

FINAL

Initial Study and Mitigated Negative Declaration

Bowtie Park Development Project

City of Los Angeles, California

Lead Agency:



California Department of Parks and Recreation
1925 Las Virgenes Road
Calabasas, CA 91302

Prepared by:



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November 2024

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TABLE OF CONTENTS

1.0	Introduction	1-1
2.0	Project Overview	2-1
3.0	AB 52 Consultation.....	3-1
4.0	Comments and Responses.....	4-1
5.0	ERRATA5-1	
5.1	Introduction.....	5-1
5.2	Project Clarification	5-1
5.2.1	Section 2.3, Project Characteristics	5-1
6.0	Mitigation Monitoring and Reporting Plan.....	6-1

LIST OF TABLES

Table 6-1. Mitigation and Monitoring Reporting Plan	6-3
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LIST OF APPENDICES

Appendix A – Addendum to the 2023 Bowtie Parcel Project Biological Resources Technical Report

Appendix B – Draft IS/MND

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**FINAL MITIGATED NEGATIVE DECLARATION
BOWTIE PARK DEVELOPMENT PROJECT**

Lead Agency:	California Department of Parks and Recreation, Angeles District
Project Proponent:	California Department of Parks and Recreation, Angeles District
Project Location:	The Proposed Project would occupy approximately 14.8 acres in the City of Los Angeles. The Project Area is located at 2780 W. Casitas Avenue on Los Angeles Assessor's Parcel Number (APN) 5442-002-914.
Project Description:	The California Department of Parks and Recreation (DPR; State Parks) proposes redeveloping the northern portion of a former rail yard into a publicly accessible urban greenspace. The greenspace would include habitat restoration and enhancement; viewing opportunities for local wildlife; walking, jogging, and biking trails; shaded picnic areas; historical, cultural, and environmental programming; and unstructured play areas.
Public Review Period:	June 26, 2024 to August 10, 2024

Standard Project Requirements (SPRs), Project Specific Requirements (PSRs), and Mitigation Measures Incorporated into the Project to Reduce Environmental Effects:

Biological Resources

BIO-1 (SPR): Preconstruction Survey for Nesting Birds. During the bird breeding/nesting window (February 15 to August 31), DPR shall ensure a nesting bird survey is completed prior to the start of any development activities (such as ground disturbance, construction activities, and/or removal of trees and vegetation) within the Project Area. This will maintain compliance with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Sections 3503, 3503.5, and 3513. The preconstruction nesting bird survey shall include the Project Area and a buffer area of 300 feet.

The survey results shall be provided to the Lead Agency (DPR). DPR shall adhere to the following:

- Designate a qualified biologist experienced in: identifying local and migratory bird species of special concern; conducting bird surveys using appropriate survey methodology; nesting surveying techniques, recognizing breeding and nesting behaviors, locating nests and breeding territories, and identifying nesting stages and nest success; determining/establishing appropriate avoidance and minimization measures; and monitoring the efficacy of implemented avoidance and minimization measures.
- Preconstruction surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than three days prior to the initiation of Project activities. Surveys shall encompass all suitable areas including trees, shrubs, bare ground, burrows, cavities, and structures. Survey duration shall take into consideration the size of the Project Area; density, and complexity of the habitat; number of survey participants; survey techniques employed; and shall be sufficient to ensure the data collected is complete and accurate.

If no nesting birds are observed during the survey, site preparation and construction activities may begin. If nesting birds (including nesting raptors) are found to be present, then avoidance or minimization measures shall be undertaken in consultation with the Lead Agency, and as required, the United States Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW). Measures shall include immediate establishment of an appropriate buffer zone to be established by a qualified biologist, based on their best professional judgement and experience. The buffer around the nest shall be delineated and flagged, and no construction activity shall occur within the buffer area until a qualified biologist determines nesting species have fledged and the nest is no longer active, or the nest has failed. The qualified biologist shall monitor the nest at the onset of Project activities, and at the onset of any changes in such Project activities (e.g., increase in number or type of equipment, change in equipment usage) to determine the efficacy of the buffer. If the qualified biologist determines that such Project activities may

be causing an adverse reaction, the qualified biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers shall be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest) or failed. The onsite qualified biologist shall review and verify compliance with these nesting avoidance buffers and shall verify the nesting effort has finished. Work can resume within these avoidance areas when no other active nests are found.

Upon completion of the survey and nesting bird monitoring, a memorandum or report shall be prepared and submitted to the Lead Agency for mitigation monitoring compliance record keeping.

BIO-2 (PSR): Protection Measures Specific to Least Bell's Vireo. Focused, protocol-level surveys for least Bell's vireo (LBVI) are in progress. The survey area includes the Project footprint and a 500-foot buffer where habitat exists.

- If LBVI is detected during the surveys, coordination with the USFWS and CDFW will be initiated.

Regardless of survey results, the following avoidance and minimization measures shall be implemented to reduce potential impacts to nesting LBVI throughout the construction process:

- DPR shall designate a qualified biologist with experience surveying for and monitoring LBVI. If construction activity overlaps with the LBVI breeding period, the qualified biologist shall conduct pre-construction surveys (i.e. surveys at least one week apart with the last survey conducted within three days of the start of Project activities) for vireos and their nests within a 500-foot buffer zone of the work area and other areas potentially supporting nesting birds. If a vireo nest is observed, the qualified biologist shall immediately contact DPR. The qualified biologist and DPR shall review the findings and notify the USFWS and/or CDFW. Project work shall be suspended within the buffer zone until the qualified biologist can determine whether nest avoidance is feasible or not.
- If nest avoidance is not feasible, DPR and the qualified biologist shall determine whether an exception is possible and seek approval from the USFWS and CDFW before work can resume within the buffer zone. All construction in the buffer zone shall cease until USFWS and CDFW approval is obtained. Additional conservation measures may be required to ensure nesting vireos are not adversely affected, which may include onsite noise reduction/attenuation techniques (i.e., noise shall not exceed an hourly average of 60 A-weighted decibels (dBA) or above existing ambient levels, whichever is greater, at the edge of occupied habitat).
- Should work be suspended or delayed for a period of greater than seven (7) days, then DPR and the qualified biologist shall determine the need for another bird survey to ensure no additional nesting has occurred in the Project Area.

- The qualified biologist shall be onsite daily during the bird breeding season (February 15 to September 15) to monitor and record activities that could impact LBVI and other nesting birds within the Project Area. If active nests are found, measures (such as those described below) shall be incorporated into ongoing operations to reduce the potential for disturbance.
- Should any other nesting bird be found during the surveys, then appropriate measures, as determined by the qualified biologist, in coordination with DPR, shall be implemented by the Contractor to minimize harm/harassment. These measures may include, but are not limited to, temporary delay of construction, staking/flagging near the nest, establishing a minimum “no work” buffer, and/or installing temporary fencing.

BIO-3 (PSR): Protection Measures Specific to Crotch’s Bumblebee. Focused surveys for Crotch’s bumblebee (CBB) are in progress.

- If CBB is detected during these surveys, coordination with CDFW will be initiated. Regardless of survey results, the following avoidance and minimization measures shall be implemented to reduce potential impacts CBB throughout the construction process:
- DPR shall designate a qualified biologist with experience surveying for and monitoring CBB. If construction activity overlaps with the CBB flight period (February 1 through October 31), the qualified biologist shall conduct pre-construction surveys (i.e. surveys at least one week apart with the last survey conducted within three days of the start of Project activities) for CBB within the work area and other adjacent areas potentially supporting native pollinators. If a CBB is observed, the qualified biologist shall immediately contact DPR. The qualified biologist and DPR shall review the findings and notify the CDFW. Project work shall be suspended within a buffer zone identified by the qualified biologist until the qualified biologist can determine whether CBB avoidance is feasible or not.
- Removal of CBB nectar plants and other native vegetation should be avoided. If nectar plants or native vegetation must be removed, it shall be completed outside the CBB flight season (February 1 through October 31), with the qualified biologist conducting a survey immediately before any vegetation removal activities. If CBB is discovered, work shall be suspended until the qualified biologist has consulted with the CDFW. Removal of vegetation shall only proceed with implementation of the conditions set forth by CDFW.
- If ground, leaf litter, or vegetation disturbing work occurs within the flight season, the qualified biologist shall conduct daily monitoring for the CBB during these activities. If CBB is discovered in the Project Area, monitoring shall occur daily for the remainder of the flight season (February 1 through October 31). The qualified biologist shall inspect vegetation for bumblebee foraging or nesting prior to

removal. If a bumblebee nest is discovered, removal of the vegetation shall not occur until the flight season has ended and the nest has been determined abandoned by the qualified biologist.

- If Crotch's bumblebee is found during the surveys, then appropriate measures, as determined by the qualified biologist and DPR, shall be implemented by the Contractor to minimize harm/harassment. These measures may include, but are not limited to, temporary delay of construction, staking/flagging near the nest or nectar plants, establishing a minimum "no work" buffer, and/or installing temporary fencing.

BIO-4 (SPR): Protection Measures for Other Sensitive Plant and Wildlife Species. DPR shall designate a qualified biologist familiar with sensitive species with the potential to occur onsite (see Section 4.4.2). The qualified biologist shall complete a pre-construction survey within 72 hours of the start of construction to ensure that no sensitive species are present onsite or will be within a 300-foot buffer of the Project footprint. If sensitive species are found during the surveys, then appropriate measures, as determined by the qualified biologist and DPR, shall be implemented by the Contractor to minimize harm/harassment. These measures may include, but are not limited to, temporary delay of construction, staking/flagging near the nest or nectar plants, establishing a minimum "no work" buffer, and/or installing temporary fencing.

Cultural Resources

CUL-1 (SPR): Worker Awareness Training, Archaeological Monitoring, and Unanticipated Discovery Procedures. Prior to the start of construction, the DPR shall retain a qualified professional archaeologist to prepare a worker awareness training program for all operators of ground-disturbing equipment and their supervisors. The program shall be designed, under the direction of DPR, to inform construction workers about: federal and state regulations pertaining to cultural resources; the purpose of monitoring; the authority of the monitors to halt construction in the event of a find; procedures for coordinating activities with the monitors and if applicable, archaeologists; and penalties and repercussions from non-compliance with the program.

In addition, DPR shall retain a qualified professional archaeologist to monitor all ground-disturbing activities associated with Project construction. Monitoring is not required for placement of equipment or fill inside excavations that were monitored, above-ground construction activities, or redistribution of soils that were previously monitored (such as the return of stockpiles to use in backfilling). The Monitoring Archaeologist shall meet or work under the direct supervision of a qualified individual meeting the Secretary of the Interior's professional qualifications standards for prehistoric and historic archaeology, or another qualified individual as determined by DPR in consultation with USACE. The Monitoring Archaeologist shall have the authority to temporarily halt ground-disturbing or construction-related work within 50 feet of any discovery of potential historical or archaeological resources to implement the following procedures.

If the Monitoring Archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required. If the Monitoring Archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, or determines that the discovery represents new significant information about a resource previously determined to not be significant, they shall immediately notify DPR, who shall consult with cooperating agencies and consulting tribes, as appropriate, on a finding of eligibility. DPR shall determine and require implementation of appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines. Work may not resume within the no-work radius until DPR, through consultation as appropriate, determines that the resources is either: 1) is not a Historical Resource under CEQA; or 2) that the treatment measures have been completed to its satisfaction.

If the find includes human remains, or remains that are potentially human, the procedures in Mitigation Measure CUL-2 shall be implemented.

CUL-2 (SPR): Human Remains. In the event that any human remains, or remains that are potentially human, are encountered within the Project Area, the following steps shall be taken: work shall cease immediately within 100 feet of the remains in compliance with California Health and Safety Code Sections 7050.5 and 7052; and Public Resources Code (PRC) Section 5097.98-.99. The Monitoring Archaeologist will then immediately contact DPR cultural staff and work with them to ensure reasonable measures are taken to protect the area from disturbance (Assembly Bill [AB] 2641). The Monitoring Archaeologist shall notify the DPR Angeles District Superintendent, and they or their designee will contact the Los Angeles County Coroner/Medical Examiner (as per Section 7050.5 of the Health and Safety Code). The provisions of Section 7050.5 of the California Health and Safety Code, Section 5097.98 of the California Public Resources Code (PRC), and AB 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the Native American Heritage Commission (NAHC), which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner (DPR) does not agree with the recommendations of the MLD, then the NAHC can mediate (Section 5097.94 of the PRC). If no agreement is reached, the landowner (DPR) must rebury the remains where they will not be further disturbed (Section 5097.98 of the PRC). Reburial will also include either recording the site with the NAHC or the appropriate Information Center or recording a reinternment document with the county in which the property is located (AB 2641). Work cannot resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

Geology and Soils

GEO-1 (PSR): The Project Proponent shall implement the Conclusions and Recommendations as listed in the final site-specific geotechnical report or most recent site-specific geotechnical evaluation.

GEO-2 (SPR): **Unanticipated Paleontological Discovery.** A paleontologist shall be retained as the Project paleontologist to oversee all aspects of paleontological mitigation, including the development and implementation of a Paleontological Monitoring and Mitigation Plan (PMMP) tailored to the Project plans that provides for paleontological monitoring of earthwork and ground disturbing activities into undisturbed geologic units with high paleontological potential to be conducted by a paleontological monitor meeting industry standards (Murphey et al. 2019). The PMMP shall also include provisions for a Workers' Environmental Awareness Program training that communicates requirements and procedures for the inadvertent discovery of paleontological resources during construction, to be delivered by the paleontological monitor to the construction crew prior to the onset of ground disturbance.

Paleontological monitoring shall be conducted by a qualified paleontological monitor for ground disturbance that exceeds 10 feet in depth across the Project Area. The Project paleontologist may reduce the frequency of monitoring or spot checks should subsurface conditions indicate low paleontological potential.

Should a potential paleontological resource be identified in the Project Area, whether by the monitor or a member of the construction crew, work shall halt in a safe radius around the find (usually 50 feet) until the Project paleontologist can assess the find and, if significant, salvage the fossil for laboratory preparation and curation at the Natural History Museum of Los Angeles County.

Hazards and Hazardous Materials

HAZ-1: **Preparation of a Removal Action Workplan.** The Project Proponent shall prepare a Removal Action Workplan (RAW) prior to construction. The RAW shall meet the requirements of Health and Safety Code Section 25356.1 and to the satisfaction of the California Department of Toxic Substances Control. The RAW shall include the following information:

- Site Description – Include current site conditions, ownership and operational history, site characterization activities conducted, any response actions taken, nature and extent of contamination, and risk assessment/evaluation.
- Conceptual Site Model – Discussion of the relationship between contaminant sources and receptors through migration and exposure paths.
- Removal Action Objectives – Identify goals or objectives to be achieved by the removal action.

- Applicable or Relevant and Appropriate Requirements (ARARs): state or federal standards, which are aimed at protecting human health and the environment.
- Identify Removal Action Alternatives – Develop and analyze removal action alternatives, at a minimum, consider effectiveness, implementability, and cost.
- Engineering Evaluation/Cost Analysis – Provide a comparison of alternatives, technical and cost evaluation, selection of a preferred alternative, and explanation of the basis for the selection.
- Implementation Details – Include details on all aspects of removal action implementation, including confirmation sampling and waste disposal.
- Sampling and Analysis Plan – Provide confirmation sampling, along with corresponding Quality Assurance Plan to confirm effectiveness of RAW, if applicable.
- Long Term Stewardship – Describe deed restrictions and any operation & maintenance requirements, if applicable.
- Dust Monitoring Plan: Describe Ambient Air Monitoring performed in accordance with appropriate SCAQMD regulation(s).
- Transportation Plan: Plan to minimize potential health, safety, and environmental risks resulting from the movement of material and/or equipment.
- Health and Safety Plan – Outline methods that will be employed during the removal action to ensure the health and safety of workers and the public.
- Schedule of Activities – Include a detailed Project schedule.
- Public Involvement Process – Describe public participation activities.
- California Environmental Quality Act – Outline the CEQA process within the RAW.
- Administrative Record – Provide a list of all documents and information relied on or considered during the removal action selection process.

Tribal Cultural Resources

TCR-1: Tribal Monitoring. A tribal monitor from a Consulting Tribe (defined herein as those tribes that consulted with DPR for this Project) shall be retained to monitor all ground-disturbing activities associated with Project construction. Monitoring is not required for placement of equipment or fill inside excavations that were monitored, above-ground construction activities, or redistribution of soils that were previously monitored (such as the return of stockpiles to use in backfilling).

In the event that more than one Consulting Tribe requests to provide a monitor for activities subject to this measure, DPR will allow for representation of the interested tribes in a mutually agreeable monitoring schedule. In the event that none of the Consulting Tribes choose to enter into a monitoring contract, or otherwise fail to respond to the offer to do so, DPR shall allow construction to proceed without a tribal monitor present as long as the offers to all Consulting Tribes were extended and documented.

No later than five business days prior to the start of ground disturbing activities, the construction supervisor or their designee shall notify the contracted Consulting Tribe(s) of the construction schedule. Should the contracted Consulting Tribe(s) choose not to provide a tribal monitor for any given day, or if the monitor does not report to the Project location at the scheduled time, or if the monitor is present but not actively observing activity, work may proceed without a monitor as long as the notification was made and documented. Unless there is a hiatus of construction activity that exceeds 14 days, daily updates to construction schedules can be made through email, text, phone, or other methods and frequencies agreed upon between the monitor(s) and construction supervisor. If a hiatus in ground disturbance of more than 14 days occurs, then notice of at least five business days before resuming work will be required to be given and documented.

The tribal monitor shall have the authority to temporarily halt ground disturbance within 50 feet of the discovery for a duration long enough to examine potential TCRs that may become unearthed during the activity. If no TCRs are identified at the discovery location, then construction activities shall proceed and no agency notifications are required. In the event that a TCR is identified, the monitor shall flag off the discovery location and notify DPR immediately to consult with tribal representatives and cooperating agencies on appropriate and respectful treatment. DPR shall determine and require implementation of appropriate treatment measures, if the find is determined to be a TCR under CEQA, as defined in Public Resources Code 5024.1. Work may not resume within the no-work radius until DPR, through consultation as appropriate, determines that the resource is either: 1) is not a TCR under CEQA; or 2) that the treatment measures have been completed to its satisfaction. Work cannot resume at the stop-work location until authorized to do so by an authorized representative of DPR.

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1.0 INTRODUCTION

This document is the Final Initial Study/Mitigated Negative Declaration (IS/MND), including the Responses to Comments and the Mitigation Monitoring and Reporting Program (MMRP), for the Bowtie Park Development Project (Proposed Project). It has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resource Code Section 21000 et. seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.), as amended. This Final IS/MND document supplements the Draft IS/MND released for public review on June 26, 2024.

The California Department of Parks and Recreation (DPR) is the Lead Agency for the Proposed Project. On June 26, 2024, DPR distributed the Draft IS/MND for the Proposed Project to public agencies and the general public for review and comment. In accordance with the State CEQA Guidelines, a 30-day review period, which ended on July 26, 2024, was completed. In response to public requests for an extension of the public review period, the review period was extended for an additional 15 days and closed on August 10, 2024. Twenty-six comment letters were received during the review period. This Final IS/MND and MMRP document is organized as follows:

- Section 1.0 provides a discussion of the purpose of the document and discusses the structure of the document;
- Section 2.0 contains a summary of the Project description;
- Section 3.0 describes the AB 52 consultation process;
- Section 4.0 includes the comment letter received and responses to these comments;
- Section 5.0 includes the Errata and describes corrections and clarifications made to the Draft IS/MND in response to comments and a discussion regarding why these changes do not require recirculation for the Draft IS/MND; and
- Section 6.0 contains the MMRP.

This Final IS/MND and MMRP document and the Draft IS/MND together constitute the environmental document for the Proposed Project.

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2.0 PROJECT OVERVIEW

2.1 Project Background

The Project Area was part of the Taylor Yard rail yard complex, the former freight classification yard (1925 to 1973) of Southern Pacific Railroad. The 247-acre Taylor Yard rail yard complex (previously referred to as the G-1 parcel) was historically divided into ten parcels, some of which were further subdivided for sale purposes, and two of which – Parcels D and G-1 – were purchased by DPR for Rio de Los Angeles State Park. The 40-acre Parcel D, acquired in 2001, is located between an active rail line and San Fernando Road. The approximately 18-acre parcel (G-1), acquired in 2003, is located between the Los Angeles River and an industrial development. The 14.8-acre Project Area is located within Parcel G-1.

2.2 Project Objectives

Project objectives include increasing outdoor recreational park space to the public, including overburdened communities in the Project vicinity; providing an experience of urban river and habitat restoration for the local community as well as those outside of it; reestablishing access to the Los Angeles River for indigenous communities who regard the area as a sacred land; restoring and enhancing natural habitat along the Los Angeles River, including wetlands, to attract wildlife; providing educational opportunities with respect to historical, cultural, and environmental considerations; and advancing the goals of the Statewide Comprehensive Outdoor Recreation Plan (SCORP). Policy documents, including the Rio de Los Angeles General Plan and Los Angeles River Master Plan, have acknowledged the need for a reimagined and revitalized Los Angeles River and is a critical component of fulfilling the ecosystem restoration goals identified in the United States Army Corps of Engineers (USACE) Los Angeles River Ecosystem Restoration Feasibility Study.

2.3 Project Characteristics

The Proposed Project would result in the development of the property to restore it to a vibrant green space, focused on nature and passive recreation. Project implementation would require soil remediation to address previous site contamination associated with the former use as a railroad maintenance facility. Proposed Park improvements would consist of the following:

- A native plant demonstration garden to provide outdoor educational space;
- Several vista points facing the Los Angeles River;
- An event space within a historic turntable circular pit repurposed for larger crowds;
- Internal multi-use trails for walking and biking;
- Open meadow areas, picnic locations, and seating benches;
- A welcoming kiosk with restrooms (comfort station) housed within an earthen mound with a green roof (natural vegetation roof);

- A Park entry and internal vehicular access road with turnouts for passenger drop off/pick-up and a turnaround point;
- A single family residence that will serve as an onsite Ranger house with outdoor space and a carport;
- Parking spaces along the internal vehicular access road along the eastern perimeter of the Project Area; and
- An internal maintenance road for State Park maintenance staff, fire access route, and utility access easement.

The Proposed Project would create a direct connection and access to the Glendale Narrows section of the Los Angeles River and complements two additional projects planned for the site by creating and facilitating access among these projects: The Bowtie Wetland Demonstration Project (in partnership with The Nature Conservancy [TNC]) and the Paseo del Rio Riverfront Trail Project (in partnership with the Mountains Recreation and Conservancy Authority and the City of Los Angeles). The Proposed Project would be partially funded by a grant from the National Parks Service and Santa Monica Mountain Conservancy.

2.4 Project Timing

It is anticipated that construction would occur in late 2025 and would take approximately 24 months to complete.

3.0 AB 52 CONSULTATION

3.1 AB 52 Consultation Summary

Effective July 1, 2015, Assembly Bill (AB) 52 amended CEQA to require that: 1) a lead agency provide notice to those California Native American tribes that requested notice of projects proposed by the lead agency; and 2) for any tribe that responded to the notice within 30 days of receipt with a request for consultation, the lead agency must consult with the tribe. Topics that may be addressed during consultation include tribal cultural resources (TCRs), the potential significance of project impacts, type of environmental document that should be prepared, and possible mitigation measures and project alternatives.

On October 26, 2020, DPR contacted the California NAHC to request a search of the Sacred Lands File and a list of tribal contacts for the Bowtie parcel. On November 9, 2020, the NAHC responded and indicated that the search of the Sacred Lands File was positive, meaning that there is a recorded sacred land in the vicinity. The NAHC provided a list of tribal contacts who may have additional information.

On February 4, 2021, DPR contacted the following individuals to invite them to consult on the Bowtie Wetland Demonstration Project.

- Gabrielino-Tongva Tribe, Charles Alvarez, Chairperson
- Fernandeno Tataviam Band of Mission Indians, Jairo Avila, Tribal Historic and Cultural Preservation Officer
- Gabrielino Tongva Indians of California Tribal Council, Robert Dorame, Chairperson
- Gabrielino/Tongva Nation, Sandonne Goad, Chairperson
- Gabrieleno/Tongva San Gabriel Band of Mission Indians, Anthony Morales, Chairperson
- Gabrieleno Band of Mission Indians – Kizh Nation, Andrew Salas, Chairperson

On June 19, 2023, contacted the following individuals to invite them to consult on the Project:

- Gabrielino-Tongva Tribe, Charles Alvarez, Chairperson
- Fernandeno Tataviam Band of Mission Indians, Sarah Brunzell, CRM Manager
- Gabrielino Tongva Indians of California Tribal Council, Christina Conley, Cultural Resource Administrator
- Gabrielino Tongva Indians of California Tribal Council, Robert Dorame, Chairperson
- Gabrielino/Tongva Nation, Sandonne Goad, Chairperson
- Gabrieleno/Tongva San Gabriel Band of Mission Indians, Anthony Morales, Chairperson
- Gabrieleno Band of Mission Indians – Kizh Nation, Andrew Salas, Chairperson

As part of the AB 52 process, each recipient was provided a brief description of the Project and its location, the lead agency contact information, and a notification that the tribe has 30 days to request consultation pursuant to PRC Section 21080.3.1(d). Multiple attempts via phone and email were made to reach non-responsive representatives.

As a result of the initial notification letters and follow-up contacts, DPR received the following responses:

- On June 19, 2023, Sarah Brunzell of the Fernandeño Tataviam Band of Mission Indians responded by email to decline consultation on the Project.
- On June 26, 2023, Christina Conley from the Gabrielino Tongva Indians of California Tribal Council responded to request consultation and a monitor during all ground disturbing activities. On December 4, 2023, tribal representatives met with DPR via virtual meeting to discuss the Project. The tribe provided comments on the use of traditional plants in the revegetation. Concern was expressed over public access to certain traditional native plants.
- On March 2, 2023, Kimberly Johnson of the Gabrieleno/Tongva San Gabriel Band of Mission Indians was contacted by phone to discuss the Project's Native Spirit Garden design concept conceptualized by the late elder Barbara Drake. A follow-up call was conducted on September 18, 2023. No response to date has been received to set up a meeting on the Park development concept. Therefore, pursuant to Section 21082.3(d)(2) of the Public Resources Code, DPR concluded consultation with the Gabrieleno/Tongva San Gabriel Band of Mission Indians.
- On June 20, 2023, Brandy Salas of the Gabrieleno Band of Mission Indians – Kizh Nation requested consultation. On October 12, 2023, tribal representatives met with DPR via virtual meeting to discuss Park development. The tribe provided comments on the placement and type of biological habitat for revegetation.
- All other tribes did not respond to the opportunity to consult; therefore, DPR considers consultation concluded with the remaining tribes pursuant to PRC Section 21082.3(d)(3).

As a result of consultation, traditional plant species for the Project would be selected in consultation with tribes and planted during restoration and maintained during the implementation of the Project as there is no geographically defined tribal vegetation landscape present within the Project Area. Additionally, according to Kizh Nation representatives, the Los Angeles River Channel is an important traditional travel corridor and noted that tribal cultural resources were often left alongside the River as people traveled. The Los Angeles River Channel is adjacent to the Project Area, however, is not within the Project Area and no Project activities will occur in the River Channel. In accordance with Mitigation Measure TCR-1, tribal monitoring during ground disturbing activities, coupled with procedures to identify, evaluate, and treat the discoveries, would ensure that TCRs, if encountered, are treated with care and in a culturally appropriate manner.

Consultation remains ongoing with the Gabrielino Tongva Indians of California Tribal Council and Gabrieleno Band of Mission Indians – Kizh Nation.

4.0 COMMENTS AND RESPONSES

The 30-day public review period began on June 26, 2024, and ended on July 26, 2024, however DPR provided a 15-day extension of the public review period until August 10, 2024. In conformance with Section 15088(a) of the State CEQA Guidelines, DPR has considered comments on twenty-six (26) letters received during the review period. These letters and the responses to the comments are provided in this section.

4.1 List of Comment Letters

Table 4.1-1. Comment Letters		
Letter Number	Sender	Date Received
1	California Department of Transportation	07-05-2024
2	Clara Solis	07-06-2024
3	Lyannie Tran	07-10-2024
4	Jabz Alejandro Palomino	07-15-2024
5	Clara Solis	07-15-2024
6	Eduardo Aguirre	07-20-2025
7	Adela and John Vangelisti	07-22-2024
8	City of Los Angeles City Council	07-25-2024
9	Clara Solis	07-26-2024
10	Jabz Alejandro Palomino	07-31-2024
11	California Department of Fish and Wildlife	07-31-2024
12	Clara Solis	08-10-2024
13	Jabz Alejandro Palomino	08-10-2024
14	Lyannie Tran	08-10-2024
15	John Vangelisti	08-10-2024
16	John Vangelisti	08-10-2024
17	Vincent Montalvo	08-10-2024
18	Buried Under the Blue	08-10-2024
19	Melissa Arechiga	08-10-2024

20	Irving Arechiga	08-10-2024
21	Angela Gonzales-Torres	08-10-2024
22	Historic Highland Park Neighborhood Council Environmental Committee	08-10-2024
23	Alliance of River Communities	08-10-2024
24	Clara Solis	08-10-2024
25	Highland Park Heritage Trust	08-10-2024
26	Clara Solis	08-10-2024

Letter 1 – California Department of Transportation

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7
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LOS ANGELES, CA 90012
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Letter 1



*Making Conservation
a California Way of Life*

July 5, 2024

Luke Serna
Associate Park & Recreation Specialist
California Department of Parks and Recreation
2797 Truxtun Rd
San Diego, CA 92106

RE: Bowtie Park Development Project –
Mitigated Negative Declaration (MND)
SCH #2024061129
GTS #07-LA-2024-04567
LA-2 PM 15.77

Dear Luke Serna,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Proposed Project would include a park entry and internal vehicular access road, parking spaces, internal maintenance road, welcoming kiosk with restrooms, vista points facing the Los Angeles River, native collection garden, event space, internal multi-use trails, open turf areas, picnic locations, and seating benches. The Project is in an urbanized area on a parcel which contains no structures. Industrial buildings border the parcel on the north and an elevated railroad track and at-grade service road border the parcel on the east. To the west is the Los Angeles River. The surrounding area is characterized by industrial and residential uses.

1-1

Vehicular access would be provided from the existing entrance at Kerr Street, near the northwest end of the Project Area. The Project would provide 35 automobile parking spaces and two bus parking spaces in the northwest end of the Project Area. The Initial Study estimates that the Project would add between 12 and 98 net daily vehicle trips to the local street system on a typical weekday.

After reviewing the MND, Caltrans has the following comments:

Caltrans concurs with the Project's objective to create a cohesive link for pedestrians and bicyclists along the Los Angeles River. If surface parking must be built, it is recommended

1-2

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Letter 1 – Continued

Luke Serna
July 5, 2024
Page 2

that it does not face the street directly. More streetscapes that encourage recreational walking and transit can be produced when active frontage is against the sidewalk and parking is shifted to the rear or interior of the site. We encourage the Lead Agency to strengthen pedestrian networks with robust signage at the Project Site during construction and provide sufficient pedestrian level lighting throughout operation to prioritize pedestrian safety and minimize collision with vehicles.

**1-2
cont.**

Any transportation of heavy construction equipment and/or materials that requires the use of oversized transport vehicles on State Highways will require a Caltrans transportation permit. Caltrans recommends limiting construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review. We look forward to the coordination of our efforts to ensure potential impacts to the highway facilities and traveling public are discussed and addressed before work begins.

1-3

If you have any questions, please contact project coordinator Frances Duong, at frances.duong@dot.ca.gov and refer to GTS #07-LA-2024-04567.

1-4

Sincerely,

Anthony Higgins

Anthony Higgins
Acting LDR/CEQA Branch Chief
Cc: State Clearinghouse

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Response to California Department of Transportation – Letter 1**Response to Comment 1-1:**

This comment summarizes the Project location and characteristics. No response is required.

Response to Comment 1-2:

In this comment Caltrans provided the following recommendations:

- Locate the surface parking lot away from the street and towards the rear or interior of the site to encourage recreational walking and transit.
- Add robust signage during construction to strengthen pedestrian networks.
- Provide pedestrian level lighting during operations for safety.

The Project Area currently does not provide any pedestrian and transit connectivity due to its location at the end of the existing Kerr Street and between the rail line and the Los Angeles River. The parking lot for the Proposed Project has been designed within the interior of the park and is not facing the public street. The parking lot would be located near the park entrance to minimize vehicular impacts to the restored landscape and vehicular conflicts with the proposed internal pedestrian circulation networks and amenities. The lot will include 35 parking stalls for cars and 2 stalls for bus parking. Vehicular access would be provided from the existing entrance at Kerr Street, which is cul-de-sac, near the northwest end of the Project Area. As described in Section 4.17.2, Transportation, the Project includes multiple internal multi-use trails for walking and biking. These trails connect the Park entrance at Kerr Street to the G2 parcel south of the Project Area, allowing for a seamless pedestrian network connection along the Los Angeles River.

No pedestrian access would be available during Project construction and signage and barriers would be provided at the site entrance to identify the site as a construction zone. During operations, where night lighting is necessary, lighting would be directed downward, and new exterior lighting would be located such that it is not highly obtrusive but provides a sense of security and safety. As described in Section 4.15.2.2, Police Services, the Proposed Project includes a space for an onsite law enforcement officer (Park Ranger), which would enhance police coverage and response time for the park. No changes to the Draft IS/MND are required in response to this comment.

Response to Comment 1-3:

This comment notes that a Caltrans transportation permit is required for any transportation of heavy construction equipment and/or materials that requires the use of oversize vehicles on State Highways. Caltrans recommends limiting construction traffic to off-peak periods and if traffic is expected, then a construction traffic control plan should be submitted to Caltrans for review.

All necessary permits for the Proposed Project will be obtained by the Project Proponent. No changes to the Draft IS/MND are required in response to this comment.

Response to Comment 1-4:

This comment provides contact information for Caltrans staff. No response is required.

Letter 2 – Clara Solis

Letter 2

From: claramsolis@earthlink.net <claramsolis@earthlink.net>
Sent: Saturday, July 6, 2024 6:19 PM
To: Review, Environmental@Parks <Environmental.Review@parks.ca.gov>
Subject: Bowtie Development - Please Extend the DEADLINE to Comment

You don't often get email from claramsolis@earthlink.net. [Learn why this is important](#)

ATTN: Luke Serna: Bowtie Redevelopment::

Please extend the comment deadline for this project. The 3- day comment period is insufficient. It will not give us enough time to make comments.

2-1

Claran Solis

From: Review, Environmental@Parks <Environmental.Review@parks.ca.gov>
Sent: Monday, July 15, 2024 9:36 AM
To: claramsolis@earthlink.net
Subject: RE: Bowtie Development - Please Extend the DEADLINE to Comment

Hello Claran Solis,

It could be that there was a misprint in one of the notices that you saw. The review period for the Bowtie Redevelopment environmental document is a standard 30 days as is required by the California Environmental Quality Act.

2-2

The review period began June 26th and will run through July 26th of 2024.

Thanks,

Luke Serna
Associate Park & Recreation Specialist
Southern Service Center
California State Parks
2797 Truxtun Rd, San Diego, CA 92106
www.parks.ca.gov



Letter 2 – Continued

From: claramsolis@earthlink.net
To: Review_Environmental@Parks
Cc: "Jabz"
Subject: RE: Bowtie Development - Please Extend the DEADLINE to Comment
Date: Monday, July 15, 2024 11:40:36 AM
Attachments: [image003.png](#)

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Dear Mr. Serna,

I made the typo. I am having trouble with my laptop. What I meant to say is 30 days is not enough. It is summer and many people are on vacation. Extend the deadline to at least 60 days. It is difficult for lay people who care about projects like these to find time to write letters. 30 days is not enough. 60 days will allow many individuals who are currently on vacation to be able to participate in this environmental review project.

Frankly, I have never before seen such a short deadline to submit comments for environmental review. This is an area that serves working class families. Many in our communities have children to take care of during the summer months. Some go on vacation. Many in our communities know nothing about this project document.

Other agencies in the past have extended deadlines. Here are some examples:

Los Angeles County and Los Angeles City have in the past extended the public comment deadlines. Here are a couple of these extensions:
https://planning.lacity.org/eir/downtownCP_newZoningCode/Deir/Comment%20Period%20Extension.pdf Public comment period extended to 120 days
<https://thesource.metro.net/2015/06/19/caltrans-and-metro-extend-public-comment-period-for-sr-710-north-study-and-release-cost-benefit-analysis/> Public comment period extended to five months.

Thank you,

Clara Solis

2-3

Response to Clara Solis – Letter 2

Response to Comment 2-1:

This comment requests an extension of the public review period as it is not enough time to make comments.

The Proposed Project's public review period was a standard 30 days as is required for MNDs under CEQA (CEQA Guidelines §15073(a)). However, DPR has extended the public review period from 30 to 45 days to be amenable to the community's request for an extension while still meeting grant funding deadline requirements. The extended public review period ended on August 10, 2024, but DPR will continue to accept comments and respond to them outside of the purview of CEQA. Additionally, to allow the public a chance to provide feedback in person, DPR hosted a public community event led by The Nature Conservancy on August 17, 2024 at the Rio De Los Angeles State Park that was focused on the Bowtie Wetland Demonstration Project, which is the first phase of the Bowtie parcel's development. No changes to the Draft IS/MND are required in response to this comment.

Response to Comment 2-2:

This comment is a reply from DPR to Comment 2-1 to clarify a typographical error in the commenter's initial comment.

The comment period was 30 days, not 3 days and was extended to 45 days. The extended review period ended on August 10, 2024. No response is required.

Response to Comment 2-3:

This comment states a 30-day review period is not enough time as many people have personal obligations during the summer and don't know about the project document. An extension of the review period to 60 days is requested. Examples of other projects with extended deadlines are provided along with email links to the extension notices.

As stated in Response to Comment 2-1, the Proposed Project's original public review period was a standard 30 days in accordance with CEQA Guidelines §15073(a). A Notice of Availability and Notice of Intent to Adopt the IS/MND (NOA-NOI) was published on June 26, 2024 to indicate the 30-day review period for the Proposed Project is June 26, 2024 to July 26, 2024. The public review period was extended by 15 days until August 10, 2024. Copies of the Draft IS/MND were made available on the State Clearinghouse and DPR websites. No changes to the Draft IS/MND are required in response to this comment.

Letter 3 – Lyannie Tran

Letter 3

From: [Lyannie Tran](#)
To: Review.Environmental@Parks
Subject: Bowtie Redevelopment
Date: Wednesday, July 10, 2024 8:31:37 AM

You don't often get email from lyannie@gmail.com. [Learn why this is important](#)

Attn: Luke Serna: Bowtie Redevelopment

I would like to address directly to you a set of problems regarding the alarming and sensitive situation involving the Least Bell's Vireo (*Vireo bellii pusillus*) "LBVI" recover, conservation and existence. The LBVI species has been, and is currently being directly and greatly affected by the several issues and negligence from City, County, State and Federal agencies.

The recover and conservation of the LBVI species is being threatened by negligence and lack of interest to implement and follow the ESA-CESA Laws and procedures that protects and ensures the very existence of this Californian Native bird on the brink of extinction.

The LBVI has returned at Rio de Los Angeles State Park (RDLASP) where it has been nesting for the past few years. The LBVI has been also observed at Bowtie Taylor Yard G1, and at Paseo del Rio at TY G2 parcels, Elysian Park, and along the LA River channel between the communities of Elysian Valley, Cypress Park, Glassell Park, Lincoln Park, and Atwater Village.

The LBVI did start returning over a decade ago to this area, which is the species ancestral and natural habitat critical to their survival, recover and conservation. It was in 2018 when the LBVI was first seen nesting at RDLASP, also well documented migrating and traveling along the Los Angeles River channel, and at G1 and G2 as well from 2020 to 2024.

Last year, in 2023, and after half a century or more, one out of 2 LBVI nesting pairs was able to successfully raise three offspring, the first three ever raised in more than half a century, and the first ever fully documented, from mating rituals to the very last day the family of 5 LBVI left their nesting grounds and critical habitat in October 16, 2023, to begin their trip to wintering in Mexico.

Unfortunately, since 2018, lots of nests have been take, making this a critical situation and crisis since the LBVI is on the brink of extinction. Just from 2022 to 2024 about 7 nests with fertile eggs and hatchlings were take, burglarized, destroyed, due to negligence, from City of LA BOE-DPW, CA State Parks, CDFW, USFWS, and 100 Acre Partnership group, who failed to enforce and be in full compliance with the Law mandated on the ESA that protects the LBVI.

It is extremely disturbing the fact that all the "recommendation" that ended in the destruction of at least 7 LBVI active nests from 2022 to 2024, came from Ms. Carol Roberts, and not a single one of them was near to be in compliance with ESA-CESA. Any procedure or recover / conservation plans were ever discussed, recommended nor followed by Ms Roberts. Also, not a single permit has been ever submitted to FWS or to CDFW by CSP, BOE, 100 acre partnership, or from any of the non-profits who are acting as "lead agencies" for these projects.

It is also extremely disturbing the fact that all these agencies have ignored and tried to diminish the impact from Bowtie G1 and Paseo del Rio at TY G2 projects, and RDLASP negligence to the LBVI. The impact from these issues will adversely affect the Least Bell's Vireo by disrupting foraging, breeding behavior or by causing adults to abandon nests, as already has happened several times in the past few years. Disruptions to breeding behavior could include a temporary reduction in breeding activity reducing the density of nesting pairs. Increment of stress due to noise from construction activity occurring during the breeding season will also impact the species. Project activities occurring during nesting season of the LBVI could result in the incidental loss "take" of fertile eggs, nestlings, fledglings, or nest abandonment. LBVI could also be forced from their ancestral natural

3-1

Letter 3 – Continued

habitat into adjacent areas that may potentially be less suitable where they would be at risk of predation, starvation or other injury or death.

3-1
cont.

There are way too many concerns with these projects due to the negligence from the public agencies in charge, and no single concern has been resolved nor negligence from the agencies has been properly addressed.

According to the two letters sent by CDFW, one sent to CSP on June 8, 2023, and another one to City of LA BOE Sarah Bryson on December 8, 2023, "impacts would occur. A review of the California Natural Diversity Database (CNDDDB) (CDFW 2023a) and E-bird (E-bird 2023) shows that Least Bell's Vireo has potential to occur around the Project site. CNDDDB shows suitable habitat in the form of low, dense thickets of willow and shrub occurring within two miles of the Project site. E-Bird shows occurrences adjacent to the Project site at the Rio de Los Angeles State Park within a mile of the Project site (Bowtie G1), and less than 100ft from Paseo del Rio at TY G2.

Following are some of the many problems and concerns. Bowtie's MND does not provide a discussion of the Project's potential impacts on Least Bell's Vireo if Project activities occur during the nesting season.

Bowtie's MND does not propose any specific mitigation measures for the Least Bell's Vireo or protocol surveys for the species. Without any avoidance, minimization, or mitigation measures, the Project may result in significant impacts to the Least Bell's Vireo.

3-2

Evidence impact would be significant. Take under ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting.

CDFW considers impacts to CESA-listed species a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. Bowtie's MND has yet to provide measures to mitigate for the Project's potential impact on the Least Bell's Vireo. Accordingly, the Project may have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or U.S. Fish and Wildlife Service (USFWS)."

The Bowtie greenspace **would** include "habitat restoration and enhancement", however, not a single "potentially Feasible Mitigation Measure(s)" recommended by CDFW has been implemented on the project, no HCP, no RMP, no ITP, no Endangered Species Recover-Conservation Plan has been mentioned nor discussed or implemented on any of this project plans. **"The provision of the law (ESA) in Section 4 establishes critical habitat is a regulatory link between habitat protection and recovery goals, requiring the identification and protection of all lands, water and air necessary to recover endangered species".**

About 3 – 4 weeks ago the LBVI was observed at Paseo del Rio at Taylor Yard site, according to LBVI expert surveyor conducting surveys for this project. The LBVI nesting grounds at Rio de Los Angeles SP are located about 400ft from the LA River, and the Taylor Yard parcel where "Paseo del Rio at Taylor Yard" project has been proposed is right between these two sites. Observations of the LBVI at these sites were expected to happen, as it has been happening for the past decade according to surveys, public records and observations made by birdwatchers and by LBVI researchers as well.

3-3

Based in factual evidence that proves the LBVI has been observed and fully documented in the area for over 10 years, and due to the clear negligence from all the agencies mentioned above, the following it is been requested but not limited to:

- Stop any type of construction / development projects (ground breaking, pre-construction, etc.) at Bowtie G1 and Paseo del Rio at Taylor Yard G2 until proper assessment-research has been done in full compliance with the ESA –

3-4

Letter 3 – Continued

<p>CESA.</p> <ul style="list-style-type: none"> Request to California State Parks, and to City of Los Angeles Bureau of Engineering – Dept. of Public Works to properly apply for any and all permits, and follow all procedures mandated on the ESA – CESA for transparency, and to avoid any possible cumulative impact, and any unnecessary “take” of the species. 	<p>3-5</p>
<ul style="list-style-type: none"> Request to California State Parks, and to City of Los Angeles Bureau of Engineering – Dept. of Public Works the immediate creation and implementation of Endangered Species Habitat Conservation Plan as required under the ESA CESA, including and using data from the past 10 years, and not data from “informal” surveys collected just weeks ago. 	<p>3-6</p>
<ul style="list-style-type: none"> The immediate implementation of proper protective and mitigation plan-measures in full compliance with the ESA – CESA at Rio de Los Angeles State Park where most nesting-offspring activity has been happening for the past decade. 	<p>3-7</p>
<ul style="list-style-type: none"> Additional complete, responsive jeopardy analysis by the CDFW and/or by the FWS that shall include consideration of species capability to survive and reproduce, and any adverse impacts of the taking on those abilities in light of known population trends, known threats to the species, and reasonably foreseeable cumulative impacts on the species from other related projects and activities. 	<p>3-8</p>
<ul style="list-style-type: none"> Creation and implementation of an Endangered Species Habitat Conservation Plan as required under the ESA CESA with the assistance of the database collected/produced from the past 10 years, and not from any “informal” data from surveys collected just weeks ago. 	<p>3-9</p>
<ul style="list-style-type: none"> Creation and implementation of an Endangered Species Recovery Plan as required under the ESA CESA with the assistance of the database collected/produced from the past 10 years, and not from any “informal” data from surveys collected just weeks ago. Creation and implementation of feasible development alternatives by the CDFW-USFWS such as biological reserves and/or wildlife refuges to help with the species recover and conservation efforts. 	<p>3-10</p>

All this to facilitate and continue the recovery and conservation of the LBVI, particularly in the Northeast Los Angeles Area, aiding Federal and State efforts.

Lyannie Tran

Response to Lyannie Tran – Letter 3**Response to Comment 3-1:**

This comment summarizes observations of LBVI from 2018 to 2024 in Rio de Los Angeles State Park, Bowtie Taylor Yard G1 parcel, at Paseo del Rio at Taylor Yard G2 parcel, Elysian Park, and along the LA River channel between the communities of Elysian Valley, Cypress Park, Glassell Park, Lincoln Park, and Atwater Village.

The comment also states that City, County, and federal agencies have been negligent in enforcing ESA/CESA laws to protect LBVI. The commenter states seven nests in these areas from 2022 to 2024 were taken and destroyed due to negligence. The commenter also comments that recommendations that were made were not in compliance with ESA/CESA and projects were not acquiring permits from USFWS or CDFW. Additionally, the commenter states there is a lack of concern for impacts to LBVI due to noise from construction activities on the G1 and G2 parcels during nesting season.

As discussed in Section 4.4 *Biological Resources* of the Draft IS/MND and the *Biological Resources Technical Report* prepared for the Project (Stantec 2023), the literature review and database searches conducted for the Proposed Project identified 48 special-status species within 10 miles of the BSA. All CNDDDB occurrences of LBVI within 5 miles of the BSA are from over 100 years ago and more recent occurrences, from 2013 and 2015, are 7 and 10 miles to the east and northeast of the BSA (CDFW 2022). A search of eBird revealed recent occurrences in 2022 and 2024 in the Rio de Los Angeles State Park approximately 0.6 mile from the BSA and in the Frogtown area approximately 1-mile south of the BSA in 2021.

Vegetation communities and land cover types occurring within the BSA include 11.77 acres of Fountaingrass swards (*Pennisetum setaceum* – *Pennisetum ciliare* Herbaceous Semi-Natural Alliance), 2.67 acres of Gooding’s willow – red willow riparian woodland and forest (*Salix gooddingii* – *Salix laevigata* Forest and Woodland Alliance), 0.94 acre of California buckwheat scrub (*Eriogonum fasciculatum* Shrubland Alliance), 0.10 acre of deerweed – silver lupine – yerba santa scrub (*Lotus scoparius* – *Lupinus albifrons* – *Eriodictyon* spp. Shrubland Alliance), 3.58 acres of ornamental non-native, 46.88 acres of disturbed/developed, and 4.88 acres of open water (Stantec 2023). Least Bell’s vireo often inhabits structurally diverse woodlands along watercourses including cottonwood-willow and oak woodlands and mulefat scrub. In Southern California, LBVI is a summer resident in low riparian vegetation in the vicinity of water or in dry river bottoms. The BSA along the Los Angeles River contains marginally suitable nesting habitat and suitable foraging habitat for LBVI thus the occurrence potential was determined to be low for nesting and moderate for foraging. Figure 3 in the *Biological Resources Technical Report* shows that the Gooding’s willow – red willow riparian woodland and forest vegetation community, which is vegetation LBVI would likely inhabit, is located within the Los Angeles Riverbed but is not within the Project Area (Stantec 2023). This vegetation type will not be temporarily or permanently affected by Project activities. It should be noted that park goals include adding native habitat plantings to restore and enhance natural habitat along the Los Angeles River.

Measure BIO-1, as described in the Draft IS/MND, is an SPR involving a pre-construction survey for nesting birds during the bird breeding/nesting window (February 15 to August 31) that shall be completed prior to the start of any development activities within the Project Area. This SPR addresses potential impacts to LBVI due to construction activities for the Proposed Project if present. BIO-2 is an SPR involving protection measures for LBVI following focused, protocol-level surveys being conducted for the Project Area plus a 500-foot buffer.

As described in the *Addendum to the 2023 Bowtie Parcel Project Biological Resources Technical Report* (Appendix A), since the completion of the *Biological Resources Technical Report*, additional protocol-level surveys have been conducted by CDPR biologists for two listed species with the potential to occur within the biological study area. Following the US Fish and Wildlife (USFWS) "Least Bell's Vireo Survey Guidelines" (USFWS 2001), a series of eight surveys were completed at the Bowtie Parks Development Project site and adjacent areas (i.e., 500-foot buffer) from April to July of 2024. Surveys spaced at least ten days apart, were conducted between dawn and 11 a.m. by qualified CDPR biologists without the use of vocalization tapes. No LBVI were detected during any of the surveys.

The avoidance measures outlined in BIO-2 would be implemented regardless of the results of the protocol-level survey and require that work be halted within the buffer zone until a qualified biologist can determine whether nest avoidance is feasible. If nest avoidance is not feasible, all work will cease until consultation with USFWS and CDFW is completed, and appropriate conservation measures will be identified and implemented.

Any construction activities occurring on the G2 parcel or in Rio de Los Angeles State Park is beyond the scope of this Project. No further response is required. No changes to the Draft IS/MND are required in response to this comment.

Response to Comment 3-2:

This comment states CDFW sent two letters to California State Parks (also known as DPR) and the City's Bureau of Engineering (BOE) in 2023 stating that a review of CNDDDB and eBird shows LBVI has potential to occur near the Project Area. The commenter states the Project has potential to impact LBVI if construction occurs during the nesting season, but the IS/MND does not propose specific mitigation measures or protocol surveys for the species. This comment also summarizes definitions of "take" and "critical habitat" under the ESA. The commenter states none of CDFW's recommended "potentially feasible mitigation measures" have been implemented and the document does not discuss an HCP, restoration management permit (RMP), incidental take permit (ITP), or Endangered Species Recover Conservation Plan.

See Response to Comment 3-1 for descriptions of CNDDDB and eBird database search results for the Proposed Project and SPRs BIO-1 and BIO-2 which address potential impacts to LBVI. The Project does not expect to have 'take' of LBVI, therefore no RMP, ITP or recovery plans have been developed.

Additionally, the Project will result in the creation of habitat for LBVI and other nesting birds where no habitat currently exists. No changes to the Draft IS/MND are required in response to this comment.

Response to Comment 3-3:

The commenter describes a recent observation of LBVI at the Paseo del Rio at Taylor Yard project site in June 2024 and states that surveys, public records, and observations from birdwatchers and LBVI researchers show observations of LBVI at Taylor Yard and Rio de Los Angeles State Park over the past decade.

In preparation of the *Biological Resources Technical Report* for the Proposed Project, biologists conducted a records search of CNDDDB and eBird along with a habitat assessment and reconnaissance survey of the Project Area. See Response to Comment 3-1 for descriptions of CNDDDB and eBird database search results for the BSA. Recent occurrences of LBVI in 2022 and 2024 in the Rio de Los Angeles State Park were approximately 0.6 mile from the BSA and in the Frogtown area approximately 1-mile south of the BSA in 2021. Additionally, LBVI was not observed in the BSA during the reconnaissance survey conducted for the Proposed Project. No changes to the IS/MND are required in response to this comment.

Response to Comment 3-4:

The commenter requests to stop construction/development of the Proposed Project on the G1 parcel and the Paseo del Rio at Taylor Yard Project on the G2 parcel until an LBVI assessment compliant with the ESA/CESA is completed.

As discussed in Section 4.4 *Biological Resources* of the IS/MND and the *Biological Resources Technical Report* prepared for the Project (Stantec 2023), BIO-2 is a SPR involving protection measures for LBVI following focused, protocol-level surveys being conducted for the Project Area plus a 500-foot buffer. As described in the *Addendum to the 2023 Bowtie Parcel Project Biological Resources Technical Report* (Appendix A), since the completion of the *Biological Resources Technical Report*, additional protocol-level surveys have been conducted by CDPR biologists for two listed species with the potential to occur within the biological study area. Following the US Fish and Wildlife (USFWS) "Least Bell's Vireo Survey Guidelines" (USFWS 2001), a series of eight surveys were completed at the Bowtie Parks Development Project site and adjacent areas (i.e., 500-foot buffer) from April to July of 2024. Surveys spaced at least ten days apart, were conducted between dawn and 11 a.m. by qualified CDPR biologists without the use of vocalization tapes. No LBVI were detected during any of the surveys.

The avoidance measures outlined in BIO-2 would be implemented regardless of the results of the protocol-level survey. All necessary protocol surveys are in process and necessary avoidance measures would be implemented in compliance with ESA and CESA.

Any construction activities occurring on the G2 parcel is beyond the scope of this Project. No changes to the IS/MND are required in response to this comment.

Response to Comment 3-5:

The commenter requests DPR and the City's BOE - Department of Public Works (DPW) apply for any required permits, follow the ESA/CESA procedures for transparency, and avoid cumulative impacts and unnecessary take.

All necessary permits will be obtained by the Project Proponent prior to site development. The implementation of SPRs and PSRs BIO-1 through BIO-4 will also reduce impacts to nesting birds and sensitive species within the Project Area. The Project does not anticipate take as a result of Project construction. DPR is coordinating with CDFW and USFWS and is therefore in compliance with both ESA and CESA regulations. No changes to the IS/MND are required in response to this comment.

Response to Comment 3-6:

The commenter requests DPR and the City's BOE-DPW create an Endangered Species HCP using data collected over the last decade.

An HCP is a planning document that describes "the anticipated effects of the proposed taking [of listed species], how those impacts will be minimized and mitigated, and how the conservation measures included in the plan will be funded." Per the *Biological Resources Technical Report* conducted for the Proposed Project, special-status species have some potential to occur within the BSA, however they are generally not expected to occur within the Project Area due to the lack of suitable habitat. A majority of the BSA is classified as disturbed/developed or fountaingrass swards. The Project Proponent would not seek an ITP as no listed species are likely to occur in the Project Area. Furthermore, creation of an HCP is not required for this Project as there is no expected take of any listed species. No changes to the IS/MND are required in response to this comment.

