City of Laguna Niguel Programmatic Permitting Project – Laguna Niguel, CA. Project Director. Activities include supporting Project Manager Lanika Cervantes on contractual, administrative and technical tasks to facilitate success of the project. Megan also served as interim Project Manager and worked closely with the USACE, RWQCB and USFWS to provide information requested by the agencies to enable progress on the aquatic resource regulatory permitting.

Old Waterman Canyon Road Bridge Project—City of San Bernardino, San Bernardino, CA. Project Manager. Activities included a jurisdictional delineation, an updated biological assessment, a Primary Constituent Element analysis, biological surveys including bat surveys, least Bell's vireo and southwestern willow flycatcher protocol surveys, fish and amphibian surveys, the installation of bat and bird exclusion netting, Section 7 consultation, mitigation development and implementation, extensions and amendments to the permits to address changes in the project schedule and design, and all post-construction compliance.

On-Call Environmental Consulting Services Contracts—Riverside County Transportation Department (RCTD), Riverside County, California.

Regulatory/Permitting. Most TOs involved federal funding and close coordination with the Caltrans to complete technical studies and environmental documentation to support project clearance in compliance with CEQA and NEPA. In addition, we have prepared numerous specialty technical studies and conducted field surveys for biological and cultural resources; obtained regulatory permits on behalf of RCTD; and supported RCTD and Caltrans with AB52 consultation and Section 106 consultation.

PETER HARDIE, INCE (ICF)

Noise

Years of Experience

- Professional start date: 01/2005
- ICF start date: 01/2005

Education

- MESM, Environmental Science and Management, University of California, Santa Barbara, 2004
- BA, Environmental Science, Rollins College, 1999

Peter Hardie will serve as a key technical expert for task orders that involve noise and vibration. Peter has more than 16 years of experience in acoustical analysis for an array of transportation projects including, highway widening, tolled express lane improvements, and other highway improvements, highway interchange improvements, commuter and heavy rail analysis, and bikeway projects throughout southern California. He has conducted and participated more than 400 noise and vibration analyses for numerous transportation projects, as well as commercial, industrial, and residential development projects throughout California. Peter is also experienced in modeling existing and future conditions to determine potential project-related noise impacts using the FHWA Traffic Noise Model (TNM®) as well as SoundPLAN. He conducts railroad noise modeling using the methods developed for the FTA and FRA. Peter is also experienced in environmental planning, environmental analysis, and impact assessments for transportation and development projects subject to CEQA.

Project Experience

Los Angeles River Master Plan—Los Angeles County Department of Public Works, Los Angeles, California.

Lead Noise Analyst and Author. Peter prepared the noise analysis and section of the environmental document for the County's Master Plan for the Los Angeles River. The noise analyses included conducting field measurements along the 51-mile stretch of the river within the 17 different jurisdictions along the alignment. The analysis also included analyzing construction impacts of different sized projects which could be developed as part of the Master Plan. The effects of construction and operational noise associated with the proposed Master Plan were analyzed in the noise section of the EIR.

Orange County Feeder Relining Project — Metropolitan Water District of Southern California, Los Angeles, California.

Lead Noise Analyst and Author. Peter prepared the noise analysis and section of the environmental document for the District's 22-mile feeder line throughout Orange County. The noise analyses included conducting field measurements along the project alignment. The analysis also included analyzing construction impacts from the relining of the pipelines and various other improvements. The effects of construction noise associated with the proposed improvements were analyzed in the noise section of the IS/MND.

Pre-Stressed Concrete Cylinder Pipe Rehabilitation Program — Metropolitan Water District of Southern California, Los Angeles, California.

Lead Noise Analyst and Author. Peter prepared the noise analysis and section of the environmental document for the District's PCCP rehabilitation of portions of five buried water distribution pipelines within its service area. The noise analyses included conducting field measurements along the project alignment. The analysis also included analyzing construction impacts from the relining of the pipelines and various other improvements. The effects of construction noise associated with the proposed improvements were analyzed in the noise section of the EIR.