Response to Comment 3-7:

The commenter requests protective and mitigation measures at Rio de Los Angeles State Park for nesting-offspring activity.

This request is beyond the scope of the Proposed Project, as the Project Area is not located within Rio de Los Angeles State Park. No further response is required. No changes to the IS/MND are required in response to this comment.

Response to Comment 3-8:

The commenter requests a responsive jeopardy analysis by CDFW or USFWS to analyze the capability of LBVI to survive and reproduce, any adverse impacts/threats to the species, and cumulative impacts of related project activities.

This request is beyond the scope of the Proposed Project. No further response is required. No changes to the IS/MND are required in response to this comment.

Response to Comment 3-9:

The commenter requests the creation and implementation of an Endangered Species Habitat Conservation Plan and Endangered Species Recovery Plan as required by the ESA/CESA using database information from the past decade.

See Response to Comment 3-6. No changes to the IS/MND are required in response to this comment.

Response to Comment 3-10:

The commenter requests CDFW or USFWS to create and implement development alternatives such as biological reserves or wildlife refuges for LBVI to improve conservation efforts.³

This request is beyond the scope of the Proposed Project. No further response is required. No changes to the IS/MND are required in response to this comment.

Letter 4 – Jabz Alejandro Palomino

Letter 4

From: [Jabz](#)
To: [Review_Environmental@Parks](#); [Review_Environmental@Parks](#); [Sema_Lucas@Parks](#); [sarah.bryson@lacity.org](#)
Cc: [Fierro_Jessy@DTSC](#); [Hernandez_Teresa@DTSC](#); [Clara.Solis](#); [vincentmontalvo@dc@yahoo.com](#); [jessica.swan@dtsc.ca.gov](#); [Kelsey_Jessup](#); [Nouven_Vu@DTSC](#); [brian.baldauf@mrca.ca.gov](#); [candice@foliar.org](#); [maggie.jenkins@tnc.org](#); [regina.mallare@lacity.org](#); [Sarai Jimenez](#); [cegacommentletters@wildlife.ca.gov](#)
Subject: Extension to Public comment period for Bowtie G1 project, and possible discrimination case
Date: Monday, July 15, 2024 3:11:08 PM

Hello,

I would like to request an extension of at least 90 days for the Bowtie G1 redevelopment project to provide proper time to outreach to the communities being impacted by this project.

I understand the standard period is only 30 days. However, the document to be reviewed by members of the public is about 200 pages long, also, most of terminology and wording included in the document/s most taxpayers -residents are not familiar with or have hard time to understand or assimilate, as we are not familiar with it, or are not being presented or provided in any language other than English.

No link or copies to the Spanish translated version of this document ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#)), or to any languages other than English have been provided or available so far, failing to properly reach out and be inclusive to the Disadvantaged and Marginalized IBPOC Spanish speaking community, to other languages speaking communities members or to members from the general public as well, which could be considered as an act of discrimination against minorities, and all of them.

4-1

As a longtime resident and member of the public, I strongly believe that any public agency or private group planning to use any public funding for any public project/s shall be more considered and inclusive with the very members of the public funding all this projects, and provide a more than reasonable time and ways for the public to fully understand and have an idea of what it is been proposed and how our communities, environment and wildlife will be impacted.

In order for your agency, and any public agency and/or private contractor to provide transparency and a more equitable, fair and inclusive process regarding these matters to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general, I'm requesting the following but not limited to:

4-2

1. Provide translated version of the document proposed / presented ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#)) in Spanish and other languages other than English for transparency and a more equitable, fair and inclusive process regarding these matters to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general as well.

2. Public Comment Period Extension to at least 90 days starting from the date copies of this document translated to Spanish and other languages are released and available to the disadvantaged and marginalized IBPOC Spanish speaking and other languages community members living adjacent to this project, and for members to the public in general as well. ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#))

4-3

Letter 4 – Continued

3. Public meetings in the form of town hall to address all the questions, concerns and recommendations from residents-stakeholders and public in general in regards of the proposed MND project, and Bowtie G1project in general ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#))

4. Have the private contractor/consultant, and every single public agency involved and part of this project, City, State and Federal agencies present to address any and all the questions, concerns and recommendations from residents-stakeholders and members of the public in regards of the proposed MND and Bowtie G1project in general ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#)).

4-4

Respectfully,

Jabz Alejandro P.

Response to Jabz Alejandro Palomino – Letter 4

Response to Comment 4-1:

This comment requests an extension of the public review period to at least 90 days as it is not enough time to make comments.

The Proposed Project's public review period was a standard 30 days as is required for MNDs under CEQA (CEQA Guidelines §15073(a)). However, DPR has extended the public review period from 30 to 45 days to be amenable to the community's request for an extension while still meeting grant funding deadline requirements. The extended public review period ended on August 10, 2024, but DPR will continue to accept comments and respond to them outside of the purview of CEQA. Additionally, to allow the public a chance to provide feedback in person, DPR held a public community event led by The Nature Conservancy on August 17, 2024 at the Rio De Los Angeles State Park that was focused on the Bowtie Wetland Demonstration Project, which is the first phase of the Bowtie's development. No changes to the IS/MND are required in response to this comment.

Response to Comment 4-2:

The commenter requests DPR to provide a translated version of the IS/MND in Spanish and other languages.

The Proposed Project has met noticing requirements for MNDs under CEQA (PRC Section 21092). Translation of a document is not required under CEQA, however, DPR prepared a Summary of the IS/MND in Spanish which includes the Project description, location, objectives, project effects, and mitigation measures. This document can be accessed at the following link: https://www.parks.ca.gov/?page_id=983. No changes to the IS/MND are required in response to this comment.

Response to Comment 4-3:

The commenter requests that the public review period be extended to at least 90 days, starting when the requested translated document is released.

As stated in Response to Comment 4-1, the Proposed Project's public review period has been extended from the standard 30 days to 45 days; the review period ended on August 10, 2024. No changes to the IS/MND are required in response to this comment.

Response to Comment 4-4:

The commenter requests public "town hall" style meetings with the private contractor, consultant, and all public agencies involved with the Proposed Project to address the public's questions, concerns, and recommendations.

Per CEQA Guidelines Section 15073, public review of a proposed MND does not require a public meeting. However, to give the public a chance to provide feedback in person, DPR attended a public community event led by The Nature Conservancy on August 17, 2024 at Rio De Los Angeles State Park that was focused on the Bowtie Wetland Demonstration Project, which is the first phase of the Bowtie parcel's development. DPR had a table to provide project updates to interested community members, accept comments, and answer questions. Notice of this was sent via email on July 19, 2024 to individuals or parties interested in the Bowtie Park Development Project. No changes to the IS/MND are required in response to this comment.

Letter 5 – Clara Solis

Letter 5

From: claramsolis@earthlink.net
To: "Jabz"; Review.Environmental@Parks; Review.Environmental@Parks; Serna.Lucas@Parks; sarah.bryson@lacity.org
Cc: Fierro.Jessy@DTSC; Hernandez.Teresa@DTSC; vincentmontalvoclc@yahoo.com; jessica.swan@dtsc.ca.gov; kelsey.jessup@tnc.org; vu.nguyen@dtsc.ca.gov; brian.baldauf@mrca.ca.gov; candice@foliar.org; maggie.jenkins@tnc.org; regina.mallare@lacity.org; Sarai.Jimenez; ceqacommentletters@wildlife.ca.gov
Subject: RE: Extension to Public comment period for Bowtie G1 project, and possible discrimination case
Date: Monday, July 15, 2024 3:21:35 PM

Some people who received this message don't often get email from claramsolis@earthlink.net. [Learn why this is important](#)

I agree with Jabz Alejandro P.

5-1

From: Jabz <savethevireo@gmail.com>
Sent: Monday, July 15, 2024 3:10 PM
To: Environmental.Review@parks.ca.gov; enviro@parks.ca.gov; Lucas.Serna@parks.ca.gov; sarah.bryson@lacity.org
Cc: jessy.fierro@dtsc.ca.gov; Hernandez.Teresa@DTSC <Teresa.Hernandez@dtsc.ca.gov>; Clara Solis <claramsolis@earthlink.net>; vincentmontalvoclc@yahoo.com; jessica.swan@dtsc.ca.gov; kelsey.jessup@tnc.org; vu.nguyen@dtsc.ca.gov; brian.baldauf@mrca.ca.gov; candice@foliar.org; maggie.jenkins@tnc.org; regina.mallare@lacity.org; Sarai.Jimenez <sarai.jimenez@tnc.org>; ceqacommentletters@wildlife.ca.gov
Subject: Extension to Public comment period for Bowtie G1 project, and possible discrimination case

Hello,

I would like to request an extension of at least 90 days for the Bowtie G1 redevelopment project to provide proper time to outreach to the communities being impacted by this project.

I understand the standard period is only 30 days. However, the document to be reviewed by members of the public is about 200 pages long, also, most of terminology and wording included in the document/s most taxpayers -residents are not familiar with or have hard time to understand or assimilate, as we are not familiar with it, or are not being presented or provided in any language other than English.

No link or copies to the Spanish translated version of this document ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#)), or to any languages other than English have been provided or available so far, failing to properly reach out and be inclusive to the Disadvantaged and Marginalized IBPOC Spanish speaking community, to other languages speaking communities members or to members from the general public as well, which could be considered as an act of discrimination against minorities, and all of them.

5-2

As a longtime resident and member of the public, I strongly believe that any public agency or private group planning to use any public funding for any public project/s shall be more considered and inclusive with the very members of the public funding all this projects, and provide a more than reasonable time and ways for the public to fully understand and have an idea of what it is been proposed and how our communities, environment and wildlife will be impacted.

Letter 5 – Continued

In order for your agency, and any public agency and/or private contractor to provide transparency and a more equitable, fair and inclusive process regarding these matters to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general, I'm requesting the following but not limited to:

1. Provide translated version of the document proposed / presented ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#)) in Spanish and other languages other than English for transparency and a more equitable, fair and inclusive process regarding these matters to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general as well.
2. Public Comment Period Extension to at least 90 days starting from the date copies of this document translated to Spanish and other languages are released and available to the disadvantaged and marginalized IBPOC Spanish speaking and other languages community members living adjacent to this project, and for members to the public in general as well. ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#))
3. Public meetings in the form of town hall to address all the questions, concerns and recommendations from residents-stakeholders and public in general in regards of the proposed MND project, and Bowtie G1 project in general ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#))
4. Have the private contractor/consultant, and every single public agency involved and part of this project, City, State and Federal agencies present to address any and all the questions, concerns and recommendations from residents-stakeholders and members of the public in regards of the proposed MND and Bowtie G1 project in general ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#)).

Respectfully,

Jabz Alejandro P.

**5-2
cont.**

Response to Clara Solis – Letter 5

Response to Comment 5-1:

This comment expresses agreement with Jabz Alejandro Palomino's comment letter (Letter 4) sent on July 15, 2024.

See Response to Comment 4-1 through 4-4.

Response to Comment 5-2:

Comment 5-2 is an attachment of Jabz Alejandro Palomino's comment letter (Letter 4) sent on July 15, 2024.

See Response to Comment 4-1 through 4-4.

Letter 6 – Eduardo Aguirre

Letter 6

From: [eduardo.aguirre](#)
To: [Review.Environmental@Parks](#)
Subject: Re: Notice of Availability and Intent to Adopt Initial Study/Mitigated Negative Declaration for The Bowtie Park Development Project – EXTENSION OF COMMENT PERIOD
Date: Saturday, July 20, 2024 8:56:11 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image001.png](#)

You don't often get email from edag6463@gmail.com. [Learn why this is important](#)

Thanks a lot.

I been since the beginning of the planing process. And understand that could exist opposition to the project, but it is A very ,very good parks and ecology implementation with wide benefits for our community.

6-1

On Fri, Jul 19, 2024, 16:35 Review, Environmental@Parks <Environmental.Review@parks.ca.gov> wrote:

Good afternoon,

You're receiving this notice as an interested individual or party regarding the Bowtie Park Development Project, a project lead by California State Parks. This message is serving as notification that the Draft Initial Study and Mitigated Negative Declaration (IS/MND) review period has been extended by **15 days** per community feedback. The Draft IS/MND is being made available for public review and comment for a period of 45 days, beginning **June 26th, 2024**, and ending on **August 10th, 2024**.

The Draft IS/MND, Notice of Availability and Intent to Adopt the IS/MND (in English and Spanish), a Summary of the documents (in English and Spanish) may be viewed at the following location...

https://www.parks.ca.gov/?page_id=983

California State Parks understands the community's request for an extension to review the IS/MND and wants to be amenable to this request while meeting Grant funding deadline requirements. The comment period regarding the IS/MND will close on August 10th, but California State Parks will continue to accept comments and respond to them outside of the purview of CEQA.

To allow the public a chance to provide feedback in person, California State Parks is planning to be present at a public community event led by The Nature Conservancy on August 17th from 10:30am-12pm at Rio De Los Angeles SP that will be focused on the Bowtie Wetland Demonstration Project, which is the first phase of the Bowtie's development. See the flyer in both English and Spanish below. California State Parks will be at this event with a table to provide project updates to interested community members, accept comments and answer questions.

6-2

Comments should continue to be directed to:

enviro@parks.ca.gov Include "Bowtie Development" in the subject line

or by mail to

ATTN: Luke Serna: Bowtie Development
California State Parks
Southern Service Center
2797 Truxtun Road
San Diego, CA 92106

The project team appreciates your continued engagement with the project as it proceeds towards construction.

Bowtie Park Development Project Team

Response to Eduardo Aguirre– Letter 6

Response to Comment 6-1:

The commenter states they have been following the Project since the beginning of the planning process and they think the Project is a very good park and ecological project with benefits to the community.

DPR appreciates the letter of support for the Project. No changes to the IS/MND are required in response to this comment.

Response to Comment 6-2:

Comment 6-2 is an attachment of DPR's letter regarding the extension of the comment period and the public meeting notice flyer for the Bowtie Wetland Demonstration Project which DPR stated they would attend to provide project updates and accept comments and answer questions.

No response is required.

Letter 7 – Adela and John Vangelisti

Letter 7

From: [Adela Vangelisti](#)
To: [Review_Environmental@Parks](#); [Review_Environmental@Parks](#); [Sema_Lucas@Parks](#); [sarah.bryson@lacity.org](#)
Cc: [Fierro_Jessy@DTSC](#); [Teresa.Hernandez@dtsc.ca.gov](#); [jessica.swan@dtsc.ca.gov](#); [Kelsey_Jessup](#); [Nguyen_Vu@DTSC](#); [brian.baldauf@mrca.ca.gov](#); [candice@foliar.org](#); [maagie.jenkins@inc.org](#); [regina.mallare@lacity.org](#); [Sara_Jimenez](#); [cegaacommentletters@wildlife.ca.gov](#)
Subject: Bowtie Public Comment Extension
Date: Monday, July 22, 2024 7:11:37 PM
Attachments: [Bowtie Public comment 06 26 24 to 07 26 24 Extention request 001.docx](#) - Attachment 1
[Bowtie Public comment 06 26 24 to 07 26 24 Extention request 001 Adela.docx](#) - Attachment 2

[Some people who received this message don't often get email from adelavangelisti@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

We John Tristan Vangelisti and Adela Vangelisti agree with this letter to extend the Public comment for the Bowtie Project.

Please find attached our signed letters.

Thank you!

7-1

Letter 7 – Continued

Letter 7 - Attachment 1

To: Environmental.Review@parks.ca.gov
enviro@parks.ca.gov
Lucas.Serna@parks.ca.gov
sarah.bryson@lacity.org

Cc: jessy.fierro@dtsc.ca.gov
Teresa.Hernandez@dtsc.ca.gov

jessica.swan@dtsc.ca.gov
kelsey.jessup@tnc.org
vu.nguyen@dtsc.ca.gov
brian.baldauf@mrca.ca.gov
candice@folar.org
maggie.jenkins@tnc.org
regina.mallare@lacity.org
sarai.jimenez@tnc.org
ceqacommentletters@wildlife.ca.gov

Hello,

I would like to request an extension of at least 90 days for the Bowtie G1 redevelopment project to provide proper time to outreach to the communities being impacted by this project.

I understand the standard period is only 30 days. However, the document to be reviewed by members of the public is about 200 pages long, also, most of terminology and wording included in the document/s most taxpayers -residents are not familiar with or have hard time to understand or assimilate, as we are not familiar with it, or are not being presented or provided in any language other than English.

No link or copies to the Spanish translated version of this document ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#)), or to any languages other than English have been provided or available so far, failing to properly reach out and be inclusive to the Disadvantaged and Marginalized IBPOC Spanish speaking community, to other languages speaking communities members or to members from the general public as well, which could be considered as an act of discrimination against minorities, and all of them.

As a longtime resident and member of the public, I strongly believe that any public agency or private group planning to use any public funding for any public project/s shall be more considered and inclusive with the very members of the public funding all this projects, and provide a more than reasonable time and ways for the public to fully understand and have an idea of what it is been proposed and how our communities, environment and wildlife will be impacted.

In order for your agency, and any public agency and/or private contractor to provide transparency and a more equitable, fair and inclusive process regarding these matters to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general, I'm requesting the following but not limited to:

Letter 7 – Continued

1. Provide translated version of the document proposed / presented ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#)) in Spanish and other languages other than English for transparency and a more equitable, fair and inclusive process regarding these matters to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general as well.
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3. Public meetings in the form of town hall to address all the questions, concerns and recommendations from residents-stakeholders and public in general in regards of the proposed MND project, and Bowtie G1project in general ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#))
4. Have the private contractor/consultant, and every single public agency involved and part of this project, City, State and Federal agencies present to address any and all the questions, concerns and recommendations from residents-stakeholders and members of the public in regards of the proposed MND and Bowtie G1project in general ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#)).

Sincerely,

John Tristan Vangelisti

Letter 7 – Continued

Letter 7 - Attachment 2

To: Environmental.Review@parks.ca.gov
enviro@parks.ca.gov
Lucas.Serna@parks.ca.gov
sarah.bryson@lacity.org

Cc: jessy.fierro@dtsc.ca.gov
Teresa.Hernandez@dtsc.ca.gov

jessica.swan@dtsc.ca.gov
kelsey.jessup@tnc.org
vu.nguyen@dtsc.ca.gov
brian.baldauf@mrca.ca.gov
candice@foliar.org
maggie.jenkins@tnc.org
regina.mallare@lacity.org
sarai.jimenez@tnc.org
ceqacommentletters@wildlife.ca.gov

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Letter 7 – Continued

1. Provide translated version of the document proposed / presented ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#)) in Spanish and other languages other than English for transparency and a more equitable, fair and inclusive process regarding these matters to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general as well.
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4. Have the private contractor/consultant, and every single public agency involved and part of this project, City, State and Federal agencies present to address any and all the questions, concerns and recommendations from residents-stakeholders and members of the public in regards of the proposed MND and Bowtie G1project in general ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#)).

Sincerely,

Adela Vangelisti

Response to Adela Vangelisti and John Vangelisti – Letter 7

Response to Comment 7-1:

The commenters express agreement with Jabz Alejandro Palomino's comment letter (Letter 4) and refer to their attached signed letters.

Attachments 1 and 2 are copies of Jabz Alejandro Palomino's comment letter (Letter 4) sent on July 15, 2024.

See Response to Comment 4-1 through 4-4.

Letter 8 – City of Los Angeles

Letter 8

From: [Kyle Hickey](#)
To: [Review_Environmental@Parks](#); [Review_Environmental@Parks](#)
Cc: [Serna_Lucas@Parks](#)
Subject: Fwd: Extension to Public comment period for Bowtie G1 project, and possible discrimination case
Date: Thursday, July 25, 2024 9:55:19 AM

You don't often get email from kyle.hickey@lacity.org. [Learn why this is important](#)

Hello CA Parks,

I'm reaching out since a concerned constituent has contacted our office regarding the lack of Spanish-translated environmental documents for the Bowtie Park project (see forwarded email below). I just wanted to inquire with you - is there a Spanish version of the IS/MND for the Bowtie?

8-1

If possible, we would appreciate a prompt response since the comment period for the project concludes tomorrow. Please advise as soon as possible. My apologies for the short notice.

Thank you,

Kyle Hickey (he/him)
Planning & Land Use Deputy
Los Angeles City Council District 1
General Office: (213) 473-7001
councildistrict1.lacity.gov



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

From: Jabz <savethevireo@gmail.com>
Date: Mon, Jul 15, 2024 at 3:10 PM
Subject: Extension to Public comment period for Bowtie G1 project, and possible discrimination case
To: <Environmental.Review@parks.ca.gov>, <enviro@parks.ca.gov>, <Lucas.Serna@parks.ca.gov>, sarah.bryson@lacity.org <sarah.bryson@lacity.org>
Cc: <jessy.fierro@dtsc.ca.gov>, Hernandez, Teresa@DTSC <Teresa.Hernandez@dtsc.ca.gov>, Clara Solis <claramsolis@earthlink.net>, <vincentmontalvo@icloud.com>, <jessica.swan@dtsc.ca.gov>, <kelsey.jessup@tnc.org>, <vu.nguyen@dtsc.ca.gov>, <brian.baldauf@mrca.ca.gov>, <candice@folar.org>, <maggie.jenkins@tnc.org>, <regina.mallare@lacity.org>, Sarai Jimenez <sarai.jimenez@tnc.org>, <ceqacommentletters@wildlife.ca.gov>

Hello,

I would like to request an extension of at least 90 days for the Bowtie G1 redevelopment project to provide proper time to outreach to the communities being impacted by this project.

8-2

Letter 8 – Continued

I understand the standard period is only 30 days. However, the document to be reviewed by members of the public is about 200 pages long, also, most of terminology and wording included in the document/s most taxpayers -residents are not familiar with or have hard time to understand or assimilate, as we are not familiar with it, or are not being presented or provided in any language other than English.

No link or copies to the Spanish translated version of this document ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#)), or to any languages other than English have been provided or available so far, failing to properly reach out and be inclusive to the Disadvantaged and Marginalized IBPOC Spanish speaking community, to other languages speaking communities members or to members from the general public as well, which could be considered as an act of discrimination against minorities, and all of them.

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1. Provide translated version of the document proposed / presented ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#)) in Spanish and other languages other than English for transparency and a more equitable, fair and inclusive process regarding these matters to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general as well.
2. Public Comment Period Extension to at least 90 days starting from the date copies of this document translated to Spanish and other languages are released and available to the disadvantaged and marginalized IBPOC Spanish speaking and other languages community members living adjacent to this project, and for members to the public in general as well. ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#))
3. Public meetings in the form of town hall to address all the questions, concerns and recommendations from residents-stakeholders and public in general in regards of the proposed MND project, and Bowtie G1project in general ([Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#))
4. Have the private contractor/consultant, and every single public agency involved and part of this project, City, State and Federal agencies present to address any and all the questions, concerns and recommendations from residents-stakeholders and members of the public in regards of the proposed MND and Bowtie G1project in general ([Bowtie Park Development Project Initial Study/Mitigated Negative](#)

**8-2
cont.**

Letter 8 – Continued

[Declaration](#)).

Respectfully,

Jabz Alejandro P.

Response to City of Los Angeles – Letter 8

Response to Comment 8-1:

The City's Planning and Land Use Deputy is inquiring if there is a Spanish-translated version of the IS/MND as a concern constituent has contacted their office.

The Proposed Project has met noticing requirements for MNDs under CEQA (PRC Section 21092). Translation of a document is not required under CEQA, however, DPR prepared a Summary of the IS/MND in Spanish which includes the Project description, location, objectives, project effects, and mitigation measures. This document can be accessed at the following link: https://www.parks.ca.gov/?page_id=983. No changes to the IS/MND are required in response to this comment.

Response to Comment 8-2:

Comment 8-2 is an attachment of Jabz Alejandro Palomino's comment letter (Letter 4) sent on July 15, 2024.

See Response to Comment 4-1 through 4-4.

Letter 9 – Clara Solis

Letter 9

From: claramsolis@earthlink.net
To: Review_Environmental@Parks
Subject: Comment Letter Re "Bowtie Redevelopment"
Date: Friday, July 26, 2024 3:47:29 PM

You don't often get email from claramsolis@earthlink.net. [Learn why this is important](#)

I am concerned that the extended deadline has not been posted to your website. For that reason, I am including these comments. Which I will add to if the deadline is indeed extended. It puts the working class and/or Spanish community at a disadvantage when extensions are not posted to the website. Some people may have just gave up.

9-1

CONCERNS ABOUT INADEQUATE MITIGATION MEASURES FOR LEAST BELL'S VIREO

The Project is not eligible for a Mitigated Negative Declaration ("MND") under the California Environmental Quality Act ("CEQA"); that the MND prepared for the Project proposes inadequate mitigation and monitoring measures; that more adequate mitigation and enforcement measures are available; that feasible alternatives to the project with less severe adverse environmental impacts are available; and that going forward with the Project without requiring a full Environmental Impact Report ("EIR") is prohibited under CEQA.

The California Environmental Quality Act is California's broadest environmental law. CEQA helps to guide public agencies during approval of projects. Courts have interpreted CEQA to afford the fullest protection of the environment within the reasonable scope of the statutes. CEQA applies to all discretionary projects proposed to be conducted or approved by a City, including private projects requiring discretionary government approval. See California Public Resources Code, sections 21000 - 21178, and Title 14 Cal. Code Regs., section 753, and Chapter 3, sections 15000 - 15387.

CEQA's Broad Definition of a "Project" Includes *All Phases* of a Development

"CEQA broadly defines a 'project' as 'an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and ... that involves the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.' [Citation.] The statutory definition is augmented by the [CEQA] Guidelines [Cal.Code Regs., tit. 14, § 15000 et seq.], which define a 'project' as '*the whole of an action*, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment....'" *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1222, 66 Cal.Rptr.3d 645 (*Tuolumne County*). This includes all phases of a project that are reasonably foreseeable, and all related projects that are directly linked to the project. (CEQA Guidelines section 15378).

9-2

CEQA Has a Strong Presumption in Favor of EIR Preparation

A strong presumption in favor of requiring preparation of an Environmental Impact Report ("EIR") is built into CEQA which is reflected in what is known as the "fair argument" standard, under which an agency must prepare an EIR whenever substantial evidence in the record supports a fair argument that a project may have a significant effect on the environment.

No Oil, Inc. v. City of Los Angeles (1974) 13 Cal.3d 68, 75, 82; *Friends of "B" St. v. City of Haywood* (1980) 106 Cal.App.3d 988, 1002.

Letter 9 – Continued

“The EIR is the primary means of achieving the Legislature's considered declaration that it is the policy of this state to ‘take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state.’ [Citation.] The EIR is therefore ‘the heart of CEQA.’ An EIR is an ‘environmental “alarm bell” whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return.’” *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 392.

Under CEQA and the CEQA Guidelines, if a project is not exempt and *may* cause a significant effect on the environment, the agency *must* prepare an EIR. PRC §§ 21100, 21151; 14 Cal. Code Regs. § 15064(a)(1), (f)(1). “Significant effect upon the environment” is defined as “a substantial or potentially substantial adverse change in the environment.” PRC § 21068; 14 Cal Code Regs § 15382. A project “may” have a significant effect on the environment if there is a “reasonable probability” that it will result in a significant impact. *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 83 n.16; *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 309, 248 CR 352. This standard sets a “low threshold” for preparation of an EIR. *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App. 4th 903, 928; *Bowman v. City of Berkeley* (2004) 122 CA4th 572, 580; *Citizen Action to Serve All Students v. Thornley* (1990) 222 CA3d 748, 754; *Sundstrom v. County of Mendocino* (1988) 202 CA3d 296, 310.

9-2
cont.

This Project not only may have a significant effect on the environment, it *will* have a significant effect on the environment. Here there will be a significant impact on the Least Bell’s Vireo. It will be endangered by inadequate mitigation both during construction and during use by users of the park. This is happening currently at the nearby state park where LBVI nests have been burnt and destroyed.

There are also “cumulative impacts” which require the preparation of an EIR. An MND is not appropriate when the cumulative impact of successive projects of the same type in the same place over time is significant. Where there is a reasonable possibility of a significant effect due to unusual circumstances surrounding the project it is not exempt even if it clearly fits one of the exemption categories. 14 Cal. Code Regs § 15300.2(c), *See, e.g., Banker’s Hill, Hillcrest, Park West Community Preservation Group v. City of San Diego*, 139 Cal.App.4th 249 (2006).

There are cumulative impacts from Bowtie G1 and Paseo del Rio at TY G2 projects, and RDLASP negligence to the LBVI. The cumulative impacts from these issues will adversely affect the Least Bell’s Vireo by disrupting foraging, breeding behavior or by causing adults to abandon nests, as already has happened several times in the past few years. Disruptions to breeding behavior could include a temporary reduction in breeding activity reducing the density of nesting pairs. Increment of stress due to noise from construction activity occurring during the breeding season will also impact the species. Project activities occurring during nesting season of the LBVI could result in the incidental loss “take” of fertile eggs, nestlings, fledglings, or nest abandonment. LBVI could also be forced from their ancestral natural habitat into adjacent areas that may potentially be less suitable where they would be at risk of predation, starvation or other injury or death.

9-3

Letter 9 – Continued

Bowtie is part of the Least Bell's Vireo (LBVI) Ancestral Natural Habitat critical for its survival, recover and conservation.

For the past decade or more the LBVI Has been using that area as Migratory corridor during the migration and nesting season. Observations has been reported- observed since 2013 to 2024 by professional surveyors hired by BOE and CSP, MRCA, FoLAR, and local independent community LBVI researchers in that area.

LBVI has been nesting at RDLASP, located about half a mile from Bowtie G1.

Since 2013 CSP and TNC knew about the LBVI presence, however, not a single has been report to CDFW or FWS to enforce and activate ESA-CESA.

Bowtie G1 Plan is to create a Recreational Park not a wildlife preserve or biological preserve.

G1 "Habitat enhancement" does not comply with Habitat Conservation Plan (HCP) which is required and mandatory by ESA- CESA in case of any alteration to the LBVI Habitat and ecosystem.

If you check the G1 renderings, 90% of G1 is accessible to the public. According to studies from Agencies, the LBVI requires 1 to 4 acres approximately per nesting pair. And a safety buffer of 300 feet per active nest. G1 in its widest area is barely 360ft wide (west side) . About 85ft in the middle area and 240ft on its East side right next to PDR Aat Taylor Yard.

In the eventually this project is approved, and let's say a year or two after, the LBVI decide to nest there, what would be the contingency plan? Will ESA-CESA be fully enforce and by who?

We don't have to wondering or imagine The negative impact from a situation such as this, we could see it and the LBVI has been experiencing it for a few years now at Rio de Los Angeles State Park where did to the wilful negligence from CST, CDFW, FWS, and 100 acre partnership has destroyed at least 7 active nests with fertile eggs and nestlings in less than 3 years.

**9-3
cont.**

I am also concerned about the extensive contamination that is known to exist at Taylor Yard. There is elevated concentrations of contaminants including, lead (140 mg/kg) and diesel-range hydrocarbons (640 mg/kg) and polycyclic aromatic hydrocarbons, such as benzo(b)fluoranthene (140,000 ug/kg), benzo(a)anthracene (190,000 ug/kg), and indeno(1,2,3-cd)pyrene (62,000 ug/kg).

I am concerned that the mitigation measures with such high levels of contamination is inadequate.

A full EIR should be prepared. DTSC lead removal from Exide has been inadequate with sites becoming recontaminated because neighboring sites were not remediated and not enough contamination was removed. Trees need to be planted but that requires removal of more soil. A full EIR must be prepared to consider all remedies. The present study is inadequate.

9-4

Document states if contamination is found, contamination has been found. The plan for it should already be included. This is not looking at the whole of the project as required by CEQA.

Clara Solis, 521 N Av 67, Los Angeles, CA 90042

Response to Clara Solis – Letter 9**Response to Comment 9-1:**

This comment expresses concern that the public review deadline extension was not posted to the DPR website by the time of their email (July 26, 2024) which puts the working class and Spanish community at a disadvantage.

The initial Notice of Availability and Intent to Adopt an IS/MND (NOA-NOI) was sent via email on June 26, 2024 to individuals or parties interested in the Bowtie Park Development Project. This notification provided links to the Draft IS/MND and NOA-NOI along with review period dates and instructions on how to provide comments. Notice of the review period extension was sent via email on July 19, 2024 to individuals or parties interested in the Bowtie Park Development Project, prior to both the initial (July 26, 2024) and extended (August 10, 2024) review period deadlines. This notice included a link to the DPR website which was updated on the same day with the extended review period as well as English and Spanish versions of the revised NOA-NOI and Summary of IS/MND. No changes to the IS/MND are required in response to this comment.

Response to Comment 9-2:

The commenter is concerned that the Project is ineligible for an MND, and an EIR should be prepared; that the mitigation measures provided in the IS/MND for LBVI (*Vireo bellii pusillus*) are inadequate; and that there are more feasible project alternatives with less severe environmental impacts. The commenter believes Project construction and operational park use will cause a significant impact to LBVI due to inadequate mitigation. This comment also provides background information about CEQA including definitions and case law regarding EIRs and when an EIR must be prepared. The commenter states an EIR should be prepared due to the significant effects to LBVI.

Under CEQA Statute §21064.5, a MND may be prepared for a project when the initial study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment. The analysis within the Initial Study demonstrated that the Project has no impact, a less than significant impact, or a less than significant impact with implementation of SPRs, PSRs, or mitigation with respect to all environmental issues. As described in the Draft IS/MND, as part of its effort to avoid impacts, DPR maintains a list of Project Requirements that are included in a project design to reduce impacts to resources. From this list, SPRs are assigned, as appropriate to all projects. These features are standard and do not constitute mitigation measures. DPR also makes use of PSRs. DPR develops these project requirements to address project impacts for projects that have unique issues but do not typically

standardize these for projects statewide. These features are a part of project design and therefore do not constitute mitigation measures.

Because of its unique role as Lead Agency, Trustee Agency as well as the Project Proponent, DPR's resource professionals take a prominent and influential role during the Project conceptualization, design, and planning process consistent with Section 15004(b)(1) of CEQA. Their early involvement during the planning process enables environmental considerations to influence Project programming and design. This approach permits DPR under CEQA Section 15065(b)(1), to incorporate Project modifications prior to the start of the public review process of the environmental document, to avoid impacts to a point where clearly no significant effect on the environment would occur.

The Project's biological survey area (BSA) is defined as the Project Area plus a 300-foot buffer along the Los Angeles River and contains marginally suitable nesting habitat and suitable foraging habitat for LBVI thus the occurrence potential was determined to be low for nesting and moderate for foraging. Figure 3 in the *Biological Resources Technical Report* shows that the Gooding's willow – red willow riparian woodland and forest vegetation community, which is vegetation LBVI would likely inhabit, is located within the Los Angeles Riverbed and is not within the Project Area (Stantec 2023). This vegetation type would not be affected by temporary or permanent Project impacts. LBVI was not observed in the BSA during the reconnaissance survey conducted for the Proposed Project. Additionally, park goals include adding native habitat plantings to restore and enhance natural habitat along the Los Angeles River.

Measure BIO-1, as described in the IS/MND, is an SPR involving a pre-construction survey for nesting birds during the bird breeding/nesting window (February 15 to August 31) that shall be completed prior to the start of any development activities within the Project Area. This SPR addresses potential impacts to LBVI due to construction activities for the Proposed Project if present. BIO-2 is an SPR involving protection measures for LBVI following focused, protocol-level surveys being conducted for the Project Area plus a 500-foot buffer.

As described in the *Addendum to the 2023 Bowtie Parcel Project Biological Resources Technical Report* (Appendix A), since the completion of the *Biological Resources Technical Report*, additional protocol-level surveys have been conducted by CDPR biologists for two listed species with the potential to occur within the biological study area. Following the US Fish and Wildlife (USFWS) "Least Bell's Vireo Survey Guidelines" (USFWS 2001), a series of eight surveys were completed at the Bowtie Parks Development Project site and adjacent areas (i.e., 500-foot buffer) from April to July of 2024. Surveys spaced at least ten days apart, were conducted between dawn and 11 a.m. by qualified CDPR biologists without the use of vocalization tapes. No LBVI were detected during any of the surveys.

The avoidance measures outlined in BIO-2 would be implemented regardless of the results of the protocol-level survey and require that work be halted within the buffer zone until a qualified biologist can determine whether nest avoidance is feasible. If nest avoidance is not feasible, all work will cease until consultation with USFWS and CDFW is completed, and appropriate conservation measures will be identified and implemented.

Given the absence of LBVI habitat within the Project Area and implementation of SPRs BIO-1 and BIO-2, impacts to LBVI would be less than significant. As the effects to LBVI would be avoided or mitigated to a point where clearly no significant effect on the environment would occur (14 CCR § 15070), an MND is appropriate.

No changes to the Draft IS/MND are required in response to this comment.

Response to Comment 9-3:

The commenter states the Project would have cumulative biological impacts from the Bowtie G1 and Paseo del Rio projects at Taylor Yard and negligence of LBVI at Rio de Los Angeles State Park and cumulative impacts require the preparation of an EIR. The commenter states cumulative impacts would disrupt LBVI foraging and breeding behavior and Project activities during nesting season could cause incidental take of eggs, nestlings, fledglings, or nest abandonment. This comment also provides information on LBVI ancestral natural habitat, use of the area as a migratory corridor during the migration and nesting season, and observations in the area from 2013 to 2024.

The commenter states the Project's proposed use as a recreational park with habitat enhancement and not a wildlife/biological preserve does not comply with a Habitat Conservation Plan (HCP) which is required by Endangered Species Act (ESA)/California Environmental Species Act (CESA) in case of any alteration to LBVI habitat and ecosystem.

The commenter notes that studies from Agencies show LBVI requires 1 to 4 acres of habitat per nesting pair and a safety buffer of 300 feet per active nest, but the width of the Project Area is 360 feet at its widest area. The commenter also asks what the contingency plan is if LBVI nest after the Project is approved and who will enforce the ESA/CESA. This comment also describes negligence of LBVI at Rio de Los Angeles State Park and observations of 7 active LBVI nests destroyed within 3 years.

As addressed in Response to Comment 9-2, an MND is the appropriate environmental document for the Proposed Project. As described in the Mandatory Findings of Significance, Section 4.21 of the Draft IS/MND, the Proposed Project's contribution to cumulative impacts would not be considerable with the incorporation of Standard Project Requirements, Project Specific Requirements and/or Mitigation Measures. Other foreseeable projects would be subject to CEQA and would undergo the same level of review as the Proposed Project and include mitigation measures to minimize potentially significant impacts. The Project has no impact, a less than significant impact, or a less than significant impact with implementation of SPRs, PSRs, or mitigation with respect to all environmental issues. Due to the limited scope of direct physical impacts to the environment associated with this development project, the Project's impacts are Project-specific in nature. With implementation of the proposed mitigation measures found throughout this document, the Project will not result in significant, unavoidable, adverse environmental impacts. Impacts from the Proposed Project and would not be cumulatively considerable.

An HCP is a planning document that describes "the anticipated effects of the proposed taking [of listed species], how those impacts will be minimized and mitigated, and how the conservation measures

included in the plan will be funded.” Per the *Biological Resources Technical Report* conducted for the Proposed Project, special-status species have some potential to occur within the BSA, however they are generally not expected to occur within the Project Area due to the lack of suitable habitat. A majority of the BSA is classified as disturbed/developed or fountaingrass swards. Creation of an HCP is not in the purview of this Project. HCP creation would be coordinated through USFWS, CDFW, State Park’ Angeles District, and the City of Los Angeles.

As discussed in Section 4.4 *Biological Resources* of the IS/MND

and the *Biological Resources Technical Report* prepared for the Project (Stantec 2023), the literature review and database searches conducted for the Proposed Project identified 48 special-status species within 10 miles of the biological survey area (BSA) (Project Area plus 300-foot buffer). All CNDDDB occurrences of LBVI within 5 miles of the BSA are from over 100 years ago and more recent occurrences, from 2013 and 2015, are 7 and 10 miles to the east and northeast of the BSA (CDFW 2022). A search of eBird revealed recent occurrences in 2022 and 2024 in the Rio de Los Angeles State Park approximately 0.6 mile from the BSA and in the Frogtown area approximately 1-mile south of the BSA in 2021. The occurrence potential for LBVI in the Project Area was determined to be low for nesting and moderate for foraging. See Response to Comment 3-1 for descriptions of SPRs BIO-1 and BIO-2 which address LBVI and describe what measures would be taken if LBVI are found onsite during pre-construction surveys. The full list of SPRs, PSRs, and Mitigation Measures Incorporated into the Project to reduce environmental effects is provided on pages iv through xi of this Final IS/MND.

Any construction activities occurring in Rio de Los Angeles State Park are beyond the scope of this Project. No further response is required. No changes to the IS/MND are required in response to this comment.

Response to Comment 9-4:

The commenter is concerned with existing contamination of Taylor Yard including elevated concentrations of lead (140 mg/kg); diesel-range hydrocarbons (640 mg/kg); and polycyclic aromatic hydrocarbons, such as benzo(b)fluoranthene (140,000 ug/kg), benzo(a)anthracene (190,000 ug/kg), and indeno(1,2,3-cd)pyrene (62,000 ug/kg) and with the proposed mitigation measures which the commenter believes are inadequate. The commenter states an EIR is required for this level of contamination.

As stated in Section 4.9.2 of the Draft IS/MND, the California Department of Toxic Substances Control’s (DTSC) investigations of the Project Area indicated that there are compounds present at elevated levels (DTSC 2023). DPR entered a Voluntary Clean-up Agreement for the Project Area in December 2021 and prepared a supplemental investigation work plan to test the soil. An assessment of historical data indicated shallow soil impacts with lead, polycyclic aromatic compounds, and petroleum-related compounds. To account for a worst-case scenario, the Draft IS/MND assumed that soil at a depth of up to three feet would not meet acceptable screening levels and would need to be removed and hauled to an offsite landfill that accepts contaminated soil. Soil with contaminant concentrations above allowable levels would be handled as described in Mitigation Measure HAZ-1, which outlines the preparation of a Removal

Action Work Plan (RAW) for the Proposed Project. The RAW would identify and evaluate remedial approaches to clean up the Project Area so that it is suitable for use as a recreation area. Applicable BMPs related to hazards and hazardous materials from the Integrated Feasibility Report (IFR) Environmental Impact Statement (EIS)/EIR would also be implemented prior to or during ground disturbance activities. After implementation of the RAW, groundbreaking and construction activities at the site would not likely release any known toxins or contaminants onsite or convey hazardous materials offsite. Impacts would be less than significant with implementation of Mitigation Measure HAZ-1. No changes to the IS/MND are required in response to this comment.

Letter 10 – Jabz Alejandro Palomino

Letter 10

From: [Jabz](#)
To: [Review.Environmental@Parks](#); [Review.Environmental@Parks](#); [cega@doj.ca.gov](#); [Harrod.Lori@Parks](#); [Serna.Lucas@Parks](#); [cesar.moreno@parks.ca.gov](#); [Kelsey.Jessup](#)
Cc: [openjustice@doj.ca.gov](#); [Tang.Victoria@Wildlife](#); [damaris.vivar@lacity.org](#); [Wilson-Olgin.Erinn@Wildlife](#); [Kwan-Davis.Ruby@Wildlife](#); [Clara.Solis](#); [Diana.Nicole](#); [Jamie.Hall](#); [vincentmontalvo@icloud.com](#); [fernanda.sanchez4532@gmail.com](#)
Subject: Violation of Title 2 and Request of Full Environmental Impact Report for a Bowtie G1 redevelopment project
Date: Wednesday, July 31, 2024 11:07:21 PM
Attachments: [image005.png](#)
[image004.png](#)
[image006.png](#)

Hello,
we did request an extension of at least 90 days and not just 15 days for proper public review of the [Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#) - Review Period Expires 7/26/2024.

As you can see the expiration date for this IS-MND has not been yet updated on the Parks California website failing to properly and fairly inform to the people. The email shown below was sent only to a handful of persons, and not to everyone else which is wrong.

The email sent to just a handful of people, states that the IS-MND is available in Spanish and English which is not true, the website's info can be switched to spanish but not the actual document (IS-MND). Once again the process is not transparent nor is your information accurate.

The spanish speaking and other disadvantaged and marginalized IBPOC communities felt extremely disturbed by the way California State Parks is disenfranchising the spanish speaking and other disadvantaged and marginalized IBPOC community members due to the lack of interest to comply with our demands and provide us with an impartial, transparent, fair, impartial and inclusive due process for the Bowtie G1 project that our public funding is been or planning to be use for. Which makes us sincerely doubt about the true nature of the Bowtie G1 project and process.

According to your email, it seems that California State Parks is more concerned about acquiring our tax dollars rather than attending to our demands, properly addressing our concerns, and comply fully with State and Federal Laws and requirements.

California State Parks shall be fully concerned and willing to immediately comply in full with our demands that are based on the real needs and priorities from the longtime residents and general public.

California State Parks shall stop ignoring and discriminating against Disadvantaged and Marginalized IBPOC communities living adjacent to this project and to members of the general public as well, and start a process that guarantee a fair, impartial, transparent and inclusive process accordingly to the demographics, needs and priorities of these communities.

Due to the following from California State Parks but not limited to:

- 1- Wilful negligence and discrimination (Title 2) from California State Parks against Spanish speaking and other disadvantaged and marginalized IBPOC communities,
- 2- The More than significant impact to the Endangered California Native the Least

Letter 10 – Continued

Bell's Vireo (according and stated on a letter sent to CA State Park on June 08, from the California Department of Fish and Wildlife)

3- No proper Outreach to the Spanish speaking and other disadvantaged and marginalized IBPOC ethnic groups in our communities.

4- Process lacking of transparency, impartiality, fairness and inclusiveness.

Due to the stated above We are demanding the following but not limited to:

1. Full and immediate implementation of an Environmental Impact Report (EIR) to the whole Boetie G1 parcel. As the proposed IS-MND seems to be not enough due to the high levels of pollutants present in that parcel that will have a more than significant impact on the safety, health and welfare of disadvantaged and marginalized IBPOC community members adjacent to this project. Also on the more than significant impact on endangered species of wildlife (Least Bell's Vireo), and environment.
2. Public Comment Period for the whole EIR process of at least 90 days.
3. Public meetings in the form of town hall held and run BY California State Parks, (not by any non-profit) to address all the questions, concerns and recommendations from residents-stakeholders and public in general in regards to the proposed Bowtie G1 project.
4. Provide translated versions of the EIR document/s in Spanish and any languages other than English for transparency and a more equitable, impartial, fair and inclusive process to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general as well.
5. Have every single public agency involved and part of this project (City, County, State, and Federal) present to address any and all the questions, concerns and recommendations from residents-stakeholders and members of the public in regards to the proposed Bowtie G1 project.

**10-3
cont.**

Sincerely,
Jabz Alejandro Palomino.
323 574 6582

From: Review, Environmental@Parks <Environmental.Review@parks.ca.gov>

Sent: Friday, July 19, 2024 4:35 PM

Subject: Notice of Availability and Intent to Adopt Initial Study/Mitigated Negative Declaration for The Bowtie Park Development Project – EXTENSION OF COMMENT PERIOD

Good afternoon,

Letter 10 – Continued

You're receiving this notice as an interested individual or party regarding the Bowtie Park Development Project, a project lead by California State Parks. This message is serving as notification that the Draft Initial Study and Mitigated Negative Declaration (IS/MND) review period has been extended by **15 days** per community feedback. The Draft IS/MND is being made available for public review and comment for a period of 45 days, beginning **June 26th, 2024**, and ending on **August 10th, 2024**.

The Draft IS/MND, Notice of Availability and Intent to Adopt the IS/MND (in English and Spanish), a Summary of the documents (in English and Spanish) may be viewed at the following location...

https://www.parks.ca.gov/?page_id=983

California State Parks understands the community's request for an extension to review the IS/MND and wants to be amenable to this request while meeting Grant funding deadline requirements. The comment period regarding the IS/MND will close on August 10th, but California State Parks will continue to accept comments and respond to them outside of the purview of CEQA.

To allow the public a chance to provide feedback in person, California State Parks is planning to be present at a public community event led by The Nature Conservancy on August 17th from 10:30am-12pm at Rio De Los Angeles SP that will be focused on the Bowtie Wetland Demonstration Project, which is the first phase of the Bowtie's development. See the flyer in both English and Spanish below. California State Parks will be at this event with a table to provide project updates to interested community members, accept comments and answer questions.

Comments should continue to be directed to:

enviro@parks.ca.gov Include "Bowtie Development" in the subject line

or by mail to

ATTN: Luke Serna: Bowtie Development

California State Parks

Southern Service Center

2797 Truxtun Road

San Diego, CA 92106

The project team appreciates your continued engagement with the project as it proceeds towards construction.

Bowtie Park Development Project Team



10-4

Response to Jabz Alejandro Palomino – Letter 10

Response to Comment 10-1:

The commenter reiterates their previous request for a public review extension of at least 90 days and states the 15-day extension was not on DPR's website as of the date of their letter (July 31, 2024).

See Response to Comment 4-1 for the response regarding the public review extension period.

The initial Notice of Availability and Intent to Adopt an IS/MND (NOA-NOI) was sent via email on June 26, 2024 to individuals or parties interested in the Bowtie Park Development Project. This notification provided links to the Draft IS/MND and NOA-NOI along with review period dates and instructions on how to provide comments. Notice of the review period extension was sent via email on July 19, 2024 to individuals or parties interested in the Bowtie Park Development Project, prior to both the initial (July 26, 2024) and extended (August 10, 2024) review period deadlines. This notice included a link to the DPR website which was updated on the same day with the extended review period as well as English and Spanish versions of the revised NOA-NOI and Summary of IS/MND. No changes to the IS/MND are required in response to this comment.

Response to Comment 10-2:

The commenter requests that DPR provide a translated version of the IS/MND in Spanish. The DPR website can be translated to Spanish, however it does not translate the document itself. The commenter states the Spanish-speaking and Indigenous, Black, and People of Color (IBPOC) community feel disenfranchised by this.

The Proposed Project has met noticing requirements for MNDs under CEQA (PRC Section 21092). Translation of a document is not required under CEQA, however, DPR prepared a Summary of the IS/MND in Spanish which includes the Project description, location, objectives, project effects, and mitigation measures. This document can be accessed at the following link: https://www.parks.ca.gov/?page_id=983. No changes to the IS/MND are required in response to this comment.

Response to Comment 10-3:

This comment provides a list of problems and demands identified by the community. The Project's problems are identified as the following:

- 1) Negligence and discrimination against Spanish-speaking and other disadvantaged and marginalized IBPOC communities;
- 2) More than significant impacts to LBVI and critical habitat; exposure of residents, visitors, and works to carcinogens and toxic pollutants during construction; improper remediation/mitigation plan; and history of improper safety measures, monitoring, response, and adherence to protocols by DTSC, CEQA, and DPR;

- 3) Improper outreach to IBPOC communities in the area and non-English speaking groups; and
- 4) Lack of transparency, impartiality, fairness, and inclusivity

The listed demands are identified as the following:

- 1) Inclusivity and transparency for IBPOC residents;
- 2) Implementation of ESA/CESA and MBTA to protect endangered, native, and migratory birds and wildlife;
- 3) Implementation of an EIR;
- 4) A 90-day public comment period for the EIR;
- 5) DPR-hosted public meetings to address Project questions, concerns, and recommendations;
- 6) Translated versions of the EIR in Spanish and other languages; and
- 7) Attendance of every public agency involved at the public meetings to address Project questions, concerns, and recommendations.

The Proposed Project has met noticing requirements for MNDs under CEQA (PRC §21092). Translation of a document is not required under CEQA, however, DPR prepared a Summary of the IS/MND in Spanish which includes the Project description, location, objectives, project effects, and mitigation measures. This document can be accessed at the following link: https://www.parks.ca.gov/?page_id=983.

As stated in the Project's *Biological Resources Technical Report* (Stantec 2023), there is no designated critical habitat for any listed plant or wildlife species within the BSA. Given the absence of LBVI during site assessments, absence of LBVI habitat within the Project Area, and implementation of SPRs BIO-1 and BIO-2, impacts to LBVI would be less than significant. As the effects to LBVI would be avoided or mitigated to a point where no significant effect on the environment would occur (14 CCR § 15070) in addition to all of the other environmental topics discussed in the document, an MND is appropriate.

DTSC's investigations of the Project Area indicated that there are compounds present at elevated levels (DTSC 2023). DPR entered a Voluntary Clean-up Agreement for the Project Area in December 2021 and conducted a supplemental investigation work plan to test the soil. The results showed shallow soil contained lead and petroleum-related compounds which at five feet and below the surface were below residential screening levels. To account for a worst-case scenario, it was assumed that soil at a depth of up to three feet would not meet acceptable screening levels and would need to be removed and hauled to an offsite landfill that accepts contaminated waste. Soil with contaminant concentrations above allowable levels would be handled as described in Mitigation Measure HAZ-1, which outlines the preparation of a Removal Action Work Plan (RAW) for the Proposed Project. The RAW would identify and evaluate remedial approaches to clean up the Project Area so that it is suitable for use as a recreation area. Applicable BMPs related to hazards and hazardous materials from the Integrated Feasibility Report (IFR) Environmental Impact Statement (EIS)/EIR would also be implemented prior to or during ground disturbance activities. After implementation of the RAW, groundbreaking and construction activities at the site would not likely release any known toxins or contaminants onsite or convey hazardous materials offsite. Impacts would be less than significant with implementation of Mitigation Measure HAZ-1.

No changes to the IS/MND are required in response to this comment.

Response to Comment 10-4:

Comment 6-2 is an attachment of DPR's letter regarding the extension of the comment period and the public meeting notice flyer for the Bowtie Wetland Demonstration Project which DPR stated they would attend to provide project updates and accept comments and answer questions.

No response is required.

Letter 11 – California Department of Fish and Wildlife

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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
wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



Letter 11

July 31, 2024

Luke Serna
California State Parks
Southern Service Center
2797 Truxtun Road
San Diego, California 92106
enviro@parks.ca.gov

SUBJECT: INITIAL STUDY/MITIGATED NEGATIVE DECLARATION FOR THE BOWTIE PARK DEVELOPMENT PROJECT, SCH NO. 2024061129, LOS ANGELES COUNTY, CA

Dear Luke Serna:

The California Department of Fish and Wildlife (CDFW) reviewed the Initial Study/Mitigated Negative Declaration (IS/MND) from the California Department of Parks and Recreation (DPR) for the Bowtie Park Development Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines¹.

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, CDFW appreciates 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 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, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (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 (Fish & G. Code, § 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

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Conserving California's Wildlife Since 1870

11-1

Letter 11 – Continued

Docusign Envelope ID: FE8A77FC-113D-4C10-94AA-6E228A5FB382

Luke Serna
 California Department of Parks and Recreation
 July 31, 2024
 Page 2 of 12

projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act 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. As proposed, for example, the Project may be subject to CDFW's 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 law² of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (Fish & G. Code, §1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY**Proponent:** DPR

Objective: The Project proposes the redevelopment of a 14.8-acre parcel into a publicly accessible urban greenspace. The greenspace would include habitat restoration and enhancement, wildlife viewing opportunities, trails, shaded picnic areas, programming (i.e., historical, cultural, environmental), and unstructured play areas. Project implementation would require soil remediation to address previous site contamination associated with the former site use as a railroad maintenance facility.

Location: The Project would occupy 14.8 acres within the former Southern Pacific Railroad Yard known as Taylor Yard. The Project is located at 2780 West Casitas Avenue on Assessor's Parcel Number 5442-002-914 in the City of Los Angeles. The Project site is bound by California State Route 2 to the northwest, the Union Pacific Railroad to the north and east, and the Los Angeles River to the south and west.

Timeframe: It is anticipated that construction activities would commence in late 2025 and would take approximately 24 months to complete.

Biological Setting: The Project site is in a highly urbanized area surrounded by industrial, commercial, and residential uses. It is a long, narrow parcel situated between active railroad tracks and the Los Angeles River.

The Biological Resources Technical Report (Bio Report; Stantec 2023) indicates vegetation communities and land cover types occurring on the Project site, and subject to permanent impact, include fountain grass swards (8.56 acres), ornamental non-native trees (0.39 acre), California buckwheat scrub (0.35 acre), deerweed – silver lupine – yerba santa scrub (0.02 acre) and disturbed/developed land (4.74 acre). The adjacent

² "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

**11-1
cont.**

Letter 11 – Continued

DocuSign Envelope ID: FE8A77FC-113D-4C10-94AA-6E228A5FB382

Luke Serna
California Department of Parks and Recreation
July 31, 2024
Page 3 of 12

Los Angeles River corridor contains open water and Gooding's willow – red willow riparian woodland and forest. No special status plants were observed on site.

Wildlife present or potentially present on the Project site include least Bell's vireo (*Vireo bellii pusillus*; Endangered Species Act (ESA) and CESA-listed endangered) and Crotch's bumble bee (*Bombus crotchii*; CESA candidate), as well as common reptile, bird, and mammal species.

The Los Angeles River provides habitat for non-native game fish, urban-adapted native and non-native frogs and toads, a wide variety of birds such as mallard duck (*Anas platyrhynchos*), great egret (*Ardea alba*), great blue heron (*Ardea herodias*), Canada goose (*Branta canadensis*), American coot (*Fulica americana*), black-necked stilt (*Himantopus mexicanus*), hooded merganser (*Lophodytes cucullatus*), belted kingfisher (*Megasceryle alcyon*), double-crested cormorant (*Nannopterum auritum*), and osprey (*Pandion haliaetus*). The IS/MND contains specific measures to reduce impacts to nesting birds, least Bell's vireo, Crotch's bumble bee, and general wildlife.

Project History: The Project site within the Taylor Yard rail yard complex was a freight classification yard for the Southern Pacific Railroad from 1925 to 1973. The 247-acre Taylor Yard rail yard complex was historically divided into ten parcels, some of which were further subdivided for sale purposes. Two of those parcels, Parcel D and Parcel G-1, were purchased by DPR for Rio de Los Angeles State Park. The 40-acre Parcel D, acquired in 2001, is located between an active rail line and San Fernando Road. The approximately 18-acre Parcel G-1, acquired in 2003, is located between the Los Angeles River and an industrial development. The 14.8-acre site for this Project is located within Parcel G-1.

Rio de Los Angeles State Park was historically used for industrial purposes. The Project site is covered with a layer of fill material to a depth of approximately 7 feet. All of the land has been graded and developed multiple times over the years (California State Parks 2005). In accordance with CEQA 15072(g)(5), the Project site has been designated as a hazardous waste property enumerated under Section 65962.5 of the Government Code due to its historic operation as a locomotive maintenance facility.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist DPR in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Additional comments or other suggestions may also be included to improve the document.

COMMENT # 1: Project Description

Issue: The Project description lacks the detail necessary for CDFW to fully evaluate the effects of the Project on fish and wildlife resources and provide a full range of meaningful comments.

11-1
cont.

11-2

Letter 11 – Continued

DocuSign Envelope ID: FE8A77FC-113D-4C10-94AA-6E228A5FB382

Luke Serna
 California Department of Parks and Recreation
 July 31, 2024
 Page 4 of 12

Specific impact: The Project intends to redevelop the site through improvements consisting of a native plant garden, vista points, an event space for larger crowds, multi-use trails, open meadow areas, picnic locations, welcoming kiosk with restrooms, park entry and internal access road, parking spaces, and an internal maintenance road as the proposed park improvements. Project construction and ongoing utilization and maintenance of the park may adversely impact wildlife through loss of suitable habitat, encroachment, injury or mortality, ongoing edge effects (i.e., noise, artificial night lighting), or attraction of nuisance wildlife to trash receptacles, that can occur with a park adjacent to natural habitat.

Why impact would occur: The proposed Project would construct a park adjacent to the Los Angeles River, a natural habitat area and regional wildlife movement corridor. As mentioned in the Bio Report, the Los Angeles River is an important wildlife corridor, used by fish, amphibians, mammals, waterfowl, songbirds, raptors, and invertebrates. Short-term construction and ongoing use and maintenance of the park can result in indirect impacts that reduce habitat value.

The MND does not provide a discussion pertaining to the design of park improvements, construction methods, grading specifics, or landscape plan. Additionally, Figure 3 of the IS/MND shows a ranger house, maintenance building, and garage toward the eastern end of the Project site. No mention is made of these facilities in the IS/MND, nor are they evaluated in the Rio de Los Angeles State Park General Plan & Final EIR (California State Parks 2005).

Landscape and turf maintenance practices can involve the use of chemicals that, if they were to enter the river corridor, would be deleterious to native plants and wildlife. The use of rodenticides can cause secondary mortality to predators that eat the target animal. Introducing or increasing human-produced noise has the potential to influence wildlife's spatial distribution, abundance, predator avoidance behavior, foraging efficiency, vocal frequency, amplitude, or timing, physiology, and reproductive success. Artificial night lighting can affect plants and wildlife through attraction and disorientation, loss of connectivity, interference with pollination and foraging, and disruption of circadian rhythms and lunar and seasonal cycles.

Without a thorough understanding of the proposed construction activities, facility designs, and ongoing utilization and maintenance of the park, it is not possible to evaluate the potential of the Project to affect adjacent resources in the Los Angeles River or to determine the avoidance, minimization, and compensatory measures that would be necessary to reduce impacts to less than significant.

Evidence impact would be significant: CEQA requires a lead agency to consider all phases of project planning, implementation, and operation in the initial study of a project (CEQA Guidelines § 15063). In evaluating the significance of the effects of a project, direct physical changes to the environment which may be caused by the project (CEQA Guidelines § 15064) must be considered.

**11-2
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Letter 11 – Continued

DocuSign Envelope ID: FE8A77FC-113D-4C10-94AA-6E228A5FB382

Luke Serna
 California Department of Parks and Recreation
 July 31, 2024
 Page 5 of 12

Recommended Potentially Feasible Mitigation Measure(s)**Recommendation #1**

CDFW recommends DPR amend the IS/MND to include a Project description of sufficient depth and scope so that we can analyze the Project and provide meaningful feedback. The IS/MND should include construction details such as proposed cut and fill volumes of grading, final grades, locations of picnic areas and associated trash receptacles, lighting design, landscape plan and plant palette, and location and type of fencing. The IS/MND should include a discussion of the proposed uses of the park and any potential noise impacts to adjacent natural areas caused by large groups or amplified sound. The IS/MND should include a discussion of the maintenance requirements of the park, in particular lawn care and vegetation management. The IS/MND should include an updated impacts analysis and, if necessary, additional avoidance and minimization measures. In particular, the IS/MND should clarify that measures related to nesting birds (e.g., Standard Project Requirement BIO-1) apply to ongoing maintenance activities, in addition to construction.

**11-2
cont.****COMMENT # 2: Least Bell's Vireo**

Issue: The mitigation measures specific to least Bell's vireo (vireo) may be improved to reduce Project impacts to a level less than significant.

Specific impact: Project activities occurring during the vireo breeding season of March 15 through September 15 could adversely affect breeding behavior of vireo. Elevated noise and ground disturbance could result in vireo abandoning nesting territory.

Why impact would occur: Although the site does not contain pristine habitat conditions, mulefat and willows readily recruit on bare moist soils, which can result in ideal vegetation for vireo nesting during the appropriate season. In addition, vireo have occupied upland shrubs and trees adjacent to waterbodies for nesting (Kus and Miner 1989). If vegetative conditions change on the Project site before construction occurs, vireo could nest within the Project footprint. Moreover, the stretch of the Los Angeles River immediately adjacent to the Project site contains characteristic vireo habitat and is known to support nesting vireo. Nearly the entire Project site is within 500 feet of the Los Angeles River, so there is high potential for vireo to nest within 500 feet of Project activities.

11-3

Project Specific Requirement (PSR) BIO-2, as it is currently written, requires focused, protocol-level surveys for vireo of the Project site and adjoining areas within 500 feet of the Project site where habitat exists. These surveys are currently being conducted (pers. comment Aly Velloze). BIO-2 requires coordination with the U.S. Fish and Wildlife Service (USFWS) and CDFW (collectively, Wildlife Agencies) if vireo are detected during these surveys.

Letter 11 – Continued

DocuSign Envelope ID: FE8A77FC-113D-4C10-94AA-6E228A5FB382

Luke Serna
California Department of Parks and Recreation
July 31, 2024
Page 6 of 12

If vireo are not detected, BIO-2 relies on pre-construction nesting surveys and daily construction monitoring, which is appropriate, but then requires suspension of work while USFWS and CDFW are consulted once vireo are detected. Construction delays caused by work stoppages due to vireo arrival can extend the Project into additional breeding seasons, leading to increased risk of disturbance to vireo.

Evidence impact would be significant: Take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). In addition, take under the ESA is more broadly defined than take under CESA. Take under ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting.

CDFW considers impacts to CESA-listed species to be significant, under CEQA. Accordingly, the Project may have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW recommends DPR amend the IS/MND to replace the current PSR BIO-2 with the following:

Mitigation Measure #1: Take Authorization

DPR shall coordinate with CDFW to obtain CESA take authorization for vireo. Appropriate take authorization may include a Restoration Management Permit, which could also cover take of Crotch's bumble bee (see Comment 3, below), Incidental Take Permit, or a Consistency Determination in certain circumstances, among other options. Coordination with CDFW shall begin as soon as possible to discuss the appropriate take authorization for the Project. Take authorization shall be obtained prior to Project initiation.

Mitigation Measure #2: Coordination with Wildlife Agencies

Prior to Project initiation, DPR shall coordinate with the Wildlife Agencies to develop an Avoidance Plan that includes conservation measures required to ensure vireo are not adversely affected by Project activities. Such measures may include, but not be limited to, pre-construction nest surveys and no-work buffers, screening materials to separate the Project site from adjacent vireo habitat, and noise reduction/attenuation techniques to reduce Project-related noise to a maximum hourly average of 60 A-weighted decibels (dBA) or existing ambient levels, whichever is greater, at the edge of vireo habitat.

**11-3
cont.**

Letter 11 – Continued

DocuSign Envelope ID: FE8A77FC-113D-4C10-94AA-6E228A5FB382

Luke Serna
California Department of Parks and Recreation
July 31, 2024
Page 7 of 12

Avoidance measures requiring installation (sound walls, for example) shall be in place prior to March 15 and shall remain operational until September 15, of each year.

Mitigation Measure #3: Vegetation Removal

Vegetation removal shall occur outside the vireo breeding season of March 15 through September 15.

COMMENT # 3: Crotch's Bumble Bee

Issue: The Project will impact habitat for, and has the potential to result in take of, Crotch's bumble bee. The measures in the IS/MND regarding Crotch's bumble bee can be improved to provide more effective and efficient protection.

Specific impact: Project activities involving ground and vegetation disturbance could result in potential significant impacts, including loss of foraging resources, changes in foraging behavior, burrow collapse, nest abandonment, reduced nest success, reduced health and vigor of eggs, young, and/or queens, and direct mortality. Construction delays caused by work stoppages due to Crotch's bumble bee presence can extend the Project into additional breeding seasons, leading to increased risk of disturbance to Crotch's bumble bee.

Why impact would occur: Crotch's bumble bee is known to forage on the Project site. Crotch's bumble bee inhabits open grassland and scrub habitats. They are generalist foragers and can be found throughout most of southwestern California in areas that have suitable nesting habitat and floral resources.

Bumble bees live in colonies composed of a queen, workers, and, near the end of the season, reproductive members of the colony. Colonies are annual, with new nests initiated by solitary queens in the spring. Crotch's bumble bees primarily nest in late February through late October underground in abandoned small mammal burrows but may also nest under perennial bunch grasses or thatched annual grasses, under-brush piles, in old bird nests, and in dead trees or hollow logs (Williams et al. 2014; Hatfield et al. 2018). New queens produced at the end of the annual colony cycle mate before entering diapause, which is a form of hibernation. Overwintering sites utilized by these solitary mated queens include soft, disturbed soil (Goulson 2010), or under leaf litter or other debris (Williams, et al. 2014).

The highest detection probability is during the Colony Active Period of April through August, but Crotch's bumble bee could be on the Project site at any time of year.

Project Specific Requirement (PSR) BIO-3, as it is currently written, requires focused surveys for Crotch's bumble bee and coordination with CDFW if Crotch's bumble bee are detected during the surveys. BIO-3 also requires pre-construction surveys if construction activities overlap with the flight period. If Crotch's bumble bee is observed, BIO-3 requires cessation of work until coordination with CDFW has occurred. While

**11-3
cont.****11-4**

Letter 11 – Continued

Docusign Envelope ID: FE8A77FC-113D-4C10-94AA-6E228A5FB382

Luke Serna
California Department of Parks and Recreation
July 31, 2024
Page 8 of 12

CDFW appreciates coordination, if Project activities may result in incidental take, an Incidental Take Permit may be needed.

Evidence impact would be significant: Recently, the California Fish and Game Commission accepted a petition to list the Crotch's bumble bee as endangered under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. Take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9).

CDFW considers impacts to species that are candidates for CESA listing to be significant, under CEQA. Accordingly, the Project may have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

Recommended Potentially Feasible Mitigation Measure(s)

In addition to PSR BIO-3, CDFW recommends DPR include the following Mitigation Measure in the IS/MND:

Mitigation Measure #4: Take Authorization for Crotch's Bumble Bee

DPR shall coordinate with CDFW to obtain CESA take authorization for Crotch's bumble bee. Appropriate take authorization may include a Restoration Management Permit, which could also cover least Bell's vireo (see Comment 2, above), or Incidental Take Permit, among other options. Appropriate take authorization shall be obtained prior to Project initiation.

Recommendation #2

As very little is known about nesting or overwintering sites of Crotch's bumble bee, if nest or overwintering sites are discovered or can be documented, CDFW recommends DPR contact CDFW at wildlifemgt@wildlife.ca.gov, as well as the CDFW staff contact listed at the end of this letter.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species detected by

**11-4
cont.**

11-5

Letter 11 – Continued

DocuSign Envelope ID: FE8A77FC-113D-4C10-94AA-6E228A5FB382

Luke Serna
California Department of Parks and Recreation
July 31, 2024
Page 9 of 12

completing and submitting [CNDDDB Online Field Survey Form](#)³. The types of information reported to CNDDDB can be found at [CNDDDB – Plants and Animals](#)⁴. The Project proponent should ensure that data was submitted data properly, with all data fields applicable filled out, prior to finalizing/adopting the environmental document. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred. The Project proponent should provide CDFW with confirmation of data submittal.

**11-5
cont.****FILING FEES**

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order 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.)

11-6**CONCLUSION**

CDFW appreciates the opportunity to comment on the IS/MND to assist DPR in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that DPR has to our comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)).

11-7

Questions regarding this letter or further coordination should be directed to Kelly Fisher⁵, Environmental Scientist.

Sincerely,

DocuSigned by:

5991E19EF8094C3...

Victoria Tang
Environmental Program Manager
South Coast Region

³ <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>

⁴ <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>

⁵ Phone: 858-354-5083; email: Kelly.Fisher@wildlife.ca.gov

Letter 11 – Continued

Docusign Envelope ID: FE8A77FC-113D-4C10-94AA-6E228A5FB382

Luke Serna
California Department of Parks and Recreation
July 31, 2024
Page 10 of 12

ATTACHMENTS

Attachment A: Draft Mitigation Monitoring and Reporting Program

EC: California Department of Fish and Wildlife
Steve Gibson, Senior Environmental Scientist (Supervisory)
Victoria Tang, Environmental Program Manager
Jennifer Turner, Senior Environmental Scientist (Supervisory)

Office of Planning and Research
State.Clearinghouse@opr.ca.gov

REFERENCES

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11-8

Letter 11 – Continued

DocuSign Envelope ID: FE8A77FC-113D-4C10-94AA-6E228A5FB382

Luke Serna
California Department of Parks and Recreation
July 31, 2024
Page 11 of 12

ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Mitigation Measure	Timing	Responsible Party
Mitigation Measure #1: Take Authorization DPR shall coordinate with CDFW to obtain CESA take authorization for vireo. Appropriate take authorization may include a Restoration Management Permit, which could also cover take of Crotch's bumble bee (see Comment 3, below), Incidental Take Permit, or a Consistency Determination in certain circumstances, among other options. Appropriate take authorization shall be obtained prior to Project initiation.	Prior to Project Initiation	DPR
Mitigation Measure #2: Coordination with Wildlife Agencies Prior to Project initiation, DPR shall coordinate with the Wildlife Agencies to develop an Avoidance Plan that includes conservation measures required to ensure vireo are not adversely affected by Project activities. Such measures may include, but not be limited to, pre-construction nest surveys and no-work buffers, screening materials to separate the Project site from adjacent vireo habitat, and noise reduction/attenuation techniques to reduce Project-related noise to a maximum hourly average of 60 A-weighted decibels (dBA) or existing ambient levels, whichever is greater, at the edge of vireo habitat. Avoidance measures requiring installation (sound walls, for example) shall be in place prior to March 15 and shall remain operational until September 15, of each year.	Prior to Project Initiation	DPR

**11-8
cont.**

Letter 11 – Continued

DocuSign Envelope ID: FE8A77FC-113D-4C10-94AA-6E228A5FB382

Luke Serna
 California Department of Parks and Recreation
 July 31, 2024
 Page 12 of 12

Mitigation Measure	Timing	Responsible Party
Mitigation Measure #3: Vegetation Removal Vegetation removal shall occur outside the vireo breeding season of March 15 through September 15.	During Project Construction and Operation	DPR
Mitigation Measure #4: Take Authorization for Crotch's Bumble Bee DPR shall coordinate with CDFW to obtain CESA take authorization for Crotch's bumble bee. Appropriate take authorization may include a Restoration Management Permit, which could also cover least Bell's vireo (see Comment 2, above), or Incidental Take Permit, among other options. Appropriate take authorization shall be obtained prior to Project initiation.	Prior to Project Initiation	DPR
Recommendation #1 CDFW recommends DPR amend the IS/MND to include a Project description of sufficient depth and scope so that we can analyze the Project and provide meaningful feedback.	Prior to adoption of CEQA document	DPR
Recommendation #2 As very little is known about nesting or overwintering sites of Crotch's bumble bee, if nest or overwintering sites are discovered or can be documented, CDFW recommends DPR contact CDFW at wildlifemgt@wildlife.ca.gov , as well as the CDFW staff contact listed at the end of this letter.	Prior to adoption of CEQA document	DPR

11-8
 cont.

Response to California Department of Fish and Wildlife – Letter 11

Response to Comment 11-1:

This comment describes CDFW's role as a Trustee and Responsible Agency under CEQA and provides a summary of the Project description, location, biological setting, and Project history.

No response is required.

Response to Comment 11-2:

This comment is in regard to the Project Description, which CDFW states lacks enough detail for them to fully evaluate the effects on fish and wildlife resources. CDFW states the MND does not provide a discussion of the design of park improvements, construction methods, grading specifics, or landscape plan. CDFW states that Project construction and ongoing utilization and maintenance of the park may adversely impact wildlife through habitat loss, encroachment, injury or mortality, ongoing edge effects, or attraction of nuisance wildlife to trash receptacles because the Project Area is adjacent to the Los Angeles River. CDFW also states that landscape and turf maintenance practices and artificial night lighting could also potentially negatively affect native plants and wildlife. Additionally, the comment states that a ranger house, maintenance building, and garage is shown on Figure 3 of the Draft IS/MND but no mention is made of these facilities in the Draft IS/MND or Rio de Los Angeles State Park General Plan and Programmatic Environmental Impact Report.

CDFW recommends that the Draft IS/MND be amended to include construction details, a discussion of the proposed uses of the park, potential noise impacts to adjacent natural areas, and a discussion of the maintenance requirements of the park including lawn care and vegetation management. Additional recommendations made by CDFW include clarifying that measures related to nesting birds apply to ongoing maintenance activities in addition to construction.

Construction of the Proposed Project would consist of standard construction techniques including site preparation and grading to prepare the site for development. Specific activities include clearing and grubbing of vegetation; demolition of remnant structures that would not be preserved and/or repurposed; and some earthwork to move soil around internally throughout and within the site to achieve proposed grade elevations and for proposed water features/bioswales. The Proposed Project will also import topsoil to create a planted green roof with a maximum 3:1 slope over the Welcoming Pavilion Building. Building construction for the Welcoming Pavilion will consist of installing a cast-in-place concrete structure with a concrete roof and waterproofing membrane. Cast-in-place concrete retaining walls vary from 12 feet to 2 feet high and will be constructed to hold soil against the building. Imported topsoil, 8 inches to 12 inches in depth, will then be installed at the top of concrete roof to allow native plants to grow on the roof. The benefit of creating a green roof includes improving wildlife connection, increasing biodiversity, reducing stormwater runoff and reducing the temperature of the roof surface. Building construction would also occur which includes a Ranger house, maintenance building, garage, and

comfort station as shown in Figure 3 of the Draft IS/MND. Permeable asphalt paving is proposed for parking areas as well as the entry driveway to the vehicle turnaround area. Class II permeable aggregate paving will be installed and placed along the east boundary to allow for maintenance vehicle and fire truck access. The majority of pedestrian pathways throughout the site will be constructed with stabilized decomposed granite paving except where an accessible path of travel is required from the building to parking area. The required accessible path of travel pathway will be cast-in-place concrete pavement. The Proposed Project will also install irrigation and plant native or adaptive trees and plants throughout the site. The goal of the Project is to restore valley foothill riparian habitat to support a high density and diversity of wildlife species. There is no "turf" proposed for the Project. The area will be planted with California native grasses such as *Carex Praegracilis* to create a meadow-like landscape. By installing native or adaptive native plant species, it is anticipated that there will be less regular maintenance required and no need for the use of fertilizers. After plant establishment, the vegetation management for native plants will include weeding, remulching and pruning as needed. Construction is expected to take approximately 24 months to complete.

A list of the proposed uses of the park is provided in Section 2.3, Project Characteristics, of the Draft IS/MND. Information pertaining to the proposed onsite Ranger house was inadvertently omitted from the list of project characteristics; however, the presence of this Project feature was analyzed within the Draft IS/MND. As described in Section 4.15.2.2, Police Services, the Proposed Project includes a space for an onsite law enforcement officer (Park Ranger), which would enhance police coverage and response time for the park. The information describing the proposed onsite Ranger house, maintenance building, garage, and comfort station on page 2-1 of the Draft IS/MND has been updated in the Errata to add this as a Project characteristic. This correction is for clarification purposes only and does not change the analysis or conclusions contained in the Draft IS/MND and are not a result of a new significant environmental impact or a substantial increase in the severity of a significant impact.

As described in Section 4.1, Aesthetics, of the Draft IS/MND where night lighting is necessary, lighting would be directed downward with sensor and timer and new exterior lighting would be located such that it is not highly obtrusive. No lighting would extend beyond the Project Area boundary. The Project Area is located in an urbanized area of the City of Los Angeles and is surrounded by existing residential and commercial uses with existing artificial lighting. Any new light associated with the Proposed Project would not represent a significant new source of light within the Project Area.

Potential indirect effects from Project-related noise are briefly described in response to checklist question IV a) on page 4-38. The analysis concluded that implementation of SPRs and PSRs BIO-1 through BIO-4 will also reduce impacts to nesting birds and sensitive species within the Project Area. Section 4.13 of the Draft IS/MND describes the Project's noise environment and analyzes Project-related noise effects. As described within this section, the Project Area is currently a vacant, former railyard. ECORP conducted three short-term noise measurements (15-minutes) and one long-term noise measurement in and around the Project Area on the afternoon of January 31, 2023. These short-term noise measurements are representative of typical existing noise exposure within and immediately adjacent to the Project Area

during the daytime. the ambient recorded noise levels range from 52.5 to 61.2 dBA L_{eq} over the course of the three short-term noise measurements taken in the Project vicinity. The ambient recorded noise level in the Project Area was 64.1 dBA CNEL. The most common noise in the Project vicinity is produced by automotive vehicles (e.g., cars, trucks, buses, motorcycles) on area roadways. Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL or L_{dn} is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban, residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). The ambient noise levels within the Project Area and vicinity are already at levels that are similar to an urban commercial environment. The natural habitat areas surrounding the Project Area, specifically in the river, are located approximately 100 feet away from the property boundary. Sound spreads (propagates) uniformly outward in a spherical pattern, and the sound level decreases (attenuates) at a rate of approximately 6 decibels (dB) for each doubling of distance from a stationary or point source. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., site preparation, excavation, paving). Noise generated by construction equipment, including earth movers, pile drivers, and portable generators, can reach high levels. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). Construction noise would be temporary in nature and would cease once construction is completed. Project-related noise levels during operation would not be significant and would not be noticeably different from the existing condition.

No additional changes to the Draft IS/MND are required.

Response to Comment 11-3:

This comment suggests that the mitigation measures specific to least Bell's vireo (LBVI) may be improved to reduce Project impacts. The comment states that elevated noise and ground disturbance could affect breeding behavior and may result in abandonment of nesting territory. As described in Section 4.4, Biological Resources, of the Draft IS/MND, land cover and vegetation communities within the Project Area consist of fountain grass swards, ornamental and non-native, and disturbed developed land. Vegetation communities within the Los Angeles River adjacent and to the west include Gooding's willow – red willow riparian woodland and forest and is located approximately 100 feet away. The Biological Resources Technical Report prepared by Stantec identified the LBVI occurrence potential as low for nesting and moderate for foraging as there is marginally suitable nesting habitat and suitable foraging habitat within the Los Angeles River. Stantec noted that all California Natural Diversity Database (CNDDB) occurrences within 5 miles are from over 100 years ago while more recent occurrences from 2013 and 2015 are 7 and

10 miles to the east and northeast of the Project Area. Recent occurrences were recorded on eBird in Rio de Los Angeles State Park approximately 0.6 mile to the southeast in June 2022 and in the Frogtown area approximately one mile south in May 2021. As described in the *Addendum to the 2023 Bowtie Parcel Project Biological Resources Technical Report* (Appendix A), since the completion of the *Biological Resources Technical Report*, additional protocol-level surveys have been conducted by CDPR biologists for two listed species with the potential to occur within the biological study area. Following the US Fish and Wildlife (USFWS) "Least Bell's Vireo Survey Guidelines" (USFWS 2001), a series of eight surveys were completed at the Bowtie Parks Development Project site and adjacent areas (i.e., 500-foot buffer) from April to July of 2024. Surveys spaced at least ten days apart, were conducted between dawn and 11 a.m. by qualified CDPR biologists without the use of vocalization tapes. No LBVI were detected during any of the surveys.

LBVI are generally not expected to occur in the Project Area due to lack of suitable habitat and LBVI were not detected in 2024 protocol surveys of the Project's biological study area. As described in Response to Comment 11-3 above, the ambient noise levels within the Project Area and vicinity are already at levels that are similar to an urban commercial environment. The natural habitat areas surrounding the Project Area, specifically in the river, are located approximately 100 feet away from the property boundary and removal of this habitat would not occur with Project implementation. SPR BIO-1, Preconstruction Survey for Nesting Birds, and PSR BIO-2, Protection Measures Specific to Least Bell's Vireo, are identified in the Draft IS/MND to reduce impacts to LBVI in addition to other avian species and are adequate to conclude a less than significant impact to LBVI. As previously stated, the avoidance measures outlined in BIO-2 would be implemented regardless of the results of the protocol-level survey and require that work be halted within the buffer zone until a qualified biologist can determine whether nest avoidance is feasible. If nest avoidance is not feasible, all work will cease until consultation with USFWS and CDFW is completed, and appropriate conservation measures will be identified and implemented.

No changes to the Draft IS/MND are required in response to this comment.

Response to Comment 11-4:

This comment states that Project implementation would impact habitat for and has the potential to result in take of Crotch's bumble bee (CBB). CDFW suggests that the mitigation measures specific to CBB may be improved to provide more effective and efficient protection. The comment states that ground and vegetation disturbance could result in loss of foraging resources; changes in foraging behavior; burrow collapse; nest abandonment; reduced nest success; reduced health and vigor of eggs, young and/or queens, and direct mortality. The comment states that CBB is known to forage on the Project Site and inhabits open grassland and scrub habitats and can be found throughout most of southwestern California where there is suitable nesting habitat and floral resources. Additional information is provided on the behaviors of CBB and identification of the Colony Active Period of April through August. CDFW recommends adding additional mitigation measures to require that DPR obtain CESA take authorization for the CBB. Lastly, CDFW recommends that if CBB nest or overwintering sites are discovered or can be documented, DPR should contact CDFW. The *Biological Resources Technical Report* prepared by Stantec identified the CBB occurrence

potential as high. As described in Section 4.4, Biological Resources, of the Draft IS/MND, the nearest recorded occurrence of this species is within the Biological Study Area (BSA) in 2020, and there are multiple occurrences within 5 miles within the past 20 years. California buckwheat, a food plant for the species, occurs within the BSA, but there is none within the Project Area. PSR BIO-3, Protection Measures Specific to Crotch's Bumblebee, are identified in the Draft IS/MND to reduce impacts to CBB specifically and are adequate to conclude a less than significant impact to CBB.

Since the completion of the BRTR, additional protocol-level surveys have been conducted by CDPR biologists for two listed species with the potential to occur within the biological study area. Following the CDFW "Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species" (CDFW 2023), four surveys were completed within the Project Area from May to July of 2024. Surveys were conducted during the known colony active periods of all species with the potential to occur and were performed when the ambient temperature was optimal for bumblebee activity. Surveys were completed by a qualified CDPR biologist with training and prior experience in surveying and monitoring for CBB. Survey methods included non-capture wandering transects with photo documentation; therefore, no Scientific Collecting Permit (SCP) was necessary.

One single female CBB was found foraging onsite during two of the four surveys. However, no additional individuals were detected during the surveys. Other bumblebee species found onsite included the yellow-faced bumble bee (*Bombus vosnesenskii*), California bumble bee (*Bombus californicus*), and Sonoran (American) bumble bee (*Bombus sonorus*).

Although no CBB queen or nesting activity was observed during the surveys, consultation with CDFW is in progress to determine avoidance measures or the need for an Incidental Take Permit (ITP). Protection measures for the species will include monitoring during construction by a qualified biologist, but additional measures will be coordinated with the CDFW for incorporation into the Project.

No changes to the Draft IS/MND are required in response to this comment. In the event CBB nest or overwintering sites are discovered, CDFW will be notified consistent with standard practice.

Response to Comment 11-5:

This comment provides information that CEQA requires that information developed in environmental document be incorporated into a database so that it can be used to make subsequent or supplemental environmental determinations. CDFW provides information on where to complete and submit the information collected.

Consistent with standard practice, DPR has completed the required environmental data submission.

Response to Comment 11-6:

This comment identified the necessary environmental document filing fees that are payable once the Notice of Determination (NOD) is filed by the lead agency.

Once the NOD is filed with the Los Angeles County Clerk, the environmental document filing fee for an IS/MND will be paid by DPR.

Response to Comment 11-7:

This comment requests an opportunity to review and comment on any responses that DPR has to comments made by CDFW and to request notification of any forthcoming hearing date(s) for the Project.

Consistent with the requirements outlined in CEQA Guidelines Section 15074 (b), DPR will consider the MND together with all comment received during the public review process, prior to approving the Proposed Project.

Letter 12 – Clara Solis

Letter 12

From: claramsolis@earthlink.net
To: Review.Environmental@Parks
Subject: Comment and request for eXTENSION OF COMMENT PERIOD
Date: Saturday, August 10, 2024 12:37:13 PM
Attachments: [image004.png](#)
[image005.png](#)
[image006.png](#)

Please extend the deadline. This is way too short. I am on a preplanned vacation.

12-1

From: Review, Environmental@Parks <Environmental.Review@parks.ca.gov>
Sent: Friday, July 19, 2024 4:35 PM
Subject: Notice of Availability and Intent to Adopt Initial Study/Mitigated Negative Declaration for The Bowtie Park Development Project – EXTENSION OF COMMENT PERIOD

Good afternoon,

You're receiving this notice as an interested individual or party regarding the Bowtie Park Development Project, a project lead by California State Parks. This message is serving as notification that the Draft Initial Study and Mitigated Negative Declaration (IS/MND) review period has been extended by **15 days** per community feedback. The Draft IS/MND is being made available for public review and comment for a period of 45 days, beginning **June 26th, 2024**, and ending on **August 10th, 2024**.

The Draft IS/MND, Notice of Availability and Intent to Adopt the IS/MND (in English and Spanish), a Summary of the documents (in English and Spanish) may be viewed at the following location...

https://www.parks.ca.gov/?page_id=983

California State Parks understands the community's request for an extension to review the IS/MND and wants to be amenable to this request while meeting Grant funding deadline requirements. The comment period regarding the IS/MND will close on August 10th, but California State Parks will continue to accept comments and respond to them outside of the purview of CEQA.

To allow the public a chance to provide feedback in person, California State Parks is planning to be present at a public community event led by The Nature Conservancy on August 17th from 10:30am-12pm at Rio De Los Angeles SP that will be focused on the Bowtie Wetland Demonstration Project, which is the first phase of the Bowtie's development. See the flyer in both English and Spanish below. California State Parks will be at this event with a table to provide project updates to interested community members, accept comments and answer questions.

Comments should continue to be directed to:

enviro@parks.ca.gov Include "Bowtie Development" in the subject line
or by mail to

ATTN: Luke Serna: Bowtie Development
California State Parks
Southern Service Center
2797 Truxtun Road
San Diego, CA 92106

The project team appreciates your continued engagement with the project as it proceeds towards construction.

Bowtie Park Development Project Team



12-2

Letter 12 – Continued



The flyer is divided into two horizontal sections. The top section is titled 'PUBLIC MEETING NOTICE' in a large, green, arched font. It features a white bird in flight on the left and a hand holding a small green plant on the right. The text is centered and reads: '10:30 am – 12 pm', 'Saturday, August 17th', '1900 N. San Fernando Rd., Los Angeles, CA 90065', 'Soccer fields at Rio de Los Angeles State Park'. Below this, a green banner contains the text: 'We invite you to learn about the upcoming soil cleanup and construction of the Bowtie Wetland Demonstration, expected to begin later this year. The project will include public access, habitat restoration, and stormwater management.' Further down, it states: 'Free tacos will be provided after the meeting, while supplies last! The meeting will be held in Spanish, with English-language interpretation. For more information, please contact Kelsey Jessup at kelsey.jessup@tnc.org.' The bottom section is titled 'AVISO DE JUNTA PÚBLICA' in a large, green, arched font, with the same bird and plant illustrations. It reads: '10:30 am – 12 pm', 'sábado, 17 de agosto', '1900 N. San Fernando Rd., Los Angeles, CA 90065', 'Parque Estatal de Río de Los Ángeles, En las canchas de fútbol'. A green banner contains: 'Te invitamos a conocer sobre la próxima limpieza del subsuelo y la construcción de la Demostración del Humedal de Bowtie, que se llevará a cabo este año. El proyecto incluirá acceso público, y la mejora de hábitat y aguas pluviales.' It continues: '¡Se proporcionarán tacos gratis después de la reunión, hasta ser agotados! La reunión será en español, con interpretación al inglés. Para obtener más información, comunícate con Kelsey Jessup at kelsey.jessup@tnc.org.' Both sections include the logos for the City of Los Angeles and The Nature Conservancy.

PUBLIC MEETING NOTICE

10:30 am – 12 pm
Saturday, August 17th

1900 N. San Fernando Rd., Los Angeles, CA 90065
Soccer fields at Rio de Los Angeles State Park

We invite you to learn about the upcoming soil cleanup and construction of the Bowtie Wetland Demonstration, expected to begin later this year. The project will include public access, habitat restoration, and stormwater management.

Free tacos will be provided after the meeting, while supplies last!
The meeting will be held in Spanish, with English-language interpretation.
For more information, please contact Kelsey Jessup at kelsey.jessup@tnc.org.

AVISO DE JUNTA PÚBLICA

10:30 am – 12 pm
sábado, 17 de agosto

1900 N. San Fernando Rd., Los Angeles, CA 90065
Parque Estatal de Río de Los Ángeles, En las canchas de fútbol

Te invitamos a conocer sobre la próxima limpieza del subsuelo y la construcción de la Demostración del Humedal de Bowtie, que se llevará a cabo este año. El proyecto incluirá acceso público, y la mejora de hábitat y aguas pluviales.

¡Se proporcionarán tacos gratis después de la reunión, hasta ser agotados!
La reunión será en español, con interpretación al inglés.
Para obtener más información, comunícate con Kelsey Jessup at kelsey.jessup@tnc.org.

12-2
cont.

Response to Clara Solis – Letter 12

Response to Comment 12-1:

The commenter states the public review extension is not long enough as they are on vacation.

In an effort to give the public more time to comment on the Project, DPR extended the 30-day public review period by 15 days. The 45-day public review period exceeds the CEQA-requirement for public review periods. Additionally, in the email notifying interested parties in the extension of the comment period, DPR noted that although the comment period regarding the IS/MND would close on August 10, 2024, they would continue to accept comments and respond to them outside of the purview of CEQA. No changes to the IS/MND are required in response to this comment.

Response to Comment 12-2:

Comment 12-2 is an attachment of DPR's letter regarding the extension of the comment period and the public meeting notice flyer for the Bowtie Wetland Demonstration Project which DPR stated they would attend to provide project updates and accept comments and answer questions.

No response is required.

Letter 13 – Jabz Alejandro Palomino

Letter 13

From: [Jabz](#)
To: [Review_Environmental@Parks](#); [Review_Environmental@Parks](#)
Cc: [Serna_Lucas@Parks](#); [Jabz](#)
Subject: Bowtie G1 development project
Date: Saturday, August 10, 2024 5:23:38 PM

I am requesting this statement to be reflected on the record.

Hello,

An extension of at least 90 days and not just 15 days was requested by several people for proper public review of the [Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#) - Review Period Expires 7/26/2024.

13-1

It took several weeks for the expiration date for this IS-MND to be updated on the California State Parks website failing to properly and fairly inform the people.

Another problem is that only a handful of people requesting and asserting their concerns regarding these matters were notified and not to everyone else which fails to be inclusive, respectful, non-bias, also a clear discrimination against the rest of the public.

Information on the California State Parks in regards to the IS-MND for this specific case / project is NOT available in any language other than English. Although the CSP's website's general info can be switched to Spanish but not the actual document (IS-MND). Once again, the process is not transparent nor is your information accurate.

The Spanish speaking and other disadvantaged and marginalized IBPOC communities felt extremely disturbed and disenfranchising by the way California State Parks is treating the Spanish speaking and other disadvantaged and marginalized IBPOC community members due to the lack of interest to comply with our demands and provide us with an impartial, transparent, fair, and inclusive due process for the Bowtie G1 project that our public money is funding or planning to be use for. Which makes us sincerely doubt about the true nature of the Bowtie G1 project and process.

13-2

According to the reasons stated in your previous email, it seems that California State Parks is more concerned about acquiring our tax dollars rather than attending to our demands, properly addressing our concerns, and comply fully with State and Federal Laws and requirements.

California State Parks shall be fully concerned and more than willing to immediately comply in full with our demands that are based on the real needs and priorities from the longtime residents and general public.

Letter 13 – Continued

California State Parks shall stop ignoring and discriminating against Disadvantaged and Marginalized IBPOC communities living adjacent to this project and to members of the general public as well, and start a process that guarantee a fair, impartial, transparent and inclusive process accordingly to the demographics, needs and priorities of these communities.

**13-2
cont.**

Due to the problems stated above, and for the following but not limited to:

- 1- Willful negligence and discrimination (Title 2) from California State Parks against Spanish speaking and other disadvantaged and marginalized IBPOC communities.
- 2- The More than significant impact on/to:
 - The Endangered California Native the Least Bell's Vireo species on the brink of extinction and their critical habitat due to the construction of this park (according to a letter sent from CDFW to CA State Park on June 08, 2023).
 - Unnecessary and Avoidable exposure to highly Carcinogens and Toxic Pollutants found at this site during and after construction prep / work for this project to residents, visitors, workers and public in general.
 - Lack of transparency and no proper and approved remediation /mitigation plan. No plan has been yet presented to the public nor a chance for comment or feedback.
 - History of irresponsibility and lack of proper safety measures, monitoring, proper response and failure to follow protocols by DTSC, CEQA and CA State Parks.
- 3- No proper Outreach to disadvantaged and marginalized IBPOC ethnic groups living in communities adjacent to this site/project in Spanish and any language other than English.
- 4- Process lacks transparency, impartiality, fairness and inclusiveness.

13-3

We are demanding the following but not limited to:

1. Proper feasible, inclusive, responsible, safe, transparent, impartial, and most important, be created mainly using the real needs and priorities from disadvantaged and marginalized IBPOC residents living adjacent to this site project.
2. Fully implementation and enforcement of Federal Law Endangered Species Act ESA -CESA, and 1918 Migratory Bird Treaty Act MBTA, that protects Endangered, Native and

Letter 13 – Continued

Migratory birds / wildlife to ensure their recover, conservation and survival as well as the natural healthy environment and ecosystem for all.

3. Full and immediate implementation of an Environmental Impact Report (EIR) for the whole Bowtie G1 parcel, as the proposed IS-MND seems to be not enough and failing to fully and properly to the high and valid concerns from Community members and public in general due to the high levels of pollutants present in that parcel that will be disturbed, removed, not properly managed, and remaining pollutants left untouched and/or disturbed prior, during and after construction perp / work for this specific site / project.

4. Public Comment Period for the full EIR process of at least 90 days.

5. Public meetings in the form of town hall held and run by California State Parks, (not by any non-profit) to address all the questions, concerns and recommendations from residents-stakeholders and public in general in regards to the proposed Bowtie G1 project.

6. Provide translated versions of the EIR document/s in Spanish and any languages other than English for transparency and a more equitable, impartial, fair and inclusive process to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general as well.

7. Have every single public agency involved and part of this project (City, County, State, and Federal) present to address any and all the questions, concerns and recommendations from residents-stakeholders and members of the public in regards to the proposed Bowtie G1 project.

**13-3
cont.**

Please feel free to contact me at any time for a chance to speak personally with me and highly concerned residents and members of the public supporting the stated above.

Sincerely,
Jabz Alejandro Palomino.
323 574 6582

Response to Jabz Alejandro Palomino – Letter 13**Response to Comment 13-1:**

The commenter reiterates their previous request for a public review extension of at least 90 days and states the 15-day extension was not on updated DPR's website for several weeks, which fails to properly inform the community. The commenter also states not everyone was sent the DPR's email notification of the public review period extension.

The Proposed Project's public review period was a standard 30 days as is required for MNDs under CEQA (CEQA Guidelines §15073(a)). However, DPR extended the public review period from 30 to 45 days to be amenable to the community's request for an extension while still meeting grant funding deadline requirements. The extended public review period ended on August 10, 2024, but DPR will continue to accept comments and respond to them outside of the purview of CEQA. Additionally, to allow the public a chance to provide feedback in person, DPR held a public community event led by The Nature Conservancy on August 17, 2024 at the Rio De Los Angeles State Park that was focused on the Bowtie Wetland Demonstration Project, which is the first phase of the Bowtie parcel's development.

The initial Notice of Availability and Intent to Adopt an IS/MND (NOA-NOI) was sent via email on June 26, 2024 to individuals or parties interested in the Bowtie Park Development Project. This notification provided links to the Draft IS/MND and NOA-NOI along with review period dates and instructions on how to provide comments. Notice of the review period extension was sent via email on July 19, 2024 to individuals or parties interested in the Bowtie Park Development Project, prior to both the initial (July 26, 2024) and extended (August 10, 2024) review period deadlines. This notice included a link to the DPR website which was updated on the same day with the extended review period as well as English and Spanish versions of the revised NOA-NOI and Summary of IS/MND. No changes to the IS/MND are required in response to this comment.

Response to Comment 13-2:

The commenter notes that there is no translated version of the IS/MND in Spanish. The DPR website can be translated to Spanish, however it does not translate the document itself. The commenter states the Spanish-speaking and Indigenous, Black, and People of Color (IBPOC) community feel disenfranchised by this.

The Proposed Project has met noticing requirements for MNDs under CEQA (PRC Section 21092). Translation of a document is not required under CEQA, however, DPR prepared a Summary of the IS/MND in Spanish which includes the Project description, location, objectives, project effects, and mitigation measures. This document can be accessed at the following link: https://www.parks.ca.gov/?page_id=983. No changes to the IS/MND are required in response to this comment.

Response to Comment 13-3:

This comment provides a list of problems and demands created by the community. The Project's problems include the following:

- 1) Negligence and discrimination against Spanish-speaking and other disadvantaged and marginalized IBPOC communities;
- 2) More than significant impacts to LBVI and critical habitat; exposure of residents, visitors, and works to carcinogens and toxic pollutants during construction; improper remediation/mitigation plan; and history of improper safety measures, monitoring, response, and adherence to protocols by DTSC, CEQA, and DPR;
- 3) Improper outreach to IBPOC communities in the area and non-English speaking groups; and
- 4) Lack of transparency, impartiality, fairness, and inclusivity

The listed demands include the following:

- 1) Inclusivity and transparency for IBPOC residents;
- 2) Implementation of ESA/CESA and MBTA to protect endangered, native, and migratory birds and wildlife;
- 3) Implementation of an EIR;
- 4) A 90-day public comment period for the EIR;
- 5) DPR-hosted public meetings to address Project questions, concerns, and recommendations;
- 6) Translated versions of the EIR in Spanish and other languages; and
- 7) Attendance of every public agency involved at the public meetings to address Project questions, concerns, and recommendations.

Please refer to Response to Comment 10-3.

No changes to the IS/MND are required in response to this comment.

Letter 14 – Lyannie Tran

Letter 14

From: [Lyannie Tran](#)
To: [Review_Environmental@Parks](#); [Review_Environmental@Parks](#)
Cc: [Serna_Lucas@Parks](#); [savethevireo@gmail.com](#)
Subject: Save the Least Bells Vireo
Date: Saturday, August 10, 2024 3:50:19 PM
Attachments: [Bowtie_G1_IS_MND comment letter.08.09.2024.pdf](#) - Attachment 1

You don't often get email from [lyannie@gmail.com](#). [Learn why this is important](#)

Right now the Bowtie G1 recreational park project at Taylor Yard parcel is a direct threat to the California Native on the Brink of extinction the Least Bell's Vireo (*Vireo bellii pusillus*) and to the critical ecosystem of hundreds of different species of wildlife along the LA River and tributaries.

What we are demanding is a proper feasible, inclusive, responsible, safe, transparent, impartial, and most important, be created mainly using the real needs and priorities from disadvantaged and marginalized IBPOC residents living adjacent to this site project, along to fully implementing and enforcing Federal Law (Endangered Species Act - CA ESA, 1918 Migratory Bird Treaty Act MBTA) that protects Endangered, Native and Migratory birds / wildlife to ensure their recover, conservation and survival as well as the natural healthy environment and ecosystem for all.

14-1

Lyannie Tran

Letter 14 – Continued

Letter 14 - Attachment 1

Hello,

An extension of at least 90 days and not just 15 days was requested by several people for proper public review of the [Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#) - Review Period Expires 7/26/2024.

It took several weeks for the expiration date for this IS-MND to be updated on the California State Parks website failing to properly and fairly informed the people.

Another problem is that only a handful of people requesting and asserting their concerns regarding these matters were notified and not to everyone else which fails to be inclusive, respectful, non-bias, also a clear discrimination against the rest of the public.

Information on the California State Parks in regards of the IS-MND for this specific case / project is NOT available in any language other than English. Although the CSP's website's general info can be switched to Spanish but not the actual document (IS-MND). Once again, the process is not transparent nor is your information accurate.

The Spanish speaking and other disadvantaged and marginalized IBPOC communities felt extremely disturbed and disenfranchising by the way California State Parks is treating the Spanish speaking and other disadvantaged and marginalized IBPOC community members due to the lack of interest to comply with our demands and provide us with an impartial, transparent, fair, and inclusive due process for the Bowtie G1 project that our public money is funding or planning to be use for. Which makes us sincerely doubt about the true nature of the Bowtie G1 project and process.

According to the reasons stated on your previous email, it seems that California State Parks is more concerned about acquiring our tax dollars rather than attending our demands, properly addressing our concerns, and comply fully with State and Federal Laws and requirements.

California State Parks shall be fully concerned and more than willing to immediately comply in full with our demands that are based on the real needs and priorities from the longtime residents and general public.

California State Parks shall stop ignoring and discriminating against Disadvantaged and Marginalized IBPOC communities living adjacent to this project and to members of the general public as well, and start a process that guarantee a fair, impartial, transparent and inclusive process accordingly to the demographics, needs and priorities of these communities.

Letter 14 – Continued

Due to the problems stated above, and for the following but not limited to:

- 1- Willful negligence and discrimination (Title 2) from California State Parks against Spanish speaking and other disadvantaged and marginalized IBPOC communities.
- 2- The More than significant impact on/to:
 - The Endangered California Native the Least Bell's Vireo species on the brink of extinction and their critical habitat due to the construction of this park (according to a letter sent from CDFW to CA State Park on June 08, 2023).
 - Unnecessary and Avoidable exposure to highly Carcinogens and Toxic Pollutants found at this site during and after construction prep / work for this project to residents, visitors, workers and public in general.
 - Lack of transparency and no proper and approved remediation /mitigation plan. No plan has been yet presented to the public nor a chance for comment or feedback.
 - History of irresponsibility and lack of proper safety measures, monitoring, proper response and failure to follow and protocols by DTSC, CEQA and CA State Parks.
- 3- No proper Outreach to disadvantaged and marginalized IBPOC ethnic groups living in communities adjacent to this site/project in Spanish and any language other than English.
- 4- Process lacking of transparency, impartiality, fairness and inclusiveness.

We are demanding the following but not limited to:

1. Full and immediate implementation of an Environmental Impact Report (EIR) for the whole Bowtie G1 parcel, as the proposed IS-MND seems to be not enough and failing to fully and properly to the high and valid concerns from Community members and public in general due to the high levels of pollutants present in that parcel that will be disturbed, removed, not properly managed, and remaining pollutants left untouched and/or disturbed prior, during and after construction prep / work for this specific site / project.

Letter 14 – Continued

2. Public Comment Period for the full EIR process of at least 90 days.
3. Public meetings in the form of town hall held and run by California State Parks, (not by any non-profit) to address all the questions, concerns and recommendations from residents-stakeholders and public in general in regards to the proposed Bowtie G1 project.
4. Provide translated versions of the EIR document/s in Spanish and any languages other than English for transparency and a more equitable, impartial, fair and inclusive process to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general as well.
5. Have every single public agency involved and part of this project (City, County, State, and Federal) present to address any and all the questions, concerns and recommendations from residents-stakeholders and members of the public in regards to the proposed Bowtie G1 project.

Please feel free to contact me at any time for a chance to speak personally with me and highly concerned residents and members of the public supporting the stated above.

Lyannie Tran
lyannie@gmail.com

Response to Lyannie Tran – Letter 14**Response to Comment 14-1:**

The commenter states the Project is a threat to LBVI and the critical ecosystem of hundreds of wildlife species along the Los Angeles River and its tributaries. The commenter also demands proper, inclusive, and transparent communication with IBPOC residents as well as enforcement of federal law protecting endangered, native, and migratory birds and wildlife.

As stated in Response to Comment 3-1, Least Bell's vireo often inhabits structurally diverse woodlands along watercourses including cottonwood-willow and oak woodlands and mulefat scrub. In Southern California, LBVI is a summer resident in low riparian in the vicinity of water or in dry river bottoms. The *Biological Resources Technical Report* prepared for the Project shows that there are 2.67 acres of Gooding's willow – red willow riparian woodland and forest vegetation community, which is vegetation LBVI would likely inhabit, however this habitat is located within the Los Angeles Riverbed and is not within the Project Area (Stantec 2023). Therefore, the occurrence potential was determined to be low for nesting and moderate for foraging.

BIO-1, as described in the Draft IS/MND, is an SPR involving a pre-construction survey for nesting birds during the bird breeding/nesting window (February 15 to August 31) that shall be completed prior to the start of any development activities within the Project Area. This SPR addresses potential impacts to LBVI due to construction activities for the Proposed Project. BIO-2 is an SPR involving protection measures for LBVI following focused, protocol-level surveys being conducted for the Project Area plus a 500-foot buffer.

As described in the *Addendum to the 2023 Bowtie Parcel Project Biological Resources Technical Report* (Appendix A), since the completion of the *Biological Resources Technical Report*, additional protocol-level surveys have been conducted by CDPR biologists for two listed species with the potential to occur within the biological study area. Following the US Fish and Wildlife (USFWS) "Least Bell's Vireo Survey Guidelines" (USFWS 2001), a series of eight surveys were completed at the Bowtie Parks Development Project site and adjacent areas (i.e., 500-foot buffer) from April to July of 2024. Surveys spaced at least ten days apart, were conducted between dawn and 11 a.m. by qualified CDPR biologists without the use of vocalization tapes. No LBVI were detected during any of the surveys.

The avoidance measures outlined in BIO-2 would be implemented regardless of the results of the protocol-level survey. Given the absence of LBVI habitat within the Project Area and implementation of SPRs BIO-1 and BIO-2, impacts to LBVI would be less than significant.

Please see Response to Comment 10-3 for a response regarding communication with the community.

Attachment 1 is a copy of Jabz Alejandro Palomino's comment letter (Letter 13) sent on August 10, 2024. See Response to Comment 13-1 through 13-3.

Letter 15 – John Vangelisti

Letter 15

From: [John Tristan Vangelisti](#)
To: [Sema, Lucas@Parks](#); [Review, Environmental@Parks](#); [Environmental Committee](#)
Subject: Environmental Review
Date: Saturday, August 10, 2024 5:04:08 PM
Attachments: [Bowtie G1 IS MND comment letter 08 09 2024.pdf](#) - Attachment 1

[You don't often get email from jtristandryden@icloud.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

I wholeheartedly agree with this letter

Save the Vireo
Save the Hahamongna
Save Ourselves

John Vangelisti
Sent from my iPhone

15-1

Letter 15 – Continued

Letter 15 - Attachment 1

Hello,

An extension of at least 90 days and not just 15 days was requested by several people for proper public review of the [Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#) - Review Period Expires 7/26/2024.

It took several weeks for the expiration date for this IS-MND to be updated on the California State Parks website failing to properly and fairly informed the people.

Another problem is that only a handful of people requesting and asserting their concerns regarding these matters were notified and not to everyone else which fails to be inclusive, respectful, non-bias, also a clear discrimination against the rest of the public.

Information on the California State Parks in regards of the IS-MND for this specific case / project is NOT available in any language other than English. Although the CSP's website's general info can be switched to Spanish but not the actual document (IS-MND). Once again, the process is not transparent nor is your information accurate.

The Spanish speaking and other disadvantaged and marginalized IBPOC communities felt extremely disturbed and disenfranchising by the way California State Parks is treating the Spanish speaking and other disadvantaged and marginalized IBPOC community members due to the lack of interest to comply with our demands and provide us with an impartial, transparent, fair, and inclusive due process for the Bowtie G1 project that our public money is funding or planning to be use for. Which makes us sincerely doubt about the true nature of the Bowtie G1 project and process.

According to the reasons stated on your previous email, it seems that California State Parks is more concerned about acquiring our tax dollars rather than attending our demands, properly addressing our concerns, and comply fully with State and Federal Laws and requirements.

California State Parks shall be fully concerned and more than willing to immediately comply in full with our demands that are based on the real needs and priorities from the longtime residents and general public.

California State Parks shall stop ignoring and discriminating against Disadvantaged and Marginalized IBPOC communities living adjacent to this project and to members of the general public as well, and start a process that guarantee a fair, impartial, transparent and inclusive process accordingly to the demographics, needs and priorities of these communities.