District 29 Priority Capital Deficiencies Improvements — County of Los Angeles Department of Public Works, Los Angeles, California.

Senior QA/QC Reviewer. Peter reviewed and provided technical oversight on the proposed infrastructure improvements withing Waterworks District 29. The improvements involved demolition of water tanks and replacement of underground water pipeline. The technical oversight involved identifying locations to conduct field measurements along the project alignment and review of the technical analysis, included they analysis of construction impacts from the proposed improvements. The effects of construction and operational noise associated with the proposed improvements were analyzed in the noise section of the EIR.

City Dock #1 Marine Research Center Project—Port of Los Angeles, California.

Noise Analyst and Author. Peter conducted noise analyses as part of ICF's on-call environmental consulting contract with the Port of Los Angeles. Noise analyses included measuring ambient noise conditions at sensitive receptors surrounding the proposed project sites and designing noise models using the FHWA's TNM® Version 2.5 to assess changes in future traffic noise levels resulting from proposed geometric changes to the proposed alignment. He also analyzed the effects of future traffic volume increases on existing noise-sensitive land uses and proposed onsite receptors (new recreational park) and analyzed construction and operational noise.

Wilmington Waterfront EIR—Port of Los Angeles, California.

Noise Analyst and Author. Peter conducted noise analyses as part of ICF's on-call environmental consulting contract with the Port of Los Angeles. Noise analyses included noise measurements measuring ambient conditions at sensitive receptors surrounding the proposed project sites and designing noise models using the FHWA's TNM® Version 2.5 to assess changes in future traffic noise levels resulting from proposed geometric changes to the proposed alignment, as well as future traffic volume increases to existing noise-sensitive land uses and proposed on-site receptors (proposed park). Additionally, noise analysis included analysis of construction noise and operational noise (such as noise impacts to park users from existing "peaker" power plants and existing rail traffic). He summarized the results of the noise studies in noise technical reports and related CEQA documents.

KATRINA SUKOLA

Water Quality and Water Resources Specialist

Katrina Sukola has experience in water and sediment quality, metal and nutrient analysis, and contaminant analysis in aquatic environments. She has managed and conducted fieldwork including river and coastal assessments such as the U.S. EPA's National Coastal Assessment, habitat assessments for herring, restoration projects including habitat restoration for red-legged frogs in the Eldorado National Forest, and monitoring programs for marine aquatic invasive species. Katrina has also designed and implemented environmental monitoring programs and coordinated fieldwork including surface and stormwater sampling.

Katrina prepares a variety of environmental documents including Environmental Impact Reports/Statements (EIRs/EISs), Environmental Assessments (EAs), Initial Studies (ISs), Mitigated Negative Declarations (MNDs), and technical reports related to water resources, and experienced in environmental compliance pursuant to the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA). She is thoroughly familiar with water resource issues, water quality regulatory compliance, and experienced with review of permits such as wastewater, stormwater, National Pollutant Discharge Elimination System (NPDES), and municipal separate storm sewer system (MS4) permits, and environmental management plans including ocean management plans and fisheries management policy.

Years of Experience

- Professional start date: 08/2004
- ICF start date: 06/2015

Education

- MSc, Chemistry, University of Manitoba, 2003
- BSc, Environmental Chemistry, University of Waterloo, 2001

Professional Development

- Wetlands Regulation & Mitigation, UC Davis Extension, 2015
- Contaminated Sites Professional Training, GeoEnviroLogic, 2014
- Wetland Restoration, Design & Construction, BC Wildlife Federation/USDA Forest Service, 2010, 2014

Project Experience

Interlake Tunnel and Spillway Modification Project EIR, Monterey County Water Resources Agency, Monterey County, California, 11/2020 – Ongoing

Hydrology and Water Quality Lead Author. The proposed project is composed of a water conveyance tunnel from Nacimiento Reservoir to San Antonio Reservoir (Interlake tunnel) and modifications to the existing spillway at San Antonio Reservoir. The Interlake tunnel consists of an intake structure at Nacimiento Reservoir, the tunnel between Nacimiento Reservoir and San Antonio Reservoir, and an energy dissipation structure at San Antonio Reservoir. The proposed project would improve water supply sustainability, water quality and flood management in the Salinas River Basin. Offsite impacts include the Salinas River Lagoon and Salinas Estuary.