Letter 15 – Continued

Due to the problems stated above, and for the following but not limited to:

- 1- Willful negligence and discrimination (Title 2) from California State Parks against Spanish speaking and other disadvantaged and marginalized IBPOC communities.
- 2- The More than significant impact on/to:
 - The Endangered California Native the Least Bell's Vireo species on the brink of extinction and their critical habitat due to the construction of this park (according to a letter sent from CDFW to CA State Park on June 08, 2023).
 - Unnecessary and Avoidable exposure to highly Carcinogens and Toxic Pollutants found at this site during and after construction prep / work for this project to residents, visitors, workers and public in general.
 - Lack of transparency and no proper and approved remediation /mitigation plan. No plan has been yet presented to the public nor a chance for comment or feedback.
 - History of irresponsibility and lack of proper safety measures, monitoring, proper response and failure to follow and protocols by DTSC, CEQA and CA State Parks.
- 3- No proper Outreach to disadvantaged and marginalized IBPOC ethnic groups living in communities adjacent to this site/project in Spanish and any language other than English.
- 4- Process lacking of transparency, impartiality, fairness and inclusiveness.

We are demanding the following but not limited to:

1. Full and immediate implementation of an Environmental Impact Report (EIR) for the whole Bowtie G1 parcel, as the proposed IS-MND seems to be not enough and failing to fully and properly to the high and valid concerns from Community members and public in general due to the high levels of pollutants present in that parcel that will be disturbed, removed, not properly managed, and remaining pollutants left untouched and/or disturbed prior, during and after construction prep / work for this specific site / project.

Letter 15 – Continued

2. Public Comment Period for the full EIR process of at least 90 days.
3. Public meetings in the form of town hall held and run by California State Parks, (not by any non-profit) to address all the questions, concerns and recommendations from residents-stakeholders and public in general in regards to the proposed Bowtie G1 project.
4. Provide translated versions of the EIR document/s in Spanish and any languages other than English for transparency and a more equitable, impartial, fair and inclusive process to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general as well.
5. Have every single public agency involved and part of this project (City, County, State, and Federal) present to address any and all the questions, concerns and recommendations from residents-stakeholders and members of the public in regards to the proposed Bowtie G1 project.

Please feel free to contact me at any time for a chance to speak personally with me and highly concerned residents and members of the public supporting the stated above.

Sincerely,
Jabz Alejandro Palomino.
323 574 6582

Response to John Vangelisti – Letter 15

Response to Comment 15-1:

The commenter expresses agreement with Jabz Alejandro Palomino's comment letter (Letter 13).

See Response to Comment 13-1 through 13-3.

Response to Comment 15-2:

This comment is an attachment of Jabz Alejandro Palomino's comment letter (Letter 13) sent on August 10, 2024. See Response to Comment 13-1 through 13-3.

Letter 16 – John Vangelisti

Letter 16

From: [John Tristan Vangelisti](#)
To: [Review_Environmental@Parks](#); [Environmental Committee](#); [Serna, Lucas@Parks](#); [Jabz](#)
Subject: Fwd: Bowtie G1 development project
Date: Saturday, August 10, 2024 5:33:22 PM

You don't often get email from jtristandryden@icloud.com. [Learn why this is important](#)

Hello

I completely agree and am highly concerned and disappointed that Title 2 and all the other concerns were not addressed.

How can State Parks notify non English speakers to hazards with language that reflects our community

John Vangelisti
Sent from my iPhone

Begin forwarded message:

From: Jabz <savethevireo@gmail.com>
Date: August 10, 2024 at 5:22:57 PM PDT
To: environmental.review@parks.ca.gov, enviro@parks.ca.gov
Cc: Lucas.Serna@parks.ca.gov, Jabz <savethevireo@gmail.com>
Subject: Bowtie G1 development project

I am requesting this statement to be reflected on the record.

Hello,
An extension of at least 90 days and not just 15 days was requested by several people for proper public review of the [Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#) - Review Period Expires 7/26/2024.

It took several weeks for the expiration date for this IS-MND to be updated on the California State Parks website failing to properly and fairly inform the people.

Another problem is that only a handful of people requesting and asserting their concerns regarding these matters were notified and not to everyone else which fails to be inclusive, respectful, non-bias, also a clear discrimination against the rest of the public.

Information on the California State Parks in regards to the IS-MND for this specific case / project is NOT available in any language other than English. Although the CSP's website's general info can be switched to Spanish but not the actual document (IS-MND). Once again, the process is not

16-1

16-2

Letter 16 – Continued

transparent nor is your information accurate.

The Spanish speaking and other disadvantaged and marginalized IBPOC communities felt extremely disturbed and disenfranchising by the way California State Parks is treating the Spanish speaking and other disadvantaged and marginalized IBPOC community members due to the lack of interest to comply with our demands and provide us with an impartial, transparent, fair, and inclusive due process for the Bowtie G1 project that our public money is funding or planning to be use for. Which makes us sincerely doubt about the true nature of the Bowtie G1 project and process.

According to the reasons stated in your previous email, it seems that California State Parks is more concerned about acquiring our tax dollars rather than attending to our demands, properly addressing our concerns, and comply fully with State and Federal Laws and requirements.

California State Parks shall be fully concerned and more than willing to immediately comply in full with our demands that are based on the real needs and priorities from the longtime residents and general public.

California State Parks shall stop ignoring and discriminating against Disadvantaged and Marginalized IBPOC communities living adjacent to this project and to members of the general public as well, and start a process that guarantee a fair, impartial, transparent and inclusive process accordingly to the demographics, needs and priorities of these communities.

Due to the problems stated above, and for the following but not limited to:

- 1- Willful negligence and discrimination (Title 2) from California State Parks against Spanish speaking and other disadvantaged and marginalized IBPOC communities.
- 2- The More than significant impact on/to:
 - The Endangered California Native the Least Bell's Vireo species on the brink of extinction and their critical habitat due to the construction of this park (according to a letter sent from CDFW to CA State Park on June 08, 2023).
 - Unnecessary and Avoidable exposure to highly Carcinogens and Toxic Pollutants found at this site during and after construction prep / work for this

**16-2
cont.**

Letter 16 – Continued

project to residents, visitors, workers and public in general.

- Lack of transparency and no proper and approved remediation /mitigation plan. No plan has been yet presented to the public nor a chance for comment or feedback.
- History of irresponsibility and lack of proper safety measures, monitoring, proper response and failure to follow protocols by DTSC, CEQA and CA State Parks.

3- No proper Outreach to disadvantaged and marginalized IBPOC ethnic groups living in communities adjacent to this site/project in Spanish and any language other than English.

4- Process lacks transparency, impartiality, fairness and inclusiveness.

We are demanding the following but not limited to:

1. Proper feasible, inclusive, responsible, safe, transparent, impartial, and most important, be created mainly using the real needs and priorities from disadvantaged and marginalized IBPOC residents living adjacent to this site project.
2. Fully implementation and enforcement of Federal Law Endangered Species Act ESA -CESA, and 1918 Migratory Bird Treaty Act MBTA, that protects Endangered, Native and Migratory birds / wildlife to ensure their recover, conservation and survival as well as the natural healthy environment and ecosystem for all.
3. Full and immediate implementation of an Environmental Impact Report (EIR) for the whole Bowtie G1 parcel, as the proposed IS-MND seems to be not enough and failing to fully and properly to the high and valid concerns from Community members and public in general due to the high levels of pollutants present in that parcel that will be disturbed, removed, not properly managed, and remaining pollutants left untouched and/or disturbed prior, during and after construction perp / work for this specific site / project.
4. Public Comment Period for the full EIR process of at least 90 days.

**16-2
cont.**

Letter 16 – Continued

5. Public meetings in the form of town hall held and run by California State Parks, (not by any non-profit) to address all the questions, concerns and recommendations from residents-stakeholders and public in general in regards to the proposed Bowtie G1 project.
6. Provide translated versions of the EIR document/s in Spanish and any languages other than English for transparency and a more equitable, impartial, fair and inclusive process to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general as well.
7. Have every single public agency involved and part of this project (City, County, State, and Federal) present to address any and all the questions, concerns and recommendations from residents-stakeholders and members of the public in regards to the proposed Bowtie G1 project.

**16-2
cont.**

Please feel free to contact me at any time for a chance to speak personally with me and highly concerned residents and members of the public supporting the stated above.

Sincerely,
Jabz Alejandro Palomino.
323 574 6582

Response to John Vangelisti – Letter 16

Response to Comment 16-1:

The commenter expresses agreement with Jabz Alejandro Palomino’s comment letter (Letter 13) and expresses disappointment that concerns had not been addressed. The commenter states State Parks should notify non-English speakers of potential hazards.

Notice of the review period extension was sent via email on July 19, 2024 to individuals or parties interested in the Bowtie Park Development Project. This notice included a link to the DPR website which was updated on the same day with the extended review period as well as English and Spanish versions of the revised NOA-NOI and Summary of IS/MND. The Spanish version of the Summary of the IS/MND includes the Project description, location, objectives, project effects, and mitigation measures. This document can be accessed at the following link: https://www.parks.ca.gov/?page_id=983. No changes to the IS/MND are required in response to this comment.

Response to Comment 16-2:

This comment is an attachment of Jabz Alejandro Palomino’s comment letter (Letter 13) sent on August 10, 2024. See Response to Comment 13-1 through 13-3.

Letter 17– Vincent Montalvo

Letter 17

From: [Vincent Montalvo](#)
To: [Review_Environmental@Parks](#); [Review_Environmental@Parks](#); [Sema_Lucas@Parks](#)
Cc: [Jabz](#)
Subject: 90 day Extension on Bowtie project / environmental review
Date: Saturday, August 10, 2024 6:22:15 PM
Attachments: [Bowtie_GI_IS_MND_comment_letter.08.09.2024.pdf](#) - Attachment 1

You don't often get email from vincentmontalvoclc@yahoo.com. [Learn why this is important](#)

My name is Vincent Montalvo and I am a member of the Lincoln Heights neighborhood council and I also serve in the steering committee of the River alliance communities. Many community members have brought it to my attention that there was poor outreach for the Bowtie project. I too have not received any information via email or flyer. I also did not receive anything through our neighborhood council or through our alliance of River communities group. I support 100% save the least bells vireo request to extend the review for 90 days. We also agree with everything in the letter provided by save the Least bells verio I have attached a copy to this email.

17-1

Thank you
Vincent Montalvo
[Yahoo Mail: Search, Organize, Conquer](#)

Letter 17 – Continued

Letter 17 - Attachment 1

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California State Parks shall stop ignoring and discriminating against Disadvantaged and Marginalized IBPOC communities living adjacent to this project and to members of the general public as well, and start a process that guarantee a fair, impartial, transparent and inclusive process accordingly to the demographics, needs and priorities of these communities.

Letter 17 – Continued

Due to the problems stated above, and for the following but not limited to:

- 1- Willful negligence and discrimination (Title 2) from California State Parks against Spanish speaking and other disadvantaged and marginalized IBPOC communities.
- 2- The More than significant impact on/to:
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 - Lack of transparency and no proper and approved remediation /mitigation plan. No plan has been yet presented to the public nor a chance for comment or feedback.
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- 3- No proper Outreach to disadvantaged and marginalized IBPOC ethnic groups living in communities adjacent to this site/project in Spanish and any language other than English.
- 4- Process lacking of transparency, impartiality, fairness and inclusiveness.

We are demanding the following but not limited to:

1. Full and immediate implementation of an Environmental Impact Report (EIR) for the whole Bowtie G1 parcel, as the proposed IS-MND seems to be not enough and failing to fully and properly to the high and valid concerns from Community members and public in general due to the high levels of pollutants present in that parcel that will be disturbed, removed, not properly managed, and remaining pollutants left untouched and/or disturbed prior, during and after construction prep / work for this specific site / project.

Letter 17 – Continued

2. Public Comment Period for the full EIR process of at least 90 days.
3. Public meetings in the form of town hall held and run by California State Parks, (not by any non-profit) to address all the questions, concerns and recommendations from residents-stakeholders and public in general in regards to the proposed Bowtie G1 project.
4. Provide translated versions of the EIR document/s in Spanish and any languages other than English for transparency and a more equitable, impartial, fair and inclusive process to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general as well.
5. Have every single public agency involved and part of this project (City, County, State, and Federal) present to address any and all the questions, concerns and recommendations from residents-stakeholders and members of the public in regards to the proposed Bowtie G1 project.

Please feel free to contact me at any time for a chance to speak personally with me and highly concerned residents and members of the public supporting the stated above.

Sincerely,
Jabz Alejandro Palomino.
323 574 6582

Response to Vincent Montalvo – Letter 17

Response to Comment 17-1:

The commenter states they are a member of the Lincoln Heights neighborhood council and on the steering committee of the River alliance communities. The commenter states they have not received any information via email or flyer and the neighborhood council and alliance of river communities did not receive information either. The commenter supports the request to extend the review period for 90 days and with everything in the attached letter.

The initial Notice of Availability and Intent to Adopt an IS/MND (NOA-NOI) was sent via email on June 26, 2024 to individuals or parties interested in the Bowtie Park Development Project and was posted to DPR's website for ease of access. This initial notification provided links to the Draft IS/MND and NOA-NOI along with review period dates and instructions on how to provide comments. Notice of the review period extension was sent via email on July 19, 2024 to individuals or parties interested in the Bowtie Park Development Project. This notice included a link to the DPR website which was updated on the same day with the extended review period as well as English and Spanish versions of the revised NOA-NOI and Summary of IS/MND. No changes to the IS/MND are required in response to this comment.

Attachment 1 is a copy of Jabz Alejandro Palomino's comment letter (Letter 13) sent on August 10, 2024. See Response to Comment 13-1 through 13-3.

Letter 18 – Buried Under the Blue

Letter 18

From: [Buried Under the Blue](#)
To: [Review_Environmental@Parks](#)
Cc: [Save the LA River; Serna, Lucas@Parks](#)
Subject: Re: Bowie G1 development project
Date: Saturday, August 10, 2024 6:49:15 PM

Some people who received this message don't often get email from buriedundertheblue@gmail.com. [Learn why this is important](#)

I am requesting this statement to be reflected on the record.

Hello,
An extension of at least 90 days and not just 15 days was requested by several people for proper public review of the [Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#) - Review Period Expires 7/26/2024.

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The Spanish speaking and other

18-1

Letter 18 – Continued

disadvantaged and marginalized IBPOC communities felt extremely disturbed and disenfranchising by the way California State Parks is treating the Spanish speaking and other disadvantaged and marginalized IBPOC community members due to the lack of interest to comply with our demands and provide us with an impartial, transparent, fair, and inclusive due process for the Bowtie G1 project that our public money is funding or planning to be use for. Which makes us sincerely doubt about the true nature of the Bowtie G1 project and process.

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Due to the problems stated above, and for the following but not limited to:

- 1- Willful negligence and discrimination (Title 2) from California State Parks against Spanish speaking and other disadvantaged and marginalized IBPOC communities.

18-1 cont.

Letter 18 – Continued

2- The More than significant impact on/to:

- The Endangered California Native the Least Bell's Vireo species on the brink of extinction and their critical habitat due to the construction of this park (according to a letter sent from CDFW to CA State Park on June 08, 2023).
- Unnecessary and Avoidable exposure to highly Carcinogens and Toxic Pollutants found at this site during and after construction prep / work for this project to residents, visitors, workers and public in general.
- Lack of transparency and no proper and approved remediation /mitigation plan. No plan has been yet presented to the public nor a chance for comment or feedback.
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3- No proper Outreach to disadvantaged and marginalized IBPOC ethnic groups living in communities adjacent to this site/project in Spanish and any language other than English.

4- Process lacks transparency, impartiality, fairness and inclusiveness.

We are demanding the following but not limited to:

1. Proper feasible, inclusive, responsible, safe, transparent, impartial, and most important, be

18-1 cont.

Letter 18 – Continued

created mainly using the real needs and priorities from disadvantaged and marginalized IBPOC residents living adjacent to this site project.

2. Fully implementation and enforcement of Federal Law Endangered Species Act ESA - CESA, and 1918 Migratory Bird Treaty Act MBTA, that protects Endangered, Native and Migratory birds / wildlife to ensure their recover, conservation and survival as well as the natural healthy environment and ecosystem for all.

3. Full and immediate implementation of an Environmental Impact Report (EIR) for the whole Bowtie G1 parcel, as the proposed IS-MND seems to be not enough and failing to fully and properly to the high and valid concerns from Community members and public in general due to the high levels of pollutants present in that parcel that will be disturbed, removed, not properly managed, and remaining pollutants left untouched and/or disturbed prior, during and after construction perp / work for this specific site / project.

4. Public Comment Period for the full EIR process of at least 90 days.

5. Public meetings in the form of town hall held and run by California State Parks, (not by any non-profit) to address all the questions, concerns and recommendations from residents-stakeholders and public in general in regards to the proposed Bowtie G1 project.

6. Provide translated versions

18-1 cont.

Letter 18 – Continued

of the EIR document/s in Spanish and any languages other than English for transparency and a more equitable, impartial, fair and inclusive process to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general as well.

7. Have every single public agency involved and part of this project (City, County, State, and Federal) present to address any and all the questions, concerns and recommendations from residents-stakeholders and members of the public in regards to the proposed Bowtie G1 project.

18-1 cont.

Sincerely Buried Under the Blue

Response to Buried Under the Blue – Letter 18

Response to Comment 18-1:

Comment 18-1 is a copy of Jabz Alejandro Palomino's comment letter (Letter 13) sent on August 10, 2024. See Response to Comment 13-1 through 13-3.

Letter 19 – Melissa Arechiga

Letter 19

From: arechigamelissa@yahoo.com
To: Review_Environmental@Parks
Cc: [Save the LA River; Serna_Lucas@Parks](mailto:Save_the_LA_River;Serna_Lucas@Parks)
Subject: Re: Bowtie G1 Development
Date: Saturday, August 10, 2024 6:51:50 PM

You don't often get email from arechigamelissa@yahoo.com. [Learn why this is important](#)

I am requesting this statement to be reflected on the record.

Hello,
An extension of at least 90 days and not just 15 days was requested by several people for proper public review of the [Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#) - Review Period Expires 7/26/2024.

It took several weeks for the expiration date for this IS-MND to be updated on the California State Parks website failing to properly and fairly inform the people.

Another problem is that only a handful of people requesting and asserting their concerns regarding these matters were notified and not to everyone else which fails to be inclusive, respectful, non-bias, also a clear discrimination against the rest of the public.

Information on the California State Parks in regards to the IS-MND for this specific case / project is NOT available in any language other than English. Although the CSP's website's general info can be switched to Spanish but not the actual document (IS-MND). Once again, the process is not transparent nor is your information accurate.

The Spanish speaking and other disadvantaged and marginalized IBPOC

19-1

Letter 19 – Continued

communities felt extremely disturbed and disenfranchising by the way California State Parks is treating the Spanish speaking and other disadvantaged and marginalized IBPOC community members due to the lack of interest to comply with our demands and provide us with an impartial, transparent, fair, and inclusive due process for the Bowtie G1 project that our public money is funding or planning to be use for. Which makes us sincerely doubt about the true nature of the Bowtie G1 project and process.

According to the reasons stated in your previous email, it seems that California State Parks is more concerned about acquiring our tax dollars rather than attending to our demands, properly addressing our concerns, and comply fully with State and Federal Laws and requirements.

California State Parks shall be fully concerned and more than willing to immediately comply in full with our demands that are based on the real needs and priorities from the longtime residents and general public.

California State Parks shall stop ignoring and discriminating against Disadvantaged and Marginalized IBPOC communities living adjacent to this project and to members of the general public as well, and start a process that guarantee a fair, impartial, transparent and inclusive process accordingly to the demographics, needs and priorities of these communities.

Due to the problems stated above, and for the following but not limited to:

1- Willful negligence and discrimination (Title 2) from California State Parks against Spanish speaking and other disadvantaged and marginalized IBPOC communities.

2- The More than significant impact

19-1 cont.

Letter 19 – Continued

on/to:

- The Endangered California Native the Least Bell's Vireo species on the brink of extinction and their critical habitat due to the construction of this park (according to a letter sent from CDFW to CA State Park on June 08, 2023).
- Unnecessary and Avoidable exposure to highly Carcinogens and Toxic Pollutants found at this site during and after construction prep / work for this project to residents, visitors, workers and public in general.
- Lack of transparency and no proper and approved remediation /mitigation plan. No plan has been yet presented to the public nor a chance for comment or feedback.
- History of irresponsibility and lack of proper safety measures, monitoring, proper response and failure to follow protocols by DTSC, CEQA and CA State Parks.

3- No proper Outreach to disadvantaged and marginalized IBPOC ethnic groups living in communities adjacent to this site/project in Spanish and any language other than English.

4- Process lacks transparency, impartiality, fairness and inclusiveness.

We are demanding the following but not limited to:

1. Proper feasible, inclusive, responsible, safe, transparent, impartial, and most important, be created mainly using the real

19-1 cont.

Letter 19 – Continued

needs and priorities from disadvantaged and marginalized IBPOC residents living adjacent to this site project.

2. Fully implementation and enforcement of Federal Law Endangered Species Act ESA - CESA, and 1918 Migratory Bird Treaty Act MBTA, that protects Endangered, Native and Migratory birds / wildlife to ensure their recover, conservation and survival as well as the natural healthy environment and ecosystem for all.

3. Full and immediate implementation of an Environmental Impact Report (EIR) for the whole Bowtie G1 parcel, as the proposed IS-MND seems to be not enough and failing to fully and properly to the high and valid concerns from Community members and public in general due to the high levels of pollutants present in that parcel that will be disturbed, removed, not properly managed, and remaining pollutants left untouched and/or disturbed prior, during and after construction perp / work for this specific site / project.

4. Public Comment Period for the full EIR process of at least 90 days.

5. Public meetings in the form of town hall held and run by California State Parks, (not by any non-profit) to address all the questions, concerns and recommendations from residents-stakeholders and public in general in regards to the proposed Bowtie G1 project.

6. Provide translated versions of the EIR document/s in Spanish

19-1 cont.

Letter 19 – Continued

and any languages other than English for transparency and a more equitable, impartial, fair and inclusive process to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general as well.

7. Have every single public agency involved and part of this project (City, County, State, and Federal) present to address any and all the questions, concerns and recommendations from residents-stakeholders and members of the public in regards to the proposed Bowtie G1 project.

19-1 cont.

Sincerely Melissa Arechiga

[Yahoo Mail: Search, Organize, Conquer](#)

Response to Melissa Arechiga – Letter 19

Response to Comment 19-1:

Comment 19-1 is a copy of Jabz Alejandro Palomino's comment letter (Letter 13) sent on August 10, 2024. See Response to Comment 13-1 through 13-3.

Letter 20 – Irving Arechiga

Letter 20

From: [BigEye Arechiga](#)
To: [Review_Environmental@Parks](#)
Cc: [Serna, Lucas@Parks](#); [savethelariver@gmail.com](#)
Subject: Re: Bowtie G1 development
Date: Saturday, August 10, 2024 6:52:47 PM

Some people who received this message don't often get email from [bigiarechiga@gmail.com](#). [Learn why this is important](#)

I am requesting this statement to be reflected on the record.

Hello,

An extension of at least 90 days and not just 15 days was requested by several people for proper public review of the Bowtie Park Development Project Initial Study/Mitigated Negative Declaration - Review Period Expires 7/26/2024.

It took several weeks for the expiration date for this IS-MND to be updated on the California State Parks website failing to properly and fairly inform the people.

Another problem is that only a handful of people requesting and asserting their concerns regarding these matters were notified and not to everyone else which fails to be inclusive, respectful, non-bias, also a clear discrimination against the rest of the public.

Information on the California State Parks in regards to the IS-MND for this specific case / project is NOT available in any language other than English. Although the CSP's website's general info can be switched to Spanish but not the actual document (IS-MND). Once again, the process is not transparent nor is your information accurate.

The Spanish speaking and other disadvantaged and marginalized IBPOC communities felt extremely disturbed and disenfranchising by the way California State Parks is treating the Spanish speaking and other disadvantaged and marginalized IBPOC community members due to the lack of interest to comply with our demands and provide us with an impartial, transparent, fair, and inclusive due process for the Bowtie G1 project that our public money is funding or planning to be use for. Which makes us sincerely doubt about the true nature of the Bowtie G1 project and process.

According to the reasons stated in your previous email, it seems that California State Parks is

20-1

Letter 20 – Continued

more concerned about acquiring our tax dollars rather than attending to our demands, properly addressing our concerns, and comply fully with State and Federal Laws and requirements.

California State Parks shall be fully concerned and more than willing to immediately comply in full with our demands that are based on the real needs and priorities from the longtime residents and general public.

California State Parks shall stop ignoring and discriminating against Disadvantaged and Marginalized IBPOC communities living adjacent to this project and to members of the general public as well, and start a process that guarantee a fair, impartial, transparent and inclusive process accordingly to the demographics, needs and priorities of these communities.

Due to the problems stated above, and for the following but not limited to:

1- Willful negligence and discrimination (Title 2) from California State Parks against Spanish speaking and other disadvantaged and marginalized IBPOC communities.

**20-1
cont.**

2- The More than significant impact on/to:

- The Endangered California Native the Least Bell's Vireo species on the brink of extinction and their critical habitat due to the construction of this park (according to a letter sent from CDFW to CA State Park on June 08, 2023).
- Unnecessary and Avoidable exposure to highly Carcinogens and Toxic Pollutants found at this site during and after construction prep / work for this project to residents, visitors, workers and public in general.
- Lack of transparency and no proper and approved remediation /mitigation plan. No plan has been yet presented to the public nor a chance for comment or feedback.
- History of irresponsibility and lack of proper safety measures, monitoring, proper response and failure to follow protocols by DTSC, CEQA and CA State Parks.

3- No proper Outreach to disadvantaged and marginalized IBPOC ethnic groups living in communities adjacent to this site/project in Spanish and any language other than English.

Letter 20 – Continued

4- Process lacks transparency, impartiality, fairness and inclusiveness.

We are demanding the following but not limited to:

1. Proper feasible, inclusive, responsible, safe, transparent, impartial, and most important, be created mainly using the real needs and priorities from disadvantaged and marginalized IBPOC residents living adjacent to this site project.
2. Fully implementation and enforcement of Federal Law Endangered Species Act ESA - CESA, and 1918 Migratory Bird Treaty Act MBTA, that protects Endangered, Native and Migratory birds / wildlife to ensure their recover, conservation and survival as well as the natural healthy environment and ecosystem for all.
3. Full and immediate implementation of an Environmental Impact Report (EIR) for the whole Bowtie G1 parcel, as the proposed IS-MND seems to be not enough and failing to fully and properly to the high and valid concerns from Community members and public in general due to the high levels of pollutants present in that parcel that will be disturbed, removed, not properly managed, and remaining pollutants left untouched and/or disturbed prior, during and after construction perp / work for this specific site / project.
4. Public Comment Period for the full EIR process of at least 90 days.
5. Public meetings in the form of town hall held and run by California State Parks, (not by any non-profit) to address all the questions, concerns and recommendations from residents-stakeholders and public in general in regards to the proposed Bowtie G1 project.
6. Provide translated versions of the EIR document/s in Spanish and any languages other than English for transparency and a more equitable, impartial, fair and inclusive process to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general as well.
7. Have every single public agency involved and part of this project (City, County, State, and Federal) present to address any and all the questions, concerns and recommendations from residents-stakeholders and members of the public in regards to the proposed Bowtie G1 project.

Sincerely Irving Arechiga

**20-1
cont.**

Response to Irving Arechiga – Letter 20

Response to Comment 20-1:

Comment 20-1 is a copy of Jabz Alejandro Palomino's comment letter (Letter 13) sent on August 10, 2024. See Response to Comment 13-1 through 13-3.

Letter 21 – Angela Gonzales-Torres

Letter 21

From: [Angela Gonzales-Torres](#)
To: [Review_Environmental@Parks](#); [Review_Environmental@Parks](#)
Cc: [savethevireo@gmail.com](#); [Sema_Lucas@Parks](#)
Subject: re: Bowtie G1 Recreational Park Project at Taylor Yard
Date: Saturday, August 10, 2024 6:52:04 PM

You don't often get email from angela.gonzalestorres@highlandparknc.com. [Learn why this is important](#)

Hello,

An extension of at least 90 days and not just 15 days was requested by several people for proper public review of the [Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#) - Review Period Expires 7/26/2024.

It took several weeks for the expiration date for this IS-MND to be updated on the California State Parks website failing to properly and fairly inform the people.

Another problem is that only a handful of people requesting and asserting their concerns regarding these matters were notified and not to everyone else which fails to be inclusive, respectful, non-bias, also a clear discrimination against the rest of the public.

Information on the California State Parks in regards of the IS-MND for this specific case / project is NOT available in any language other than English. Although the CSP's website's general info can be switched to Spanish but not the actual document (IS-MND). Once again, the process is not transparent nor is your information accurate.

The Spanish speaking and other disadvantaged and marginalized IBPOC communities felt extremely disturbed and disenfranchising by the way California State Parks is treating the Spanish speaking and other disadvantaged and marginalized IBPOC community members due to the lack of interest to comply with our demands and provide us with an impartial, transparent, fair, and inclusive due process for the Bowtie G1 project that our public money is funding or planning to be use for. Which makes us sincerely doubt about the true nature of the Bowtie G1 project and process.

According to the reasons stated in your previous email, it seems that California State Parks is more concerned about acquiring our tax dollars rather than attending to our demands, properly addressing our concerns, and comply fully with State and Federal Laws and requirements.

California State Parks shall be fully concerned and more than willing to immediately comply in full with our demands that are based on the real needs and priorities from the longtime residents and general public.

21-1

Letter 21 – Continued

California State Parks shall stop ignoring and discriminating against Disadvantaged and Marginalized IBPOC communities living adjacent to this project and to members of the general public as well, and start a process that guarantee a fair, impartial, transparent and inclusive process accordingly to the demographics, needs and priorities of these communities.

Due to the problems stated above, and for the following but not limited to:

- 1- Willful negligence and discrimination (Title 2) from California State Parks against Spanish speaking and other disadvantaged and marginalized IBPOC communities.
- 2- The More than significant impact on/to:
 - The Endangered California Native the Least Bell's Vireo species on the brink of extinction and their critical habitat due to the construction of this park (according to a letter sent from CDFW to CA State Park on June 08, 2023).
 - Unnecessary and Avoidable exposure to highly Carcinogens and Toxic Pollutants found at this site during and after construction prep / work for this project to residents, visitors, workers and public in general.
 - Lack of transparency and no proper and approved remediation /mitigation plan. No plan has been yet presented to the public nor a chance for comment or feedback.
 - History of irresponsibility and lack of proper safety measures, monitoring, proper response and failure to follow and protocols by DTSC, CEQA and CA State Parks.
- 3- No proper Outreach to disadvantaged and marginalized IBPOC ethnic groups living in communities adjacent to this site/project in Spanish and any language other than English.
- 4- Process lacks transparency, impartiality, fairness and inclusiveness.

We are demanding the following but not limited to:

1. Full and immediate implementation of an Environmental Impact Report (EIR) for the whole Bowtie G1 parcel, as the proposed IS-MND seems to be not enough and failing to fully and properly to the high and valid concerns from Community members and public in general due to the high levels of pollutants present in that parcel that will be disturbed, removed, not properly managed, and remaining pollutants left untouched and/or

**21-1
cont.**

Letter 21 – Continued

- disturbed prior, during and after construction prep / work for this specific site / project.
2. Public Comment Period for the full EIR process of at least 90 days.
 3. Public meetings in the form of town hall held and run by California State Parks, (not by any non-profit) to address all the questions, concerns and recommendations from residents, stakeholders, and public in general in regards to the proposed Bowtie G1 project.
 4. Provide translated versions of the EIR document/s in Spanish and any languages other than English for transparency and a more equitable, impartial, fair and inclusive process to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general as well.
 5. Have every single public agency involved and part of this project (City, County, State, and Federal) present to address any and all the questions, concerns and recommendations from residents stakeholders and members of the public in regards to the proposed Bowtie G1 project.

**21-1
cont.**

Please feel free to contact me at any time for a chance to speak personally with me and highly concerned residents and members of the public supporting the stated above.

Sincerely,
Angela

Response to Angela Gonzales-Torres – Letter 21

Response to Comment 21-1:

Comment 21-1 is a copy of Jabz Alejandro Palomino's comment letter (Letter 13) sent on August 10, 2024. See Response to Comment 13-1 through 13-3.

Letter 22 – Historic Highland Park Neighborhood Council Environmental Committee

Letter 22

From: [Steve Crouch](#)
To: [Review_Environmental@Parks](#); [Review_Environmental@Parks](#)
Cc: [Sema_Lucas@Parks](#); [savethevireo@gmail.com](#); [John Tristan Vangelisti](#); [repavan4197@gmail.com](#); [Clara Solis](#); [vincentmontalvo@yaho.com](#)
Subject: Bowtie Park Development Project in Los Angeles
Date: Saturday, August 10, 2024 7:13:38 PM

Some people who received this message don't often get email from sprch@gmail.com. [Learn why this is important](#)

This project needs to be paused until full transparency and disclosure, proper testing, and adherence to Federal and State Law are achieved.

22-1

The outreach to the surrounding community has been grossly inadequate.

It is incomprehensible that an EIR was not considered necessary for this site which was subject to previous heavy industrial use.

22-2

The non-profits or any groups or individuals who might have a financial interest in this project need to be excluded from the decision making process (this should be obvious).

22-3

Thank You,
Steve Crouch
Los Angeles
Historic Highland Park Neighborhood Council Environmental Committee

Response to Historic Highland Park Neighborhood Council Environmental Committee – Letter 22**Response to Comment 22-1:**

The commenter is responding on behalf of the Historic Highland Park Neighborhood Council Environmental Committee. The commenter states the Project needs to be paused until there is full transparency, disclosure, proper testing, and adherence to federal and state law is achieved. The commenter states the Project's community outreach is inadequate.

In efforts of full transparency, disclosure, and community outreach under CEQA, the NOA-NOI indicating the original 30-day review period was published on June 26, 2024 to the State Clearinghouse and DPR. A 30-day public review period is standard for MNDs under CEQA (CEQA Guidelines §15073(a)), however, DPR extended the public review period from 30 to 45 days to be amenable to the community's request for an extension while still meeting grant funding deadline requirements. This extension notification was sent on July 19, 2024 via email to interested individuals and parties and was updated on DPR's website the same day. The notification stated that the extended public review period ended on August 10, 2024, but DPR would continue to accept comments and respond to them outside of the purview of CEQA. Additionally, to allow the public a chance to provide feedback in person, DPR held a public community event led by The Nature Conservancy on August 17, 2024 at the Rio De Los Angeles State Park that was focused on the Bowtie Wetland Demonstration Project, which is the first phase of the Bowtie parcel's development.

As described in Hazards and Hazardous Materials, Section 4.9 of the Draft IS/MND, soil characterization and risk assessments to determine the levels of contaminants in on-site soils is ongoing and data is not yet available at the time of preparation of the Draft IS/MND. To account for a worst-case scenario, it was assumed that soil excavation at a depth of up to three feet would need to occur for the entire site and would need to be removed and hauled to an offsite landfill that accepts contaminated wastes. The estimated volume of soil to be exported offsite equates to 56,000 cubic yards of soil requiring 70 haul trips. It is anticipated that soil characterization and risk assessments at the site would identify that a majority, if not all, of the onsite soils do not pose a health risk and would be able to be kept onsite. Soil with contaminant concentrations above allowable levels would be handled as described in Mitigation Measure HAZ-1, which outlines the preparation of a Removal Action Work Plan (RAW) for the Proposed Project. The RAW would identify and evaluate remedial approaches to clean up the Project Area so that it is suitable for use as a recreation area. Applicable BMPs related to hazards and hazardous materials from the Integrated Feasibility Report (IFR) Environmental Impact Statement (EIS)/EIR would also be implemented prior to or during ground disturbance activities. After implementation of the RAW, groundbreaking and construction activities at the site would not likely release any known toxins or contaminants onsite or convey hazardous materials offsite. Impacts would be less than significant with implementation of Mitigation Measure HAZ-1.

No changes to the IS/MND are required in response to this comment.

Response to Comment 22-2:

The commenter states an EIR is necessary for the Project given the site's previous heavy industrial use.

DTSC's investigations of the Project Area indicated that there are compounds present at elevated levels (DTSC 2023). DPR entered a Voluntary Clean-up Agreement for the Project Area in December 2021 and conducted a supplemental investigation work plan to test the soil. The results showed shallow soil contained lead and petroleum-related compounds which at five feet and below the surface were below residential screening levels. To account for a worst-case scenario, it was assumed that soil at a depth of up to three feet would not meet acceptable screening levels and would need to be removed and hauled to an offsite landfill that accepts contaminated waste. Soil with contaminant concentrations above allowable levels would be handled as described in Mitigation Measure HAZ-1, which outlines the preparation of a Removal Action Work Plan (RAW) for the Proposed Project. The RAW would identify and evaluate remedial approaches to clean up the Project Area so that it is suitable for use as a recreation area. Applicable BMPs related to hazards and hazardous materials from the Integrated Feasibility Report (IFR) Environmental Impact Statement (EIS)/EIR would also be implemented prior to or during ground disturbance activities. After implementation of the RAW, groundbreaking and construction activities at the site would not likely release any known toxins or contaminants onsite or convey hazardous materials offsite. Impacts would be less than significant with implementation of Mitigation Measure HAZ-1.

As previously stated, under CEQA Statute §21064.5, a MND may be prepared for a project when the initial study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment. The analysis within the Initial Study demonstrated that the Project has no impact, a less than significant impact, or a less than significant impact with implementation of SPRs, PSRs, or mitigation with respect to all environmental issues. As the Project is able to reduce impacts to less than significant with the implementation of Mitigation Measure HAZ-1, an MND is the appropriate environmental document for the Proposed Project. No changes to the Draft IS/MND are required in response to this comment.

Response to Comment 22-3:

The commenter states any non-profits, groups, or individuals with financial interest in the project need to be excluded from the decision-making process.

This comment does not pertain to any environmental aspects of the Proposed Project. No further response is required.

Letter 23 – Alliance of River Communities

Letter 23

From: [Alliance of River Communities ARC](#)
To: [Review_Environmental@Parks](#); [Review_Environmental@Parks](#)
Cc: [Serna_Lucas@Parks](#); [savethevireo@gmail.com](#); [Vincent Montalvo](#)
Subject: Bowtie G1 development
Date: Saturday, August 10, 2024 7:32:17 PM
Attachments: [Bowtie G1 IS MND comment letter 08.09.2024.pdf](#)

Some people who received this message don't often get email from [arc.info2021@gmail.com](#). [Learn why this is important](#)

to whom it concerns:

Several valid concerns have been brought to Alliance of River Communities by members of the communities we conform and represent regarding the Bowtie project development in the Northeast LA area.

We have looked into it and we also share the same concerns as well. Alliance of River Communities stand in solidarity with community members that have brought this to our attention and support in its totality the letter attached to this email. We expect California State Parks, and every single public agency and public elected official involved and part of this project to immediately comply in full with the demands expressed in this email and on the attached letter, and statement.

23-1

"An extension of at least 90 days and not just 15 days was requested by several people for proper public review of the [Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#) - Review Period Expires 7/26/2024.

It took several weeks for the expiration date for this IS-MND to be updated on the California State Parks website failing to properly and fairly inform the people.

Another problem is that only a handful of people requesting and asserting their concerns regarding these matters were notified and not to everyone else which fails to be inclusive, respectful, non-bias, also a clear discrimination against the rest of the public.

23-2

Information on the California State Parks in regards to the IS-MND for this specific case / project is NOT available in any language other than English. Although the CSP's website's general info can be switched to Spanish but not the actual document (IS-MND). Once again, the process is not transparent nor is your information accurate.

The Spanish speaking and other disadvantaged and marginalized IBPOC communities felt extremely disturbed and disenfranchising by the way California State Parks is treating the Spanish speaking and other disadvantaged and marginalized IBPOC community members due to the lack of interest to comply with our demands and provide us with an impartial, transparent, fair, and inclusive due process for the Bowtie G1 project that our public money is funding or planning to be use for. Which makes us sincerely doubt about the true nature of the Bowtie G1 project and process.

Letter 23 – Continued

According to the reasons stated in your previous email, it seems that California State Parks is more concerned about acquiring our tax dollars rather than attending to our demands, properly addressing our concerns, and comply fully with State and Federal Laws and requirements.

California State Parks shall be fully concerned and more than willing to immediately comply in full with our demands that are based on the real needs and priorities from the longtime residents and general public.

California State Parks shall stop ignoring and discriminating against Disadvantaged and Marginalized IBPOC communities living adjacent to this project and to members of the general public as well, and start a process that guarantee a fair, impartial, transparent and inclusive process accordingly to the demographics, needs and priorities of these communities.

Due to the problems stated above, and for the following but not limited to:

- 1- Willful negligence and discrimination (Title 2) from California State Parks against Spanish speaking and other disadvantaged and marginalized IBPOC communities.
- 2- The More than significant impact on/to:
 - The Endangered California Native the Least Bell's Vireo species on the brink of extinction and their critical habitat due to the construction of this park (according to a letter sent from CDFW to CA State Park on June 08, 2023).
 - Unnecessary and Avoidable exposure to highly Carcinogens and Toxic Pollutants found at this site during and after construction prep / work for this project to residents, visitors, workers and public in general.
 - Lack of transparency and no proper and approved remediation /mitigation plan. No plan has been yet presented to the public nor a chance for comment or feedback.
 - History of irresponsibility and lack of proper safety measures, monitoring, proper response and failure to follow protocols by DTSC, CEQA and CA State Parks.
- 3- No proper Outreach to disadvantaged and marginalized IBPOC ethnic groups living in communities adjacent to this site/project in Spanish and any language other than English.
- 4- Process lacks transparency, impartiality, fairness and inclusiveness.

**23-2
cont.**

Letter 23 – Continued

We are demanding the following but not limited to:

1. Proper feasible, inclusive, responsible, safe, transparent, impartial, and most important, be created mainly using the real needs and priorities from disadvantaged and marginalized IBPOC residents living adjacent to this site project.
2. Fully implementation and enforcement of Federal Law Endangered Species Act ESA -CESA, and 1918 Migratory Bird Treaty Act MBTA, that protects Endangered, Native and Migratory birds / wildlife to ensure their recover, conservation and survival as well as the natural healthy environment and ecosystem for all.
3. Full and immediate implementation of an Environmental Impact Report (EIR) for the whole Bowtie G1 parcel, as the proposed IS-MND seems to be not enough and failing to fully and properly to the high and valid concerns from Community members and public in general due to the high levels of pollutants present in that parcel that will be disturbed, removed, not properly managed, and remaining pollutants left untouched and/or disturbed prior, during and after construction perp / work for this specific site / project.
4. Public Comment Period for the full EIR process of at least 90 days.
5. Public meetings in the form of town hall held and run by California State Parks, (not by any non-profit) to address all the questions, concerns and recommendations from residents-stakeholders and public in general in regards to the proposed Bowtie G1 project.
6. Provide translated versions of the EIR document/s in Spanish and any languages other than English for transparency and a more equitable, impartial, fair and inclusive process to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general as well.
7. Have every single public agency involved and part of this project (City, County, State, and Federal) present to address any and all the questions, concerns and recommendations from residents-stakeholders and members of the public in regards to the proposed Bowtie G1 project.

Please feel free to contact me at any time for a chance to speak personally with me and highly concerned residents and members of the public supporting the stated above."

Sincerely,

Alliance of River communities | ARC

**23-2
cont.**

Response to Alliance of River Communities– Letter 23

Response to Comment 23-1:

The Alliance of River Communities (ARC) states members of community have brought concerns regarding the Proposed Project to ARC. ARC states they agree with the community members and fully support the attached letter.

See Response to Comment 13-1 through 13-3.

Response to Comment 23-2:

Comment 23-2 is a copy of Jabz Alejandro Palomino's comment letter (Letter 13) sent on August 10, 2024. See Response to Comment 13-1 through 13-3.

Letter 24 – Clara Solis

Letter 24

From: claramsolis@earthlink.net
To: Review_Environmental@Parks
Subject: Comment Letter Re "Bowtie Redevelopment"
Date: Saturday, August 10, 2024 8:04:17 PM

An updated EIR is required. The EIR for this project was completed in June 2005. A lot has happened in the almost 20 years since the EIR was done. We have experienced 12 months of temperature rise of 1.5 degrees Celsius above preindustrial levels. Climate change is causing devastating fires and impacts to wildlife. The unprecedented levels of destruction and loss of wildlife which are occurring have been called the sixth mass extinction event none of this was studied in the 2005 EIR. This screams for a new EIR to study the impact on wildlife which is struggling to survive especially the Least Bell's Vireo and Crotch's Bumblebee. The Least Bell's Vireo has been found both at Taylor Yard and Del Rio State Park. Crotch's Bumblebee has been sighted nearby as evidenced on the iNaturalist app. Additionally, Least Bell's Vireo was not sighted on the Bowtie property or adjacent Del Rio State Park until recently. Instead of doing creating additional plans after more investigation is done on Least Bell's Vireo. This MND should be postponed until after the investigation is completed. What is being done is piecemealing. Additionally, saying plans will be implemented after surveys are completed and then possibly creating mitigation plans means the moving parties of this MND are trying to circumvent CEQA by not doing an EIR. If mitigation measures are implemented, then a full EIR should have been completed. Not completing the survey before the MND is backwards. Further, since 2005, pollution, traffic studies, are all too old to be relied upon. A new EIR is needed. Additionally, contamination throughout the community is more extensive than what was thought in 2005.

24-1

It's nests at Del Rio have been destroyed by fires set under suspicious circumstances and cut down by unknown parties.

Events must not occur nearby when it is during breeding and nesting period for the Least Bell's Vireo.

CONCERNS ABOUT INADEQUATE MITIGATION MEASURES FOR LEAST BELL'S VIREO

The Project is not eligible for a Mitigated Negative Declaration ("MND") under the California Environmental Quality Act ("CEQA"); that the MND prepared for the Project proposes inadequate mitigation and monitoring measures; that more adequate mitigation and enforcement measures are available; that feasible alternatives to the project with less severe adverse environmental impacts are available; and that going forward with the Project without requiring a full Environmental Impact Report ("EIR") is prohibited under CEQA.

24-2

The California Environmental Quality Act is California's broadest environmental law. CEQA helps to guide public agencies during approval of projects. Courts have interpreted CEQA to afford the fullest protection of the environment within the reasonable scope of the statutes. CEQA applies to all discretionary projects proposed to be conducted or approved by a City, including private projects requiring discretionary government approval. See California Public Resources Code, sections 21000 - 21178, and Title 14 Cal. Code Regs., section 753, and Chapter 3, sections 15000 - 15387.

CEQA's Broad Definition of a "Project" Includes *All Phases* of a Development

"CEQA broadly defines a 'project' as 'an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and ... that involves the issuance to a person of a lease, permit, license, certificate, or other entitlement for

Letter 24 – Continued

use by one or more public agencies.’ [Citation.] The statutory definition is augmented by the [CEQA] Guidelines [Cal.Code Regs., tit. 14, § 15000 et seq.], which define a ‘project’ as ‘*the whole of an action*, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment....’” *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1222, 66 Cal.Rptr.3d 645 (*Tuolumne County*). This includes all phases of a project that are reasonably foreseeable, and all related projects that are directly linked to the project. (CEQA Guidelines section 15378).

CEQA Has a Strong Presumption in Favor of EIR Preparation

A strong presumption in favor of requiring preparation of an Environmental Impact Report (“EIR”) is built into CEQA which is reflected in what is known as the “fair argument” standard, under which an agency must prepare an EIR whenever substantial evidence in the record supports a fair argument that a project may have a significant effect on the environment.

No Oil, Inc. v. City of Los Angeles (1974) 13 Cal.3d 68, 75, 82; *Friends of “B” St. v. City of Haywood* (1980) 106 Cal.App.3d 988, 1002.

“The EIR is the primary means of achieving the Legislature’s considered declaration that it is the policy of this state to ‘take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state.’ [Citation.] The EIR is therefore ‘the heart of CEQA.’ An EIR is an ‘environmental “alarm bell” whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return.’” *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 392.

Under CEQA and the CEQA Guidelines, if a project is not exempt and *may* cause a significant effect on the environment, the agency *must* prepare an EIR. PRC §§ 21100, 21151; 14 Cal. Code Regs. §15064(a)(1), (f)(1). “Significant effect upon the environment” is defined as “a substantial or potentially substantial adverse change in the environment.” PRC §21068; 14 Cal Code Regs §15382. A project “may” have a significant effect on the environment if there is a “reasonable probability” that it will result in a significant impact. *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 83 n.16; *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 309, 248 CR 352. This standard sets a “low threshold” for preparation of an EIR. *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App. 4th 903, 928; *Bowman v. City of Berkeley* (2004) 122 CA4th 572, 580; *Citizen Action to Serve All Students v. Thornley* (1990) 222 CA3d 748, 754; *Sundstrom v. County of Mendocino* (1988) 202 CA3d 296, 310.

This Project not only may have a significant effect on the environment, it *will* have a significant effect on the environment. Here there will be a significant impact on the Least Bell’s Vireo. It will be endangered by inadequate mitigation both during construction and during use by users of the park. This is happening currently at the nearby state park where LBVI nests have been burnt and destroyed.

There are also “cumulative impacts” which require the preparation of an EIR. An MND is not appropriate when the cumulative impact of successive projects of the same type in the same place over time is significant. Where there is a reasonable possibility of a significant effect

24-2
cont.

Letter 24 – Continued

due to unusual circumstances surrounding the project it is not exempt even if it clearly fits one of the exemption categories. 14 Cal. Code Regs § 15300.2(c), *See, e.g., Banker's Hill, Hillcrest, Park West Community Preservation Group v. City of San Diego*, 139 Cal.App.4th 249 (2006).

There are cumulative impacts from Bowtie G1 and Paseo del Rio at TY G2 projects, and RDLASP negligence to the LBVI. The cumulative impacts from these issues will adversely affect the Least Bell's Vireo by disrupting foraging, breeding behavior or by causing adults to abandon nests, as already has happened several times in the past few years. Disruptions to breeding behavior could include a temporary reduction in breeding activity reducing the density of nesting pairs. Increment of stress due to noise from construction activity occurring during the breeding season will also impact the species. Project activities occurring during nesting season of the LBVI could result in the incidental loss "take" of fertile eggs, nestlings, fledglings, or nest abandonment. LBVI could also be forced from their ancestral natural habitat into adjacent areas that may potentially be less suitable where they would be at risk of predation, starvation or other injury or death.

Bowtie is part of the Least Bell's Vireo (LBVI) Ancestral Natural Habitat critical for its survival, recover and conservation.

For the past decade or more the LBVI Has been using that area as Migratory corridor during the migration and nesting season. Observations has been reported- observed since 2013 to 2024 by professional surveyors hired by BOE and CSP, MRCA, FoLAR, and local independent community LBVI researchers in that area.

LBVI has been nesting at RDLASP, located about half a mile from Bowtie G1.

Since 2013 CSP and TNC knew about the LBVI presence, however, not a single has been report to CDFW or FWS to enforce and activate ESA-CESA.

Bowtie G1 Plan is to create a Recreational Park not a wildlife preserve or biological preserve.

G1 "Habitat enhancement" does not comply with Habitat Conservation Plan (HCP) which is required and mandatory by ESA- CESA in case of any alteration to the LBVI Habitat and ecosystem.

If you check the G1 renderings, 90% of G1 is accessible to the public. According to studies from Agencies, the LBVI requires 1 to 4 acres approximately per nesting pair. And a safety buffer of 300 feet per active nest. G1 in its widest area is barely 360ft wide (west side) . About 85ft in the middle area and 240ft on its East side right next to PDR Aat Taylor Yard.

In the eventually this project is approved, and let's say a year or two after, the LBVI decide to nest there, what would be the contingency plan? Will ESA-CESA be fully enforce and by who?

We don't have to wondering or imagine The negative impact from a situation such as this, we could see it and the LBVI has been experiencing it for a few years now at Rio de Los Angeles State Park where did to the wilful negligence from CST, CDFW, FWS, and 100 acre partnership has destroyed at least 7 active nests with fertile eggs and nestlings in less than 3 years.

I am also concerned about the extensive contamination that is known to exist at Taylor Yard. There is elevated concentrations of contaminants including, lead (140 mg/kg) and diesel-range hydrocarbons (640 mg/kg) and polycyclic aromatic hydrocarbons, such as benzo(b)fluoranthene (140,000 ug/kg), benzo(a)anthracene (190,000 ug/kg), and indeno(1,2,3-cd)pyrene (62,000 ug/kg).

I am concerned that the mitigation measures with such high levels of contamination is inadequate.

A full EIR should be prepared. DTSC lead removal from Exide has been inadequate with sites becoming recontaminated because neighboring sites were not remediated and not enough contamination was removed. Trees need to be planted but that requires removal of more soil. A full new EIR must be prepared to consider all remedies. The present study is inadequate.

**24-2
cont.**

Letter 24 – Continued

Document states if contamination is found, contamination has been found. The plan for it should already be included. This is not looking at the whole of the project as required by CEQA.

**24-2
cont.**

An extension of at least 90 days and not just 15 days was requested by several people for proper public review of the [Bowtie Park Development Project Initial Study/Mitigated Negative Declaration](#) - Review Period Expires 7/26/2024.

It took several weeks for the expiration date for this IS-MND to be updated on the California State Parks website failing to properly and fairly inform the people.

Another problem is that only a handful of people requesting and asserting their concerns regarding these matters were notified and not to everyone else which fails to be inclusive, respectful, non-bias, also a clear discrimination against the rest of the public.

Information on the California State Parks in regards to the IS-MND for this specific case / project is NOT available in any language other than English. Although the CSP's website's general info can be switched to Spanish but not the actual document (IS-MND). Once again, the process is not transparent nor is your information accurate.

The Spanish speaking and other disadvantaged and marginalized IBPOC communities felt extremely disturbed and disenfranchising by the way California State Parks is treating the Spanish speaking and other disadvantaged and marginalized IBPOC community members due to the lack of interest to comply with our demands and provide us with an impartial, transparent, fair, and inclusive due process for the Bowtie G1 project that our public money is funding or planning to be use for. Which makes us sincerely doubt about the true nature of the Bowtie G1 project and process.

24-3

According to the reasons stated in your previous email, it seems that California State Parks is more concerned about acquiring our tax dollars rather than attending to our demands, properly addressing our concerns, and comply fully with State and Federal Laws and requirements.

California State Parks shall be fully concerned and more than willing to immediately comply in full with our demands that are based on the real needs and priorities from the longtime residents and general public.

California State Parks shall stop ignoring and discriminating against Disadvantaged and Marginalized IBPOC communities living adjacent to this project and to members of the general public as well, and start a process that guarantee a fair, impartial, transparent and inclusive process accordingly to the demographics, needs and priorities of these communities.

Due to the problems stated above, and for the following but not limited to:

1- Willful negligence and discrimination (Title 2) from California State Parks against Spanish speaking and other disadvantaged and marginalized IBPOC communities.

Letter 24 – Continued

2- The More than significant impact on/to:

- The Endangered California Native the Least Bell's Vireo species on the brink of extinction and their critical habitat due to the construction of this park (according to a letter sent from CDFW to CA State Park on June 08, 2023).
- Unnecessary and Avoidable exposure to highly Carcinogens and Toxic Pollutants found at this site during and after construction prep / work for this project to residents, visitors, workers and public in general.
- Lack of transparency and no proper and approved remediation /mitigation plan. No plan has been yet presented to the public nor a chance for comment or feedback.
- History of irresponsibility and lack of proper safety measures, monitoring, proper response and failure to follow protocols by DTSC, CEQA and CA State Parks.

3- No proper Outreach to disadvantaged and marginalized IBPOC ethnic groups living in communities adjacent to this site/project in Spanish and any language other than English.

4- Process lacks transparency, impartiality, fairness and inclusiveness.

We are demanding the following but not limited to:

1. Proper feasible, inclusive, responsible, safe, transparent, impartial, and most important, be created mainly using the real needs and priorities from disadvantaged and marginalized IBPOC residents living adjacent to this site project.
2. Fully implementation and enforcement of Federal Law Endangered Species Act ESA -CESA, and 1918 Migratory Bird Treaty Act MBTA, that protects Endangered, Native and Migratory birds / wildlife to ensure their recover, conservation and survival as well as the natural healthy environment and ecosystem for all.
3. Full and immediate implementation of an Environmental Impact Report (EIR) for the whole Bowtie G1 parcel, as the proposed IS-MND seems to be not enough and failing to fully and properly to the high and valid concerns from Community members and public in general due to the high levels of pollutants present in that parcel that will be disturbed, removed, not properly managed, and remaining pollutants left untouched and/or disturbed prior, during and after construction prep / work for this specific site / project.
4. Public Comment Period for the full EIR process of at least 90 days.
5. Public meetings in the form of town hall held and run by California State Parks, (not by any non-profit) to address all the questions, concerns and recommendations from residents-stakeholders and public in general in regards to the proposed Bowtie G1 project.
6. Provide translated versions of the EIR document/s in Spanish and any languages other than English for transparency and a more equitable, impartial, fair and inclusive process to the disadvantaged and marginalized IBPOC communities living adjacent to this project, and to the public in general as well.
7. Have every single public agency involved and part of this project (City, County, State, and Federal) present to address any and all the questions, concerns and recommendations from residents-stakeholders and members of the public in regards to the proposed Bowtie G1 project.

**24-3
cont.**

Response to Clara Solis – Letter 24**Response to Comment 24-1:**

This comment states an EIR was conducted for the Project in June 2005 and an updated EIR is required as the 2005 EIR did not include analysis on climate change-induced fires and wildlife impacts. The commenter states an EIR is needed to address impacts to LBVI and Crotch's bumblebee (*Bombus crotchii*), which have been found at Taylor Yard and Rio de Los Angeles State Park and nearby as indicated on the iNaturalist app. The commenter says the MND should be postponed until a LBVI investigation is complete because it is piecemealing otherwise. Additionally, the commenter states construction events must not occur during LBVI breeding and nesting periods. They also note that nests at Rio de Los Angeles State Park have been destroyed by suspicious fires and cut down by unknown parties.

The commenter states the 2005 pollution and traffic studies are too old to be relied upon and contamination throughout the community is more extensive than thought in 2005.

An updated EIR is not required, as the Project's IS/MND fully analyzes the Proposed Project's potential impacts related to fires and wildfires. See Response to Comment 3-1 through 3-3 regarding impacts to LBVI and proposed SPRs. As stated in Section 4.4 *Biological Resources* of the Draft IS/MND, Crotch's bumblebee is a CDFW candidate for listing as endangered. The nearest recorded occurrence of this species is within the BSA in 2020, and there are multiple occurrences within 5 miles within the past 20 years. California buckwheat, a food plant for the species, occurs within the BSA, but there is none within the Project Area. Although Crotch's bumblebee was not detected during the most recent biological surveys, the species was determined to have a high potential to occur because habitat for the taxa occurs onsite and a known occurrence occurs within the BSA or immediate vicinity within the past 20 years. Therefore, as described in the Draft IS/MND, the Project will implement PSR BIO-3 which outlines protection measures specific to Crotch's bumblebee. Impacts to Crotch's bumblebee would be less than significant with the implementation of this measure.

The Traffic Study conducted for the Proposed Project was completed in February 2023 and is Project-specific. The purpose of the study was to assess the potential traffic effects of the Proposed Project on the surrounding roadway system. The traffic analysis demonstrated that the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities, and the impact would therefore be less than significant. No changes to the IS/MND are required in response to this comment.

Response to Comment 24-2:

Comment 24-2 reiterates the commenter's concerns as outlined in Letter 9.

Please see Response to Comment 9-2 through 9-4.

Response to Comment 24-3:

Comment 24-3 is a copy of Jabz Alejandro Palomino's comment letter (Letter 13) sent on August 10, 2024. See Response to Comment 13-1 through 13-3.

Letter 25 – Highland Park Heritage Trust

Letter 25

From: [HPHT Prez Jamie Tijerina](#)
To: [Review.Environmental@Parks](#)
Cc: [Sema.Lucas@Parks](#)
Subject: Comments on the Bowtie G1 project
Date: Saturday, August 10, 2024 8:18:54 PM
Attachments: [Bowtie_G1_comment.pdf](#)

Some people who received this message don't often get email from jamie.hpht@gmail.com. [Learn why this is important](#)

For consideration. Thank you.

25-1

--

Jamie Tijerina
President, Highland Park Heritage Trust
jamie.hpht@gmail.com
highlandparkheritagetrust.org
FB, IG: @highlandparkheritagetrust

Letter 25 – Continued



Letter 25 - Attachment 1

August 10, 2024

Board of Directors

Jamie Tijerina

President

Charlie Fisher

Vice President

JJ Jackman

Secretary

Stephanie Maynetto-Jackson

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Membership

The Bowtie G1 recreational park project at Taylor Yard parcel presents a threat to the Least Bell's Vireo (*Vireo bellii pusillus*) and to the critical ecosystem of hundreds of different species of wildlife along the LA River and tributaries.

25-2

We support the community's requests for the following:

1. Full and immediate implementation of an Environmental Impact Report (EIR) for the Bowtie G1 parcel.
2. Public comment period for the full EIR process of at least 90 days.
3. Public meetings in town hall format, directly organized and run by California State Parks, to address questions, concerns and recommendations from residents, stakeholders and the general public with regard to the proposed Bowtie G1 project.
4. Translated versions of the EIR document/s to Spanish and any languages other than English for transparency and a fair, equitable, and inclusive process for the disadvantaged and marginalized communities living adjacent to this project, as well as the general public.
5. Availability of every public agency associated with this project (City, County, State, and Federal) to address questions, concerns and recommendations from residents, stakeholders and members of the public in regards to the proposed Bowtie G1 project.

25-3

Sincerely,

Jamie Tijerina

President, Highland Park Heritage

Trust

HIGHLAND PARK HERITAGE TRUST

P.O. BOX 50894, LOS ANGELES, CA 90050-0894

(323)-510-7547 • www.hpht.org • info@hpht.org

Response to Highland Park Heritage Trust – Letter 25

Response to Comment 25-1:

The commenter refers attention to the attached letter.

No response is required.

Response to Comment 25-2:

The commenter states the Proposed Project poses a threat to LBVI and the ecosystem of hundreds of species of wildlife along the Los Angeles River and tributaries.

See Response to Comment 3-1 through 3-3 regarding impacts to LBVI and proposed SPRs.

Response to Comment 25-3:

The commenter support's the community's requests for an EIR; a public review period of at least 90 days; public meetings run by DPR to address the community's questions, concerns, and recommendations; translated versions of the IS/MND to Spanish and other languages; and the availability of every public agency associated with the Project to address the community's questions, concerns, and recommendations.

See Response to Comment 13-3 regarding the community's list of demands.

Letter 26 – Clara Solis

Letter 26

From: claramsolis@earthlink.net
To: Review_Environmental@Parks
Subject: Comment Letter Re "Bowtie Redevelopment"
Date: Saturday, August 10, 2024 8:24:08 PM

The Spanish speaking community is being treated differently than everyone else. Wherein English speakers were able to read the entire documentation. Spanish speakers were only given a four page summary. Further notice in Spanish was not given on June 26th as with other communities. This is a violation of Federal law and is unfair. The four day summary was only recently uploaded to the site. So Spanish speakers had less time to review than others.

26-1

Further, new information was provided and reviewers were given less than 30 days to review.

This entire process of not providing an updated EIR, not completing the survey regarding Least Bell's Vireo and Crotch's bumblebee is a violation of CEQA.

26-2

A full updated EIR should be produced after the survey is completed. Notice and documentation should be provided in English and Spanish with a full 90 review period.

Clara Solis

Response to Clara Solis – Letter 26**Response to Comment 26-1:**

The commenter states it is unfair and a violation of federal law to provide only a summary document of the IS/MND for Spanish speakers. The commenter states the notice in Spanish was not provided until June 26, 2024, which gives Spanish-speakers less time to review. The commenter states new information was provided and reviewers were given less than 30 days to review.

The Proposed Project has met noticing requirements for MNDs under CEQA (PRC Section 21092). Translation of a document is not required under CEQA, however, DPR prepared the NOA-NOI in Spanish and provided a Summary of the IS/MND in Spanish which includes the Project description, location, objectives, project effects, and mitigation measures.

The initial NOA-NOI was sent via email on June 26, 2024 to individuals or parties interested in the Bowtie Park Development Project and was also submitted to the State Clearinghouse and posted to the DPR website on this day. This notification provided links to the Draft IS/MND and NOA-NOI along with review period dates and instructions on how to provide comments. To be amendable to the community's request for an extension while still meeting grant funding deadline requirements, DPR extended the public review period from a standard 30 days to 45 days. This exceeds CEQA requirements for an IS/MND. The extended public review period ended on August 10, 2024, but DPR stated they would continue to accept comments and respond to them outside of the purview of CEQA. Notice of this review period extension and updated NOA-NOI was sent via email on July 19, 2024 to individuals or parties interested in the Project, prior to both the initial (July 26, 2024) and extended (August 10, 2024) review period deadlines. This notice included a link to the DPR website which was updated on the same day with the extended review period as well as English and Spanish versions of the revised NOA-NOI and Summary of IS/MND. No changes to the IS/MND are required in response to this comment.

Response to Comment 26-2:

The commenter states the Project has violated CEQA by not providing an EIR and not completing surveys for LBVI and Crotch's bumblebee. The commenter states notice and documentation of the EIR should be provided in Spanish and English and include a 90-day review period.

See Response to Comment 9-2 regarding providing necessity of an EIR due to potential biological impacts.

See Response to Comment 26-1 regarding document translation and the extended review period timeframe.

5.0 ERRATA

5.1 Introduction

For clarification and correction, ~~strikeout~~/underline has been used to identify changes in the Draft IS/MND when compared to the Final IS/MND.

Changes to the text are noted with underline type for added text and ~~strikeout~~ type for deleted text.

5.2 Project Clarification

Standard Project Requirements (SPRs), Project Specific Requirements (PSRs), and Mitigation Measures Incorporated into the Project to Reduce Environmental Effects:

Text clarifications to PSR GEO-1.

GEO-1: The Project ~~Applicant~~ Proponent shall implement the Conclusions and Recommendations as listed in the final site-specific geotechnical report or most recent site-specific geotechnical evaluation.

5.2.1 Section 2.3, Project Characteristics

The following change has been made to provide additional clarification and information on the proposed onsite Ranger house to the list of Project Characteristics in Section 2.2 on page 2-1 and 2-2 as it was not included in the list of proposed improvements in the Draft IS/MND. This does not constitute a Project change as the onsite space for a Park Ranger is discussed in Section 4.15.2.2, Police Services, in the Draft IS/MND.

The Proposed Project would result in the development of the property to restore it to a vibrant green space, focused on nature and passive recreation. Project implementation would require soil remediation to address previous site contamination associated with the former use as a railroad maintenance facility. Proposed Park improvements would consist of the following:

- A native plant demonstration garden to provide outdoor educational space;
- Several vista points facing the Los Angeles River;
- An event space within a historic turntable circular pit repurposed for larger crowds;
- Internal multi-use trails for walking and biking;
- Open meadow areas, picnic locations, and seating benches;
- A welcoming kiosk with restrooms (comfort station) housed within an earthen mound with a green roof (natural vegetation roof);

- A Park entry and internal vehicular access road with turnouts for passenger drop off/pick-up and a turnaround point;
- A single family residence that will serve as an onsite Ranger house with outdoor space and a carport;
- Parking spaces along the internal vehicular access road along the eastern perimeter of the Project Area; and
- An internal maintenance road for State Park maintenance staff, fire access route, and utility access easement.

The Proposed Project would create a direct connection and access to the Glendale Narrows section of the Los Angeles River and complements two additional projects planned for the site by creating and facilitating access among these projects: The Bowtie Wetland Demonstration Project (in partnership with The Nature Conservancy [TNC]) and the Paseo del Rio Riverfront Trail Project (in partnership with the Mountains Recreation and Conservancy Authority and the City of Los Angeles). The Proposed Project would be partially funded by a grant from the National Parks Service and Santa Monica Mountain Conservancy. The proposed conceptual site plan is illustrated in Figure 3.

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6.0 MITIGATION MONITORING AND REPORTING PLAN

6.1 Introduction

In accordance with CEQA, an IS/MND that identified adverse impacts related to the construction activity for the Bowtie Park Development Project was prepared. The MND identified SPRs, PSRs, and mitigation measures that would reduce or eliminate these impacts to below the level of significance.

Section 21081.6 of the Public Resources Code and Sections 15091(d) and 15097 of the State CEQA Guidelines require public agencies to adopt a reporting and monitoring plan for changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment. A Mitigation Monitoring and Reporting Plan (MMRP) is required for the Proposed Project because the IS/MND identified potentially significant adverse impacts related to construction activity, and identified SPRs, PSRs, and mitigation measures to mitigate these impacts. Adoption of the MMRP will occur along with approval of the Proposed Project.

6.1.1 Project Requirements (Standard Project Requirements [SPRs] and Project Specific Requirements [PSRs])

Under CEQA Section 15065(b)(1), DPR is permitted to incorporate Project modifications prior to the start of the public review process of the environmental document, to avoid impacts to a point where clearly no significant effect on the environment would occur.

As part of its effort to avoid impacts, DPR also maintains a list of Project Requirements that are included in a project design to reduce impacts to resources. From this list, SPRs are assigned, as appropriate to all projects. These features are standard and do not constitute mitigation measures. For example, projects that include ground-disturbing activities, such as trenching would always include SPRs addressing the inadvertent discovery of archaeological artifacts. However, for a project that replaces a roof on an historic structure, ground disturbance would not be necessary; therefore, SPRs for ground disturbance would not be applicable and DPR would not assign it to the project.

DPR also makes use of PSRs. DPR develops these project requirements to address project impacts for projects that have unique issues but do not typically standardize these for projects statewide. These features are a part of project design and therefore do not constitute mitigation measures. As part of the IS/MND review process, DPR will utilize both SPRs and PSRs.

6.2 Purpose of the Mitigation Monitoring and Reporting Plan

This MMRP has been prepared to ensure that all project requirements (SPRs and PSRs) and mitigation measures are implemented and completed according to schedule and maintained in a satisfactory manner during the construction and operation of the Proposed Project, as required. The MMRP may be modified by DPR during project implementation, as necessary, in response to changing conditions or other Project refinements. Table 6-1 has been prepared to assist the responsible parties in implementing the MMRP. This table identifies the Project's significant environmental impact(s), individual mitigation

measures, project requirements (SPRs and PSRs), monitoring and mitigation timing, responsible person/agency for implementing the measure, monitoring and reporting procedure, and notation space to confirm implementation of the measures. The project requirements (SPRs and PSRs) will be listed in the table first, followed by the mitigation measures.

6.3 Roles and Responsibilities

The DPR, as Lead Agency, is responsible for oversight of compliance of the project requirements and mitigation measures listed in the MMRP.

6.4 Mitigation Monitoring and Reporting Plan

The column categories identified in the MMRP table (Table 6.4-1) are described below.

- **Project Requirement/Mitigation Measure** – This column lists the project requirement or mitigation measure by number.
- **Monitoring Activity/Timing/Frequency/Schedule** – This column lists the activity to be monitored for each measure, the timing of each activity, and the frequency/schedule of monitoring for each activity.
- **Implementation Responsibility/Verification** – This column identifies the entity responsible for complying with the project requirements and provides space for verification initials and date.
- **Responsibility for Oversight of Compliance/Verification** – This column provides the agency responsible for oversight of the mitigation implementation and is to be dated and initialed by the agency representative based on the documentation provided by the construction contractor or through personal verification by agency staff.
- **Outside Agency Coordination** – This column lists any agencies with which DPR may coordinate for implementation of the project requirements.
- **Comments** – This column provides space for written comments, if necessary.

Table 6.4-1. Mitigation and Monitoring Reporting Plan

Project Requirement/Mitigation Measure	Monitoring Activity/Timing/Frequency/Schedule	Implementation Responsibility/Verification	Responsibility for Oversight of Compliance/Verification	Outside Agency Coordination	Comments
Standard Project Requirements (SPRs)					
Biological Resources					
<p>BIO-1 (SPR): Preconstruction Survey for Nesting Birds.</p> <p>During the bird breeding/nesting window (February 15 to August 31), DPR shall ensure a nesting bird survey is completed prior to the start of any development activities (such as ground disturbance, construction activities, and/or removal of trees and vegetation) within the Project Area. This will maintain compliance with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Sections 3503, 3503.5, and 3513. The preconstruction nesting bird survey shall include the Project Area and a buffer area of 300 feet.</p> <p>The survey results shall be provided to the Lead Agency (DPR). DPR shall adhere to the following:</p> <ul style="list-style-type: none"> ■ Designate a qualified biologist experienced in: identifying local and migratory bird species of special concern; conducting bird surveys using appropriate survey methodology; nesting surveying techniques, recognizing breeding and nesting behaviors, locating nests and breeding territories, and identifying nesting stages and nest success; determining/establishing appropriate avoidance and minimization measures; and monitoring the 	<p>Activity: Preconstruction survey for nesting birds.</p> <p>Timing: No more than 3 days prior to initial ground disturbance.</p> <p>Frequency: One time.</p>	<p>Project Biologist</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>DPR</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	USFWS and CDFW, as required	

Table 6.4-1. Mitigation and Monitoring Reporting Plan

Project Requirement/Mitigation Measure	Monitoring Activity/Timing/Frequency/Schedule	Implementation Responsibility/Verification	Responsibility for Oversight of Compliance/Verification	Outside Agency Coordination	Comments
<p>efficacy of implemented avoidance and minimization measures.</p> <ul style="list-style-type: none"> ■ Preconstruction surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than three days prior to the initiation of Project activities. Surveys shall encompass all suitable areas including trees, shrubs, bare ground, burrows, cavities, and structures. Survey duration shall take into consideration the size of the Project Area; density, and complexity of the habitat; number of survey participants; survey techniques employed; and shall be sufficient to ensure the data collected is complete and accurate. <p>If no nesting birds are observed during the survey, site preparation and construction activities may begin. If nesting birds (including nesting raptors) are found to be present, then avoidance or minimization measures shall be undertaken in consultation with the Lead Agency, and as required, the United States Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW). Measures shall include immediate establishment of an appropriate buffer zone to be established by a qualified biologist, based on their best professional judgement and experience. The buffer around the nest shall be delineated and flagged, and no construction</p>					

Table 6.4-1. Mitigation and Monitoring Reporting Plan

Project Requirement/Mitigation Measure	Monitoring Activity/Timing/Frequency/Schedule	Implementation Responsibility/Verification	Responsibility for Oversight of Compliance/Verification	Outside Agency Coordination	Comments
<p>activity shall occur within the buffer area until a qualified biologist determines nesting species have fledged and the nest is no longer active, or the nest has failed. The qualified biologist shall monitor the nest at the onset of Project activities, and at the onset of any changes in such Project activities (e.g., increase in number or type of equipment, change in equipment usage) to determine the efficacy of the buffer. If the qualified biologist determines that such Project activities may be causing an adverse reaction, the qualified biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers shall be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest) or failed. The onsite qualified biologist shall review and verify compliance with these nesting avoidance buffers and shall verify the nesting effort has finished. Work can resume within these avoidance areas when no other active nests are found.</p> <p>Upon completion of the survey and nesting bird monitoring, a memorandum or report shall be prepared and submitted to the Lead Agency for mitigation monitoring compliance record keeping.</p>					

Table 6.4-1. Mitigation and Monitoring Reporting Plan

Project Requirement/Mitigation Measure	Monitoring Activity/Timing/Frequency/Schedule	Implementation Responsibility/Verification	Responsibility for Oversight of Compliance/Verification	Outside Agency Coordination	Comments
BIO-4 (SPR): Protection Measures for Other Sensitive Plant and Wildlife Species. DPR shall designate a qualified biologist familiar with sensitive species with the potential to occur onsite (see Section 4.4.2). The qualified biologist shall complete a pre-construction survey within 72 hours of the start of construction to ensure that no sensitive species are present onsite or will be within a 300-foot buffer of the Project footprint. If sensitive species are found during the surveys, then appropriate measures, as determined by the qualified biologist and DPR, shall be implemented by the Contractor to minimize harm/harassment. These measures may include, but are not limited to, temporary delay of construction, staking/flagging near the nest or nectar plants, establishing a minimum “no work” buffer, and/or installing temporary fencing.	Activity: Preconstruction survey for sensitive species. Timing: Within 72 hours of the start of construction. Frequency: One time.	Project Biologist <hr/> Initials <hr/> Date	DPR <hr/> Initials <hr/> Date	None	

Table 6.4-1. Mitigation and Monitoring Reporting Plan

Project Requirement/Mitigation Measure	Monitoring Activity/Timing/Frequency/Schedule	Implementation Responsibility/Verification	Responsibility for Oversight of Compliance/Verification	Outside Agency Coordination	Comments
Cultural Resources					
<p>CUL-1 (SPR): Worker Awareness Training, Archaeological Monitoring, and Unanticipated Discovery Procedures. Prior to the start of construction, the DPR shall retain a qualified professional archaeologist to prepare a worker awareness training program for all operators of ground-disturbing equipment and their supervisors. The program shall be designed, under the direction of DPR, to inform construction workers about: federal and state regulations pertaining to cultural resources; the purpose of monitoring; the authority of the monitors to halt construction in the event of a find; procedures for coordinating activities with the monitors and if applicable, archaeologists; and penalties and repercussions from non-compliance with the program.</p> <p>In addition, DPR shall retain a qualified professional archaeologist to monitor all ground-disturbing activities associated with Project construction. Monitoring is not required for placement of equipment or fill inside excavations that were monitored, above-ground construction activities, or redistribution of soils that were previously monitored (such as the return of stockpiles to use in backfilling). The Monitoring Archaeologist shall meet or work under the direct supervision of a qualified individual meeting the Secretary of the Interior's</p>	<p>Activity: Worker awareness training program; Archaeological evaluation of potential cultural resources.</p> <p>Timing: During ground-disturbing construction activities.</p> <p>Frequency: As necessary during construction.</p>	Qualified Archaeologist	DPR	USACE	
		Initials	Initials		
		Date	Date		

Table 6.4-1. Mitigation and Monitoring Reporting Plan

Project Requirement/Mitigation Measure	Monitoring Activity/Timing/Frequency/Schedule	Implementation Responsibility/Verification	Responsibility for Oversight of Compliance/Verification	Outside Agency Coordination	Comments
<p>professional qualifications standards for prehistoric and historic archaeology, or another qualified individual as determined by DPR in consultation with USACE. The Monitoring Archaeologist shall have the authority to temporarily halt ground-disturbing or construction-related work within 50 feet of any discovery of potential historical or archaeological resources to implement the following procedures.</p> <p>If the Monitoring Archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required. If the Monitoring Archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, or determines that the discovery represents new significant information about a resource previously determined to not be significant, they shall immediately notify DPR, who shall consult with cooperating agencies and consulting tribes, as appropriate, on a finding of eligibility. DPR shall determine and require implementation of appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines. Work may not resume within the no-work radius until DPR, through consultation as appropriate, determines that the resources is</p>					

Table 6.4-1. Mitigation and Monitoring Reporting Plan

Project Requirement/Mitigation Measure	Monitoring Activity/Timing/Frequency/Schedule	Implementation Responsibility/Verification	Responsibility for Oversight of Compliance/Verification	Outside Agency Coordination	Comments
<p>either: 1) is not a Historical Resource under CEQA; or 2) that the treatment measures have been completed to its satisfaction.</p> <p>If the find includes human remains, or remains that are potentially human, the procedures in SPR CUL-2 shall be implemented.</p>					
<p>CUL-2 (SPR): Human Remains. In the event that any human remains, or remains that are potentially human, are encountered within the Project Area, the following steps shall be taken: work shall cease immediately within 100 feet of the remains in compliance with California Health and Safety Code Sections 7050.5 and 7052; and Public Resources Code (PRC) Section 5097.98-.99 The Monitoring Archaeologist will then immediately contact DPR cultural staff and work with them to ensure reasonable measures are taken to protect the area from disturbance (Assembly Bill [AB] 2641). The Monitoring Archaeologist shall notify the DPR Angeles District Superintendent, and they or their designee will contact the Los Angeles County Coroner/Medical Examiner (as per Section 7050.5 of the Health and Safety Code). The provisions of Section 7050.5 of the California Health and Safety Code, Section 5097.98 of the California Public Resources Code (PRC), and AB 2641 will be implemented. If the Coroner determines the remains are</p>	<p>Activity: Protocol for discovery of human remains.</p> <p>Timing: During ground-disturbing construction activities.</p> <p>Frequency: As necessary during construction.</p>	<p>Qualified Archaeologist</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>DPR</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>Los Angeles County Coroner/Medical Examiner and NAHC.</p>	

Table 6.4-1. Mitigation and Monitoring Reporting Plan

Project Requirement/Mitigation Measure	Monitoring Activity/Timing/Frequency/Schedule	Implementation Responsibility/Verification	Responsibility for Oversight of Compliance/Verification	Outside Agency Coordination	Comments
Native American and not the result of a crime scene, the Coroner will notify the Native American Heritage Commission (NAHC), which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner (DPR) does not agree with the recommendations of the MLD, then the NAHC can mediate (Section 5097.94 of the PRC). If no agreement is reached, the landowner (DPR) must rebury the remains where they will not be further disturbed (Section 5097.98 of the PRC). Reburial will also include either recording the site with the NAHC or the appropriate Information Center or recording a reinternment document with the county in which the property is located (AB 2641). Work cannot resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.					

Table 6.4-1. Mitigation and Monitoring Reporting Plan

Project Requirement/Mitigation Measure	Monitoring Activity/Timing/ Frequency/ Schedule	Implementation Responsibility/ Verification	Responsibility for Oversight of Compliance/ Verification	Outside Agency Coordination	Comments
Geology and Soils					
<p>GEO-2 (SPR): Unanticipated Paleontological Discovery. A paleontologist shall be retained as the Project paleontologist to oversee all aspects of paleontological mitigation, including the development and implementation of a Paleontological Monitoring and Mitigation Plan (PMMP) tailored to the Project plans that provides for paleontological monitoring of earthwork and ground disturbing activities into undisturbed geologic units with high paleontological potential to be conducted by a paleontological monitor meeting industry standards (Murphey et al. 2019). The PMMP shall also include provisions for a Workers' Environmental Awareness Program training that communicates requirements and procedures for the inadvertent discovery of paleontological resources during construction, to be delivered by the paleontological monitor to the construction crew prior to the onset of ground disturbance.</p> <p>Paleontological monitoring shall be conducted by a qualified paleontological monitor for ground disturbance that exceeds 10 feet in depth across the Project Area. The Project paleontologist may reduce the frequency of monitoring or spot checks should subsurface conditions indicate low paleontological potential.</p>	<p>Activity: Evaluation of paleontological resources.</p> <p>Timing: During earthwork and ground disturbing activities.</p> <p>Frequency: As necessary during construction.</p>	Qualified Paleontologist	DPR	Natural History Museum of Los Angeles County.	
		Initials	Initials		
		Date	Date		

Table 6.4-1. Mitigation and Monitoring Reporting Plan

Project Requirement/Mitigation Measure	Monitoring Activity/Timing/Frequency/Schedule	Implementation Responsibility/Verification	Responsibility for Oversight of Compliance/Verification	Outside Agency Coordination	Comments
Should a potential paleontological resource be identified in the Project Area, whether by the monitor or a member of the construction crew, work shall halt in a safe radius around the find (usually 50 feet) until the Project paleontologist can assess the find and, if significant, salvage the fossil for laboratory preparation and curation at the Natural History Museum of Los Angeles County.					
Project Specific Requirements (PSRs)					
Biological Resources					
<p>BIO-2 (PSR): Protection Measures Specific to Least Bell's Vireo. Focused, protocol-level surveys for least Bell's vireo (LBVI) are in progress. The survey area includes the Project footprint and a 500-foot buffer where habitat exists.</p> <ul style="list-style-type: none"> ■ If LBVI is detected during the surveys, coordination with the USFWS and CDFW will be initiated. <p>Regardless of survey results, the following avoidance and minimization measures shall be implemented to reduce potential impacts to nesting LBVI throughout the construction process:</p> <ul style="list-style-type: none"> ■ DPR shall designate a qualified biologist with experience surveying for and monitoring LBVI. If construction activity overlaps with the LBVI breeding period, the qualified 	<p>Activity: Protocol-level surveys and protection measures LBVI.</p> <p>Timing: No more than 3 days prior to the start of Project activities.</p> <p>Frequency:</p>	<p>Project Biologist</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>DPR</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	USFWS and CDFW	

Table 6.4-1. Mitigation and Monitoring Reporting Plan

Project Requirement/Mitigation Measure	Monitoring Activity/Timing/Frequency/Schedule	Implementation Responsibility/Verification	Responsibility for Oversight of Compliance/Verification	Outside Agency Coordination	Comments
<p>biologist shall conduct pre-construction surveys (i.e. surveys at least one week apart with the last survey conducted within three days of the start of Project activities) for vireos and their nests within a 500-foot buffer zone of the work area and other areas potentially supporting nesting birds. If a vireo nest is observed, the qualified biologist shall immediately contact DPR. The qualified biologist and DPR shall review the findings and notify the USFWS and/or CDFW. Project work shall be suspended within the buffer zone until the qualified biologist can determine whether nest avoidance is feasible or not.</p> <ul style="list-style-type: none"> ■ If nest avoidance is not feasible, DPR and the qualified biologist shall determine whether an exception is possible and seek approval from the USFWS and CDFW before work can resume within the buffer zone. All construction in the buffer zone shall cease until USFWS and CDFW approval is obtained. Additional conservation measures may be required to ensure nesting vireos are not adversely affected, which may include onsite noise reduction/attenuation techniques (i.e., noise shall not exceed an hourly average of 60 A-weighted decibels (dBA)) 	One week apart.				

Table 6.4-1. Mitigation and Monitoring Reporting Plan

Project Requirement/Mitigation Measure	Monitoring Activity/Timing/Frequency/Schedule	Implementation Responsibility/Verification	Responsibility for Oversight of Compliance/Verification	Outside Agency Coordination	Comments
<p>or above existing ambient levels, whichever is greater, at the edge of occupied habitat).</p> <ul style="list-style-type: none"> ■ Should work be suspended or delayed for a period of greater than seven (7) days, then DPR and the qualified biologist shall determine the need for another bird survey to ensure no additional nesting has occurred in the Project Area. ■ The qualified biologist shall be onsite daily during the bird breeding season (February 15 to September 15) to monitor and record activities that could impact LBVI and other nesting birds within the Project Area. If active nests are found, measures (such as those described below) shall be incorporated into ongoing operations to reduce the potential for disturbance. ■ Should any other nesting bird be found during the surveys, then appropriate measures, as determined by the qualified biologist, in coordination with DPR, shall be implemented by the Contractor to minimize harm/harassment. These measures may include, but are not limited to, temporary delay of construction, staking/flagging near the nest, establishing a minimum "no work" buffer, and/or installing temporary fencing. 					

Table 6.4-1. Mitigation and Monitoring Reporting Plan

Project Requirement/Mitigation Measure	Monitoring Activity/Timing/Frequency/Schedule	Implementation Responsibility/Verification	Responsibility for Oversight of Compliance/Verification	Outside Agency Coordination	Comments
Geology and Soils					
GEO-1 (PSR): The Project Proponent shall implement the Conclusions and Recommendations as listed in the final site-specific geotechnical report or most recent site-specific geotechnical evaluation.	Activity: Implementation of recommendations.	DPR	DPR		
		_____ Initials	_____ Initials		
	Timing: Prior to the start of Project activities.	_____ Date	_____ Date		
	Frequency: As necessary.				
Mitigation Measures					
Hazards and Hazardous Materials					
HAZ-1: Preparation of a Removal Action Workplan. The Project Proponent shall prepare a Removal Action Workplan (RAW) prior to construction. The RAW shall meet the requirements of Health and Safety Code Section 25356.1 and to the satisfaction of the California Department of Toxic Substances Control. The RAW shall include the following information: ■ Site Description – Include current site conditions, ownership and operational history, site characterization	Activity: Removal Action Workplan preparation.	DPR	DTSC		
		_____ Initials	_____ Initials		
	Timing: Prior to Project construction.	_____ Date	_____ Date		

Table 6.4-1. Mitigation and Monitoring Reporting Plan

Project Requirement/Mitigation Measure	Monitoring Activity/Timing/Frequency/Schedule	Implementation Responsibility/Verification	Responsibility for Oversight of Compliance/Verification	Outside Agency Coordination	Comments
<p>activities conducted, any response actions taken, nature and extent of contamination, and risk assessment/evaluation.</p> <ul style="list-style-type: none"> ■ Conceptual Site Model – Discussion of the relationship between contaminant sources and receptors through migration and exposure paths. ■ Removal Action Objectives – Identify goals or objectives to be achieved by the removal action. ■ Applicable or Relevant and Appropriate Requirements (ARARs): state or federal standards, which are aimed at protecting human health and the environment. ■ Identify Removal Action Alternatives – Develop and analyze removal action alternatives, at a minimum, consider effectiveness, implementability, and cost. ■ Engineering Evaluation/Cost Analysis – Provide a comparison of alternatives, technical and cost evaluation, selection of a preferred alternative, and explanation of the basis for the selection. ■ Implementation Details – Include details on all aspects of removal action implementation, including confirmation sampling and waste disposal. 	<p>Frequency: One time.</p>				

Table 6.4-1. Mitigation and Monitoring Reporting Plan

Project Requirement/Mitigation Measure	Monitoring Activity/Timing/Frequency/Schedule	Implementation Responsibility/Verification	Responsibility for Oversight of Compliance/Verification	Outside Agency Coordination	Comments
<ul style="list-style-type: none"> ■ Sampling and Analysis Plan – Provide confirmation sampling, along with corresponding Quality Assurance Plan to confirm effectiveness of RAW, if applicable. ■ Long Term Stewardship – Describe deed restrictions and any operation & maintenance requirements, if applicable. ■ Dust Monitoring Plan: Describe Ambient Air Monitoring performed in accordance with appropriate SCAQMD regulation(s). ■ Transportation Plan: Plan to minimize potential health, safety, and environmental risks resulting from the movement of material and/or equipment. ■ Health and Safety Plan – Outline methods that will be employed during the removal action to ensure the health and safety of workers and the public. ■ Schedule of Activities – Include a detailed Project schedule. ■ Public Involvement Process – Provide the public the opportunity to review the RAW, ask questions of both CDPR and DTSC and ensure they understand the risks associated with park use once remediation has been completed. 					

Table 6.4-1. Mitigation and Monitoring Reporting Plan

Project Requirement/Mitigation Measure	Monitoring Activity/Timing/Frequency/Schedule	Implementation Responsibility/Verification	Responsibility for Oversight of Compliance/Verification	Outside Agency Coordination	Comments
<ul style="list-style-type: none"> California Environmental Quality Act – Outline the CEQA process within the RAW. Administrative Record – Provide a list and access to all documents and information relied on or considered during the removal action selection process. 					
Tribal Cultural Resources					
<p>TCR-1: Tribal Monitoring. A tribal monitor from a Consulting Tribe (defined herein as those tribes that consulted with DPR for this Project) shall be retained to monitor all ground-disturbing activities associated with Project construction. Monitoring is not required for placement of equipment or fill inside excavations that were monitored, above-ground construction activities, or redistribution of soils that were previously monitored (such as the return of stockpiles to use in backfilling).</p> <p>In the event that more than one Consulting Tribe requests to provide a monitor for activities subject to this measure, DPR will allow for representation of the interested tribes in a mutually agreeable monitoring schedule. In the event that none of the Consulting Tribes choose to enter into a monitoring contract, or otherwise fail to respond to the offer to do so, DPR shall allow construction to proceed without a tribal monitor present as long</p>	<p>Activity: Tribal monitoring.</p> <p>Timing: During ground disturbing activities.</p> <p>Frequency: As necessary during construction.</p>	<p>Qualified Archaeologist</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	<p>DPR</p> <hr/> <p>Initials</p> <hr/> <p>Date</p>	Consulting Tribe, if any.	

Table 6.4-1. Mitigation and Monitoring Reporting Plan

Project Requirement/Mitigation Measure	Monitoring Activity/Timing/Frequency/Schedule	Implementation Responsibility/Verification	Responsibility for Oversight of Compliance/Verification	Outside Agency Coordination	Comments
<p>as the offers to all Consulting Tribes were extended and documented.</p> <p>No later than five business days prior to the start of ground disturbing activities, the construction supervisor or their designee shall notify the contracted Consulting Tribe(s) of the construction schedule. Should the contracted Consulting Tribe(s) choose not to provide a tribal monitor for any given day, or if the monitor does not report to the Project location at the scheduled time, or if the monitor is present but not actively observing activity, work may proceed without a monitor as long as the notification was made and documented. Unless there is a hiatus of construction activity that exceeds 14 days, daily updates to construction schedules can be made through email, text, phone, or other methods and frequencies agreed upon between the monitor(s) and construction supervisor. If a hiatus in ground disturbance of more than 14 days occurs, then notice of at least five business days before resuming work will be required to be given and documented.</p> <p>The tribal monitor shall have the authority to temporarily halt ground disturbance within 50 feet of the discovery for a duration long enough to examine potential TCRs that may become unearthed during the activity. If no TCRs are identified at the</p>					

Table 6.4-1. Mitigation and Monitoring Reporting Plan

Project Requirement/Mitigation Measure	Monitoring Activity/Timing/Frequency/Schedule	Implementation Responsibility/Verification	Responsibility for Oversight of Compliance/Verification	Outside Agency Coordination	Comments
discovery location, then construction activities shall proceed and no agency notifications are required. In the event that a TCR is identified, the monitor shall flag off the discovery location and notify DPR immediately to consult with tribal representatives and cooperating agencies on appropriate and respectful treatment. DPR shall determine and require implementation of appropriate treatment measures, if the find is determined to be a TCR under CEQA, as defined in Public Resources Code 5024.1. Work may not resume within the no-work radius until DPR, through consultation as appropriate, determines that the resource is either: 1) is not a TCR under CEQA; or 2) that the treatment measures have been completed to its satisfaction. Work cannot resume at the stop-work location until authorized to do so by an authorized representative of DPR.					

Table 6.4-1. Mitigation and Monitoring Reporting Plan					
Project Requirement/Mitigation Measure	Monitoring Activity/Timing/ Frequency/ Schedule	Implementation Responsibility/ Verification	Responsibility for Oversight of Compliance/ Verification	Outside Agency Coordination	Comments

LIST OF APPENDICES

Appendix A – Addendum to the 2023 Bowtie Parcel Project Biological Resources Technical Report

Appendix B – Draft IS/MND

APPENDIX A

Addendum to the 2023 Bowtie Parcel Project Biological Resources Technical Report



DEPARTMENT OF PARKS AND RECREATION
SOUTHERN SERVICE CENTER
2797 TRUXTUN ROAD
SAN DIEGO, CALIFORNIA 92106
619-221-7060

Armando Quintero, Director

October 7, 2024

ADDENDUM TO 2023 BOWTIE PARCEL PROJECT BIOLOGICAL RESOURCES TECHNICAL REPORT

This memo serves as an addendum to the Bowtie Parcel Project Biological Resources Technical Report (BRTR) prepared for California Department of Parks and Recreation (CDPR) by Stantec on March 16, 2023.

Since the completion of the BRTR, additional protocol-level surveys have been conducted by CDPR biologists for two listed species with the potential to occur within the biological study area. As a result of these protocol surveys, coordination with the appropriate federal and state agencies will be conducted and any additional measures or permitting will be incorporated into the IS/MND prior to finalization of the document.

Least Bell's Vireo (*Vireo bellii pusillus*; LBVI):

Following the US Fish and Wildlife (USFWS) "Least Bell's Vireo Survey Guidelines" (USFWS 2001), a series of eight surveys were completed at the Bowtie Parks Development Project site and adjacent areas (i.e., 500-foot buffer) from April to July of 2024. Surveys spaced at least ten days apart, were conducted between dawn and 11 a.m. by qualified CDPR biologists without the use of vocalization tapes. No LBVI were detected during any of the surveys. Despite lack of detection, CDPR will consult with the USFWS and the California Department of Fish and Wildlife (CDFW) on the LBVI. Species-specific protection measures, such as pre-construction surveys, will be included in the Biological Assessment, which is currently being prepared. During consultation, additional measures will be coordinated with the agencies; with consultation anticipated for completion prior to issuance of the final IS/MND.

Crotch's Bumblebee (*Bombus crotchii*; CBB):

Following the CDFW "Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species" (CDFW 2023), four surveys were completed within the Bowtie Parks Development Project site from May to July of 2024. Surveys were conducted during the known colony active periods of all species with the potential to occur and were performed when the ambient temperature was optimal for bumblebee activity. Surveys were completed by a qualified CDPR biologist with training and prior experience in surveying and monitoring for CBB. Survey methods included non-capture wandering transects with photo documentation; therefore, no Scientific Collecting Permit (SCP) was necessary.

One single female CBB was found foraging onsite during two of the four surveys. However, no additional individuals were detected during the surveys. Other bumblebee species found onsite included the yellow-faced bumble bee (*Bombus vosnesenskii*), California bumble bee (*Bombus californicus*), and Sonoran (American) bumble bee (*Bombus sonorus*).

Although no CBB queen or nesting activity was observed during the surveys, consultation with CDFW is in progress to determine avoidance measures or the need for an Incidental Take Permit (ITP). Protection measures for the species will include monitoring during construction by a qualified biologist, but additional measures will be coordinated with the CDFW for incorporation into the project. All survey results of CBB occurrences will also be submitted/uploaded to the California Natural Diversity Database (CNDDB).

References:

California Department of Fish and Wildlife *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species*. June 6, 2023. Website: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline> [Accessed 2024].

United States Department of the Interior, Fish and Wildlife Service, Carlsbad Fish and Wildlife Office, Ken S. Berg *Least Bell's Vireo Survey Guidelines*. January 19, 2001. Website: <https://www.fws.gov/sites/default/files/documents/survey-protocol-for-least-bells-vireo.pdf> [Accessed 2024].

APPENDIX B

Draft IS/MND

DRAFT

Initial Study and Mitigated Negative Declaration

Bowtie Park Development Project

City of Los Angeles, California

Lead Agency:



California Department of Parks and Recreation
1925 Las Virgenes Road
Calabasas, CA 91302

Prepared by:



ECORP Consulting, Inc.
ENVIRONMENTAL CONSULTANTS

ECORP Consulting, Inc.
3838 Camino del Rio North, Suite 370
San Diego, CA 92108

June 2024

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DRAFT MITIGATED NEGATIVE DECLARATION

Lead Agency:	California Department of Parks and Recreation, Angeles District 1925 Las Virgenes Road Calabasas, CA 91302
Project Proponent:	California Department of Parks and Recreation, Angeles District
Project Location:	The Proposed Project would occupy approximately 14.8 acres in the City of Los Angeles. The Project Area is located at 2780 W. Casitas Avenue on Los Angeles Assessor's Parcel Number (APN) 5442-002-914.
Project Description:	The California Department of Parks and Recreation (DPR; State Parks) proposes redeveloping the northern portion of a former rail yard into a publicly accessible urban greenspace. The greenspace would include habitat restoration and enhancement; viewing opportunities for local wildlife; walking, jogging, and biking trails; shaded picnic areas; historical, cultural, and environmental programming; and unstructured play areas.
Public Review Period:	June 26, 2024 to July 26, 2024

Standard Project Requirements (SPRs), Project Specific Requirements (PSRs), and Mitigation Measures Incorporated into the Project to Reduce Environmental Effects:

Biological Resources

BIO-1 (SPR): Preconstruction Survey for Nesting Birds. During the bird breeding/nesting window (February 15 to August 31), DPR shall ensure a nesting bird survey is completed prior to the start of any development activities (such as ground disturbance, construction activities, and/or removal of trees and vegetation) within the Project Area. This will maintain compliance with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Sections 3503, 3503.5, and 3513. The preconstruction nesting bird survey shall include the Project Area and a buffer area of 300 feet.

The survey results shall be provided to the Lead Agency (DPR). DPR shall adhere to the following:

- Designate a qualified biologist experienced in: identifying local and migratory bird species of special concern; conducting bird surveys using appropriate survey methodology; nesting surveying techniques, recognizing breeding and nesting behaviors, locating nests and breeding territories, and identifying nesting stages and nest success; determining/establishing appropriate avoidance and minimization measures; and monitoring the efficacy of implemented avoidance and minimization measures.
- Preconstruction surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than three days prior to the initiation

of Project activities. Surveys shall encompass all suitable areas including trees, shrubs, bare ground, burrows, cavities, and structures. Survey duration shall take into consideration the size of the Project Area; density, and complexity of the habitat; number of survey participants; survey techniques employed; and shall be sufficient to ensure the data collected is complete and accurate.

If no nesting birds are observed during the survey, site preparation and construction activities may begin. If nesting birds (including nesting raptors) are found to be present, then avoidance or minimization measures shall be undertaken in consultation with the Lead Agency, and as required, the United States Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW). Measures shall include immediate establishment of an appropriate buffer zone to be established by a qualified biologist, based on their best professional judgement and experience. The buffer around the nest shall be delineated and flagged, and no construction activity shall occur within the buffer area until a qualified biologist determines nesting species have fledged and the nest is no longer active, or the nest has failed. The qualified biologist shall monitor the nest at the onset of Project activities, and at the onset of any changes in such Project activities (e.g., increase in number or type of equipment, change in equipment usage) to determine the efficacy of the buffer. If the qualified biologist determines that such Project activities may be causing an adverse reaction, the qualified biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers shall be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest) or failed. The onsite qualified biologist shall review and verify compliance with these nesting avoidance buffers and shall verify the nesting effort has finished. Work can resume within these avoidance areas when no other active nests are found.

Upon completion of the survey and nesting bird monitoring, a memorandum or report shall be prepared and submitted to the Lead Agency for mitigation monitoring compliance record keeping.

BIO-2 (PSR): Protection Measures Specific to Least Bell's Vireo. Focused, protocol-level surveys for least Bell's vireo (LBVI) are in progress. The survey area includes the Project footprint and a 500-foot buffer where habitat exists.

- If LBVI is detected during the surveys, coordination with the USFWS and CDFW will be initiated.

Regardless of survey results, the following avoidance and minimization measures shall be implemented to reduce potential impacts to nesting LBVI throughout the construction process:

- DPR shall designate a qualified biologist with experience surveying for and monitoring LBVI. If construction activity overlaps with the LBVI breeding period, the qualified biologist shall conduct pre-construction surveys (i.e. surveys at least one

week apart with the last survey conducted within three days of the start of Project activities) for vireos and their nests within a 500-foot buffer zone of the work area and other areas potentially supporting nesting birds. If a vireo nest is observed, the qualified biologist shall immediately contact DPR. The qualified biologist and DPR shall review the findings and notify the USFWS and/or CDFW. Project work shall be suspended within the buffer zone until the qualified biologist can determine whether nest avoidance is feasible or not.

- If nest avoidance is not feasible, DPR and the qualified biologist shall determine whether an exception is possible and seek approval from the USFWS and CDFW before work can resume within the buffer zone. All construction in the buffer zone shall cease until USFWS and CDFW approval is obtained. Additional conservation measures may be required to ensure nesting vireos are not adversely affected, which may include onsite noise reduction/attenuation techniques (i.e., noise shall not exceed an hourly average of 60 A-weighted decibels (dBA) or above existing ambient levels, whichever is greater, at the edge of occupied habitat).
- Should work be suspended or delayed for a period of greater than seven (7) days, then DPR and the qualified biologist shall determine the need for another bird survey to ensure no additional nesting has occurred in the Project Area.
- The qualified biologist shall be onsite daily during the bird breeding season (February 15 to September 15) to monitor and record activities that could impact LBVI and other nesting birds within the Project Area. If active nests are found, measures (such as those described below) shall be incorporated into ongoing operations to reduce the potential for disturbance.
- Should any other nesting bird be found during the surveys, then appropriate measures, as determined by the qualified biologist, in coordination with DPR, shall be implemented by the Contractor to minimize harm/harassment. These measures may include, but are not limited to, temporary delay of construction, staking/flagging near the nest, establishing a minimum “no work” buffer, and/or installing temporary fencing.

BIO-3 (PSR): Protection Measures Specific to Crotch’s Bumblebee. Focused surveys for Crotch’s bumblebee (CBB) are in progress.

- If CBB is detected during these surveys, coordination with CDFW will be initiated.

Regardless of survey results, the following avoidance and minimization measures shall be implemented to reduce potential impacts CBB throughout the construction process:

- DPR shall designate a qualified biologist with experience surveying for and monitoring CBB. If construction activity overlaps with the CBB flight period (February 1 through October 31), the qualified biologist shall conduct pre-construction surveys (i.e. surveys at least one week apart with the last survey conducted within three days of the start of Project activities) for CBB within the work area and other adjacent areas potentially supporting native pollinators. If a CBB is observed, the qualified biologist

shall immediately contact DPR. The qualified biologist and DPR shall review the findings and notify the CDFW. Project work shall be suspended within a buffer zone identified by the qualified biologist until the qualified biologist can determine whether CBB avoidance is feasible or not.

- Removal of CBB nectar plants and other native vegetation should be avoided. If nectar plants or native vegetation must be removed, it shall be completed outside the CBB flight season (February 1 through October 31), with the qualified biologist conducting a survey immediately before any vegetation removal activities. If CBB is discovered, work shall be suspended until the qualified biologist has consulted with the CDFW. Removal of vegetation shall only proceed with implementation of the conditions set forth by CDFW.
- If ground, leaf litter, or vegetation disturbing work occurs within the flight season, the qualified biologist shall conduct daily monitoring for the CBB during these activities. If CBB is discovered in the Project Area, monitoring shall occur daily for the remainder of the flight season (February 1 through October 31). The qualified biologist shall inspect vegetation for bumblebee foraging or nesting prior to removal. If a bumblebee nest is discovered, removal of the vegetation shall not occur until the flight season has ended and the nest has been determined abandoned by the qualified biologist.
- If Crotch's bumblebee is found during the surveys, then appropriate measures, as determined by the qualified biologist and DPR, shall be implemented by the Contractor to minimize harm/harassment. These measures may include, but are not limited to, temporary delay of construction, staking/flagging near the nest or nectar plants, establishing a minimum "no work" buffer, and/or installing temporary fencing.

BIO-4 (SPR): Protection Measures for Other Sensitive Plant and Wildlife Species. DPR shall designate a qualified biologist familiar with sensitive species with the potential to occur onsite (see Section 4.4.2). The qualified biologist shall complete a pre-construction survey within 72 hours of the start of construction to ensure that no sensitive species are present onsite or will be within a 300-foot buffer of the Project footprint. If sensitive species are found during the surveys, then appropriate measures, as determined by the qualified biologist and DPR, shall be implemented by the Contractor to minimize harm/harassment. These measures may include, but are not limited to, temporary delay of construction, staking/flagging near the nest or nectar plants, establishing a minimum "no work" buffer, and/or installing temporary fencing.

Cultural Resources

CUL-1 (SPR): Worker Awareness Training, Archaeological Monitoring, and Unanticipated Discovery Procedures. Prior to the start of construction, the DPR shall retain a qualified professional archaeologist to prepare a worker awareness training program for all operators of ground-disturbing equipment and their supervisors. The program shall be designed, under the direction of DPR, to inform construction workers about: federal and

state regulations pertaining to cultural resources; the purpose of monitoring; the authority of the monitors to halt construction in the event of a find; procedures for coordinating activities with the monitors and if applicable, archaeologists; and penalties and repercussions from non-compliance with the program.

In addition, DPR shall retain a qualified professional archaeologist to monitor all ground-disturbing activities associated with Project construction. Monitoring is not required for placement of equipment or fill inside excavations that were monitored, above-ground construction activities, or redistribution of soils that were previously monitored (such as the return of stockpiles to use in backfilling). The Monitoring Archaeologist shall meet or work under the direct supervision of a qualified individual meeting the Secretary of the Interior's professional qualifications standards for prehistoric and historic archaeology, or another qualified individual as determined by DPR in consultation with USACE. The Monitoring Archaeologist shall have the authority to temporarily halt ground-disturbing or construction-related work within 50 feet of any discovery of potential historical or archaeological resources to implement the following procedures.

If the Monitoring Archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required. If the Monitoring Archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, or determines that the discovery represents new significant information about a resource previously determined to not be significant, they shall immediately notify DPR, who shall consult with cooperating agencies and consulting tribes, as appropriate, on a finding of eligibility. DPR shall determine and require implementation of appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines. Work may not resume within the no-work radius until DPR, through consultation as appropriate, determines that the resources is either: 1) is not a Historical Resource under CEQA; or 2) that the treatment measures have been completed to its satisfaction.

If the find includes human remains, or remains that are potentially human, the procedures in Mitigation Measure CUL-2 shall be implemented.

CUL-2 (SPR): Human Remains. In the event that any human remains, or remains that are potentially human, are encountered within the Project Area, the following steps shall be taken: work shall cease immediately within 100 feet of the remains in compliance with California Health and Safety Code Sections 7050.5 and 7052; and Public Resources Code (PRC) Section 5097.98-.99 The Monitoring Archaeologist will then immediately contact DPR cultural staff and work with them to ensure reasonable measures are taken to protect the area from disturbance (Assembly Bill [AB] 2641). The Monitoring Archaeologist shall notify the DPR Angeles District Superintendent, and they or their designee will contact the Los Angeles County Coroner/Medical Examiner (as per Section 7050.5 of the Health and Safety Code). The provisions of Section 7050.5 of the California Health and Safety

Code, Section 5097.98 of the California Public Resources Code (PRC), and AB 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the Native American Heritage Commission (NAHC), which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner (DPR) does not agree with the recommendations of the MLD, then the NAHC can mediate (Section 5097.94 of the PRC). If no agreement is reached, the landowner (DPR) must rebury the remains where they will not be further disturbed (Section 5097.98 of the PRC). Reburial will also include either recording the site with the NAHC or the appropriate Information Center or recording a reinternment document with the county in which the property is located (AB 2641). Work cannot resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

Geology and Soils

GEO-1 (PSR): The Project Applicant shall implement the Conclusions and Recommendations as listed in the final site-specific geotechnical report or most recent site-specific geotechnical evaluation.

GEO-2 (SPR): **Unanticipated Paleontological Discovery.** A paleontologist shall be retained as the Project paleontologist to oversee all aspects of paleontological mitigation, including the development and implementation of a Paleontological Monitoring and Mitigation Plan (PMMP) tailored to the Project plans that provides for paleontological monitoring of earthwork and ground disturbing activities into undisturbed geologic units with high paleontological potential to be conducted by a paleontological monitor meeting industry standards (Murphey et al. 2019). The PMMP shall also include provisions for a Workers' Environmental Awareness Program training that communicates requirements and procedures for the inadvertent discovery of paleontological resources during construction, to be delivered by the paleontological monitor to the construction crew prior to the onset of ground disturbance.

Paleontological monitoring shall be conducted by a qualified paleontological monitor for ground disturbance that exceeds 10 feet in depth across the Project Area. The Project paleontologist may reduce the frequency of monitoring or spot checks should subsurface conditions indicate low paleontological potential.

Should a potential paleontological resource be identified in the Project Area, whether by the monitor or a member of the construction crew, work shall halt in a safe radius around the find (usually 50 feet) until the Project paleontologist can assess the find and, if significant, salvage the fossil for laboratory preparation and curation at the Natural History Museum of Los Angeles County.