LA River Master Plan Update Program EIR — City of Los Angeles Department of Public Works,—Various, California 2/2020 – Ongoing

Hydrology and Water Quality Lead Author. The LA River Master Plan Update builds on the adopted 1996 Master Plan and other regional planning studies since then, and is intended to improve 51 miles of connected open space along the LA River. The plans objective is to improve health, equity, access, mobility, and economic opportunity for the diverse communities of LA County while still providing flood risk management.

Mile Square Regional Park Master Plan EIR — Orange County Parks —Orange County, California 9/2020 – 4/2021

Hydrology and Water Quality Lead Author. Orange County Parks is proposing improvements outlined in the Mile Square Regional Park (MISQ) Master Plan, which include adding 93 acres of programmed space to the existing Mile Square Golf Course to the existing 186 acres of MISQ park facilities in north Orange County. MISQ contains and is in proximity to critical drainage infrastructure. The project proposed stormwater channel improvements and modifications to reduce discharge flow rates and provide planting habitats.

El Campo, Estrella, High Valley, and Rangeland WSAs, sPower LLC, Los Angeles County California, 7/2020 – November 2020

Water Resources Lead Author. Katrina prepared individual Water Supply Assements (WSAs) for four proposed photovoltaic (PV) projects in the northern portion of unincorporated Los Angeles County. The Estrella Solar Project involves the construction of a ground- mounted utility-scale solar energy facility and optional battery energy storage system. The proposed project would employ PV modules that convert sunlight directly into electrical energy without use of heat transfer fluid or cooling water. The Estrella Solar Project would have a generating capacity of up to 21 megawatts (MW), and up to 28 MW of energy storage capacity. The El Campo would have a generating capacity of 35 MW, and a storage capacity of 28 MW. The High Valley and Rangeland Solar Projects would have generating capacities of up to 61 MW and 36 MW, respectively.

Laguna Niguel Wetlands O&M Project IS/MND — City of Laguna Niguel, California 9/2018 – 8/2018

Hydrology and Water Quality Lead Author. The project involved implementation of the operation and maintenance plan for the project, which proposes a systematic program for flood control maintenance in wetland sites throughout the Aliso Creek Watershed. The reduced wetland functional capacity has resulted in the loss of riparian habitat, erosion and channel incision, poor water quality, and flooding. The project and O&M Plan would implement flood control, maintain the integrity of the restored ecosystems, and manage sites for the long-term sustainability of the Watershed.

East Garden Grove-Wintersburg Channel, Warner to 1,250 Feet Downstream of Goldenwest Sheet Pile Project IS/MND – Orange County, California 11/2017 – 10/2019

Hydrology and Water Quality Author. The project involves facilitating improvements to the C05 facility to correct erosion issues and increase the flood conveyance capacity of the channel. The project proposes improvements to this segment of OCPW's C05 facility to increase the flood conveyance capacity of the channel and to address liquefaction issues and erosion issues, and to remediate reported sand-boils issues.

SF Giants Mission Rock Seawall Lot 337 Pier 48 EIR—Seawall Los 37 Associates LLC, San Francisco, California, 09/2015 – 06/2017

Hydrology and Water Quality Lead Author. Katrina authored the Hydrology and Water Quality section for the SF Giants Mission Rock Seawall Lot 337 Pier 48 Project EIR documents. The 27-acre mixed use project involves development of residential, commercial, light industrial, active/retail, and open space as well as the rehabilitation and reuse of Pier 48. The project is located adjacent to marginal wharf, China Basin Park and Terry A. Francois Boulevard in the City of San Francisco.