Hazards and Hazardous Materials

- HAZ-1: Preparation of a Removal Action Workplan.** The Project Proponent shall prepare a Removal Action Workplan (RAW) prior to construction. The RAW shall meet the requirements of Health and Safety Code Section 25356.1 and to the satisfaction of the California Department of Toxic Substances Control. The RAW shall include the following information:
- Site Description – Include current site conditions, ownership and operational history, site characterization activities conducted, any response actions taken, nature and extent of contamination, and risk assessment/evaluation.
 - Conceptual Site Model – Discussion of the relationship between contaminant sources and receptors through migration and exposure paths.
 - Removal Action Objectives – Identify goals or objectives to be achieved by the removal action.
 - Applicable or Relevant and Appropriate Requirements (ARARs): state or federal standards, which are aimed at protecting human health and the environment.
 - Identify Removal Action Alternatives – Develop and analyze removal action alternatives, at a minimum, consider effectiveness, implementability, and cost.
 - Engineering Evaluation/Cost Analysis – Provide a comparison of alternatives, technical and cost evaluation, selection of a preferred alternative, and explanation of the basis for the selection.
 - Implementation Details – Include details on all aspects of removal action implementation, including confirmation sampling and waste disposal.
 - Sampling and Analysis Plan – Provide confirmation sampling, along with corresponding Quality Assurance Plan to confirm effectiveness of RAW, if applicable.
 - Long Term Stewardship – Describe deed restrictions and any operation & maintenance requirements, if applicable.
 - Dust Monitoring Plan: Describe Ambient Air Monitoring performed in accordance with appropriate SCAQMD regulation(s).
 - Transportation Plan: Plan to minimize potential health, safety, and environmental risks resulting from the movement of material and/or equipment.
 - Health and Safety Plan – Outline methods that will be employed during the removal action to ensure the health and safety of workers and the public.
 - Schedule of Activities – Include a detailed Project schedule.
 - Public Involvement Process – Describe public participation activities.
 - California Environmental Quality Act – Outline the CEQA process within the RAW.
 - Administrative Record – Provide a list of all documents and information relied on or considered during the removal action selection process.

Tribal Cultural Resources

TCR-1: Tribal Monitoring. A tribal monitor from a Consulting Tribe (defined herein as those tribes that consulted with DPR for this Project) shall be retained to monitor all ground-disturbing activities associated with Project construction. Monitoring is not required for placement of equipment or fill inside excavations that were monitored, above-ground construction activities, or redistribution of soils that were previously monitored (such as the return of stockpiles to use in backfilling).

In the event that more than one Consulting Tribe requests to provide a monitor for activities subject to this measure, DPR will allow for representation of the interested tribes in a mutually agreeable monitoring schedule. In the event that none of the Consulting Tribes choose to enter into a monitoring contract, or otherwise fail to respond to the offer to do so, DPR shall allow construction to proceed without a tribal monitor present as long as the offers to all Consulting Tribes were extended and documented.

No later than five business days prior to the start of ground disturbing activities, the construction supervisor or their designee shall notify the contracted Consulting Tribe(s) of the construction schedule. Should the contracted Consulting Tribe(s) choose not to provide a tribal monitor for any given day, or if the monitor does not report to the Project location at the scheduled time, or if the monitor is present but not actively observing activity, work may proceed without a monitor as long as the notification was made and documented. Unless there is a hiatus of construction activity that exceeds 14 days, daily updates to construction schedules can be made through email, text, phone, or other methods and frequencies agreed upon between the monitor(s) and construction supervisor. If a hiatus in ground disturbance of more than 14 days occurs, then notice of at least five business days before resuming work will be required to be given and documented.

The tribal monitor shall have the authority to temporarily halt ground disturbance within 50 feet of the discovery for a duration long enough to examine potential TCRs that may become unearthed during the activity. If no TCRs are identified at the discovery location, then construction activities shall proceed and no agency notifications are required. In the event that a TCR is identified, the monitor shall flag off the discovery location and notify DPR immediately to consult with tribal representatives and cooperating agencies on appropriate and respectful treatment. DPR shall determine and require implementation of appropriate treatment measures, if the find is determined to be a TCR under CEQA, as defined in Public Resources Code 5024.1. Work may not resume within the no-work radius until DPR, through consultation as appropriate, determines that the resource is either: 1) is not a TCR under CEQA; or 2) that the treatment measures have been completed to its satisfaction. Work cannot resume at the stop-work location until authorized to do so by an authorized representative of DPR.

TABLE OF CONTENTS

1.0	BACKGROUND	1-1
1.1	Summary.....	1-1
1.2	Introduction.....	1-1
1.3	Surrounding Land Uses/Environmental Setting.....	1-2
2.0	PROJECT DESCRIPTION	2-1
2.1	Project Background.....	2-1
2.2	Project Objectives	2-1
2.3	Project Characteristics	2-1
2.4	Project Requirements (Standard Project Requirements [SPRs] and Project Specific Requirements [PSRs])	2-2
2.5	Project Timing	2-3
2.6	Regulatory Requirements, Permits, and Approvals	2-3
2.7	Consistency with Programmatic and Planning Documentation.....	2-5
2.7.1	Rio De Los Angeles State Park General Plan and Programmatic Environmental Impact Report for Taylor Yard Parcels D and G-1	2-5
2.7.2	Final Feasibility Report and Environmental Impact Statement/Environmental Impact Report for the Los Angeles River Ecosystem Restoration Integrated Feasibility Report	2-7
2.8	Consultation With California Native American Tribe(s)	2-16
3.0	ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED AND DETERMINATION.....	3-1
3.1	Environmental Factors Potentially Affected.....	3-1
3.2	Evaluation of Environmental Impacts.....	3-2
4.0	ENVIRONMENTAL CHECKLIST AND DISCUSSION	4-1
4.1	Aesthetics	4-1
4.1.1	Environmental Setting	4-1
4.1.2	Mitigation Measures	4-3
4.2	Agriculture and Forestry Resources.....	4-4
4.2.1	Environmental Setting	4-4
4.2.2	Agriculture and Forestry Resources (II) Environmental Checklist and Discussion.....	4-4
4.2.3	Mitigation Measures	4-6
4.3	Air Quality	4-6
4.3.1	Environmental Setting	4-6
4.3.2	Air Quality (III) Environmental Checklist and Discussion	4-12
4.3.3	Mitigation Measures	4-28

4.4	Biological Resources	4-28
4.4.1	Environmental Setting	4-28
4.4.2	Biological Resources (IV) Environmental Checklist and Discussion.....	4-32
4.4.3	Standard Project Requirements.....	4-41
4.5	Cultural Resources	4-44
4.5.1	Environmental Setting	4-46
4.5.2	Cultural Resources (V) Environmental Checklist and Discussion.....	4-49
4.5.3	Mitigation Measures	4-54
4.6	Energy	4-55
4.6.1	Environmental Setting	4-56
4.6.2	Energy (VI) Environmental Checklist and Discussion	4-58
4.6.3	Mitigation Measures	4-61
4.7	Geology and Soils	4-61
4.7.1	Environmental Setting	4-61
4.7.2	Geology and Soils (VII) Environmental Checklist and Discussion	4-63
4.7.3	Project Specific Requirements/Standard Project Requirements	4-68
4.8	Greenhouse Gas Emissions	4-69
4.8.1	Environmental Setting	4-69
4.8.2	Greenhouse Gas Emissions (VIII) Environmental Checklist and Discussion	4-71
4.8.3	Mitigation Measures	4-74
4.9	Hazards and Hazardous Materials.....	4-74
4.9.1	Environmental Setting	4-74
4.9.2	Hazardous Conditions Within the Project Area.....	4-74
4.9.3	Hazards and Hazardous Materials (IX) Environmental Checklist and Discussion.....	4-76
4.9.4	Mitigation Measures	4-81
4.10	Hydrology and Water Quality	4-82
4.10.1	Environmental Setting	4-82
4.10.2	Hydrology and Water Quality (X) Environmental Checklist and Discussion	4-83
4.10.3	Mitigation Measures	4-88
4.11	Land Use and Planning	4-88
4.11.1	Environmental Setting	4-88
4.11.2	Land Use and Planning (XI) Environmental Checklist and Discussion.....	4-88
4.11.3	Mitigation Measures	4-89
4.12	Mineral Resources.....	4-89

4.12.1	Environmental Setting	4-89
4.12.2	Mineral Resources (XII) Environmental Checklist and Discussion	4-90
4.12.3	Mitigation Measures	4-90
4.13	Noise	4-90
4.13.1	Environmental Setting	4-90
4.13.2	Vibration Fundamentals.....	4-92
4.13.3	Existing Ambient Noise Environment.....	4-93
4.13.4	Noise (XIII) Environmental Checklist and Discussion	4-98
4.13.5	Environmental Setting	Error! Bookmark not defined.
4.13.6	Mitigation Measures	4-104
4.14	Population and Housing	4-104
4.14.1	Population and Housing (XIV) Environmental Checklist and Discussion	4-104
4.14.2	Mitigation Measures	4-104
4.15	Public Services	4-105
4.15.1	Environmental Setting	4-105
4.15.2	Public Services (XV) Environmental Checklist and Discussion.....	4-106
4.15.3	Mitigation Measures	4-107
4.16	Recreation	4-107
4.16.1	Environmental Setting	4-107
4.16.2	Recreation (XVI) Materials Checklist	4-108
4.16.3	Mitigation Measures	4-109
4.17	Transportation	4-109
4.17.1	Transportation (XVII) Environmental Checklist and Discussion	4-110
4.17.2	Mitigation Measures	4-111
4.18	Tribal Cultural Resources	4-112
4.18.1	Environmental Setting	4-112
4.18.2	Tribal Cultural Resources (XVIII) Environmental Checklist and Discussion.....	4-115
4.18.3	Mitigation Measures	4-116
4.19	Utilities and Service Systems	4-117
4.19.1	Utilities and Service Systems (XIX) Environmental Checklist and Discussion.....	4-118
4.19.2	Mitigation Measures	4-121
4.20	Wildfire	4-121
4.20.1	Environmental Setting	4-121
4.20.2	Wildfire (XX) Environmental Checklist and Discussion	4-121

4.20.3	Mitigation Measures	4-123
4.21	Mandatory Findings of Significance	4-123
4.21.1	Mandatory Findings of Significance (XXI) Environmental Checklist and Discussion.....	4-123
5.0	LIST OF PREPARERS	5-1
5.1	California Department of Parks and Recreation	5-1
5.1.1	Lead Agency	5-1
5.2	ECORP Consulting, Inc.	5-1
5.2.1	CEQA Documentation.....	5-1
6.0	REFERENCES.....	6-1

LIST OF TABLES

Table 1.3-1.	Surrounding Land Uses.....	1-2
Table 4.3-1.	Summary of Ambient Air Quality Data	4-7
Table 4.3-2.	Attainment Status of Criteria Pollutants in the Los Angeles County Portion of the SoCAB.....	4-8
Table 4.3-3.	SCAQMD Regional Significance Thresholds – Pounds per Day.....	4-11
Table 4.3-4.	Local Significance Thresholds at 25 Meters of a Sensitive Receptor	4-11
Table 4.3-5.	Construction-Related Emissions (Regional Significance Analysis).....	4-17
Table 4.3-6.	Equipment-Specific Grading Rates.....	4-18
Table 4.3-7.	Construction-Related Emissions (Localized Significance Analysis).....	4-19
Table 4.3-8.	Construction-Related Emissions (USEPA Conformity Determination Analysis).....	4-21
Table 4.3-9.	Operational-Related Emissions (Regional Significance Analysis).....	4-22
Table 4.3-10.	Operational-Related Emissions (USEPA Conformity Determination Analysis)	4-23
Table 4.6-1.	Nonresidential Electricity Consumption in Los Angeles County 2017-2021	4-57
Table 4.6-2.	Nonresidential Natural Gas Consumption in Los Angeles County 2017-2021	4-57
Table 4.6-3.	Automotive Fuel Consumption in Los Angeles County 2017-2021	4-57
Table 4.6-4.	Proposed Project Energy and Fuel Consumption.....	4-59
Table 4.7-1.	Historic Soil Units Occurring within the BSA.....	4-62
Table 4.8-1.	Construction-Related Greenhouse Gas Emissions	4-72
Table 4.8-2.	Operational-Related Greenhouse Gas Emissions	4-72
Table 4.13-1.	Existing (Baseline) Noise Measurements	4-93
Table 4.13-2.	Guidelines for Noise Compatible Land Use.....	4-95
Table 4.13-3	Construction Average (dBA) Noise Levels at Nearest Receptor.....	4-99

Table 4.13-4. Representative Vibration Source Levels for Construction Equipment.....	4-102
Table 4.13-5 Construction Vibration Levels at 235 Feet	4-103

LIST OF FIGURES

Figure 1. Project Vicinity	1-3
Figure 2. Project Location.....	1-4
Figure 3. Project Site Plan	2-4

LIST OF APPENDICES

Appendix A – Air Quality/Greenhouse Gas Emissions Assessment
Appendix B – Biological Resources Assessment
Appendix C – Cultural Resources Assessment (CONFIDENTIAL)
Appendix D – Energy Impact Assessment
Appendix E – Paleontological Resources Assessment
Appendix F – Noise Assessment
Appendix G – Traffic Impact Assessment

LIST OF ACRONYMS AND ABBREVIATIONS

Term	Definition
µg/m ³	micrograms per cubic meter
AB	Assembly Bill
AF	acre-feet
APE	Area of Potential Effect
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
ARBOR	Area with Restoration Benefits and Opportunities for Revitalization
bgs	below ground surface
BMP	Best Management Practice
BSA	Biological Study Area
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBB	Crotch's bumblebee
CBC	California Building Code

Term	Definition
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CH ₄	methane
CHP	California Highway Patrol
City	City of Los Angeles
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalence Levels
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
Coordinator	Noise Control Coordinator
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
dB	decibels
dBA	A-weighted decibels
DHS	California Department of Health Services
DOC	California Department of Conservation
DPM	Diesel Particulate Matter
DTSC	California Department of Toxic Substances Control
DWR	California Department of Water Resources
ECORP	ECORP Consulting, Inc.
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
Geocon	Geocon Consultants, Inc.
GHG	greenhouse gas
HTRW	hazardous, toxic, and radioactive waste
IFR	Integrated Feasibility Report
IS/MND	Initial Study/Mitigated Negative Declaration
KOA	KOA Corporation
LADOT	Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAMC	City of Los Angeles Municipal Code
LAPD	Los Angeles Police Department

Term	Definition
LASAN	Los Angeles Sanitation and Environment
LAUSD	Los Angeles Unified School District
LBVI	least Bell's vireo
L_{dn}	day-night average sound level
L_{eq}	average equivalent noise level
LID	low impact development
L_{max}	maximum noise level during a measurement period
L_{min}	minimum noise level during a measurement period
LST	Localized Significance Thresholds
MBTA	Migratory Bird Treaty Act
MLD	Most Likely Descendant
MRZ	Mineral Resource Zone
MWD	Metropolitan Water District
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO_2	nitrogen dioxide
NO_x	nitric oxides
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
O_3	ozone
OPR	Office of Planning and Research
Park	Bowtie Park
PM	Particulate Matter
PM_{10}	Particulate Matter Less than 10 Microns in Diameter
$PM_{2.5}$	Particulate Matter Less than 2.5 Microns in Diameter
PMMP	Paleontological Monitoring and Mitigation Plan
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
Project	Bowtie Park Development Project
RAW	Removal Action Workplan
RCPG	Regional Comprehensive Plan and Guide
River	Los Angeles River
ROG	Reactive Organic Gases
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison

Term	Definition
SCORP	Statewide Comprehensive Outdoor Recreation Plan
SFVGB	San Fernando Valley Groundwater Basin
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SMARA	Surface Mining and Reclamation Act of 1975
SO ₂	sulfur dioxide
SoCAB	South Coast Air Basin
SPR	Standard Project Requirement
SR	State Route
SRA	source receptor area
SSC	California Species of Special Concern
Stantec	Stantec Consulting Services, Inc.
State Parks	California Department of Parks and Recreation
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TA	Transportation Assessment
TAC	toxic air contaminant
TAG	Transportation Assessment Guidelines
TCR	tribal cultural resource
TNC	The Nature Conservancy
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zones
VMТ	Vehicle Miles Traveled
VOC	Volatile Organic Compound
WQMP	Water Quality Management Plan

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1.0 BACKGROUND

1.1 Summary

Project Title:	Bowtie Park Development Project
Lead Agency Name and Address:	California Department of Parks and Recreation, Angeles District 1925 Las Virgenes Road Calabasas, CA 91302
Contact Person and Phone Number:	Luke Serna Associate Park and Recreation Specialist (619) 221-7060
Project Location:	The Proposed Project would occupy approximately 14.8 acres in the City of Los Angeles. The Project Area is located at 2780 West Casitas Avenue on Los Angeles Assessor's Parcel Number (APN) 5442-002-914.
General Plan Designation (California Department of Parks and Recreation):	State Park
Zoning (City of Los Angeles):	Public Facilities

1.2 Introduction

The California Department of Parks and Recreation (DPR) is the Lead Agency for this California Environmental Quality Act (CEQA) Initial Study. This Initial Study has been prepared to identify and assess the anticipated environmental impacts of the Bowtie Park Development Project (Project) to satisfy CEQA (Public Resources Code [PRC], Section 21000 et seq.) and State CEQA Guidelines (14 California Code of Regulations [CCR] 15000 et seq.). The Initial Study also identifies mitigation measures for any identified significant environmental impacts. CEQA requires that all state and local government agencies consider the environmental consequences before approving those projects. DPR will use this CEQA Initial Study to determine which CEQA document is appropriate for the Project: Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report (EIR).

In accordance with CEQA, this Initial Study/Mitigated Negative Declaration (IS/MND) will be circulated for a 30-day public review and comment period. Written comments on the Draft IS/MND should be submitted to:

Luke Serna
Department of Parks & Recreation
Southern Service Center
2797 Truxtun Road
San Diego, CA 92106
(619) 221-7060
Lucas.Serna@parks.ca.gov

1.3 Surrounding Land Uses/Environmental Setting

The Project Area is within an approximately 18-acre parcel (APN 5442-002-914) in the northeast portion of the City of Los Angeles (City). The Project Area encompasses approximately 14.8 acres and is currently undeveloped. The Project address is 2780 W. Casitas Avenue and is generally bordered by California State Route (SR) 2 to the northwest, the Union Pacific Railroad to the north and east, and the Los Angeles River to the south and west (Figures 1 and 2). The Project Area is a sub-unit of the existing Rio de Los Angeles State Park and under DPR's General Plan for the park has a Land Use designation of State Park. The existing underlying City zoning designation of the Project Area is Public Facilities. Table 1.3-1 below summarizes the General Plan and zoning designations for the Project Area and surrounding properties.

Table 1.3-1. Summary of Project Area and Surrounding Land Uses			
	Rio de Los Angeles State Park Land Use Designation	City of Los Angeles Zoning Designation	Existing Land Use
Project Area	State Park	Public Facilities	Vacant
North	Heavy Manufacturing/Commercial Manufacturing	Manufacturing	Manufacturing, Storage Facility
East	Heavy Manufacturing/Commercial Manufacturing	Manufacturing	Manufacturing, Educational Facilities
South	Open Space/Heavy Manufacturing	Open Space/Heavy Manufacturing	Los Angeles River, Vacant
West	Open Space	Open Space	Los Angeles River

Source: California Department of Parks and Recreation 2005; City of Los Angeles 2023.

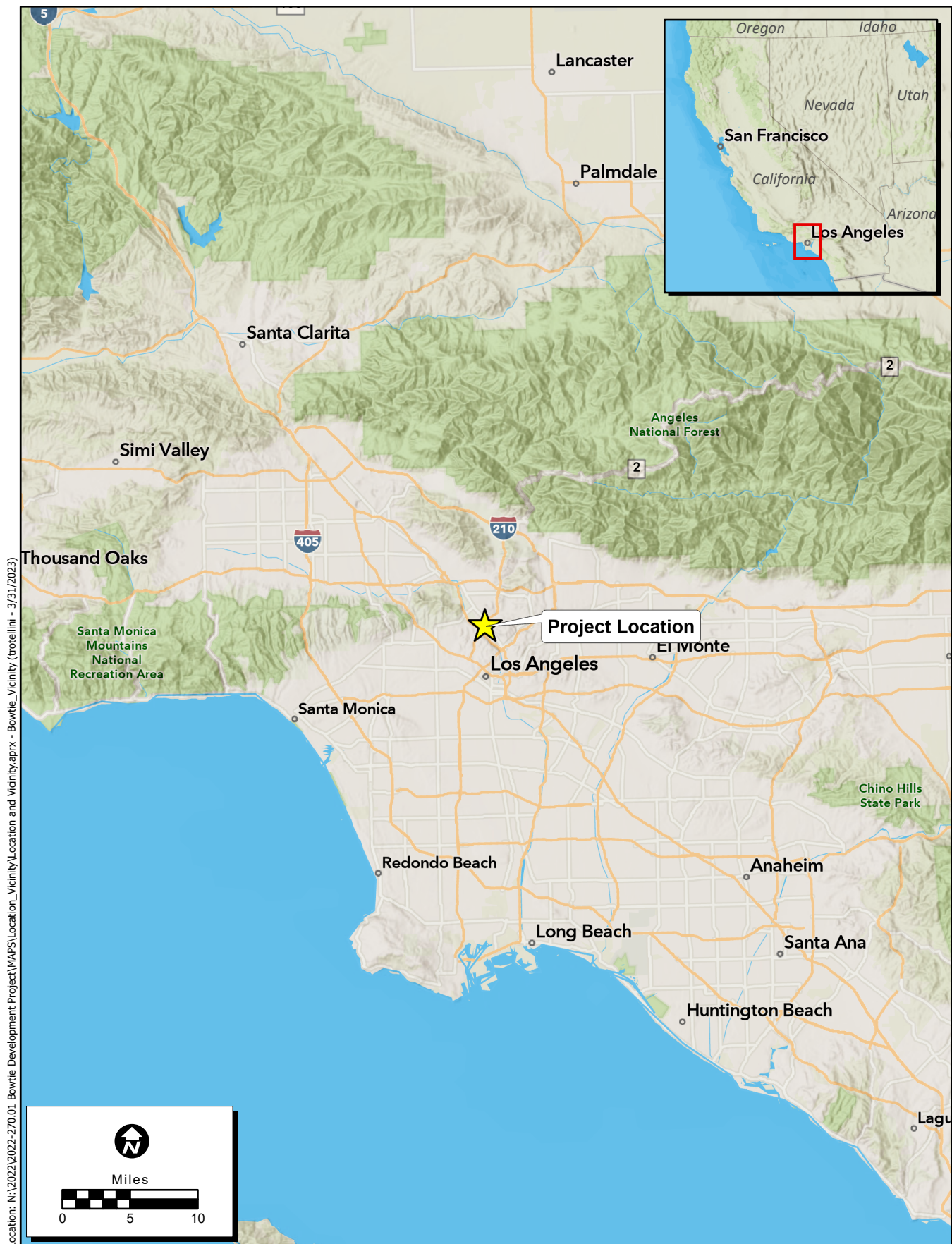


Figure 1. Regional Project Location



Figure 2. Project Location

2.0 PROJECT DESCRIPTION

2.1 Project Background

The Project Area was part of the Taylor Yard rail yard complex, the former freight classification yard (1925 to 1973) of Southern Pacific Railroad. The 247-acre Taylor Yard rail yard complex (previously referred to as the G-1 parcel) was historically divided into ten parcels, some of which were further subdivided for sale purposes, and two of which – Parcels D and G-1 – were purchased by DPR for Rio de Los Angeles State Park. The 40-acre Parcel D, acquired in 2001, is located between an active rail line and San Fernando Road. The approximately 18-acre parcel (G-1), acquired in 2003, is located between the Los Angeles River and an industrial development. The 14.8-acre Project Area is located within Parcel G-1 (Figure 2). Formerly part of a 247-acre closed freight switching facility, this and several other parcels in the facility were vacant for two decades, as rail yard functions shifted offsite (DPR 2005).

2.2 Project Objectives

Project objectives include increasing outdoor recreational park space to the public, including overburdened communities in the Project vicinity; providing an experience of urban river and habitat restoration for the local community as well as those outside of it; reestablishing access to the Los Angeles River for indigenous communities who regard the area as a sacred land; restoring and enhancing natural habitat along the Los Angeles River, including wetlands, to attract wildlife; providing educational opportunities with respect to historical, cultural, and environmental considerations; and advancing the goals of the Statewide Comprehensive Outdoor Recreation Plan (SCORP). Policy documents, including the Rio de Los Angeles General Plan and Los Angeles River Master Plan, have acknowledged the need for a reimagined and revitalized Los Angeles River and is a critical component of fulfilling the ecosystem restoration goals identified in the United States Army Corps of Engineers (USACE) Los Angeles River Ecosystem Restoration Feasibility Study.

2.3 Project Characteristics

The Proposed Project would result in the development of the property to restore it to a vibrant green space, focused on nature and passive recreation. Project implementation would require soil remediation to address previous site contamination associated with the former use as a railroad maintenance facility. Proposed Park improvements would consist of the following:

- A native plant demonstration garden to provide outdoor educational space;
- Several vista points facing the Los Angeles River;
- An event space within a historic turntable circular pit repurposed for larger crowds;
- Internal multi-use trails for walking and biking;
- Open meadow areas, picnic locations, and seating benches;

- A welcoming kiosk with restrooms (comfort station) housed within an earthen mound with a green roof (natural vegetation roof);
- A Park entry and internal vehicular access road with turnouts for passenger drop off/pick-up and a turnaround point;
- Parking spaces along the internal vehicular access road along the eastern perimeter of the Project Area; and
- An internal maintenance road for State Park maintenance staff, fire access route, and utility access easement.

The Proposed Project would create a direct connection and access to the Glendale Narrows section of the Los Angeles River and complements two additional projects planned for the site by creating and facilitating access among these projects: The Bowtie Wetland Demonstration Project (in partnership with The Nature Conservancy [TNC]) and the Paseo del Rio Riverfront Trail Project (in partnership with the Mountains Recreation and Conservancy Authority and the City of Los Angeles). The Proposed Project would be partially funded by a grant from the National Parks Service and Santa Monica Mountain Conservancy. The proposed conceptual site plan is illustrated in Figure 3.

2.4 Project Requirements (Standard Project Requirements [SPRs] and Project Specific Requirements [PSRs])

Under the CEQA guidelines, DPR is in a unique role as both the Lead Agency and a Trustee Agency. The Lead Agency is a public agency that has the primary responsibility for carrying out or approving a project and for implementing CEQA. A Trustee Agency is a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California. DPR takes this distinction with responsibility to ensure that its actions protect both cultural and natural resources on all projects.

However, DPR is also the Project Proponent. Because of its unique role as Lead Agency, Trustee Agency as well as the Project Proponent, DPR's resource professionals take a prominent and influential role during the Project conceptualization, design, and planning process consistent with Section 15004(b)(1) of CEQA. Their early involvement during the planning process enables environmental considerations to influence Project programming and design. This approach permits DPR under CEQA Section 15065(b)(1), to incorporate Project modifications prior to the start of the public review process of the environmental document, to avoid impacts to a point where clearly no significant effect on the environment would occur.

As part of its effort to avoid impacts, DPR also maintains a list of Project Requirements that are included in a project design to reduce impacts to resources. From this list, SPRs are assigned, as appropriate to all projects. These features are standard and do not constitute mitigation measures. For example, projects that include ground-disturbing activities, such as trenching would always include SPRs addressing the inadvertent discovery of archaeological artifacts. However, for a project that replaces a roof on an historic structure, ground disturbance would not be necessary; therefore, SPRs for ground disturbance would not be applicable and DPR would not assign it to the project.

DPR also makes use of PSRs. DPR develops these project requirements to address project impacts for projects that have unique issues but do not typically standardize these for projects statewide. These features are a part of project design and therefore do not constitute mitigation measures. As part of the Initial Study review process, DPR will utilize both SPRs and PSRs.

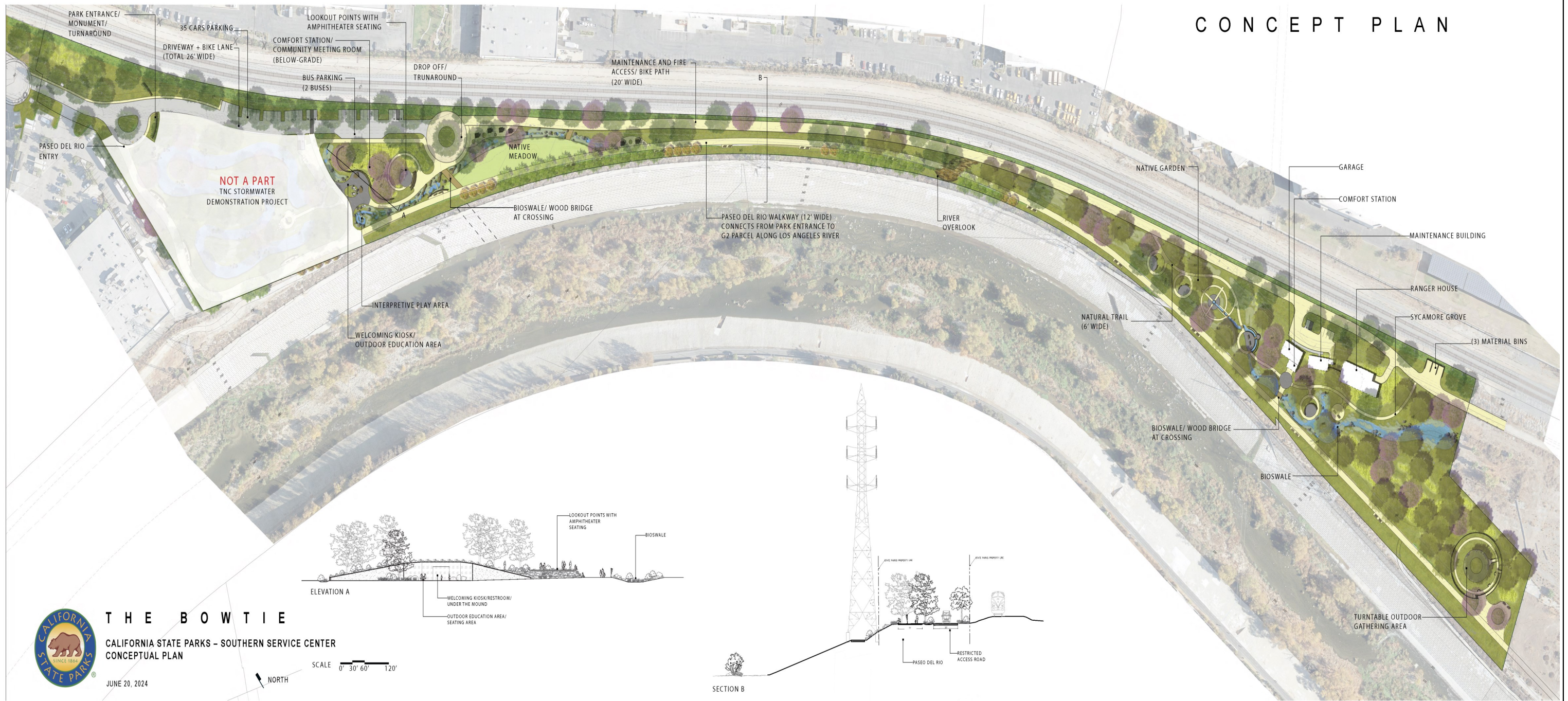
2.5 Project Timing

It is anticipated that construction would occur in late 2025 and would take approximately 24 months to complete.

2.6 Regulatory Requirements, Permits, and Approvals

The Proposed Project would require the following approvals and regulatory permits:

- Statewide Construction General Permit – State Water Resources Control Board (SWRCB)
- National Environmental Policy Act approval – USACE
- Removal Action Workplan – California Department of Toxic Substances Control (DTSC)
- Permitting – City of Los Angeles



2.7 Consistency with Programmatic and Planning Documentation

2.7.1 Rio De Los Angeles State Park General Plan and Programmatic Environmental Impact Report for Taylor Yard Parcels D and G-1

The Programmatic EIR for the Rio de Los Angeles State Park Project was certified by DPR (as CEQA Lead Agency) in June 2005. The EIR evaluates the planned development and management strategies developed in the General Plan for the approximate 37-acre property along the eastern banks of the Los Angeles River. The General Plan establishes a framework to build, restore, and maintain the DPR unit's natural resources and provide for recreational activities at the Park. The General Plan proposes a variety of traditional passive park uses such as habitat restoration, multi-purpose trails, special event areas, nature center, gardens, picnic areas, and other compatible uses. Interpretive and educational facilities would focus on the site's natural history along the Los Angeles River. Transitional open space zones are provided to buffer the Park from adjacent City park uses and trail connections are provided to connect the Park to other regional open space and recreational areas.

The EIR was prepared to analyze potential environmental impacts that may result from the implementation of the management goals and guidelines as well as the area-specific management and facility prescriptions that, together, constitute the General Plan.

The Rio de Los Angeles State Park General Plan and EIR serves as a first-tier EIR, as defined in Section 15166 of the CEQA Guidelines. Tiering in an EIR, particularly for a program-level project such as a general plan, allows agencies to consider broad environmental issues at the general planning stage. These environmental considerations are analyzed in greater detail in subsequent environmental documents when specific development projects and management programs are proposed. It should be noted that subsequent environmental documents would incorporate, by reference, the general analysis from this program-level EIR and would concentrate on the issues specific to the characteristics of subsequent projects (PRC Section 21093; CEQA Guidelines Section 15152).

The General Plan specifically envisions a series of focused management plans (Cultural Resources, Interpretive, Concessions) that will propose the activities to be carried out and will require CEQA compliance and public review as part of their approval. Future second-tier environmental review will be based on more detailed information about each proposed action, including facility size, location, and capacity. The environmental analysis for second-tier environmental review will be more specific and focused, identifying any significant environmental impacts and mitigation measures that are applicable to future projects. Future actions will also be evaluated for consistency with the General Plan.

The General Plan EIR concluded that implementation of the General Plan would not result in significant impacts on the environment, with the exception of potential impacts to soils and groundwater from contamination by previous industrial processes that occurred within the site from former uses prior to purchase by DPR.

The following are mitigation measures developed within the General Plan EIR and have been considered and implemented where applicable to the Project.

2.7.1.1 Mitigation Measure HAZ-1

Potential impacts from hazardous materials release during the construction-phase related to soil contamination should be reviewed at the Project level for specific facilities or management plans proposed under the Rio de Los Angeles State Park General Plan. Appropriate mitigation measures shall be implemented, and may include but not be limited to:

- Prior to earthwork and construction activities on Parcel G-1, the State shall submit the Project grading plans to DTSC for concurrence that the Project is cleared for recreational development and is consistent with approvals described in the *Explanation of Significant Differences for Union Pacific Railroad Company – Taylor Yard – Sale Parcel Site- Hump Yard Area* (January 30, 1998). Approval to proceed with the recreational development on Parcel D shall be documented in writing.
- During Project construction on Parcel G-1, soil sampling shall occur consistent with the requirements of DTSC in areas of heavy ground disturbance to ensure that construction workers and future Park users are not exposed to contaminated soil. Samples will be screened for petroleum hydrocarbons, soluble lead, volatile organic compounds, and semi-volatile organic compounds. If soil contamination levels are encountered that exceed regulatory standards, grading activities in the area(s) of contamination shall be halted until appropriate remediation measures are identified and approved by DTSC.
- If contaminated soils are encountered during construction on Parcels D and G-1, operations shall be stopped in the vicinity of the suspected impacted soil. Samples shall be collected and analyzed using appropriate collection and sampling techniques. If an area of contamination is identified, the department shall implement appropriate testing and handling of the soil to determine the appropriate disposal and treatment options. If the soils exceed the applicable screening criteria established by DTSC or are classified as hazardous (according to Resource Conservation and Recovery Act and CCR Title 22), soils shall be hauled to a Class I landfill or other appropriate soil treatment and recycling facility.

2.7.1.2 Mitigation Measure HAZ-2

Potential construction-phase hazardous materials release impacts related to groundwater contamination should be reviewed at the Project level for specific facilities or management plans proposed under the Rio de Los Angeles State Park General Plan. Appropriate mitigation measures shall be implemented, and may include but not limited to:

- If groundwater is encountered during Project grading or construction activities, construction shall be halted in the area until appropriate dewatering or avoidance measures are identified or other treatment is recommended or required by the Regional Water Quality Control Board (RWQCB) If dewatering is required, the Department shall procure a permit from the RWQCB for treatment and disposal of groundwater and shall comply with all provisions of the permit.

2.7.2 Final Feasibility Report and Environmental Impact Statement/Environmental Impact Report for the Los Angeles River Ecosystem Restoration Integrated Feasibility Report

The Integrated Feasibility Report (IFR) and Environmental Impact Statement (EIS)/EIR was prepared as a partial response to the resolution adopted by the Senate Committee on Public Works approved June 25, 1969, and Section 4018 of the Water Resources Development Act of 2007. The study's primary purpose is to restore approximately 11 miles of the Los Angeles River from Griffith Park to downtown Los Angeles through habitat reestablishment and reconnecting the River to major tributaries, its historic floodplain, and regional habitat zones of the local mountain ranges while maintaining existing levels of flood risk management. In addition to habitat restoration, a secondary Project objective is to provide recreational opportunities consistent with the restored ecosystem. Channelization has degraded the remaining habitat values of the River by straightening the River's course, diminishing its plant and wildlife diversity and quality, disconnecting it from its floodplain and significant ecological zones, and dramatically changing its appearance and function. The 11-mile reach analyzed in the EIS/EIR is identified as the Area with Restoration Benefits and Opportunities for Revitalization (ARBOR). The ARBOR reach contains a large portion of soft bottom area where existing native vegetation already exists making this portion of the River ideal for implementing the primary objectives of restoring habitat, increasing habitat connectivity, and increasing passive recreational opportunities identified in the IFR.

The IFR analyzed a range of potential environmental impacts that could result during construction and operation of the Proposed Project across the five action alternatives and the No Project alternative. Aside from impacts related to air quality and land use, all other impacts to environmental resource areas analyzed in the EIS/EIR were found to be less than significant with implementation of mitigation measures and/or Best Management Practices (BMPs), less than significant, or would have no impact. Significant and unavoidable air quality impacts under CEQA were identified for four of the five action alternatives evaluated due to the use of equipment during construction that were expected to exceed daily significance thresholds for nitrogen oxides. Significant and unavoidable land use impacts under CEQA were identified for all five action alternatives within Reach 8 and within both Reach 8 and 3 (Alternative 20 only) due to a conflict with the Industrial and Light Industrial land use designation within those areas.

A complete list of the mitigation measures and/or BMPs from the IFR EIS/EIR are listed below. These measures have been considered and implemented as necessary within the Proposed Project.

2.7.2.1 GEOLOGY

- Minimizing the extent of areas to be cleared, graded, or recontoured,
- Erecting construction fencing in all areas that require clearing, grading, revegetation, or recontouring,
- Conducting all construction work in accordance with site-specific construction plans that minimize the potential for sediment to enter the stream,

- Applying mulch or chemical stabilizers to disturbed areas as needed, and/or using a water truck to reduce fugitive dust,
- Stabilizing and reseeded disturbed areas with native grasses after construction is complete,
- Installing silt fences to prevent silt and sediment from entering the River channel,
- Grading spoil sites to minimize surface erosion and prevent sediment from entering water courses or the stream channel to the maximum extent feasible,
- Designing and implementing a dewatering plan to avoid operating equipment in flowing water by using temporary cofferdams or some other suitable diversion to divert channel flow around the channel and bank construction area, and
- Limiting certain aspects of in-channel construction to the low-flow period between April 15 and October 31 (non-flood season) to minimize soil erosion.
- Soils and all materials used for backfilling or stabilization must be certified to be free of contaminants.
- In-channel work would be isolated from existing flows by the use of dewatering structures such as cofferdams constructed from k-rails and other suitable materials.
 - Cofferdam construction will be adequate to prevent seepage into or from the work area.
 - Cofferdams may be constructed from sandbags, concrete k-rails, sheet piles or other appropriate materials that would not leach contaminants into the water column or increase downstream turbidity.
 - Ensure that dewatering structures and coffer dams are in place and functional prior to in-water work.
 - Visually inspect all cofferdam components on a regular basis.
 - Check for water seepage under the dam and general integrity of the dam.
 - Fix all leaks immediately.
 - If turbid water is discharged from the work area despite the cofferdam, place wattles, filter fabric, silt fencing across the flow stream downstream of the work area as appropriate.
 - All cofferdams and associated structures will be removed upon completion of work.
- Prepare a Storm Water Pollution Prevention Plan (SWPPP) consistent with RWQCB policy and guidelines. At a minimum, the SWPPP would include the following elements:
 - Work areas, staging areas, or stockpile areas that could be subject to erosion during storm events would be stabilized with erosion control measures as appropriate. These measures could typically include silt fencing, straw bales, sandbags, filter fabric, coir rolls or wattles.
 - Erosion control methods used to prevent siltation would be monitored weekly and maintained as needed.

- Stabilize and reseed disturbed upland areas with native grasses, shrubs, and trees upon completion of construction.
- Stationary equipment such as motors, pumps, generators, and welders located within or adjacent to the channel or basin will be positioned over drip pans.
- Any equipment or vehicles driven and/or operated within or adjacent to the channel or basin should be checked and maintained daily, to prevent leaks. All maintenance will occur in a designated offsite area. The designated area will include a drain pan or drop cloth and absorbent material to clean up spills.
- Fueling and equipment maintenance will be done in a designated area removed from the area of the channel or basin such that no petroleum products or other pollutants from the equipment may enter these areas via rainfall or runoff. The designated area will include a drain pan or drop cloth and absorbent materials to clean up spills.
- Materials for the containment of spills (i.e., absorbent materials, silt fencing, filter fabric, coir rolls) will be identified and be available onsite prior to commencement of construction or maintenance activities.
- Any accidental spill of hydrocarbons or coolant that may occur within the work area will be cleaned immediately. Absorbent materials will be maintained within the work area for this purpose.
- No wet concrete product will come into contact with any flowing or standing water at any time. Areas where raw cement or grout are applied or where concrete curing or finishing operations are conducted will be separated from any ponded or diverted water flows by a cofferdam or silt-free, exclusionary fencing. All equipment involved with the concrete or grouting operations will be located within a contained area while using any slurry or concrete product. A protective berm or other structure will be in place prior to maintenance and/or repair activities.
- Any spill of the grout, concrete, concrete curing, or wash water adjacent to or within the work area will be removed immediately.

2.7.2.2 AIR QUALITY

- Tier 4 equipment and haul trucks no older than 2010 would be utilized to the extent practicable during construction years when emissions are expected to exceed Local Significance Thresholds.
- Mobile Emissions Attenuating Measures:
 - Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
 - Provide dedicated turn lanes for movement of construction trucks and equipment on- and offsite.
 - Reroute construction trucks away from congested streets or sensitive receptor areas.
 - Utilize electricity from power poles rather than temporary diesel or gasoline power generators to the extent practicable.
- Fugitive Dust Attenuating Measures:

- Appoint a construction relations officer to act as a community liaison concerning onsite construction activity including resolution of issues related to Particulate Matter Less than 10 Microns in Diameter (PM₁₀) generation.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour.
- Require frequent street sweeping surrounding the Project Area to minimize fugitive dust emissions from track-out. All street sweeping shall use alternatively fueled sweepers that are equivalent to those specified in South Coast Air Quality Management District (SCAQMD) Rules 1186 and 1186.1.
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturer's specifications, to all unpaved parking or staging areas or unpaved road surfaces.
- Replace ground cover in disturbed areas as quickly as possible.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).

2.7.2.3 WATER RESOURCES

- Limiting most in-channel construction to the low-flow period between April 15 and October 30 to minimize soil erosion.
- Soils and all materials used for backfilling or stabilization must be certified to be free of contaminants.
- All sites with known and suspected hazardous, toxic, and radioactive waste (HTRW) soil contamination will be investigated and remediated prior to Project construction. All groundwater contamination that cannot be remediated prior to Project construction will be subject to appropriate handling, treatment and disposal ensured by the non-Federal sponsor. All work shall be consistent with Engineering Regulations 1165-2-132.
- In-channel work would be isolated from existing flows by the use of dewatering structures such as cofferdams constructed from k-rails and other suitable materials.
 - Cofferdam construction will be adequate to prevent seepage into or from the work area.
 - Cofferdams may be constructed from sandbags, concrete k-rails, sheet piles or other appropriate materials that would not leach contaminants into the water column or increase downstream turbidity.
 - Ensure that dewatering structures and coffer dams are in place and functional prior to in-water work.
 - Visually inspect all cofferdam components on a regular basis.
 - Check for water seepage under the dam and general integrity of the dam.
 - Fix all leaks immediately.

- If turbid water is discharged from the work area despite the cofferdam, place wattles, filter fabric, silt fencing across the flow stream downstream of the work area as appropriate.
 - All cofferdams and associated structures will be removed upon completion of work.
- Require the construction contractor to prepare a SWPPP consistent with State Water Board policy and guidelines. At a minimum, the SWPPP would include the following elements:
- Work areas, staging areas, or stockpile areas that could be subject to erosion during storm events would be stabilized with erosion control measures as appropriate. These measures could typically include silt fencing, straw bales, sandbags, filter fabric, coir rolls or wattles.
 - Erosion control methods used to prevent siltation would be monitored weekly and maintained as needed.
 - Stabilize and reseed disturbed upland areas with native grasses, shrubs, and trees upon completion of construction.
 - Stationary equipment such as motors, pumps, generators, and welders located within or adjacent to the channel or basin will be positioned over drip pans.
 - Any equipment or vehicles driven and/or operated within or adjacent to the channel or basin should be checked and maintained daily, to prevent leaks. All maintenance will occur in a designated offsite area. The designated area will include a drain pan or drop cloth and absorbent material to clean up spills.
 - Fueling and equipment maintenance will be done in a designated area removed from the area of the channel or basin such that no petroleum products or other pollutants from the equipment may enter these areas via rainfall or runoff. The designated area will include a drain pan or drop cloth and absorbent materials to clean up spills.
 - Materials for the containment of spills (i.e., absorbent materials, silt fencing, filter fabric, coir rolls) will be identified and be available onsite prior to commencement of construction or maintenance activities.
 - Any accidental spill of hydrocarbons or coolant that may occur within the work area will be cleaned immediately. Absorbent materials will be maintained within the work area for this purpose.
 - No wet concrete product will come into contact with any flowing or standing water at any time. Areas where raw cement or grout are applied or where concrete curing or finishing operations are conducted will be separated from any ponded or diverted water flows by a cofferdam or silt-free, exclusionary fencing. All equipment involved with the concrete or grouting operations will be located within a contained area while using any slurry or concrete product. A protective berm or other structure will be in place prior to maintenance and/or repair activities.
 - Any spill of the grout, concrete, concrete curing, or wash water adjacent to or within the work area will be removed immediately.

2.7.2.4 BIOLOGICAL RESOURCES

- To the maximum extent practicable, vegetation clearing activities would not occur during the breeding season, which generally runs from February 15 to August 31.
- If vegetation removal must occur during the breeding season, a qualified biologist would perform nesting bird surveys following established protocol prior to construction. If nests are detected during these surveys, a 300-foot no construction buffer would be delineated around the nest (500-foot buffer for raptors).
- Construction would be monitored by a qualified biologist.
- Construction would be phased to minimize impacts to wildlife species, so that the entire study area would not be under construction at the same time.
- Pre-construction surveys for special-status plants and wildlife would be performed as needed in coordination with U.S. Fish and Wildlife Service (USFWS).
- Protocol level surveys for least Bell's vireo (LBVI) would be performed during the detailed design phase and prior to construction to avoid impact to this species. If paired and potentially nesting vireo or other listed species are found, DPR will coordinate with USFWS and consult as applicable, if it is determined that the Project would affect the species.
- Trails and other recreational features will be designed and located to be compatible with restoration features and goals.

2.7.2.5 CULTURAL RESOURCES

- An archaeologist meeting the Secretary of the Interior's Qualification Standards, or another qualified individual as determined by DPR in consultation with USACE shall monitor all construction activities in areas where there is a potential for buried resources. The monitor shall immediately notify the Project's on-site construction supervisor of any discovery. The Project on-site construction supervisor shall temporarily stop construction in the area of the discovery. The discovery area and a surrounding buffer zone shall then be clearly delineated. Ground disturbing activities can resume outside the delineated buffer zone. Should previously unknown historic or archaeological remains be discovered, the DPR and USACE would comply with 36 Code of Federal Regulations (CFR) 800.13. At the conclusion of monitoring activities, a detailed letter report shall be prepared. This report shall be submitted to the State Historic Preservation Officer (SHPO) for review and comment.
- When construction crews are working within 50 meters of an eligible or unevaluated cultural resource, the edge of the site, including a 25-meter site buffer will be fenced off, thus ensuring that no construction equipment inadvertently strays into the culturally sensitive area.

- Cultural resource block inventories and evaluations shall be conducted early in the next design phase so that avoidance and impact minimization measures for cultural resources can be incorporated into Project design.
- Recordation and evaluation of the constructed features of the flood risk management system on the river and lower tributaries within the Area of Potential Effect (APE) will be prioritized in preconstruction, engineering, and design. The recordation and evaluation shall be conducted in one effort and in reference to and in the context of the entirety of the flood risk management system constructed on the Los Angeles River and lower tributaries.
- Comply with the terms and conditions of the Programmatic Agreement executed by and between the Corps and SHPO, and any amendments thereto.

2.7.2.6 NOISE

- Develop and implement a Project noise control plan that identifies when construction activities would occur and where and how avoidance measures shall be used. Construction activities would generally occur between the hours of 8 a.m. and 6 p.m. Monday through Friday, and 8 a.m. and 5 p.m. Saturday. Construction and operations would not occur on Sunday or a national holiday. The plan will require the identification of a Noise Control Coordinator, who will be available to receive and respond to any concerns from residents regarding construction noise. Residents shall be notified prior to the start of construction activities and informed of the Coordinator's contact information. Signage will also be posted on the construction site with Coordinator's contact information.
- Use power construction equipment state-of-the-art noise shielding and muffling devices.
- Whenever construction occurs within 500 feet of occupied residences, temporary barriers shall be constructed around the construction sites to shield the ground floor of the noise-sensitive uses. These barriers shall be of ¾-inch medium density plywood sheeting, or equivalent, and shall achieve a Sound Transmission Class of 30 or greater, based on certified sound transmission loss data taken according to American Society for Testing and Materials Test Method E90 or as approved by the City Building Department.
- Construction equipment staging areas shall be located as far as practicable from residential areas.
- Quieter "sonic" pile drivers shall be used as necessary, unless engineering studies are submitted to the City showing this is not feasible and cost effective, based on geotechnical considerations.
- Routes for heavy construction site vehicles shall be identified to minimize noise impacts to residences and noise-sensitive receptors.
- Impose construction hours that are more restrictive than those set forth in the City Municipal Code (LAMC) if necessary and when practical.
- Require vehicle parking and deployment activities to be separated and buffered from sensitive uses.

- Limit haul truck or other vehicle speed on roads adjacent to residences and on unpaved roadways.
- Notify residents about type and schedule of construction.

2.7.2.7 TRAFFIC

- (P 5-104) A construction traffic management plan would be prepared and submitted to Los Angeles Department of Transportation (LADOT) for review and approval prior to Project implementation to ensure that construction impacts are minimized. The plan would include:
 - Designated routes and access points for construction vehicles and equipment,
 - Any turning movement restrictions,
 - Travel time restrictions to avoid peak travel periods on selected roadways, and
 - Designated staging and parking areas for workers and equipment.
- The location and duration of any lane or street closures, including impacts on public transit, railroads, bicycle lanes, sidewalks, and parking would be fully coordinated with local cities and nearby residents,
- Detour routes would be provided if needed (including detour routes for public transit, bicycles, and pedestrians when effected),
- Local traffic and emergency vehicle access would be maintained or accommodated,
- Traffic protective devices and control measures would be implemented such as barricades, cones, flaggers, lights, warning beacons, temporary turning restrictions, temporary traffic signals, and warning signs,
- Advance notice would be provided to affected residents, businesses, emergency services providers (police, fire, ambulance) and public transit providers,
- Temporary bus stops would be located within a reasonable walking distance of any displaced bus stops when public transit stops are affected,
- Safety improvements would be made to existing at-grade street-rail crossings where traffic increases would be expected, and
- The Project would coordinate with railroad companies to ensure continuous operation and appropriate safety measures.

2.7.2.8 RECREATION

- Public media/meetings to provide clear information on the types and durations of disruptions to the River and adjacent resources.
- Signed detour routes for affected roads as well as pedestrian, bicycle, and equestrian trails, and river access points.

- Signage at construction areas with information relevant to recreation users (length of closure, alternative access points, etc.).
- Working with Park representatives on timing of Park and golf club closures to minimize effects on recreational access and use.
- Consult with Park maintenance personnel prior to implementation of measures to coordinate maintenance during construction and operations.

2.7.2.9 PUBLIC HEALTH AND SAFETY

- Fire extinguishers or other firefighting equipment (such as drums of water) would be close at hand during construction, regularly inspected, and maintained in proper working condition.
- Equipment with internal combustion engines would be placed so that exhaust is not near combustible materials.
- Combustible or flammable materials would be properly stored and proper clearance around these materials would be maintained.
- City will coordinate as needed with Vector Control agencies after Project completion.
- A rigorous review of the HTRW sites identified as those with potential impacts on the Project would be conducted. The review would include obtaining and reviewing regulatory files, site visits, and discussions with regulators and others about the severity of the contamination. Following this review, Phase I or II environmental site assessments would be conducted as necessary. In areas where existing information is limited, environmental investigations shall follow industry approved protocols for conducting Phase I and Phase II investigations as needed. The sponsor shall not provide lands for Project construction without first ensuring that it has undertaken adequate investigation and determined there is no contamination of concern for the relevant parcel or, where contamination is identified, has remediated or ensured remediation of the parcel to the standards necessary to support the restoration Project, as agreed by the relevant regulatory agency and USACE. Coordination and consultation with the appropriate regulatory agencies, including the U.S. Environmental Protection Agency (USEPA) and California lead agency (usually the Los Angeles RWQCB or the DTSC), and responsible parties, as necessary, would begin as early as possible regarding investigation and remediation at the San Fernando Valley Superfund Site and Taylor Yard G1 and G2 sites, as well as the Los Angeles Trailer and Container Intermodal Facility LATC site as needed. The City would conduct remediation at contaminated sites prior to construction of restoration features at those sites.
- Prior to the start of construction, the USACE will develop engineering specifications and plans that will include a written environmental protection plan. This plan will include a written pollution prevention plan that outlines the actions needed to respond to spill or release of hazardous materials during construction or maintenance activities. The environmental protection plan would describe hazardous materials management and spill prevention and response methods. The plan would be reviewed with all site workers.

- A site-specific health and safety plan would be prepared and reviewed with all workers detailing methods of compliance with occupational health and safety regulations, emergency response actions, and include the route to the nearest emergency medical facility. Relevant paperwork such as Material Safety Data Sheets and chain of custody documents recording the transport and disposal of hazardous material and waste would be maintained and available for inspection.
- All hazardous materials would be completely removed from the site when construction or maintenance activities were completed, if not before.
- Construction site would be fenced to prevent unauthorized access.

2.7.2.10 UTILITIES AND PUBLIC SERVICES

- Development of a utility management plan
- Obtaining a Private Solid Waste Hauler permit from the City's Bureau of Sanitation prior to collecting, hauling, and transporting waste.
- Recycling/reuse of construction debris to the extent possible.
- Disposing of excess debris to City certified waste processing facility.

2.8 Consultation With California Native American Tribe(s)

On October 26, 2020, DPR contacted the California Native American Heritage Commission (NAHC) to request a search of the Sacred Lands File and a list of tribal contacts for the Bowtie parcel. On November 9, 2020, the NAHC responded and indicated that the search of the Sacred Lands File was positive, meaning that there is a recorded sacred land in the vicinity. The NAHC provided a list of tribal contacts who may have additional information.

On February 4, 2021, DPR contacted the following individuals to invite them to consult on the Bowtie Wetland Demonstration Project.

- Gabrielino-Tongva Tribe, Charles Alvarez, Chairperson
- Fernandeno Tataviam Band of Mission Indians, Jairo Avila, Tribal Historic and Cultural Preservation Officer
- Gabrielino Tongva Indians of California Tribal Council, Robert Dorame, Chairperson
- Gabrielino/Tongva Nation, Sandonne Goad, Chairperson
- Gabrieleno/Tongva San Gabriel Band of Mission Indians, Anthony Morales, Chairperson
- Gabrieleno Band of Mission Indians – Kizh Nation, Andrew Salas, Chairperson

On June 19, 2023, DPR contacted the following individuals to invite them to consult on the Project:

- Gabrielino-Tongva Tribe, Charles Alvarez, Chairperson

- Fernandeno Tataviam Band of Mission Indians, Sarah Brunzell, CRM Manager
- Gabrielino Tongva Indians of California Tribal Council, Christina Conley, Cultural Resource Administrator
- Gabrielino Tongva Indians of California Tribal Council, Robert Dorame, Chairperson
- Gabrielino/Tongva Nation, Sandonne Goad, Chairperson
- Gabrieleno/Tongva San Gabriel Band of Mission Indians, Anthony Morales, Chairperson
- Gabrieleno Band of Mission Indians – Kizh Nation, Andrew Salas, Chairperson

Each recipient was provided a brief description of the Project and its location, the lead agency (DPR) contact information, and a notification that the tribe has 30 days to request consultation, pursuant to PRC Section 21080.3.1(d). Phone calls and follow-up emails were made to reach non-responsive representatives. As a result of the initial notification letters and follow-up contacts, DPR received the following responses:

- On June 19, 2023, Sarah Brunzell of the Fernandeno Tataviam Band of Mission Indians responded by email to decline consultation on the Project.
- On June 26, 2023, Christina Conley from the Gabrielino Tongva Indians of California Tribal Council responded to request consultation and a monitor during all ground disturbing activities. On December 4, 2023, tribal representatives met with DPR via virtual meeting to discuss the Project. The tribe provided comments on the use of traditional plants in the revegetation. Concern was expressed over public access to certain traditional native plants.
- On March 2, 2023, Kimberly Johnson of the Gabrieleno/Tongva San Gabriel Band of Mission Indians was contacted by phone to discuss the Project's Native Spirit Garden design concept conceptualized by the late elder Barbara Drake. A follow-up call was conducted on September 18, 2023. No response to date has been received to set up a meeting on the Park development concept. Therefore, pursuant to Section 21082.3(d)(2) of the Public Resources Code, DPR concluded consultation with the Gabrieleno/Tongva San Gabriel Band of Mission Indians.
- On June 20, 2023, Brandy Salas of the Gabrieleno Band of Mission Indians – Kizh Nation requested consultation. On October 12, 2023, tribal representatives met with DPR via virtual meeting to discuss Park development. The tribe provided comments on the placement and type of biological habitat for revegetation.
- All other tribes did not respond to the opportunity to consult; therefore, DPR considers consultation concluded with the remaining tribes pursuant to Section 21082.3(d)(3) of the Public Resources Code.

Consultation is ongoing with the Gabrielino Tongva Indians of California Tribal Council and Gabrieleno Band of Mission Indians – Kizh Nation; however, the threshold for releasing the CEQA document for public review (PRC Section 21080.3.1(b)) has been met. DPR will conclude consultation with these two remaining tribes prior to the certification of the EIR pursuant to PRC Section 21082.3(d).

Section 4.18 of this IS/MND provides a summary of the consultation process, including the determination of significance of impacts to tribal cultural resources (TCRs).

3.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED AND DETERMINATION

3.1 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the Project, involving at least one impact that is a *Potentially Significant Impact*, as indicated by the checklist on the following pages.

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Hazards/Hazardous Materials | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities and Service Systems |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Paleontological Resources | <input type="checkbox"/> Mandatory Findings of Significance |
| <input type="checkbox"/> Geology and Soils | <input type="checkbox"/> Population and Housing | |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services | |

Determination

On the basis of this initial evaluation:

- I find that the Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. ☐
- I find that although the Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. ☒
- I find that the Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. ☐
- I find that the Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. ☐
- I find that although the Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Project, nothing further is required. ☐

Richard Fink
District Superintendent

Date

3.2 Evaluation of Environmental Impacts

Evaluation Process

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less-Than-Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

- 7) Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question.
 - b) The mitigation measure identified, if any, to reduce the impact to less than significant.

4.0 ENVIRONMENTAL CHECKLIST AND DISCUSSION

4.1 Aesthetics

4.1.1 Environmental Setting

4.1.1.1 Regional Setting

State Scenic Highways

The California Scenic Highway Program protects and enhances the scenic beauty of California's highways and adjacent corridors. The California Department of Transportation (Caltrans) can designate a highway as scenic based on how much natural beauty can be seen by users of the highway, the quality of the scenic landscape, and if development impacts the enjoyment of the view.

SR-2 is the closest officially designated state scenic highway. However, it does not become a scenic highway until it reaches the San Gabriel Mountains approximately 11 miles north of the Project Area, where its name changes to the Angeles Crest Highway. Arroyo Seco Parkway (SR-110), an official Federal Byway, connects the City of Los Angeles to Pasadena approximately 2 miles southeast of the Project Area (Caltrans 2023).

General Plan

The City has four designated scenic highways within a 3.5-mile radius of the Project Area: Los Feliz Boulevard, Glendale Boulevard, Eagle Rock Boulevard, and Colorado Boulevard. The scenic portion of Los Feliz Boulevard runs from Western Avenue to Riverside Drive and exposes viewers to hillside and city views. The scenic section of Glendale Boulevard offers a wide landscaped median and stretches from the Los Angeles River Bridge to the City boundary with Glendale. The Eagle Rock Boulevard scenic section offers a landscaped median and runs from Verdugo Road to Colorado Boulevard. The scenic stretch of Colorado joins Eagle Rock Boulevard at Eagle Dale and continues to Monte Bonito (City of Los Angeles 2016).

4.1.1.2 Visual Character of the Project Area

The Project Area is a 14.8-acre riverfront strip of land on the east bank of the Los Angeles River near the Glendale Freeway (SR-2). Due to its shape, this parcel is typically referred to as the "bowtie." Overall, the Project Area is flat, devoid of structures, and has limited vegetation. A few piles of rubble, concrete pads, small trees, and isolated patches of vegetation are visible on this otherwise barren dirt lot. Large overhead utility lines parallel the Los Angeles River on the Project parcel. Industrial buildings border the lot on the north, while to the east lie an elevated railroad track and at-grade service road. Further north lies the Heron Gates and historic bridges spanning the Los Angeles River.

Aesthetics (I) Environmental Checklist and Discussion**Except as provided in Public Resources Code Section 21099, would the Project:**

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

The Project Area runs along the Los Angeles River and offers views of the surrounding Verdugo and San Gabriel Mountains to the far north. The views from the Project Area down the River include the Glendale Narrows. In the Los Angeles basin and along the River there is a severe shortage of native plants and natural vegetation. The Proposed Project would establish open space and would add to the Los Angeles regional green open space network and connection to the Los Angeles River landscape. No adverse impacts would occur. The conversion of the Project Area to open space with native and natural vegetation would be a beneficial Project effect.

Except as provided in Public Resources Code Section 21099, would the Project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

The Project Area is generally vacant, but remnants of the former use remain such as remnant concrete pads, railroads, and structure foundations; overhead electrical utility poles are present throughout. A few piles of rubble, small trees, and isolated patches of vegetation are also visible. The Proposed Project would create natural habitat and passive recreation opportunities. The proposed greenspace would include habitat restoration and enhancement; viewing opportunities for wildlife; walking, jogging, and biking trails, shaded picnic areas; historical, cultural, and environmental programming; and unstructured play areas. Scenic resources, such as the adjacent Los Angeles River, would not be damaged as a result of the Project but would become further accessible based on the addition of new pathways and recreation areas for public use. There are small trees in the Project Area, however they are non-native and not considered scenic resources. Additionally, the Proposed Project is not located within or near a state scenic highway. No impact would occur.

Except as provided in Public Resources Code Section 21099, would the Project:

- c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact.

The Proposed Project is in an urbanized area on a parcel which contains no structures. A few piles of rubble, concrete pads, small trees, and isolated patches of vegetation are visible. Industrial buildings border the parcel on the north and an elevated railroad track and at-grade service road border the parcel on the east. To the west is the Los Angeles River. The surrounding area is characterized by industrial and residential uses. The existing zoning designation of the Project Area is public facilities as it is a sub-unit of the existing Rio de Los Angeles State Park. The Project does not conflict with the current zoning or regulations governing scenic quality. No impact would occur.

Except as provided in Public Resources Code Section 21099, would the Project:

- d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less than Significant Impact.

The proposed Park improvements would include a Park entry and internal vehicular access road, parking spaces, internal maintenance road, welcoming kiosk with restrooms, vista points facing the Los Angeles River, native collection garden, event space, internal multi-use trails, open turf areas, picnic locations, and seating benches. The welcoming kiosk would be within an earthen mound with a green roof (natural vegetation roof), thus reducing any glare from the building. Where night lighting is necessary, lighting would be directed downward and new exterior lighting would be located such that it is not highly obtrusive. Impacts relating to light or glare would be less than significant.

4.1.2 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.2 Agriculture and Forestry Resources

4.2.1 Environmental Setting

“Forest land” as defined by PRC Section 12220(g) is “...land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.”

“Timberland” as defined by PRC Section 4526 means “...land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis.”

“Timberland zoned Timberland Production” is defined by PRC Section 51104(g) as “...an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision h.”

According to the California Department of Conservation (DOC) Important Farmland Finder, the Project Area is classified as Urban and Built-Up Land. The surrounding area consists of Urban and Built-Up Land and Other Land. The Project Area is not located on or near Farmland, nor is it under a Williamson Act Contract (DOC 2023).

4.2.2 Agriculture and Forestry Resources (II) Environmental Checklist and Discussion

Would the Project:	Less than Significant			
	Potentially Significant Impact	With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

The Project Area is characterized by urban (residential and industrial) uses. According to the California Important Farmland Finder, the Project Area is classified as Urban and Built-Up Land. Therefore, the Proposed Project would not be located on land classified as prime farmland, unique farmland, or farmland of statewide importance (DOC 2023). No impact would occur, and no mitigation is required.

Would the Project:

- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Potentially
Significant
Impact☐Less than
Significant
With
Mitigation
Incorporated☐Less than
Significant
Impact☐No
Impact☒**No Impact.**

The Project Area is not located on land zoned for agricultural use. According to the California Important Farmland Finder, the Project Area is mapped as Urban and Built-Up Land and not an agricultural preserve subject to a Williamson Act contract (DOC 2023). The Proposed Project would not conflict with zoning for agricultural use or a Williamson Act Contract. No impact would occur, and no mitigation is required.

Would the Project:

- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

Potentially
Significant
Impact☐Less than
Significant
With
Mitigation
Incorporated☐Less than
Significant
Impact☐No
Impact☒**No Impact.**

The Project Area is currently zoned for public facilities. The Project is surrounded by residential and industrial uses and is not located on land designated for forest land, timberland, or timberland zoned timberland production. No impact would occur.

Would the Project:

- d) Result in the loss of forest land or conversion of forest land to non-forest use?

Potentially
Significant
Impact☐Less than
Significant
With
Mitigation
Incorporated☐Less than
Significant
Impact☐No
Impact☒**No Impact.**

As described above, the Project Area is not zoned for forest land, timberland, or timberland production (DOC 2023). Therefore, the Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

Would the Project:		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
e)	Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

The Project Area and surrounding properties are not currently designated for agricultural use. As previously described, the Project Area is on land classified as Urban and Built-Up Land. The surrounding area consists of Urban and Built-Up Land and Other Land. Development on the Project Area would not result in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use. No impact would occur.

4.2.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.3 Air Quality

4.3.1 Environmental Setting

The Proposed Project is located within the City of Los Angeles. The California Air Resources Board (CARB) has divided California into regional air basins according to topographic features. Los Angeles is located in a region identified as the South Coast Air Basin (SoCAB). The SoCAB occupies the non-desert portions of Los Angeles, Riverside, and San Bernardino counties and all of Orange County. The air basin is on a coastal plain with connecting broad valleys and low hills and is bounded by the Pacific Ocean on the southwest, with high mountains forming the remainder of the perimeter. The mountain ranges to the east affect the diffusion of pollutants by inhibiting the eastward transport of pollutants. Air quality in the SoCAB generally ranges from fair to poor and is similar to air quality in most of coastal Southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions.

Ambient air quality is commonly characterized by climate conditions, the meteorological influences on air quality, and the quantity and type of pollutants released. The air basin is subject to a combination of topographical and climatic factors that reduce the potential for high levels of regional and local air pollutants. The following section describes the pertinent characteristics of the air basin and provides an overview of the physical conditions affecting pollutant dispersion in the Project Area.

Both the USEPA and CARB have established ambient air quality standards for common pollutants. These ambient air quality standards are levels of contaminants representing safe levels that avoid specific adverse health effects associated with each pollutant. The ambient air quality standards cover what are

called “criteria” pollutants because the health and other effects of each pollutant are described in criteria documents. The six criteria pollutants are ozone (O₃), carbon monoxide (CO), particulate matter (PM), nitric oxide (NO_x), sulfur dioxide (SO₂), and lead. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas.

Toxic Air Contaminants (TACs) are separated into categories of carcinogens and noncarcinogens. Carcinogens, such as diesel particulate matter (DPM), are considered dangerous at any level of exposure. Noncarcinogens, however, have a minimum threshold for dangerous exposure. Common sources of TACs include, but are not limited to: gas stations, dry cleaners, diesel generators, ships, trains, construction equipment, and motor vehicles.

4.3.1.1 *Ambient Air Quality*

Ambient air quality in the Project Area can be inferred from ambient air quality measurements conducted at nearby air quality monitoring stations. CARB maintains more than 60 monitoring stations throughout California. O₃, PM₁₀ and Particulate Matter Less than 2.5 Microns in Diameter (PM_{2.5}) are the pollutant species most potently affecting the Project region. As described in detail below, the region is designated as a nonattainment area for the federal O₃ and PM_{2.5} standards and is also a nonattainment area for the state standards for O₃, PM_{2.5} and PM₁₀ (CARB 2020; 2018). The North Main Street air quality monitoring station (1630 North Main Street) located approximately 2.4 miles south of the Project Area monitors ambient concentrations of O₃, PM_{2.5}, and PM₁₀. Ambient emission concentrations will vary due to localized variations in emission sources and climate and should be considered “generally” representative of ambient concentrations in the Project Area.

Table 4.3-1 summarizes the published data concerning O₃, PM_{2.5} and PM₁₀ since 2019 for each year that the monitoring data is provided.

Table 4.3-1. Summary of Ambient Air Quality Data			
Pollutant Standards	2019	2020	2021
O₃			
Max 1-hour concentration (ppm)	0.093	0.185	0.099
Max 8-hour concentration (ppm) (State/federal)	* / 0.080	* / 0.118	0.109 / 0.085
Number of days above 1-hour standard (State/federal)	0 / *	14 / *	1 / *
Number of days above 8-hour standard (State/federal)	2 / 2	22 / 22	2 / 2
PM₁₀			
Max 24-hour concentration (µg/m ³) (State/federal)	93.9 / 62.4	185.2 / 83.7	138.5 / 64.0

Table 4.3-1. Summary of Ambient Air Quality Data

Pollutant Standards	2019	2020	2021
Number of days above 24-hour standard (State/federal)	* / *	35.6 / *	17.2 / 0.0
PM_{2.5}			
Max 24-hour concentration (µg/m ³) (State/federal)	43.5 / 43.5	175.0 / 175.0	61.1 / 61.0
Number of days above federal 24-hour standard	1.0	12.1	13.0

Notes: ppm = parts per million; PM₁₀ = Particulate Matter Less than 10 Microns in Diameter; PM_{2.5} = Particulate Matter Less than 2.5 Microns in Diameter; µg/m³ = micrograms per cubic meter; * = Insufficient data available.

Source: CARB 2022a.

The USEPA and CARB designate air basins or portions of air basins and counties as being in “attainment” or “nonattainment” for each of the criteria pollutants. Areas that do not meet the standards are classified as nonattainment areas. Acceptable exceedances of the maximum value vary for the National Ambient Air Quality Standards (NAAQS) from 4th highest concentration for the 8-hour O₃ standard to 99th percentile to the SO₂ standard. The NAAQS for O₃, PM₁₀, and PM_{2.5} are based on statistical calculations over one- to three-year periods, depending on the pollutant. The California Ambient Air Quality Standards (CAAQS) are not to be exceeded during a three-year period. The attainment status for the Los Angeles portion of the SoCAB, which encompasses the Project Area, is included in Table 4.3-2.

Table 4.3-2. Attainment Status of Criteria Pollutants in the Los Angeles County Portion of the SoCAB

Pollutant	State Designation	Federal Designation
O ₃	Nonattainment	Nonattainment
PM ₁₀	Nonattainment	Attainment
PM _{2.5}	Nonattainment	Nonattainment
CO	Attainment	Unclassified/Attainment
NO ₂	Attainment	Unclassified/Attainment
SO ₂	Attainment	Unclassified/Attainment
Lead	Attainment	Nonattainment

Notes: CO = carbon monoxide; NO₂ = nitrogen dioxide; O₃ = Ozone; PM₁₀ = Particulate Matter Less than 10 Microns in Diameter; PM_{2.5} = Particulate Matter Less than 2.5 Microns in Diameter; SO₂ = sulfur dioxide.

Source: CARB 2020, 2018.

The determination of whether an area meets the state and federal standards is based on air quality monitoring data. Some areas are unclassified, which means there is insufficient monitoring data for determining attainment or nonattainment. Unclassified areas are typically treated as being in attainment. Because the attainment/nonattainment designation is pollutant-specific, an area may be classified as nonattainment for one pollutant and attainment for another. Similarly, because the state and federal standards differ, an area could be classified as attainment for the federal standards of a pollutant and as nonattainment for the state standards of the same pollutant. The region is designated as a nonattainment area for the federal O₃, PM_{2.5}, and lead standards and is also a nonattainment area for the state standards for O₃, PM_{2.5} and PM₁₀ (CARB 2020; 2018). It is noted that the Project would not be a source of lead emissions.

4.3.1.2 Regulatory Setting

South Coast Air Quality Management District

The local air quality regulating authority in Los Angeles City portion is the SCAQMD. The SCAQMD's primary responsibility is ensuring that the NAAQS and CAAQS are attained and maintained in the Los Angeles City portion of the SoCAB. The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, and conducting public education campaigns, as well as many other activities. All projects are subject to SCAQMD rules and regulations in effect at the time of construction.

The following is a list of noteworthy SCAQMD rules that are required of construction activities associated with the Proposed Project:

- **Rule 201 & Rule 203 (Permit to Construct & Permit to Operate)** – Rule 201 requires a "Permit to Construct" prior to the installation of any equipment "the use of which may cause the issuance of air contaminants . . ." and Regulation II provides the requirements for the application for a Permit to Construct. Rule 203 similarly requires a Permit to Operate.
- **Rule 212 (Standards for Approving Permits and Issuing Public Notice)**- This rule requires the applicant to show that the equipment used of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, is so designed, controlled, or equipped with such air pollution control equipment that it may be expected to operate without emitting air contaminants in violation of Section 41700, 4170 or 44300 of the Health and Safety Code or of these rules.
- **Rule 402 (Nuisance)** – This rule prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to

odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

- **Rule 403 (Fugitive Dust)** – This rule requires fugitive dust sources to implement the best available control measures for all sources, and all forms of visible PM are prohibited from crossing any property line. This rule is intended to reduce PM10 emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM10 suppression techniques are summarized below.
 - A. Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
 - B. All onsite roads will be paved as soon as feasible or watered periodically or chemically stabilized.
 - C. All material transported offsite will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
 - D. The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
 - E. Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the workday to remove soil tracked onto the paved surface.
- **Rule 1113 (Architectural Coatings)** – This rule requires manufacturers, distributors, and end-users of architectural and industrial maintenance coatings to reduce emissions of Reactive Organic Gases (ROG) from the use of these coatings, primarily by placing limits on the ROG content of various coating categories.
- **Rule 1401 (New Source Review of Toxic Air Contaminants)** – This rule requires new source review of any new, relocated, or modified permit units that emit TACs. The rule establishes allowable risks for permit units requiring permits pursuant to Rules 201 and 203 discussed above.

4.3.1.3 *Thresholds of Significance*

The significance criteria established by the applicable air quality management or air pollution control district (SCAQMD) may be relied upon to make the impact determination shown below in the Checklist Questions. According to the SCAQMD, an air quality impact is considered significant if the Proposed Project would violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has established thresholds of significance for air quality for construction and operational activities of land use development projects such as that proposed, as shown in Table 4.3-3.

Table 4.3-3. SCAQMD Regional Significance Thresholds – Pounds per Day		
Air Pollutant	Construction Activities	Operations
Reactive Organic Gas	75	55
Carbon Monoxide	550	550
Nitrogen Oxide	100	55
Sulfur Oxide	150	150
Coarse Particulate Matter	150	150
Fine Particulate Matter	55	55

Notes: SCAQMD = South Coast Air Quality Management District.

Source: SCAQMD 1993 (Particulate Matter Less than 2.5 Microns in Diameter threshold adopted June 1, 2007).

By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's individual emissions exceed its identified significance thresholds, the Project would be cumulatively considerable. Projects that do not exceed significance thresholds would not be considered cumulative considerable.

4.3.1.4 Localized Significance Thresholds

In addition to regional significance thresholds, the SCAQMD developed localized significance thresholds (LSTs) for emissions of nitrogen dioxide (NO₂), CO, PM₁₀, and PM_{2.5} generated at new development sites (offsite mobile source emissions are not included in the LST analysis protocol). LSTs represent the maximum emissions that can be generated at a project site without expecting to cause or substantially contribute to an exceedance of the most stringent national or state ambient air quality standards. LSTs are based on the ambient concentrations of that pollutant within the Project source receptor area (SRA), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor. The Project Area is located within SCAQMD SRA 2 (Los Angeles). Table 4.3-4 shows the LSTs for a one-acre, two-acre, and five-acre Project site in SRA 2 with sensitive receptors located within 25 meters of the Project Area.

Table 4.3-4. Local Significance Thresholds at 25 Meters of a Sensitive Receptor				
Project Size	Pollutant (pounds per day Construction/Operations)			
	NO₂	CO	PM₁₀	PM_{2.5}
1 Acre	103 / 103	562 / 562	4 / 1	3 / 1
2 Acres	147 / 147	827 / 827	6 / 2	4 / 1

Table 4.3-4. Local Significance Thresholds at 25 Meters of a Sensitive Receptor

Project Size	Pollutant (pounds per day Construction/Operations)			
	NO ₂	CO	PM ₁₀	PM _{2.5}
5 Acres	221 / 221	1,531 / 1,531	13 / 3	6 / 2

Notes: CO = carbon monoxide; NO₂ = nitrogen dioxide; PM₁₀ = Particulate Matter Less than 10 Microns in Diameter; PM_{2.5} = Particulate Matter Less than 2.5 Microns in Diameter.

Source: SCAQMD 2009.

4.3.2 Air Quality (III) Environmental Checklist and Discussion

Would the Project:

- a) Conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

As part of its enforcement responsibilities, the USEPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under state law, the California Clean Air Act requires an air quality attainment plan to be prepared for areas designated as nonattainment with regard to the NAAQS and CAAQS. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

As previously mentioned, the Project Area is located within the SoCAB, which is under the jurisdiction of the SCAQMD. The SCAQMD is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the SoCAB is in nonattainment. In order to reduce such emissions, the SCAQMD drafted the 2016 Air Quality Management Plan (AQMP) (it is noted that the SCAQMD has recently adopted the 2022 AQMP, which is awaiting final approval by the USEPA). Although the SCAQMD has recently adopted the 2022 AQMP and submitted to the USEPA for approval, the 2016 AQMP will be utilized until the USEPA approval is granted for the 2022 AQMP. The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state (California) and national air quality standards. The 2016 AQMP is a regional and multi-agency effort including the SCAQMD, CARB, Southern California Association of Governments (SCAG), and the USEPA. The plan's pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's latest Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. (SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans.) The Project is subject to the SCAQMD's AQMP.

According to the SCAQMD, in order to determine consistency with SCAQMD's air quality planning two main criteria must be addressed.

Criterion 1:

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in relation to contributing to air quality violations and delay of attainment.

- a) *Would the Project result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new air quality violations?*

As shown in Table 4.3-5, 4.3-7, and 4.3-9 below, the Proposed Project would result in emissions that would be below the SCAQMD regional and localized thresholds during both construction and operations. Therefore, the Proposed Project would not result in an increase in the frequency or severity of existing air quality violations and would not have the potential to cause or affect a violation of the ambient air quality standards.

- b) *Would the Project delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP?*

As shown in Table 4.3-5 and 4.3-9 below, the Proposed Project would be below the SCAQMD regional thresholds for construction and operations. Because the Project would result in less than significant regional emission impacts, it would not delay the timely attainment of air quality standards or AQMP emissions reductions.

Criterion 2:

With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it is important to recognize that air quality planning within the SoCAB focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining Project consistency focuses on whether or not the Proposed Project exceeds the assumptions utilized in preparing the forecasts presented in its air quality planning documents. Determining whether or not a project exceeds the assumptions reflected in the 2016 AQMP involves the evaluation of the three criteria outlined below. The following discussion provides an analysis of each of these criteria.

- a) *Would the Project be consistent with the population, housing, and employment growth projections utilized in the preparation of the 2016 AQMP?*

A project is consistent with regional air quality planning efforts in part if it is consistent with the population, housing, and employment assumptions that were used in the development of the SCAQMD air quality plans. Generally, three sources of data form the basis for the projections of air pollutant emissions in the City. Specifically, SCAG's Growth Management Chapter of the Regional Comprehensive Plan and Guide (RCPG) provides regional population forecasts for the region and SCAG's RTP/SCS

provides socioeconomic forecast projections of regional population growth. The City's General Plan is referenced by SCAG in order to assist forecasting future growth in the unincorporated portions of the City.

The Proposed Project is consistent with the land use designation and development density presented in the County General Plan. The Project Area currently has a land use designation of *State Park* under the Rio de Los Angeles State Park General Plan (DPR 2005). According to the General Plan, development within the State-owned Park is not subject to the land use plans and policies of the City (DPR 2005). The uses proposed by the Project are consistent with the General Plan's *State Park* land use designation, and this change would not increase the number of people residing in the area beyond that anticipated by the City.

The Project is consistent with the Rio de Los Angeles State Park General Plan and is therefore consistent with the types, intensity, and patterns of land use envisioned for the site vicinity in the RTP/SCS and RCPG. Several of the goals laid out by SCAG's RTP/SCS promote construction of and access to sustainable development projects and parks. The Proposed Project would boost the availability and accessibility of parks and recreational facilities for local residents, and therefore is consistent with the land uses envisioned by the General Plan and SCAG's RTP/SCS. As a result, the Project would not conflict with the land use assumptions or exceed the population or job growth projections used by SCAQMD to develop the 2016 AQMP. The City's population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the City; and these are used by SCAG in all phases of implementation and review. Additionally, as the SCAQMD has incorporated these same projections into their air quality planning efforts, it can be concluded that the Proposed Project would be consistent with the projections. (SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans.) Therefore, the Proposed Project would be considered consistent with the population, housing, and employment growth projections utilized in the preparation of SCAQMD's air quality plans.

b) Would the Project implement all feasible air quality mitigation measures?

In order to further reduce emissions, the Project would be required to comply with emission reduction measures promulgated by the SCAQMD, such as SCAQMD Rules 201, 402, 403, and 1113. SCAQMD Rule 402 prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. SCAQMD Rule 403 requires fugitive dust sources to implement Best Available Control Measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. SCAQMD Rule 403 is intended to reduce PM₁₀ emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. SCAQMD 1113 requires manufacturers, distributors, and end-users of architectural and industrial maintenance coatings to reduce ROG emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories. As such, the Proposed Project meets this consistency criterion.

c) *Would the Project be consistent with the land use planning strategies set forth by SCAQMD air quality planning efforts?*

The AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. As mentioned previously, the Proposed Project aims to redevelop a former railyard into a community Park and open space area for recreation. This would not increase the Project Area's development density beyond current levels that would conflict with the development density standards set out by the City's General Plan. This would not exceed the population or job growth projections used by the SCAQMD to develop the AQMP.

In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of a Project on air quality. The Proposed Project would not result in a long-term impact on the region's ability to meet state and federal air quality standards. The Proposed Project's long-term influence would also be consistent with the goals and policies of the SCAQMD's 2016 AQMP.

Because of these reasons, this impact is less than significant.

Applicable BMPs related to air quality from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's individual emissions exceed its identified significance thresholds, the Project would be cumulatively considerable. Projects that do not exceed significance thresholds would not be considered cumulative considerable.

Air quality impacts were assessed in accordance with methodologies recommended by the SCAQMD. Where criteria air pollutant quantification was required, emissions were modeled using the California Emissions Estimator Model (CalEEMod), version 2022.1. CalEEMod is a statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. Project construction-generated air pollutant emissions were calculated using CalEEMod model defaults for Los Angeles County. Operational air pollutant emissions were based on the Project site plans and traffic trip generation rates from KOA Corporation (KOA; KOA 2022).

4.3.2.2 Construction Impacts

Regional Construction Significance Analysis

Construction-generated emissions are temporary and short-term but have the potential to represent a significant air quality impact. The basic sources of short-term emissions that will be generated through construction of the Proposed Project will be from grading activities and the from the operation of the construction vehicles (i.e., trenchers, dump trucks). Construction activities such as excavation and grading operations, construction vehicle traffic, and wind blowing over exposed soils would generate exhaust emissions and fugitive PM emissions that affect local air quality at various times during construction. Effects would be variable depending on the weather, soil conditions, the amount of activity taking place, and the nature of dust control efforts. The dry climate of the area during the summer months creates a high potential for dust generation. Construction activities would be subject to SCAQMD Rule 403, which requires taking reasonable precautions to prevent the emissions of fugitive dust, such as using water or chemicals, where possible, for control of dust during the clearing of land and other construction activities.

Construction-generated emissions associated with the Proposed Project were calculated using the CARB-approved CalEEMod computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. The total Project Area, defined for the purposes of this IS/MND encompasses the development site including the area incorporating the proposed infrastructure improvements internal to the site. The Proposed Project will include roadway infrastructure improvements that will accommodate project circulation needs, new parking areas, and will include a new building with necessary utility infrastructure. Emissions resulting from infrastructure improvements are accounted for in the construction emissions analysis. As previously identified, the General Plan EIR concluded that implementation of the General Plan would not result in significant impacts on the environment, with the exception of potential impacts on soils and groundwater contamination. Soil characterization and risk assessment to determine the levels of contaminants in on-site soils is ongoing and data is not yet available at the time of preparation of this IS/MND. To account for a worst-case scenario, the emissions modeling assumed that soil excavation at a depth of up to three feet would need to occur for the entire site and would need to be removed and hauled away offsite to a landfill that accepts contaminated wastes. The estimated volume of soil to be exported offsite equates to 56,000 cubic yards of soil requiring 70 haul trips. It is anticipated that soil characterization would identify that a majority of the onsite soils do not pose a health risk and would be able to be kept onsite. Therefore, the results of the analysis are conservative and likely overstate Project-related emissions impacts. See Appendix A for more information regarding the construction assumptions, including construction equipment and duration, used in this analysis.

Predicted maximum daily construction-generated emissions for the Proposed Project are summarized in Table 4.3-5. Construction-generated emissions are short-term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

Table 4.3-5. Construction-Related Emissions (Regional Significance Analysis)

Construction Year	Pollutant (pounds per day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Construction Year One	4.09	43.70	38.10	0.07	7.94	4.58
Construction Year Two	3.78	35.40	31.70	0.08	7.72	4.39
Construction Year Three	1.15	10.50	13.40	0.02	0.50	0.41
<i>SCAQMD Regional Significance Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Exceed SCAQMD Regional Threshold?	No	No	No	No	No	No

Notes: CO = carbon monoxide; NO_x = nitric oxides; PM₁₀ = Particulate Matter Less than 10 Microns in Diameter; PM_{2.5} = Particulate Matter Less than 2.5 Microns in Diameter; ROG = Reactive Organic Gases; SCAQMD = South Coast Air Quality Management District; SO₂ = sulfur dioxide.

Emissions taken of the season, summer or winter, with the highest outputs. Emission reduction/credits for construction emissions are applied based on the required implementation of SCAQMD Rule 403. The specific Rule 403 measures applied in CalEEMod include the following: sweeping/cleaning adjacent roadway access areas daily; washing equipment tires before leaving the construction site; water exposed surfaces three times daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Table 11-4 and A11-9-A) were applied.

Source: California Emissions Estimator Model version 2022.1. Refer to Appendix A for Model Data Outputs.

As shown in Table 4.3-5, emissions generated during Project construction would not exceed the SCAQMD's regional thresholds of significance. Therefore, criteria pollutant emissions generated during Project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard, and no health effects from Project criteria pollutants would occur. As such, the Project would have a less than significant impact.

Localized Construction Significance Analysis

The nearest sensitive receptor is Alliance Tennenbaum Family Technology High School, which is located approximately 183 feet to the east of the Project Area. In order to identify localized, air toxic-related impacts to sensitive receptors, the SCAQMD recommends addressing LSTs for construction. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with Project-specific level proposed projects.

For this Project, the appropriate SRA for the localized significance thresholds is Los Angeles, SRA 2. LSTs apply to CO, NO₂, PM₁₀, and PM_{2.5}. Over the course of construction, the Proposed Project would disturb approximately 10 acres out of total 18-acre Project Area. The SCAQMD has produced lookup tables for projects that disturb less than or equal to five acres daily. The SCAQMD has also issued guidance on applying the CalEEMod emissions software to LSTs for projects greater than five acres. Since CalEEMod

calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment, Table 4.3-6 is used to determine the maximum daily disturbed acreage for comparison to LSTs. All construction years have the same equipment, as such, only phases are shown in the table.

Table 4.3-6. Equipment-Specific Grading Rates					
Construction Phase	Equipment Type	Acres Graded/Disturbed per 8-Hour Day	Equipment Quantity	Operating Hours per Day	Acres Graded per Day
Site Preparation	Rubber Tired Dozer	0.5	3	8	1.5
	Tractors/Loaders/Backhoes	0.5	4	8	2.0
Site Preparation Total:					3.5
Site Grading	Grader	0.5	1	8	0.5
	Rubber Tired Dozer	0.5	1	8	0.5
	Tractors/Loaders/Backhoes	0.5	2	8	1.0
	Scraper	1.0	2	8	2.0
	Excavator	0.0	2	8	0.0
Site Grading Total:					4.0
Building Construction, Paving, and Painting	Tractors/Loaders/Backhoes	0.5	3	8	1.5
	Crane	0.0	1	8	0.0
	Forklift	0.0	3	8	0.0
	Generator Sets	0.0	1	8	0.0
	Welders	0.0	1	8	0.0
	Pavers	0.0	2	8	0.0
	Paving Equipment	0.0	2	8	0.0
	Rollers	0.0	2	8	0.0
	Air Compressors	0.0	1	8	0.0
Building Construction, Paving, and Painting Total:					1.5

As shown in Table 4.3-6, Project implementation could potentially disturb a total maximum of 3.5 acres daily during site preparation, 4.0 acres daily during site grading, and 1.5 acres daily during the combined building construction, paving, and painting phase. As described, the SCAQMD has produced lookup tables for projects that disturb one, two and five acres. While the Project Area could disturb over two acres during the site preparation and site grading phases, the LST threshold value for a two-acres site was employed from the LST lookup tables for these phases. The Proposed Project could disturb over one acre during the combined building construction, paving, and painting phase, and therefore, the LST threshold value for a one-acre site was employed. This is a conservative estimate since the analysis will only account for the dispersion of air pollutants over one and two acres before reaching sensitive receptors, as opposed to accounting for the dispersion of pollutants over the 18.0-acre Project Area.

LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. The nearest sensitive receptor is Alliance Tennenbaum Family Technology High School, which is located approximately 183 feet, or 55.8 meters, to the east of the Project Area. Nevertheless, LSTs for receptors located at 50 meters were utilized in this analysis as a conservative approach. The SCAQMD's methodology clearly states that "offsite mobile emissions from a project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "onsite" emissions outputs were considered. Table 4.3-7 presents the results of localized emissions from the most polluting activity for each year of construction.

Table 4.3-7. Construction-Related Emissions (Localized Significance Analysis)				
Activity	Onsite Pollutant (pounds per day)			
	NO_x	CO	PM₁₀	PM_{2.5}
1.0 Acre Threshold				
Building Construction, Paving, and Painting (Year Two)	11.20	13.10	0.50	0.46
Building Construction, Paving, and Painting (Year Three)	10.40	13.0	0.43	0.40
<i>SCAQMD Localized Significance Threshold (1.0 Acres)</i>	104	833	3	1
Exceed SCAQMD Localized Threshold?	No	No	No	No
2.0 Acre Threshold				

Table 4.3-7. Construction-Related Emissions (Localized Significance Analysis)				
Activity	Onsite Pollutant (pounds per day)			
	NO_x	CO	PM₁₀	PM_{2.5}
Site Preparation	39.70	35.50	6.92	4.29
Grading	34.30	30.20	3.84	2.28
<i>SCAQMD Localized Significance Threshold (2.0 Acres)</i>	<i>143</i>	<i>1,213</i>	<i>19</i>	<i>5</i>
Exceed SCAQMD Localized Threshold?	No	No	No	No

Notes: CO = carbon monoxide; NO_x = nitric oxides; PM₁₀ = Particulate Matter Less than 10 Microns in Diameter; PM_{2.5} = Particulate Matter Less than 2.5 Microns in Diameter; SCAQMD = South Coast Air Quality Management District. Emissions taken of the season, summer or winter, with the highest outputs. Emission reduction/credits for construction emissions are applied based on the required implementation of SCAQMD Rule 403. The specific Rule 403 measures applied in California Emissions Estimator Model include the following: sweeping/cleaning adjacent roadway access areas daily; washing equipment tires before leaving the construction site; water exposed surfaces three times daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD California Environmental Quality Act Handbook (Table 11-4 and A11-9-A) were applied.

Source: California Emissions Estimator Model version 2022.1. Refer to Appendix A for Model Data Outputs.

Table 4.3-7 shows that the emissions of these pollutants during construction would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, significant impacts would not occur concerning LSTs during construction activities. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative. The SCAQMD Environmental Justice Enhancement Initiative program seeks to ensure that everyone has the right to equal protection from air pollution. Therefore, impacts would be less than significant concerning LSTs during construction activities.

USEPA Conformity Determination Thresholds

As previously described, the Project Area is located in the Los Angeles County region, which is designated as a nonattainment area for the federal O₃ and PM_{2.5} standards. Emissions generated during Project implementation would be short term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the Conformity Determination thresholds. Predicted maximum annual construction-generated emissions for the Proposed Project are summarized in Table 4.3-8 and compared against the USEPA Conformity Determination thresholds.

Table 4.3-8. Construction-Related Emissions (USEPA Conformity Determination Analysis)

Construction Year	Pollutant (tons per year)				
	VOC (ROG)	NO _x	CO	PM ₁₀	PM _{2.5}
Construction First Calendar Year	0.13	1.42	1.24	0.26	0.15
Construction Second Calendar Year	0.43	3.77	3.55	0.47	0.27
Construction Third Calendar Year	0.12	1.06	1.35	0.05	0.04
<i>USEPA Conformity Determination Thresholds (40 CFR 93.153)</i>	<i>10</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>70</i>
<i>Exceed USEPA Conformity Determination Thresholds?</i>	No	No	No	No	No

Notes: CFR = Code of Federal Regulations; CO = carbon monoxide; NO_x = nitric oxides; PM₁₀ = Particulate Matter Less than 10 Microns in Diameter; PM_{2.5} = Particulate Matter Less than 2.5 Microns in Diameter; ROG = Reactive Organic Gases; USEPA = U.S. Environmental Protection Agency; VOC = Volatile Organic Compound.

Source: CalEEMod version 2022.1. Refer to Appendix A for Model Data Outputs.

As shown in Table 4-3.8, emissions from construction of the Proposed Project would not exceed the USEPA Conformity Determination thresholds for the region.

4.3.2.3 Project Operations Criteria Air Quality Emissions

Regional Operational Significance Analysis

Implementation of the Project would result in long-term operational emissions of criteria air pollutants such as PM₁₀, PM_{2.5}, CO, and SO₂ as well as O₃ precursors such as ROG_s and NO_x. Project-generated increases in emissions would be predominantly associated with motor vehicle use. As previously described, operational air pollutant emissions were based on the Project site plans and traffic trip generation rates from KOA (2022). Long-term operational emissions attributable to the Project are identified in Table 4.3-9 and compared to the operational significance thresholds promulgated by the SCAQMD.

Table 4.3-9. Operational-Related Emissions (Regional Significance Analysis)						
Emission Source	Pollutant (pounds per day)					
	ROG	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
Summer Emissions						
Mobile	0.31	0.21	2.42	0.01	0.20	0.04
Area	0.32	0.00	0.43	0.00	0.00	0.00
Energy	0.01	0.09	0.08	0.00	0.01	0.01
Total:	0.64	0.3	2.93	0.01	0.21	0.05
Winter Emissions						
Mobile	0.31	0.23	2.25	0.01	0.20	0.04
Area	0.25	0.00	0.00	0.00	0.00	0.00
Energy	0.01	0.09	0.08	0.00	0.01	0.01
Total:	0.57	0.32	2.33	0.01	0.21	0.05
<i>SCAQMD Regional Significance Threshold</i>	<i>55</i>	<i>55</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Exceed SCAQMD Regional Threshold?	No	No	No	No	No	No

Notes: CO = carbon monoxide; NO_x = nitric oxides; PM₁₀ = Particulate Matter Less than 10 Microns in Diameter; PM_{2.5} = Particulate Matter Less than 2.5 Microns in Diameter; ROG = Reactive Organic Gases; SCAQMD = South Coast Air Quality Management District; SO₂ = sulfur dioxide. Emission projections predominately based on CalEEMod model defaults for Los Angeles County. Average daily vehicle trips provided by KOA (2022).

Source: California Emissions Estimator Model version 2022.1. Refer to Appendix A for Model Data Outputs.

As shown in Table 4.3-9, the Project's emissions would not exceed any SCAQMD thresholds for any criteria air pollutants during operation.

The Los Angeles City portion of the SoCAB is listed as a nonattainment area for federal O₃ and PM_{2.5} standards and is also a nonattainment area for the state standards for O₃, PM_{2.5} and PM₁₀ (CARB 2020; 2018). O₃ is a health threat to persons who already suffer from respiratory diseases and can cause severe ear, nose and throat irritation and increases susceptibility to respiratory infections. PM can adversely affect the human respiratory system. As shown in Table 4.3-9, the Proposed Project would result in increased emissions of the O₃ precursor pollutants ROG and NO_x, PM₁₀, and PM_{2.5}, however, the correlation between a project's emissions and increases in nonattainment days, or frequency or severity of related illnesses, cannot be accurately quantified. The overall strategy for reducing air pollution and related health effects in the SCAQMD is contained in the SCAQMD AQMP. The AQMP provides control measures that reduce emissions to attain federal ambient air quality standards by their applicable deadlines such as the

application of available cleaner technologies, best management practices, incentive programs, as well as development and implementation of zero and near-zero technologies and control methods. The CEQA thresholds of significance established by the SCAQMD are designed to meet the objectives of the AQMP and in doing so achieve attainment status with state and federal standards. As noted above, the Project would increase the emission of these pollutants, but would not exceed the thresholds of significance established by the SCAQMD for purposes of reducing air pollution and its deleterious health effects.

Localized Operational Significance Analysis

According to the SCAQMD localized significance threshold methodology, LSTs would apply to the operational phase of a proposed project only if the project includes stationary sources (e.g., smokestacks) or attracts heavy-duty trucks that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). The Proposed Project does not include such uses. Therefore, in the case of the Proposed Project, the operational LST protocol is not applied.

As previously described, the Project Area is located in the Los Angeles County region, which is designated as a nonattainment area for the federal O₃ and PM_{2.5} standards. Project operations would be considered a significant air quality impact if the volume of pollutants generated during operations exceeds the USEPA Conformity Determination thresholds. Predicted maximum annual operational-generated emissions of criteria air pollutants for the Proposed Project are summarized in Table 4.3-10 and compared to the Conformity Determination thresholds promulgated by the USEPA Conformity Determination.

Table 4.3-10. Operational-Related Emissions (USEPA Conformity Determination Analysis)						
Emission Source	Pollutant (tons per year)					
	VOC (ROG)	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
Total Annual Emissions	0.10	0.05	0.40	0.01	0.03	0.01
<i>USEPA Conformity Determination Thresholds (40 CFR 93.153)</i>	<i>10</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>70</i>	<i>10</i>
Exceed USEPA Conformity Determination Thresholds?	No	No	No	No	No	No

Notes: CFR = Code of Federal Regulations; CO = carbon monoxide; NO_x = nitric oxides; PM₁₀ = Particulate Matter Less than 10 Microns in Diameter; PM_{2.5} = Particulate Matter Less than 2.5 Microns in Diameter; ROG = Reactive Organic Gases; SO₂ = sulfur dioxide; USEPA = U.S. Environmental Protection Agency; VOC = Volatile Organic Compound.

Source: CalEEMod version 2022.1. Refer to Appendix A for Model Data Outputs.

As shown in Table 4.3-10, emissions from operation of the Proposed Project do not exceed the USEPA Conformity Determination thresholds for the region.

Because of these reasons, these impacts of the Proposed Project are less than significant, and no mitigation is required.

Applicable BMPs related to air quality from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

Would the Project:		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
c)	Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

As previously described, sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over age 65, children under age 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. The nearest sensitive receptor is Alliance Tennenbaum Family Technology High School, which is located approximately 183 feet east of the Project Area.

4.3.2.4 Construction-Generated Air Contaminants

Construction-related activities would result in temporary, short-term Proposed Project-generated emissions of DPM, ROG, NO_x, CO, and PM₁₀ from the exhaust of off-road, heavy-duty diesel equipment for site preparation (e.g., clearing, grading); soil hauling truck traffic; paving; and other miscellaneous activities. The portion of the SoCAB which encompasses the Project Area is designated as a nonattainment area for federal O₃ and PM_{2.5} standards and is also a nonattainment area for the state standards for O₃, PM_{2.5} and PM₁₀ (CARB 2020; 2018). Thus, existing O₃, PM₁₀, and PM_{2.5} levels in the SoCAB are at unhealthy levels during certain periods. However, as shown in Table 4.3-5 and Table 4.3-7, the Project would not exceed the SCAQMD regional or localized significance thresholds for emissions.

The health effects associated with O₃ are generally associated with reduced lung function. Because the Project would not involve construction activities that would result in O₃ precursor emissions (ROG or NO_x) in excess of the SCAQMD thresholds, the Project is not anticipated to substantially contribute to regional O₃ concentrations and the associated health impacts.

CO tends to be a localized impact associated with congested intersections. In terms of adverse health effects, CO competes with oxygen, often replacing it in the blood, reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions. The Project would not involve construction activities that would result in CO emissions in excess of the SCAQMD thresholds. Thus, the Project's CO emissions would not contribute to the health effects associated with this pollutant.

Particulate matter (PM₁₀ and PM_{2.5}) contains microscopic solids or liquid droplets that are so small that they can get deep into the lungs and cause serious health problems. Particulate matter exposure has been

linked to a variety of problems, including premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms such as irritation of the airways, coughing, or difficulty breathing. For construction activity, DPM is the primary TAC of concern. PM₁₀ exhaust is considered a surrogate for DPM as all diesel exhaust is considered to be DPM. As with O₃ and NO_x, the Project would not generate emissions of PM₁₀ or PM_{2.5} that would exceed the SCAQMD's thresholds. Accordingly, the Project's PM₁₀ and PM_{2.5} emissions are not expected to cause any increase in related regional health effects for these pollutants.

In summary, Project construction would not result in a potentially significant contribution to regional concentrations of nonattainment pollutants and would not result in a significant contribution to the adverse health impacts associated with those pollutants. Furthermore, the Project has been evaluated against the SCAQMD's LSTs for construction. As previously stated, LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative and can be used to assist lead agencies in analyzing localized impacts associated with Project-specific level of proposed projects. The SCAQMD Environmental Justice Enhancement Initiative program seeks to ensure that everyone has the right to equal protection from air pollution. The Environmental Justice Program is divided into three categories, with the LST protocol promulgated under Category I: *Further-Reduced Health Risk*. As shown in Table 4.3-7, the emissions of pollutants on the peak day of construction would not result in significant concentrations of pollutants at nearby sensitive receptors. Thus, the fact that onsite Project construction emissions would be generated at rates below the LSTs for NO_x, CO, PM₁₀, and PM_{2.5} demonstrates that the Project would not adversely impact vicinity sensitive receptors. A less than significant impact would occur.

4.3.2.5 Operational Air Contaminants

Operation of the Proposed Project would not result in the development of any substantial sources of air toxics. There are no stationary sources associated with the operations of the Project; nor would the Project attract additional mobile sources that spend long periods queuing and idling at the site. Onsite Project emissions would not result in significant concentrations of pollutants at nearby sensitive receptors. The Project would not have a high carcinogenic or non-carcinogenic risk during operation.

Carbon Monoxide Hot Spots

It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when idling at intersections. Concentrations of CO are a direct function of the number of vehicles, length of delay, and traffic flow conditions. Under certain meteorological conditions, CO concentrations close to congested intersections that experience high levels of traffic and elevated background concentrations may reach unhealthy levels, affecting nearby sensitive receptors. Given the high traffic volume potential, areas of high CO concentrations, or "hot spots," are typically associated with intersections that are projected to operate at unacceptable levels of service during the peak commute hours. It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. However, transport of this criteria pollutant is extremely limited, and CO disperses rapidly with distance from the source under normal meteorological conditions. Furthermore, vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams per mile for passenger cars (there are requirements for certain

vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SoCAB is designated as in attainment. Detailed modeling of Project-specific CO “hot spots” is not necessary and thus this potential impact is addressed qualitatively.

A CO “hot spot” would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur. The analysis prepared for CO attainment in the SCAQMD’s 1992 *Federal Attainment Plan for Carbon Monoxide* in Los Angeles County and a Modeling and Attainment Demonstration prepared by the SCAQMD as part of the 2003 AQMP can be used to demonstrate the potential for CO exceedances of these standards. The SCAQMD is the air pollution control officer for much of southern California. The SCAQMD conducted a CO hot spot analysis as part of the 1992 CO Federal Attainment Plan at four busy intersections in Los Angeles County during the peak morning and afternoon time periods. The intersections evaluated included Long Beach Boulevard and Imperial Highway (Lynwood), Wilshire Boulevard and Veteran Avenue (Westwood), Sunset Boulevard and Highland Avenue (Hollywood), and La Cienega Boulevard and Century Boulevard (Inglewood). The busiest intersection evaluated was at Wilshire Boulevard and Veteran Avenue, which has a traffic volume of approximately 100,000 vehicles per day. Despite this level of traffic, the CO analysis concluded that there was no violation of CO standards (SCAQMD 1992). In order to establish a more accurate record of baseline CO concentrations affecting Los Angeles, a CO “hot spot” analysis was conducted in 2003 at the same four busy intersections in Los Angeles at the peak morning and afternoon time periods. This “hot spot” analysis did not predict any violation of CO standards. The highest one-hour concentration was measured at 4.6 ppm at Wilshire Boulevard and Veteran Avenue and the highest eight-hour concentration was measured at 8.4 ppm at Long Beach Boulevard and Imperial Highway. Thus, there was no violation of CO standards.

Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District, the air pollution control officer for the San Francisco Bay Area, concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact.

The Proposed Project is anticipated to result in 98 weekday traffic trips (KOA 2022). Thus, the Proposed Project would not generate traffic volumes at any intersection of more than 100,000 vehicles per day (or 44,000 vehicles per day) and there is no likelihood of the Project traffic exceeding CO values.

Because of these reasons, this impact is less than significant.

Applicable BMPs related to biological resources from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

Would the Project:		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

Typically, odors are regarded as an annoyance rather than a health hazard. However, manifestations of a person’s reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache).

With respect to odors, the human nose is the sole sensing device. The ability to detect odors varies considerably among the population and overall is quite subjective. Some individuals have the ability to smell minute quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor; in fact, an odor that is offensive to one person (e.g., from a fast-food restaurant) may be perfectly acceptable to another. It is also important to note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity.

Quality and intensity are two properties present in any odor. The quality of an odor indicates the nature of the smell experience. For instance, if a person describes an odor as flowery or sweet, then the person is describing the quality of the odor. Intensity refers to the strength of the odor. For example, a person may use the word “strong” to describe the intensity of an odor. Odor intensity depends on the odorant concentration in the air. When an odorous sample is progressively diluted, the odorant concentration decreases. As this occurs, the odor intensity weakens and eventually becomes so low that the detection or recognition of the odor is quite difficult. At some point during dilution, the concentration of the odorant reaches a detection threshold. An odorant concentration below the detection threshold means that the concentration in the air is not detectable by the average human.

During construction, the Proposed Project presents the potential for generation of objectionable odors in the form of diesel exhaust in the immediate vicinity of the site. However, these emissions are short-term in nature and will rapidly dissipate and be diluted by the atmosphere downwind of the emission sources. Additionally, odors would be localized and generally confined to the construction area. Therefore, construction odors would not adversely affect a substantial number of people to odor emissions.

According to the SCAQMD, land uses commonly considered to be potential sources of obnoxious odorous emissions include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Proposed Project includes the development of a community Park and associated in the

Project Area. There would not be any introduction of other uses identified by the SCAQMD as being associated with odors.

4.3.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.4 Biological Resources

This section is based on the analysis and recommendations presented in the Biological Resources Technical Report prepared for the Proposed Project (Stantec Consulting Services Inc. [Stantec] 2023a; Appendix B). A reconnaissance survey for the Project Area and a 300-foot buffer zone was conducted on November 21, 2022. This 79-acre area is defined as the Biological Survey Area (BSA). The Project Area does not cover the northwest end of the parcel, which was surveyed separately on May 26, 2022 for the Bowtie Demonstration Project.

4.4.1 Environmental Setting

4.4.1.1 Vegetation Communities

Vegetation communities and land cover types occurring within the BSA include Fountaingrass swards (*Pennisetum setaceum* – *Pennisetum ciliare* Herbaceous Semi-Natural Alliance), Gooding's willow – red willow riparian woodland and forest (*Salix gooddingii* – *Salix laevigata* Forest and Woodland Alliance), California buckwheat scrub (*Eriogonum fasciculatum* Shrubland Alliance), deerweed – silver lupine – yerba santa scrub (*Lotus scoparius* – *Lupinus albifrons* – *Eriodictyon* spp. Shrubland Alliance), ornamental non-native, disturbed/developed, and open water (Stantec 2023a).

Fountaingrass swards (*Pennisetum setaceum* – *Pennisetum ciliare* Herbaceous Semi-Natural Alliance)

Vegetation characteristic of the *Pennisetum setaceum* – *Pennisetum ciliare* herbaceous seminatural alliance was mapped throughout the Project Area. In the BSA, this alliance is dominated by crimson fountaingrass (*Pennisetum setaceum*). Other species that occur within this community include Mexican fan palm (*Washingtonia robusta*), coyote brush (*Baccharis pilularis*), deerweed (*Acmispon glaber* [*Lotus scoparius*]), and mulefat (*Baccharis salicifolia*).

Gooding's willow – red willow riparian woodland and forest (*Salix gooddingii* – *Salix laevigata* Forest and Woodland Alliance)

Vegetation characteristic of the *Salix gooddingii* – *Salix laevigata* forest and woodland alliance was mapped within the Los Angeles River in the southern portion of the BSA. This alliance is considered a state-sensitive vegetation community and has a State Rarity Rank of S3 (Appendix B). In the BSA, this alliance is dominated by red willow (*Salix laevigata*) in the open tree canopy with white mulberry (*Morus alba*) occurring occasionally. The shrub layer is sparse to absent. In the understory, there is a variety of

wetland and riparian plants, including cattail (*Typha* sp.), bulrushes (*Schoenoplectus* sp.), and spotted ladythumb (*Persicaria maculosa*).