ELLIOTT WEZEREK

Air Quality & Climate Change Specialist

Elliott Wezerek works at ICF as an air quality and climate change specialist. He assists with air quality and greenhouse gas emissions inventory and mitigation development, environmental impact analysis and report preparation, climate action planning, health risk assessments for air quality, and climate change projects for municipal governments in California. Corresponding responsibilities include collecting and analysing qualitative and quantitative data, preparing and reviewing reports, modelling air quality, and researching and interpreting major climate change legislation and policy.

Years of Experience

- Professional start date: 06/2017
- ICF start date:06/2017

Education

- BS (summa cum laude), Environmental Studies (minor in Social Entrepreneurship), University of Southern California, 2017

Professional Memberships

- Association of Environmental Professionals
- Air & Waste Management Association

Professional Development

- CEQA Essentials Workshop, 11/2017
- CEQA Advanced Workshop, 02/2018
- Lakes Environmental AERMOD Course, 09/2019

Key Skills

Air Quality and GHG Modeling. Elliott is adept with air quality and climate change models, including CalEEMod, EMFAC, CT-EMFAC, MOVES, RCEM, and AERMOD.

Selected Project Experience

Los Angeles River Master Plan Update EIR—LACDPW, Los Angeles County, California.

Air Quality and Climate Change Specialist. ICF is preparing the programmatic environmental impact report (EIR) for implementation of the LA River Master Plan, which will serve as a guidance document for reimagining the Los Angeles River as a multi-benefit resource for the communities of LA County while continuing to ensure flood protection. Elliott prepared the air quality and GHG sections of the EIR.

City of Antioch Habitat Conservation Plan (HCP)—City of Antioch, East Contra Costa County, California.

Air Quality and Climate Change Specialist. ICF prepared the EIR for implementation of the City of Antioch HCP, which includes covered activities or urban development and conservation, management, and restoration. Elliott evaluated the short-term and long-term effects of the project on air quality and climate change. He calculated the emissions from the construction of restoration projects and recreation and management facilities.

Santa Clara Valley Habitat Plan (Habitat Plan) Nitrogen Deposition Fee Assessment Pursuant to California Senate Bill 743 – Santa Clara Valley Habitat Agency (Habitat Agency), Santa Clara County.

Technical Analyst. ICF is helping the Habitat Agency evaluate the feasibility of updating the structure of the nitrogen deposition fee collected under the Habitat Plan to be from cost per new vehicle trip to instead be unitized as cost per vehicle miles travelled. Elliott scoped the analysis,

conducted the literature review, prepared a recommendations memorandum, and is currently coordinating with the Habitat Agency on how to best implement these recommendations.

Updates to the Quantifying Greenhouse Gas Mitigation Measures and California Emissions Estimator Model – Sacramento Metropolitan Air Quality Management District, California.

Technical Analyst. ICF is incorporating climate adaptation and environmental justice into the California Air Pollution Control Officers Association (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* handbook as well as expanding the GHG reduction measures to reflect the latest methodologies and best practices. Elliott led the process to identify approximately 120 emissions reduction measures and is currently leading the preparation of the quantification methodologies for 80 of these measures.

Concurrently, ICF will transform the California Emissions Estimator Model (CalEEMod) into a web-based platform that will integrate the updated Handbook and mainstream climate adaptation and public health planning into project-level. Elliott participated in the Lightning Workshop and Design Sprint for the CalEEMod transformation. He is the lead technical analyst for the revisions to CalEEMod's methodology for quantifying emissions and reporting the model outputs.

Port of Long Beach On-Dock Rail Support Facility Project— U.S. Maritime Administration (MARAD), Los Angeles County, California.

Air Quality and Climate Change Specialist. ICF prepared the EIS on behalf of MARAD for a range of activities proposed at the Port of Long Beach. The proposed facility would shift more cargo to on-dock rail, which would place containers directly on trains at the marine terminal. The project is designed to address current traffic and cargo distribution bottlenecks into, out of and within the port. Elliott prepared, among other things, the Climate Change section of the draft environmental impact statement and a technical appendix explaining the methodology for calculating GHG emissions.

Upper Santa Ana River HCP Restoration Plan—San Bernardino Valley Municipal Water District, Riverside County, California.

Air Quality and Climate Change Specialist. ICF prepared the EIR for the construction and operation of four tributary restoration sites along the Santa Ana River in the cities of Riverside and Jurupa Valley. Elliott evaluated the short-term and long-term effects of the project on air quality and climate change. He calculated the emissions from the construction of restoration projects and the operation of maintenance projects.

FEHR PEERS

Netai Basu, AICP CTP

Project Manager

EDUCATION

Master of Urban and Regional Planning
San José State University, 1994

Bachelor of Arts in History
Oberlin College, 1985

REGISTRATIONS

American Institute of Certified Planners (013655)
American Institute of Certified Planners Certified Transportation Planner (CTP)

AFFILIATIONS

American Planning Association (APA)
Association of Environmental Professionals (AEP)

EXPERTISE

- Transportation Impact Analysis
- Construction Impact Analysis
- Campus/Institution Master Planning
- Special Event Planning
- Parking Studies
- Transportation Demand Management
- Land Use and Transportation

ABOUT

Netai has over 25 years of experience in transportation planning including 20 years with Fehr & Peers. He has been involved in a broad range of traffic and parking studies for public and private clients in many parts of Southern California and in Hawaii. He has prepared numerous consulting reports including area-wide circulation studies, general and specific plans, traffic impact studies, and parking studies. Among his specialties is the preparation of construction-period impact analyses for infrastructure projects such as water, wastewater, and electric transmission lines. These types of projects have temporary transportation impacts associated with soil removal/replacement and installation of treatment infrastructure. He holds a Master of Urban and Regional Planning from San José State University and is a member of both the American Planning Association and the American Institute of Certified Planners. Netai's clients have called him "very smart and precise and deliberate" as well as praised his superior service and high-quality reports

PROJECT EXPERIENCE

Puente Hills Landfill Park Master Plan

Fehr & Peers evaluated the potential impacts of a project to redevelop 117 acres of the former Puente Hills Landfill in the City of Industry to create a new regional park. The entire project site occupies approximately 600 acres and would be accessed by way of an existing access road. In all, the proposed project would construct picnic areas, scenic overlooks, running trails, equestrian trails, a dog park, slides, zip lines, climbing stairs, a bicycle skills area, bicycle rentals, restrooms, and a visitor center. Open space within the park would be used for special single-day or multi-day events and performances during daytime hours. This study analyzed the potential for project-generated traffic impacts on the local street system against existing and long-term future conditions. A small portion of the proposed project is planned to open initially, with full development occurring by 2035. As part of the study, Fehr & Peers led a stakeholder workshop on transportation, prepared an initial Event Traffic Management Plan and assisted with emergency evacuation plan. Mr. Basu was PM.

Lopez Spreading Grounds Improvement Project MND

Fehr & Peers is preparing a transportation impact study for the CEQA clearance of the Lopez Spreading Grounds Improvement project. The project would deepen, reconfigure and otherwise improve the existing spreading grounds to increase their capacity to recharge the groundwater basin. All construction and excavation work would occur within the boundary of the existing spreading grounds. Temporary VMT

is being estimated and FP is preparing a consistency analysis of relevant plans and policies. While no in-street construction would be necessary to complete the project, extensive amounts of soil would need to be hauled to disposal sites. To provide information for the public Fehr & Peers is analyzing potential temporary construction-related project traffic effects at numerous intersections in the vicinity of the spreading grounds and the disposal sites. Because of the nature of the project itself, no increase in traffic is anticipated upon completion.

Transportation Assessment for Los Angeles DDWP Stormwater Capture Parks Program MND

Fehr & Peers conducted a detailed transportation impact analysis to assess potential impacts related to the construction of an extensive program of groundwater recharge facilities in the San Fernando Valley of Los Angeles. The proposed project will capture surface water runoff and divert it to underground infiltration galleries. These facilities would be constructed within existing city parks across a 9-square mile tributary area of the Tujunga Wash over a period of four years, generating a substantial amount of truck traffic, often close to residences. Detailed trip generation estimates for autos and trucks were made and a VMT analysis conducted per the City's guidelines. Potential conflicts with relevant adopted plans, programs, ordinances, and policies were assessed, as well as geometric design hazards. Early in the study Mr. Basu coordinated with LADOT to ensure that the study scope for this uncommon project fully satisfied the requirements of the City's guidelines, which had recently been revised to focus on VMT rather than LOS. Mr. Basu was the Project Manager.

Los Angeles Zoo Vision Plan EIR

Fehr & Peers prepared the transportation analysis for the Los Angeles Zoo Vision Plan, a long-term comprehensive plan, encompassing physical growth, enhancement of the attractions and visitor services, and growth in attendance. The transportation analysis took a deep dive into historic zoo attendance, membership, and operations to develop an empiric understanding of on-site trip generation, trip distribution, and visitor trip origins, with unique analyses for both employees and visitors. FP developed and oversaw extensive visitor, employee, and transit-rider surveys to supplement the historic data analyzed. FP worked closely with the consultant team and City staff to refine the visitor growth projections and assumptions for use in the transportation analysis. The EIR for this project was one of the first to be analyzed using LADOT's new Transportation Analysis Guidelines (TAG) and vehicle-miles-traveled-based impact thresholds – and with the Zoo as a unique generator, Fehr & Peers used their deep understanding of the TAG and coordinated with LADOT staff to develop the right VMT and site-access and circulation analysis approaches for this project. A robust program of transportation mitigation measures was prepared to separately address employee VMT impacts and visitor VMT impacts. Mr. Basu was the Associate in Charge.

2020 Los Angeles River Master Plan PEIR

Fehr & Peers prepared the transportation analysis for the 2020 Los Angeles River Master Plan, a long-term comprehensive plan to guide development of habitat management and infrastructure improvements along the 51-mile length of the river. The Master Plan is organized around six groupings of improvements or actions, including "Trails, Access Gateways and Shelters" and "Crossings and Platforms." In all, over five dozen individual project elements are proposed on well over 100 sites along the length of the river. The Master Plan is among the first projects to utilize the County's newly released guidance on VMT analysis and thresholds for determining a significant impact to VMT. Given the Master Plan's programmatic level of analysis, Fehr & Peers coordinated with County Department of Public Works staff to develop a tailored approach to analyzing the potential for VMT-related impacts. Fehr & Peers also synthesized dozens of city General Plans and other relevant planning studies to create a framework for assessing the policy consistency of the Master Plan. Mr. Basu was Project Manager.

LADWP Century Boulevard Line Project MND

Netai oversaw a focused study that assessed the extent and significance of temporary traffic impacts related to the replacement of over three miles of an existing 36" water main line in the vicinity of Los Angeles International Airport. Most the replacement line would be located outside the current alignment on busy collector streets in Los Angeles and in Inglewood, and a detailed assessment of temporary impacts to traffic circulation, pedestrian circulation, and local access was made. Specific recommendations were made on elements to include in the construction traffic management plan.

Santa Monica Airport Park Expansion Project EIR

Fehr & Peers prepared the transportation analysis for a proposed expansion of the City of Santa Monica's Airport Park. The project, once complete, will renovate a portion of the existing Airport Park, located at the southeast corner of the Santa Monica Airport, and expand into adjacent unused paved surface parcels of the airport. The resulting park will occupy approximately 20 acres and provide significantly expanded soccer and sports fields, an off-leash dog area, picnic areas and open space. Fehr & Peers analyzed the potential future transportation network (intersection and local road segment) impacts of the proposed project and provided support at public meetings and in responding to comments on the Draft EIR. In the early 2000s the City of Santa Monica identified certain airport land as surplus and Fehr & Peers worked with the landscape architects and City staff in the design of the initial phase of Airport Park, and subsequently assisted with CEQA clearance.