California buckwheat scrub (*Eriogonum fasciculatum* Shrubland Alliance)

Vegetation characteristic of the *Eriogonum fasciculatum* shrubland alliance was mapped adjacent to the concrete canal embankment just south of the Project Area within the BSA. In the BSA, California buckwheat dominates the shrub canopy. Other shrubs include California sage (*Artemisia californica*), bush sunflower (*Encelia californica*), and white sage (*Salvia apiana*). Shrubs are less than 2 meters in height and shrub canopy is continuous. The herbaceous layer is variable but has grasses. Non-native crimson fountaingrass and Mexican fan palms also occur within this area. Within the BSA, this alliance transitions into the fountaingrass swards herbaceous semi-natural alliance. Due to presence, height, maturity, and density of native plant species observed only in this area, where they were intermixed with the surrounding non-native plant species, this alliance appears to have been planted or seeded within approximately the last five years.

Deerweed – silver lupine – yerba santa scrub (*Lotus scoparius* – *Lupinus albifrons* – *Eriodictyon* spp. Shrubland Alliance)

Vegetation characteristic of the *Lotus scoparius* – *Lupinus albifrons* – *Eriodictyon* spp. Shrubland alliance was mapped adjacent to the concrete canal embankment. In the BSA this plant community is heavily dominated by thick leaved yerba santa in the shrub layer along with the occasional white sage. A few Mexican fan palms are found in the tree layer. Crimson fountaingrass is found throughout the herbaceous layer.

Ornamental non-native

This land cover type was used to describe landscaped areas within the buffer around the Project Area, which were observed from the edge of the Project Area and through aerial imagery, and disturbed areas in the parcel where non-native ornamental plants had volunteered. The disturbed areas consist of various ornamental and non-native plants such as Brazilian peppertree (*Schinus terebinthifolius*), common fig (*Ficus carica*), acacias (*Acacia* sp.), and tree tobacco (*Nicotiana glauca*) in the tree layer, and star thistle (*Centaurea solstitialis*), crimson fountaingrass, and California buckwheat occurring in the herbaceous layer.

Disturbed/Developed

This land cover type was mapped where there is compacted soil, gravel, concrete cover, or buildings.

Open water

This land cover type was mapped where the Los Angeles River is located south of the Project Area.

4.4.1.2 Wildlife

Common wildlife observed during the reconnaissance survey of the BSA includes two (2) species of terrestrial invertebrates, one (1) species of reptiles, and 14 species of birds. No species of fish, amphibians, and mammals were observed during the November 2022 survey of the BSA (Stantec 2023a).

Terrestrial Invertebrates

Though heavily urbanized, habitat conditions within the BSA provide a suite of microhabitat conditions for a wide variety of terrestrial insects and other invertebrates that are known to adapt to such disturbance. During the field reconnaissance two insects were observed, the non-native honeybee (*Apis mellifera*) and a harvester ant species (*Pogonomyrmex* sp.).

Fish

There were no fish observed in the Los Angeles River during the survey of the BSA. Non-native fish species known to occur in the Glendale Narrows portion of the Los Angeles River include fathead minnow (*Pimephales promelas*), black bullhead (*Ameriurus melas*), Amazon sailfin catfish (*Pteroplichthys pardalis*), mosquitofish (*Gambusia affinis*), green sunfish (*Lepomis cyanellus*), largemouth bass (*Micropterus salmoides*), and tilapia (*Oreochromis* sp.). No native fish species historically occupying the Glendale Narrows portion of the LA River remain in the river, based on results from recently performed fish surveys.

Amphibians

No amphibians were observed during the reconnaissance survey; however, the survey was performed during the day when frogs are typically inactive and not calling. Therefore, it is not unexpected that other amphibian species were not observed during the reconnaissance survey. Amphibians known to occur within the Los Angeles River watershed include western toad (*Anaxyrus boreas*), Pacific chorus frog (*Pseudacris regilla*), California tree frog (*Pseudacris cadaverina*), and non-native American bullfrog (*Lithobates catesbeianus*).

Reptiles

One reptile species, the native common side-blotched lizard (*Uta stansburiana*), was observed during the reconnaissance survey. Other species of reptile known to occur within the Los Angeles River watershed include Western pond turtle (*Actinemys marmorata*), red-eared slider (*Trachemys scripta elegans*), western fence lizard (*Sceloporus occidentalis*), southern alligator lizard (*Elgaria multicarinata*), western whiptail (*Aspidoscelis tigris*), striped racer (*Masticophis lateralis*), gopher snake (*Pituophis catenifer*), California king snake (*Lampropeltis californiae*), and western rattlesnake (*Crotalus oreganus*).

Birds

Birds were identified by sight and observed throughout the BSA, especially birds associated with the Los Angeles River corridor. Bird species observed within the river corridor included native mallard duck (*Anas platyrhynchos*), great egret (*Ardea alba*), great blue heron (*Ardea herodias*), Canada goose (*Branta canadensis*), American coot (*Fulica americana*), hooded merganser (*Lophodytes cucullatus*), double-crested

cormorant (*Nannopterum auritum*), belted kingfisher (*Megasceryle alcyon*), osprey (*Pandion haliaetus*), and black-necked stilt (*Himantopus mexicanus*). Upland bird species observed included black phoebe (*Sayornis nigricans*), Cooper's hawk (*Accipiter cooperii*), American crow (*Corvus brachyrhynchos*), and northern mockingbird (*Mimus polyglottus*). Many of the bird species found in the Los Angeles River corridor are migratory and the Los Angeles River is within the Pacific Flyway avian migratory corridor. Therefore, bird species diversity near the Bowtie Parcel is remarkably high, and the bird species present in the BSA will change throughout the year.

Mammals

No terrestrial mammal species were observed during the reconnaissance survey of the BSA. Mammals not observed during the reconnaissance survey that are tolerant of urban spaces and known to occur in the Los Angeles region include raccoon (*Procyon lotor*), opossum (*Deidelphis virginiana*), striped skunk (*Mephitis mephitis*), and coyote (*Canis latrans*).

Bats

No bat surveys were performed within the Project Area. However, a bat habitat assessment was performed during the foot surveys. Suitable bat roosting habitat within the Project Area consisted of untrimmed palm trees near the northern entrance gate to the property and the middle section of the parcel. The untrimmed palm trees would be suitable for tree roosting bats such as the western yellow bat (*Lasurus xanthinus*). No bat guano or other bat sign was observed near the base of the palm trees. Bats are known to occur in the Los Angeles River corridor and use the corridor for foraging and roosting on the numerous bridges over the river.

4.4.1.3 Soils

Historic soils data from the Natural Resources Conservation Service (NRCS) was used to determine potential soil types that may occur with the BSA. Soils onsite include urban land-Palmview-Tujunga complex (0 to 5 percent slopes); urban land, commercial (0 to 5 percent slopes); and Xeropsamments, frequently flooded (0 to 2 percent slopes).

4.4.1.4 Potential Waters of the U.S.

There are no potential jurisdictional features within the Project Area. Immediately adjacent (southwest) to the Project Area and within the BSA is the Los Angeles River. The Project Area is located in the upland area adjacent to the concrete-lined banks of the Los Angeles River channel. The Los Angeles River is considered to be Waters of the U.S. and under the jurisdiction of the USACE up to the Ordinary High Water Mark, and waters of the state under jurisdiction of the RWQCB. The river channel up to the top of the concrete banks and within any adjacent riparian zone vegetation is considered to be under the jurisdiction of California Department of Fish and Wildlife (CDFW; Stantec 2023a).

4.4.1.5 *Special-Status Plants*

The literature review and database searches identified 30 special-status plant species that occur in or within 10 miles of the BSA. A list was generated from the results of the literature review and database search, and the BSA was evaluated for suitable habitat that could support any of the special-status plant species on the list. While many of the species have a low potential to occur within the BSA, they are not expected to occur within the Project Area due to the lack of suitable habitat (Stantec 2023a).

4.4.1.6 *Special-Status Wildlife*

The literature review and database searches identified 48 special-status wildlife species that occur in or within 10 miles of the BSA. A list was generated from the results of the literature review and database search, and the BSA was evaluated for suitable habitat that could support any of the special-status wildlife species on the list. While many of the species have some potential to occur within the BSA, they are generally not expected to occur within the Project Area due to the lack of suitable habitat (Stantec 2023a).

4.4.1.7 *Wildlife Movement Corridors*

The concept of habitat corridors addresses the linkage between large blocks of habitat that allow the safe movement of mammals and other wildlife species from one habitat area to another. Corridors can connect water, food, and cover sources, spatially linking these three resources with wildlife in different areas. In addition, wildlife movement between habitat areas provides for the potential of genetic exchange between wildlife species populations, thereby maintaining genetic variability and adaptability to maximize the success of wildlife responses to changing environmental conditions.

Within the BSA, the level of surrounding urban development, presence of physical barriers, and lack of native habitat outside of the Los Angeles River would significantly constrain the passage of most large terrestrial wildlife known to occur in the region. The BSA is located in a heavily developed area but contains localized portions of open space and riparian habitat along the Los Angeles River.

4.4.2 **Biological Resources (IV) Environmental Checklist and Discussion**

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant with Standard Project Requirements and Project Specific Requirements Incorporated.

4.4.2.1 Special-Status Plants

Of the 30 special-status plants identified, 20 are not likely to occur and 10 were determined to have a low potential to occur. While many of the species have some potential to occur within the BSA, they are generally not expected to occur within the Project Area due to the lack of suitable habitat.

Plant Species with a High Potential to Occur

Due to the lack of a documented recent record (within 10 years) of the taxa within the BSA or immediate vicinity (approximately 5 miles) and lack of suitable habitat for the special-status plants identified in the literature review, no special-status plant species were found to have a high potential to occur.

Plant Species with a Moderate Potential to Occur

Due to the lack of a documented recent record (within 10 years) of the taxa within the BSA or immediate vicinity (approximately 5 miles) and lack of marginally or limited suitable habitat for the special-status plants identified in the literature review, no special-status plant species were found to have a moderate potential to occur.

Plant Species with a Low Potential to Occur

The following species were found to have a low potential to occur in the BSA because limited habitat for the species occurs in the BSA and a historic record (over 10 years) exists of the taxa within the BSA or general vicinity (approximately 10 miles):

- Marsh sandwort (*Arenaria paludicola*) – California Rare Plant Rank (CRPR) 1B.1
- Braunton's milk-vetch (*Astragalus brauntonii*) – CRPR 1B.1
- Coastal dunes milk-vetch (*Astragalus tener* var. *titi*) – CRPR 1B.1
- Lucky morning-glory (*Calystegia felix*) – CRPR 1B.1
- Southern tarplant (*Centromadia parryi* ssp. *Australis*) – CRPR 1B.1
- White rabbit-tobacco (*Pseudognaphalium leucocephalum*) – CRPR 2B.2
- Parish's gooseberry (*Ribes divaricatum* var. *Parishii*) – CRPR 1A
- San Bernardino aster (*Symphyotrichum defoliatum*) – CRPR 1B.2
- Greata's aster (*Symphyotrichum greatae*) – CRPR 1B.2
- Sonoran maiden fern (*Thelypteris puberula* var. *sonorensis*) – CRPR 2B.2

4.4.2.2 Special-Status Wildlife

Of the 48 special-status wildlife identified, 21 are not likely to occur, nine (9) were determined to have a high potential to occur, 18 were determined to have a moderate potential to occur, and 15 were determined to have a low potential to occur. Occurrence potential for each bird species includes separate

occurrence potential determinations for nesting and foraging. While many of the species have a low potential to occur within the BSA, they are not expected to occur within the Project Area due to the lack of suitable habitat.

Wildlife Species with a High Potential to Occur

Nine species were found to have a high potential to occur in the BSA because habitat (including soils) for the taxa occurs onsite, and a known occurrence occurs within the BSA or immediate vicinity (within 5 miles of the BSA) within the past 20 years; however, these taxa were not detected during the most recent surveys.

- Crotch bumble bee (*Bombus crotchii*). CDFW candidate for listing as endangered. The nearest recorded occurrence of this species is within the BSA in 2020, and there are multiple occurrences within 5 miles within the past 20 years. California buckwheat, a food plant for the species, occurs within the BSA, but there is none within the Project Area.
- Cooper's hawk (*Accipiter cooperii*). High potential to occur for foraging. CDFW Watch List. Suitable foraging habitat occurs in the Los Angeles River corridor, but habitat is disturbed. This species was observed within the BSA in the Los Angeles River corridor during the reconnaissance survey.
- Great Egret (*Ardea alba*). High potential to occur for foraging. CDFW Special Animal. Suitable habitat occurs within the LA River corridor. There are no California Natural Diversity Database (CNDDDB) occurrences recorded from within 10 miles of the BSA, however, this species was observed in the Los Angeles River corridor during the reconnaissance survey.
- Great blue heron (*Ardea Herodias*). High potential to occur for foraging. CDFW Special Animal. Suitable habitat occurs within the Los Angeles River corridor. There are no CNDDDB occurrences recorded from within 10 miles of the BSA, however, this species was observed in the Los Angeles River corridor during the reconnaissance survey.
- Snowy egret (*Egretta thula*). High potential to occur for foraging. CDFW Special Animal. Suitable habitat occurs within the Los Angeles River corridor. There are no CNDDDB occurrences recorded from within 10 miles of the BSA, however, this species was observed in the Los Angeles River corridor during the reconnaissance survey.
- American peregrine falcon (*Falco peregrinus anatum*). CDFW Fully Protected. Marginally suitable foraging habitat occurs within the BSA. There is one recorded occurrence within 1-mile north of the BSA in 2005, and an occurrence recorded on eBird across the Los Angeles River from the BSA at Lewis MacAdams Riverfront Park in 2022.
- Black-crowned night heron (*Nycticorax nycticorax*). High potential to occur for foraging. CDFW Special Animal. Suitable habitat occurs within the Los Angeles River corridor. This species was observed within the river corridor adjacent to the Bowtie Parcel during surveys.
- Osprey (*Pandion haliaetus*). High potential to occur for foraging. CDFW Watch List. Suitable foraging habitat occurs within the Los Angeles River corridor. This species was observed within the river corridor adjacent to the Bowtie Parcel during surveys.

- American white pelican (*Pelecanus erythrorhynchos*). High potential to occur for foraging. CDFW Species of Special Concern (SSC). Suitable foraging habitat occurs within the Los Angeles River corridor. There are occurrences recorded on eBird in Lewis McAdams Riverfront Park, approximately 0.6 mile southwest of the BSA from 2022, in the Frogtown area approximately 1-mile south of the BSA from 2021, and in the Rio de Los Angeles State Park, approximately 0.6 mile from the BSA from 2022.

Wildlife Species with a Moderate Potential to Occur

Nineteen species were found to have a moderate potential to occur in the BSA because habitat (including soils) for the taxa occurs onsite, and a known regional record occurs within the database search but not within 5 miles of the BSA or within the past 20 years; or a known occurrence occurs within 5 miles of the BSA and within the past 20 years and marginal or limited amounts of habitat occurs onsite; or the taxa's range includes the geographic area and suitable habitat exists.

- Western ridged mussel (*Gonidea angulate*) – State Ranking S1S2. The portion of the BSA that contains the Los Angeles River has suitable habitat for this species, and the nearest recorded occurrence was within the BSA in 1993. However, the species was not observed onsite during the field survey. It is not expected to occur within the Project Area due to lack of suitable habitat.
- Southern California legless lizard (*Anniella stebbinsi*) – CDFW SSC, State Ranking S3. Marginally suitable habitat occurs within the Los Angeles River within the BSA. Five species occurrences occur within 5 miles within the past 10 years. The closest of these was approximately 0.5 mile to the east of the BSA in 2013. This species was not observed during the field survey.
- Western pond turtle (*Emys marmorata*) – CDFW SSC, State Ranking S3. Marginally suitable habitat occurs within the BSA. The nearest CNDDDB records were 6 miles west northwest of the BSA in 1917. Species was observed in the Los Angeles River approximately 5 miles upstream of Bowtie parcel in 2017 by Stantec Biologists.
- Cooper's hawk – CDFW Watch List, State Ranking S4. Moderate potential to occur for nesting. Suitable foraging habitat occurs in the Los Angeles River corridor, but habitat is disturbed. This species was observed in the BSA eating a prey item in the river corridor in November of 2022.
- Sharp-shinned hawk (*Accipiter striatus*) – CDFW Watch List, State Ranking S4. Moderate potential to occur for foraging. Marginally suitable habitat occurs within the Los Angeles River corridor. There is one occurrence recorded on eBird in Lewis MacAdam's Riverfront Park, approximately 0.6 mile southwest of the BSA from 2022 and one occurrence at the Frogtown area approximately 1-mile downstream of the BSA from 2022.
- Tri-color blackbird (*Agelaius tricolor*) – State Threatened. Moderate potential to occur for nesting and foraging. Suitable habitat occurs in the river corridor, but habitat is disturbed within the Los Angeles River corridor. There are numerous occurrences near the BSA on eBird, including at the Lewis MacAdams Riverfront Park, approximately 0.6 mile southwest of the BSA in 2022 and the Frogtown area approximately 1-mile downstream of the BSA in 2023.

- Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*) – CDFW Watch List, State Ranking S3. Moderate potential to occur for nesting and foraging. Marginally suitable breeding and foraging habitat occurs within the BSA. There is one occurrence 5 miles west of the BSA in 2014.
- Great egret – CDFW Special Animal, State Ranking S4. Moderate potential to occur for nesting. Suitable habitat occurs within the Los Angeles River corridor. There are no CNDDDB occurrences recorded from within 10 miles of the BSA. This species was observed in the Los Angeles River corridor during the survey.
- Great blue heron – CDFW Special Animal, State Ranking S4. Moderate potential to occur for nesting. Suitable habitat occurs within the Los Angeles River corridor. There are no CNDDDB occurrences recorded from within 10 miles of the BSA. This species was observed in the Los Angeles River during the survey.
- Costa's hummingbird (*Calypte costae*) – CDFW Special Animal, USFWS Bird of Conservation Concern, State Ranking S4. Moderate potential to occur for foraging. Marginally suitable habitat occurs within the BSA. There are occurrences recorded on eBird at Lewis MacAdams Riverfront Park approximately 0.6 mile west of the BSA in 2022 and in the Frogtown area approximately 1-mile south of the BSA in 2016.
- Southwestern willow flycatcher (*Empidonax traillii extimus*) – Federally and State Endangered, State Ranking S1. Moderate potential to occur for foraging. Marginally suitable nesting habitat occurs and suitable foraging habitat occurs within the BSA. There are two occurrences from within the site and within 5 miles of the site, but they are from over 90 years ago. There is an eBird occurrence of willow flycatcher from Rio De Los Angeles State Park approximately 0.6 mile south of the BSA from 2022 and from the Frogtown area approximately 1-mile south of the BSA in 2018. These occurrences were not confirmed at the subspecies level.
- American peregrine falcon – CDFW Fully Protected, State Ranking S3S4. Moderate potential to occur for nesting. Marginally suitable nesting and foraging habitat occurs within the BSA. There is one recorded occurrence within 1-mile north of the BSA in 2005, and an occurrence recorded on eBird across the Los Angeles River from the BSA at Lewis MacAdams Riverfront Park in 2022.
- California gull (*Larus californicus*) – CDFW Watch List, USFWS Bird of Conservation Concern, State Ranking S4. Moderate potential to occur for foraging. Suitable foraging habitat occurs within the Los Angeles River corridor. Two recorded occurrences in 2022 in eBird, including one in the BSA and one in the Rio de Los Angeles State Park, approximately 0.6 mile from the BSA.
- Double-crested cormorant (*Nannopterum auritum*) – CDFW Watch List, State Ranking S4. Moderate potential to occur for foraging. Suitable foraging habitat occurs within the Los Angeles River corridor. There are no CNDDDB occurrences within 10 miles of the BSA. An occurrence was recorded in eBird from 2022, from the Bowtie Parcel hotspot.

- Osprey – CDFW Watch List, State Ranking S4. Moderate potential to occur for nesting. Suitable foraging habitat occurs within the Los Angeles River corridor. This species was observed within the river corridor adjacent to the Bowtie parcel during surveys.
- Yellow warbler (*Setophaga petechia*) – CDFW SSC, State Ranking S3S4. Moderate potential to occur for nesting and foraging. Suitable nesting habitat and foraging habitat occurs in vegetated sections of the Los Angeles River corridor. This species was observed in 2022 by Stantec biologists within the Los Angeles River corridor adjacent to the Bowtie parcel.
- Least Bell's vireo (*Vireo bellii pusillus*) – Federally and State Endangered, State Ranking S2. Moderate potential to occur for foraging. Marginally suitable nesting habitat and suitable foraging habitat occurs within the BSA along the Los Angeles River. All the CNDDDB occurrences within 5 miles of the BSA are from over 100 years ago. More recent occurrences, from 2013 and 2015, are 7 and 10 miles to the east and northeast of the BSA. Recent occurrences were recorded on eBird in the Rio de Los Angeles State Park approximately 0.6 mile from the BSA in 2022 in 2024 (and confirmed by DPR biologists during a survey performed in the spring of 2024), and in the Frogtown area approximately 1-mile south of the BSA in 2021.
- Western yellow bat – CDFW SSC, State Ranking S3. Moderate potential to occur. Untrimmed palm trees are present in the BSA. There is an occurrence 1-mile north/northwest of the BSA from 1984.
- San Diego desert woodrat (*Neotoma lepida intermedia*) – CDFW SSC, State Ranking S3S4. Moderate potential to occur. Marginally suitable habitat occurs within the BSA within the low-quality coastal scrub. Two occurrences from 2006 were documented approximately 5 miles west/northwest of the site.

Wildlife Species with a Low Potential to Occur

Fifteen species were found to have a low potential to occur in the BSA because limited habitat for the taxa occurs within the BSA and no known occurrences were found from the database search (although the taxa's range includes the geographic area). These species include western spadefoot (*Spea hammondi*), burrowing owl (*Athene cunicularia*), Costa's hummingbird (nesting), Vaux's swift (*Chaetura vauxi*), white-tailed kite (*Elanus leucurus*), southwestern willow flycatcher (nesting), snowy egret (nesting), white-faced ibis (*Plegadis chihi*)(foraging), coastal California gnatcatcher (*Poliophtila californica californica*), bank swallow (*Riparia riparia*)(foraging), LBVI (nesting), hoary bat (*Lasiurus cinereus*), southern grasshopper mouse (*Onychomys torridus ramona*), and Los Angeles pocket mouse (*Perognathus longimembris brevinasus*).

While many of the species have some potential to occur within the BSA, they are generally not expected to occur within the Project Area due to the lack of suitable habitat. However, the trees and shrubs immediately adjacent to the Project Area and the disturbed land on the Project Area could provide nesting habitat for birds and raptors protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. The timing of the nesting season varies greatly depending on several factors, such as the bird species, weather conditions in any given year, and long-term climate changes (e.g., drought, warming). Changing climate conditions may result in the nesting bird season occurring earlier and later in

the year than historical nesting season dates. To ensure compliance with all applicable laws pertaining to nesting birds and to avoid take of nests, a nesting bird survey should be conducted prior to initial ground disturbance during the bird breeding/nesting window (February 15 to August 31). If nesting birds are present in the Project Area, ground-disturbing construction activities could directly affect nesting birds and other birds protected by the MBTA and their nests through the removal of habitat in the Project Area, and indirectly through increased noise, vibrations, and increased human activity. Impacts to nesting birds would be less than significant. The implementation of SPRs and PSRs BIO-1 through BIO-4 will also reduce impacts to nesting birds and sensitive species within the Project Area. SPRs are specific standard requirements imposed uniformly by DPR based on the proposed action taken and are required of the Proposed Project to reduce its potential environmental effects. Because these features are standard, they do not constitute mitigation measures. PSRs are specific project requirements of the Proposed Project that have been incorporated to reduce its potential environmental effects. Because these features are part of Project design, they do not constitute mitigation measures.

Applicable BMPs related to biological resources from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

Would the Project:		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

One vegetation community identified within the BSA is listed as sensitive: Gooding’s willow – red willow riparian woodland and forest. This community has a state rank of S3/Vulnerable; vulnerable in the state due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation from the state. Although this community occurs within the BSA, it is not found within the Project Area. No other sensitive communities occur within the Project Area. No impact would occur.

Applicable BMPs related to biological resources from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

There are no potential jurisdictional features within the Project Area. The Project Area is located in the upland area adjacent to the concrete-lined banks of the Los Angeles River. The Los Angeles River is considered to be Waters of the U.S. and under the jurisdiction of the USACE up to the Ordinary High Water Mark, and waters of the state under jurisdiction of the RWQCB. The River channel up to the top of the concrete banks and within any adjacent riparian zone vegetation is considered to be under the jurisdiction of the CDFW. Construction of the Proposed Project includes filling, however there would be no substantial adverse effects to the Los Angeles River. No state or federally protected wetlands occur within the Project Area. No impact would occur.

Applicable BMPs related to biological resources from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

The BSA is located in a heavily developed area but contains localized portions of open space and riparian habitat along the Los Angeles River. Development and anticipated usage of the Proposed Project could potentially impact the habitat linkages that exist between the property and the surrounding heavily vegetated portion of the Los Angeles River. Once established, Bowtie Park (Park) has the potential to become significant in the habitat linkage along the Los Angeles River. The proximity of the Project Area to the Los Angeles River may synergistically establish and attract avian wildlife from throughout the region by providing protective cover, water, and forage for a variety of bird species as they travel up and down the River valley. The Project Area resides in the Pacific Flyway, a critical migratory bird path. Regionally, the Park will continue to provide intermediate open space refuge for migratory species. Therefore, impacts would be less than significant.

Applicable BMPs related to biological resources from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

Would the Project:		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

The Project Area is located within a parcel with a partial concrete post-industrial landscape on the east bank of the Los Angeles River. The Project aligns with the following local policies:

- Conservation and Natural Resources Element of the Los Angeles County General Plan
 - Open Space Resources Component
 - Goal 1: Open space area that meet the diverse needs of the Los Angeles County
 - Biological Resources Component
 - Goal 3: Permanent, sustainable preservation of genetically and physically diverse biological resources and ecological systems including: habitat linkages, forests, coastal zone, riparian habitats, streambeds, wetlands, woodlands, alpine habitat, chaparral, shrublands, and sensitive ecological areas.
 - Local Water Resources Component
 - Goal 5: Protected and useable local surface water resources.
 - Goal 7: Protected and healthy watersheds.
- City of Los Angeles General Plan
 - Conservation Element: Preservation, conservation, protection, and enhancement of the City's natural resources. The natural resources or processes that should be or are subject to preservation, conservation, protection, and enhancement efforts include endangered species, erosion, habitats, and open space and parks.
 - Open Space Element: Open Space Plan that serves to guide the identification, preservation, conservation, and acquisition of open space within the City. The BSA supports several of the characteristics used to define "Open Space" in the Open Space Element of the City's General Plan. Specifically, it provides "opportunities for recreation and education", preserves scenic, cultural, or historic values, conserves or preserves natural resources or ecologically important areas, and protects or preserves lands for managed production of natural resources.

LAMC Article 6 Preservation of Protected Trees protects certain southern California indigenous tree and shrub species, including trees of the oak genus indigenous to California but excluding the scrub oak (*Quercus berberidifolia*), southern California black walnut (*Juglans californica*), western sycamore (*Platanus*

racemosa), and California bay (*Umbellularia californica*). Protected shrubs include blue elderberry (*Sambucus mexicana*) and toyon (*Heteromeles arbutifolia*). There are no protected tree or shrub species in the Project Area, thus the Project would not conflict with the tree protection policy. No impact would occur.

Would the Project:		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

The Project Area is zoned Public Facilities and is designated in the General Plan as Public Facilities. As discussed above, the Project Area is a partial concrete post-industrial landscape and does not contain habitat for sensitive biological resources. The Proposed Project would not conflict with any habitat conservation plans. No impact would occur.

4.4.3 Standard Project Requirements and Project Specific Requirements

BIO-1 (SPR): Preconstruction Survey for Nesting Birds. During the bird breeding/nesting window (February 15 to August 31),, DPR shall ensure a nesting bird survey is completed prior to the start of any development activities (such as ground disturbance, construction activities, and/or removal of trees and vegetation) within the Project Area. This will avoid violations of the MBTA and California Fish and Game Code Sections 3503, 3503.5, and 3513. The preconstruction nesting bird survey shall include the Project Area and adjacent areas Where Project activities have the potential to cause nest failure.

The survey results shall be provided to the Lead Agency (DPR). DPR shall adhere to the following:

- Designate a qualified biologist experienced in: identifying local and migratory bird species of special concern; conducting bird surveys using appropriate survey methodology; nesting surveying techniques, recognizing breeding and nesting behaviors, locating nests and breeding territories, and identifying nesting stages and nest success; determining/establishing appropriate avoidance and minimization measures; and monitoring the efficacy of implemented avoidance and minimization measures.
- Preconstruction surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than three days prior to the initiation of Project activities. Surveys shall encompass all suitable areas including trees, shrubs, bare ground, burrows, cavities, and structures. Survey duration shall take into consideration the size of the Project Area; density, and complexity of the habitat;

number of survey participants; survey techniques employed; and shall be sufficient to ensure the data collected is complete and accurate.

If no nesting birds are observed during the survey, site preparation and construction activities may begin. If nesting birds (including nesting raptors) are found to be present, then avoidance or minimization measures shall be undertaken in consultation with the Lead Agency, and as required, the United State Fish and Wildlife Service (USFWS and California Department of Fish and Wildlife (CDFW). Measures shall include immediate establishment of an appropriate buffer zone to be established by a qualified biologist, based on their best professional judgement and experience. The buffer around the nest shall be delineated and flagged, and no construction activity shall occur within the buffer area until a qualified biologist determines nesting species have fledged and the nest is no longer active, or the nest has failed. The qualified biologist shall monitor the nest at the onset of Project activities, and at the onset of any changes in such Project activities (e.g., increase in number or type of equipment, change in equipment usage) to determine the efficacy of the buffer. If the qualified biologist determines that such Project activities may be causing an adverse reaction, the qualified biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers shall be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest) or failed. The onsite qualified biologist shall review and verify compliance with these nesting avoidance buffers and shall verify the nesting effort has finished. Work can resume within these avoidance areas when no other active nests are found.

Upon completion of the survey and nesting bird monitoring, a memorandum or report shall be prepared and submitted to the Lead Agency for mitigation monitoring compliance record keeping.

BIO-2 (PSR): Protection Measures Specific to Least Bell's Vireo. Focused, protocol-level surveys for LBVI are in progress. The survey area includes the Project footprint and a 500-foot buffer where habitat exists.

- If LBVI is detected during the surveys, coordination with the USFWS and CDFW will be initiated.

Regardless of survey results, the following avoidance and minimization measures shall be implemented to reduce potential impacts to nesting LBVI throughout the construction process:

- DPR shall designate a qualified biologist with experience surveying for and monitoring LBVI. If construction activity overlap with the LBVI breeding period, the qualified biologist shall conduct pre-construction surveys (i.e. surveys at least one week apart with the last survey conducted within three days of the start of Project activities) for vireos and their nests within a 500-foot buffer zone of the work area and other areas potentially supporting nesting birds. If a vireo nest is observed, the

qualified biologist shall immediately contact DPR. The qualified biologist and DPR shall review the findings and notify the USFWS and/or CDFW. Project work shall be suspended within the buffer zone until the qualified biologist can determine whether nest avoidance is feasible or not.

- If nest avoidance is not feasible, DPR and the qualified biologist shall determine whether an exception is possible and seek approval from the USFWS and CDFW before work can resume within the buffer zone. All construction in the buffer zone shall cease until USFWS and CDFW approval is obtained. Additional conservation measures may be required to ensure nesting vireos are not adversely affected, which may include onsite noise reduction/attenuation techniques (i.e., noise shall not exceed an hourly average of 60 A-weighted decibels (dBA) or above existing ambient levels, whichever is greater, at the edge of occupied habitat).
- Should work be suspended or delayed for a period of greater than seven (7) days, then DPR and the qualified biologist shall determine the need for another bird survey to ensure no additional nesting has occurred in the Project Area.
- The qualified biologist shall be onsite daily during the bird breeding season (February 15 to 15) to monitor and record activities that could impact the LBVI and other nesting birds within the Project Area. If active nests are found, measures (such as those described below) shall be incorporated into ongoing operations to reduce the potential for disturbance.
- Should any other nesting bird be found during the surveys, then appropriate measures, as determined by the qualified biologist, in coordination with DPR, shall be implemented by the Contractor to minimize harm/harassment. These measures may include, but are not limited to, temporary delay of construction, staking/flagging near the nest, establishing a minimum "no work" buffer, and/or installing temporary fencing.

BIO-3 (PSR): Protection Measures Specific to Crotch's Bumblebee. Focused surveys for Crotch's bumblebee (CBB) are in progress.

- If CBB is detected during these surveys, coordination with CDFW will be initiated.

Regardless of survey results, the following avoidance and minimization measures shall be implemented to reduce potential impacts CBB throughout the construction process:

- DPR shall designate a qualified biologist with experience surveying for and monitoring CBB. If construction activity overlaps with the CBB flight period (February 1 through October 31), the qualified biologist shall conduct pre-construction surveys (i.e., surveys at least one week apart with the last survey conducted within three days of the start of Project activities) for CBB within the work area and other adjacent areas potentially supporting native pollinators. If a CBB is observed, the qualified biologist shall immediately contact DPR. The qualified biologist and DPR shall review the findings and notify the CDFW. Project work shall be suspended within a buffer zone

identified by the qualified biologist until the qualified biologist can determine whether CBB avoidance is feasible or not.

- Removal of CBB nectar plants and other native vegetation should be avoided. If nectar plants or native vegetation must be removed, it shall be completed outside the CBB flight season (February 1 through October 31), with the qualified biologist conducting a survey immediately before any vegetation removal activities. If CBB is discovered, work shall be suspended until the qualified biologist has consulted with the CDFW. Removal of vegetation shall only proceed with implementation of the conditions set forth by CDFW.
- If ground, leaf litter, or vegetation disturbing work occurs within the flight season, the qualified biologist shall conduct daily monitoring for the CBB during these activities. If CBB is discovered in the Project Area, monitoring shall occur daily for the remainder of the flight season (February 1 through October 31). The qualified biologist shall inspect vegetation for bumblebee foraging or nesting prior to removal. If a bumblebee nest is discovered, removal of the vegetation shall not occur until the flight season has ended and the nest has been determined abandoned by the qualified biologist.
- If Crotch's bumblebee is found during the surveys, then appropriate measures, as determined by the qualified biologist and DRP, shall be implemented by the Contractor to minimize harm/harassment. These measures may include, but are not limited to, temporary delay of construction, staking/flagging near the nest or nectar plants, establishing a minimum "no work" buffer, and/or installing temporary fencing.

BIO-4 (SPR): Protection Measures for Other Sensitive Plant and Wildlife Species. DPR shall designate a qualified biologist familiar with sensitive species with the potential to occur onsite (see Section 4.4.2). The qualified biologist shall complete a pre-construction survey within 72 hours of the start of construction to ensure that no sensitive species are present onsite or will be within a 300-foot buffer of the Project footprint. If sensitive species are found during the surveys, then appropriate measures, as determined by the qualified biologist and DPR, shall be implemented by the Contractor to minimize harm/harassment. These measures may include, but are not limited to, temporary delay of construction, staking/flagging near the nest or nectar plants, establishing a minimum "no work" buffer, and/or installing temporary fencing.

4.5 Cultural Resources

Stantec prepared a Cultural Resources Survey Report for the Proposed Project to determine if cultural resources were present in or adjacent to the Project Area and assess the sensitivity of the Project Area for undiscovered or buried cultural resources (Stantec 2024; Appendix C). Cultural resources include precontact archaeological sites, historic archaeological sites, and historic structures, and generally consist of artifacts, food waste, structures, and facilities made by people in the past. Precontact archaeological sites are places that contain the material remains of activities carried out by Native Americans prior to the arrival of Europeans in Southern California. Places that contain the material remains of activities carried

out by people during the period when written records were produced after the arrival of Europeans are considered historic archaeological sites. Historic structures include houses, garages, barns, commercial structures, industrial facilities, community buildings, and other structures and facilities that are more than 50 years old. Historic structures may also have associated archaeological deposits, such as abandoned wells, cellars, privies, refuse deposits, and foundations of former outbuildings. Tribal cultural resources are addressed separately in Section 4.18 of this Initial Study.

Under CEQA, "historical resources" require special consideration. A historical resource is a resource that 1) is listed in or has been determined eligible for listing in the California Register of Historical Resources (CRHR) by the State Historical Resources Commission, or has been determined historically significant by the CEQA lead agency because it meets the eligibility criteria for the CRHR, 2) is included in a local register of historical resources, as defined in Public Resources Code (PRC) 5020.1(k), or 3), and has been identified as significant in a historical resources survey, as defined in PRC 5024.1(g) (14 CCR 15064.5(a)).

The eligibility criteria for the CRHR are as follows (14 CCR 4852(b)):

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
2. It is associated with the lives of persons important to local, California, or national history;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition, the resource must retain integrity, which is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association (14 CCR 4852I). Resources that have been determined eligible for the National Register of Historic Places (NRHP) are automatically eligible for the CRHR.

Impacts to a Historical Resource, as defined by CEQA (listed in an official historic inventory or survey or eligible for the CRHR), are significant if the resource is demolished or destroyed or if the characteristics that made the resource eligible are materially impaired (14 CCR 15064.5(b)). Demolition or alteration of eligible buildings, structures, and features that they would no longer be eligible would result in a significant impact. Whole or partial destruction of eligible archaeological sites would result in a significant impact. In addition to impacts from construction resulting in destruction or physical alteration of an eligible resource, impacts to the integrity of setting (sometimes termed *visual impacts*) of physical features in the Project Area could also result in significant impacts.

The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to PRC Section 5020.1(k)), or identified in a historical resources survey (meeting the criteria in PRC Section 5024.1(g)) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1. In addition, properties of local significance that have been designated under a local preservation ordinance (local landmarks or landmark districts) or that have been identified in a local historical

resources inventory may be eligible for listing in the CRHR and are presumed to be historical resources for purposes of CEQA unless a preponderance of evidence indicates otherwise (PRC Section 5024.1 and 14 CCR 4850).

CEQA also requires lead agencies to determine if a proposed project would have a significant effect on unique archaeological resources. If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 would apply. If an archaeological site does not meet the CEQA Guidelines criteria for a historical resource, then the site may meet the threshold of PRC Section 21083.2 regarding unique archaeological resources.

“Unique archaeological resource” means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

The CEQA Guidelines note that if a resource is neither a unique archaeological resource nor a historical resource, the effects of the Project on that resource shall not be considered a significant effect on the environment (14 CCR 15064[c][4]).

4.5.1 Environmental Setting

The following environmental setting is excerpted and summarized from Stantec 2024.

The Bowtie Parcel includes a concrete former industrial landscape on the eastern bank of the Los Angeles River. A group of businessmen led by Timothy Phelps formed the Southern Pacific Railroad company in 1865 with the aim of building a new rail line between San Francisco and San Diego. Looking to expand their western operations, Central Pacific Railroad purchased the fledgling company in 1868 as part of the western expansion of its soon to be completed transcontinental railroad line. In 1876, Southern Pacific completed Los Angeles’ connection to the terminus of the transcontinental rail line in San Francisco, transforming the course of the city’s history and fueling its early growth. It opened Los Angeles’ burgeoning agricultural industry to outside markets, inciting the cultivation of cash crops. This rise in agricultural production led to an expansion of the city’s population, which had doubled by 1886, as seasonal workers poured into Los Angeles along the transcontinental rail line. From the late 19th century onward, the history of the Southern Pacific Railroad and Los Angeles were intimately tied—with periods of growth in Southern Pacific’s business closely mirroring periods of economic growth in the city overall.

Within the City, Southern Pacific’s original rail alignment extended adjacent to San Fernando Road into downtown. Around 1908, Southern Pacific built a spur off the main line on San Fernando Road to a feed mill southwest of the present-day Bowtie parcel near Elm Street. The mill was owned by grain merchant J.

Hartley Taylor—an influential Los Angeles businessman and owner of the Taylor Grocery and Taylor Milling Company. As Los Angeles' economy and population continued to grow in the early 1900s, rail traffic increased throughout the region, prompting Southern Pacific to begin expansion of their freight classification yard capacity. In the early 1910s, the company began developing the area southwest of the Taylor spur between San Ferando Road and the Los Angeles River as a new freight classification yard and the site was soon commonly referred to as "Taylor Yard" after the owner of the nearby mill. Taylor Yard's capacity was increased to ten tracks by 1913 totaling 21,000 feet on both sides of the main line. Also in 1913, a railroad refrigerator car company named Pacific Fruit Express—jointly owned by Southern Pacific and Union Pacific—opened an ice plant at the new classification yard and a year later built several warehouse-type buildings adjacent to the tracks, just south of the present-day Bowtie Parcel. Many of these original buildings and structures were later damaged by flooding along the Los Angeles River in 1914.

Los Angeles' post-World War I economic boom driven by the film, oil, and real estate industries prompted an increase in rail activity along the Southern Pacific from a few hundred cars a month to 100,000 cars a month by the early 1920s. This increased traffic motivated the company to make a number of operational changes, including relocating freight handling operations from River Station to Taylor Yard. Taylor yard would soon become the central destination for much of Southern Pacific's freight traffic with other smaller switch yards in Calexico, Indio, and Colton supporting Los Angeles operations. Southern Pacific began a major overhaul of the Taylor classification yard in 1923, building a new earthen levee along the river's east bank, importing 900,000 yards of earth to level the ground between the Pacific Fruit Facility and the main line, and adding 47,000 feet of track. Taylor Yard extended roughly 2 miles on the east bank of the Los Angeles River between present-day Glendale Freeway (United States Route 2) on the north and I-5 on the south.

The northern portion of the yard was occupied by about 15 tracks, referred to as "A Yard" or receiving tracks. To the south of A Yard, the tracks narrowed to a single track sited on an eight-foot-high hill or "hump" before widening out to around 20 tracks, an area known as "B Yard" or the classification yard. South of B Yard, the tracks once again narrowed to four tracks before widening out again to approximately 10 tracks at an area known as "C Yard". The area to the west of B Yard was used during this period for maintenance and operation. The Pacific Fruit warehouses were at the north end of this maintenance area. The company also built icing docks near the center. A powerhouse was near the south end of the maintenance area as well as several warehouse buildings scattered throughout. The yard office was located to the south in between B Yard and C Yard, and an underpass connected the office to San Ferando Road.

Freight traffic traveling to Taylor Yard traveled from the main line into A Yard where the train cars were uncoupled, then the uncoupled train cars were pushed over the hump into B Yard and sorted, before finally being assembled into consists or groups of rail vehicles at C Yard. The hump between A Yard and B Yard was part of what was called a "hump-based" classification system or hump yard, one of several modern railroad infrastructure advancements that Southern Pacific first introduced to its Southern California operations at Taylor Yard. Hump yards appear to have originated in Europe in the mid-19th century and were built all over the United States by the 1920s. The system operated using small switch

locomotives that pushed strings of freight cars to the top of the artificially created hill and then were allowed to roll down the opposite side to prearranged tracks. The small switch locomotives were manned by car riders who used brake wheels to slow their descent. The hump at Taylor Yard was west of Macon Street south of the Bowtie parcel.

Despite the Great Depression, Southern Pacific continued to expand and improve Taylor Yard in 1930–1931, although by 1932 freight traffic was halved and Southern Pacific revenues sank to negative \$3 million. A new roundhouse and divisional shop facility for train maintenance and repair were constructed at the southwest end of the maintenance area, adjacent to the river. The roundhouse featured 24 stalls for steam locomotives and a turntable used to move the trains into the stalls. A new control tower—referred to as Dayton Tower—was built near the south end of the yard as well as other miscellaneous warehouse-type buildings and fuel tanks.

Other changes during this period included encasing the riverbanks adjacent to the freight yard in concrete. Due to the efforts to build up the levee after the 1914 flood, Taylor Yard sat above the river's natural flood plain. Because of this, flooding in 1938 mostly spared the yard. Nevertheless, as a result of the 1938 flood, the city soon embarked on one of its largest infrastructure projects, the channelization of the Los Angeles River. The riverbank to the west of Taylor Yard was subsequently reconfigured as a result of the channelization. According to historic aerial photographs, the west property boundary became a clearly defined concrete embankment instead of an undulating sandy riverbank by 1940. The fill material used to construct the channel was placed on undeveloped portions of the north end of Taylor Yard. The river's channelization created a permanent edge along Taylor Yard as well as protected the area from regular flooding.

Following World War II, growth in freight transport and transition from steam to diesel spurred Southern Pacific to upgrade Taylor Yard beginning in 1949. The company added tracks to A, B, and C Yards and built a new diesel repair shop to the south of the Taylor roundhouse. The hump was relocated 215 feet to the north and upgraded with pneumatically controlled retarders that pinched the train car's wheel, slowing it down to an appropriate speed, rather than requiring a brakeman to pull the brakes. Other changes included the addition of new concrete control towers west of the hump and construction of new warehouse-type buildings throughout the maintenance area. Sometime between 1952 and 1960, a new office building was constructed at the north end of the yard within the Bowtie parcel. The steam locomotive roundhouse was removed between 1960 and 1964, although the turntable and tracks appear to remain. A new diesel servicing facility with a diesel turntable called the sanding and fueling station was built to the north of the former roundhouse. A new addition was also built on the east facade of the ca. 1949 divisional shop facility.

With the redesign, Southern Pacific downgraded other classification yards in the region and rerouted traffic to Taylor Yard. It also reassigned responsibilities from peripheral yards in Los Angeles to Taylor Yard, consolidating its operations in the region. By the 1960s, freight traffic through Taylor Yard reached its peak, accounting for 50 percent of all railroad traffic into and out of Southern California. Its diesel repair shops also remained integral to the company's operations, second only to Southern Pacific's Sacramento facilities. As more people in the United States traveled by car than ever before, most railroads began discontinuing passenger train service, including Southern Pacific which began slowly eliminating

passenger service in the 1960s—although freight railroads remained important through the postwar period and continue to remain important to the American economy today.

After the completion of a modern automated freight classification yard at West Colton in 1973, Southern Pacific began phasing out operations at Taylor Yard. For 12 years, Taylor Yard was used for engine and car repair before finally closing in 1985. Southern Pacific prepared the northern portion of the site for sale, demolishing buildings, and structures as well as remediating contaminated soil, but retained facilities at the south end of the site, including the sanding and fueling station, turntables, and divisional shop facility. Union Pacific then bought out Southern Pacific in 1996, beginning the process of selling off the remaining parcels of Taylor Yard for redevelopment. One parcel was sold to the City for construction of the Metrolink. It was this sale that launched the extensive public effort to reserve the bulk of Taylor Yard for public use as a park and greenspace. A total of 40 acres of the former yard were subsequently acquired by the CA DPR in December 2001 and the Rio de Los Angeles State Park opened by 2007. Union Pacific sold other parcels, mostly those to the north of the Park on San Fernando Road, to private owners. The last buildings and structures at Taylor Yard were demolished between 2009 and 2010.

4.5.2 Cultural Resources (V) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant with Standard Project Requirements Incorporated.

A records search was requested from the South-Central Coastal Information Center of the California Historical Resources Information System at California State University, Fullerton. The request was submitted on May 11, 2022, and the results were received on July 19, 2022. The purpose of the records search was to identify previously recorded cultural resources, if any, within the APE which includes the Project Area and a 0.5-mile radius surrounding the entire 18-acre Bowtie parcel. The records search resulted in identification of previous investigations and site records of previously recorded resources within the Project Area and the 0.5-mile search radius. Stantec also reviewed the Built Environment Resources Directory on file with the Information Center to identify historic-era resources listed on or determined eligible for listing on the NRHP, the CRHR, and local registers. It also included a review of resources listed as California Historical Landmarks and California Points of Historical Interest (Stantec 2024).

The records search revealed that 23 previous cultural resources investigations have been completed within a 0.5-mile of the Project Area. The investigations were conducted between 1986 and 2017; three of the studies were conducted in the last ten years and most were conducted between 2000 and 2010. These projects supported a variety of undertakings, including private developments, railways, roadways, telecommunications, and water or sewer, and several involved archaeological monitoring. Two of the previous investigations overlapped a portion of the Project Area. However, most of the northern and

southern portions of Project Area have not been previously surveyed for cultural resources. The records search results also revealed that there are no previously recorded cultural resources within the Project Area. A total of five previously documented cultural resources are within a 0.5-mile radius of the Project Area, and these include three historic-era buildings, and two historic-era structures. None of the historic-era resources identified in the record search results were recommended eligible for the CRHR or NRHP (Stantec 2024).

The USACE, with SHPO concurrence, has determined that the Los Angeles River Channel is eligible for listing on the NRHP under Criterion A (is associated with events that have made a significant contribution to the broad patterns of our history) at the local level of significance for its significant association with the development of a comprehensive flood risk management program in the County and development in the Los Angeles metropolitan area. It is also eligible under NRHP Criterion C (embodies the distinctive characteristics of a type, period or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction) as the first implementation of a fully concrete lined waterway engineered to address unique challenges of the locale and for its role as a prototype for flood control channels in the region. The period of significance is 1936 to 1960. The formal recordation of the Los Angeles River Channel is still in process. Reach 6 of the Los Angeles River Channel is adjacent to, but outside of, the APE for the Project. No Project activities would impact the Los Angeles River Channel.

Archaeologists carried out an intensive pedestrian survey of the Project Area in 2022. The Project Area was surveyed using systematic, parallel transects spaced 15-meters apart. The goal of survey was to identify artifacts, archaeological features (such as foundations and other historic structures), anthropogenic sediments, or other evidence of cultural remains. All areas were examined, and noted the environment, disturbances, access, and the presence or absence of cultural resources (Stantec 2024).

Stantec concluded that the historical features of Taylor Yard remain within the Project Area, including building foundations, remnants of railroad tracks, and a railroad turntable, but that no other historic-era cultural resources were identified, and no precontact cultural resources were identified during the survey (Stantec 2024).

Stantec evaluated the significance of Taylor Yard by applying the NAHC and CRHR eligibility criteria. Taylor Yard is significant for its association with the history of Los Angeles' railroads, which played a primary role in the development of the Los Angeles economy, linking the City to the commercial port of San Pedro and the rest of the United States. Stantec concluded that Taylor Yard is eligible for inclusion in the NRHP and CRHR under NRHP Criterion A (is associated with events that have made a significant contribution to the broad patterns of our history) and CRHR Criterion 1 (associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States) and NRHP Criterion D (has yielded, or may be likely to yield, information important in history or prehistory) and CRHR Criterion 4 (has yielded, or has the potential to yield, information important in prehistory or history of the local area, California, or the nation) as a potential historic archaeological district (Southern Pacific Taylor Yard Historic Archaeological District; Stantec 2024).

A total of 25 contributing elements of Taylor Yard were identified, 12 of which are located (completely or partially) within the Project APE:

- Concrete foundation for the Southern Pacific Regional Office (Feature 1)
- Concrete foundation for Shed No. 1 (Feature 2)
- Concrete foundation for Shed No. 2 (Feature 3)
- Turntable pit for diesel locomotives (Feature 4)
- Concrete block containment wall for oil tanks (Feature 5)
- Structural Foundation No. 3, concrete base for possible water heater (Feature 15)
- East property roadway (Feature 16)
- West property roadway (Feature 17)
- Four sets of in-situ railroad tracks (Feature 21)
- Ten in-situ railroad ties (Feature 22)
- Single railroad track (Feature 23)
- Manhole No. 1 and No. 2 (Feature 24)

Although Southern Pacific leaders participated in the development of Taylor Yard, none were found to possess sufficient importance necessary to be considered a significant historical figure under NRHP Criterion B (is associated with the lives of persons significant in our past) or CRHR Criterion 2 (associated with the lives of persons important to local, California or national history). As a result, Taylor Yard is not eligible under Criterion B/2 at the local, state, or national level (Stantec 2024).

Taylor Yard does not embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, or possess high artistic value. The majority of the buildings and structures on the property have been demolished, and the features that remain—building foundations, short segments of railroad tracks, a turntable, amongst other small-scale features—do not retain enough physical integrity from the period Taylor Yard gained significance (1923 to 1973). Taylor Yard is not eligible under Criterion 3/C at the local, state, or national level (Stantec 2024).

Taylor Yard appears to be eligible under Criterion D/4 for its potential to reveal information important to history because the Taylor Yard Historic Archaeological District appears to have the potential to provide important information about the history of the Southern Pacific's Taylor Yard and its role in the economic expansion of Los Angeles area (Stantec 2024).

Taylor Yard's period of significance is 1923 to 1973—the year it was constructed through the years it served as Southern Pacific's primary freight classification yard in Southern California. According to Stantec (2024), the Taylor Yard Historic Archaeological District contains extant structural remnants of railyard facilities that retain sufficient integrity of design to convey their original dimensions, some integrity of

material in the remaining construction materials. This includes concrete, some integrity of workmanship reflected in the construction of the extant features, and integrity of location in that the features still convey their spatial relationship with one another. Research questions related to the themes of function, design, operation, and advances/changes in railroad technology (such as Taylor Yard's transition from steam to diesel locomotive technologies), can potentially be answered based on the known remaining structural features. While some information about the physical development of Taylor Yard may also be obtained via archival sources (e.g., photographs, engineering, and architectural records), archival documents would likely not include all potentially significant details related to day-to-day operations on the ground. Frequently, actual operations differ from documented plans.

In addition, the property has the potential to contain previously undocumented subsurface refuse deposits and structural remnants. Because Taylor Yard experienced three major expansions that each involved massive amounts of soil fill and levee building as the Yard expanded northward, refuse and equipment that was no longer useful may underlie fill at the Project Area. Under some of these filled areas may lie historic roads and rail lines that would have been rebuilt on top of the fill. The historical information that could be gleaned from each period would broaden the understanding of Southern Pacific's priorities and methods of territorial expansion (Stantec 2024).

In summary, the Stantec (2024) cultural resources inventory concluded that there is one Historical Resource present within the Project Area: the Southern Pacific Taylor Yard Historic Archaeological District. Twelve of the 25 contributing features are located completely or partially within the Project APE. The development of the Proposed Project would result in the demolition and removal of 4 of the 25 contributing elements of the Taylor Yard District: the Regional Office, Shed No. 1 and Shed No. 2 foundations, and a single railroad track. Impacts to all other remaining contributing elements in the APE (the diesel turntable pit, concrete water heater base, concrete block containment wall for oil tank, the four sets of in-situ railroad tracks, manholes No. 1 and No. 2, and the two roads [minor modifications only]) will be avoided as these features would be preserved in place. The two manholes would be covered with fill material and the diesel turntable pit will be minimally capped to protect the public from protruding metal pieces while the remaining features would be preserved in-situ.

Southern Pacific occupied the 200 plus acre Taylor Yard through 1985, after which time almost all the buildings and structures related to the site's railroad use were demolished. To date, its extent has not been fully inventoried beyond the Project Area. While the Proposed Project would result in direct impacts to four contributing features of the NRHP- and CRHR-eligible Southern Pacific Taylor Yard Historic Archaeological District, the Project Area encompasses 14.8 acres of a much larger area associated with the historic district and only represents a small portion of the former rail yard facility. Eight of the 12 contributing features within the Project Area would be preserved in place with no modifications with the exception of the manholes and the diesel turntable pit. While the manholes would be covered with fill and no longer visible, the diesel turntable pit will remain intact and incorporated into the Project design and all changes to these features would be reversible. With the preservation of several key contributing elements of the historic district, and because of the size and scale of the former rail yard facility, the demolition and removal of the Regional Office, Shed No. 1 and Shed No. 2 foundations, and a single

railroad track would not affect the eligibility of the Southern Pacific Taylor Yard Historic Archaeological District to the NRHP or the CRHR. Impacts would be less than significant.

Other impacts to the district include demolition, grading, trenching, and other ground disturbing activities, such as the addition of new fill material, associated with Project construction. If those activities encounter associated archaeological deposits or previously unknown resources, a potentially significant impact could occur. Implementation of Standard Project Requirements CUL-1 and CUL-2 would reduce this impact to less than significant. SPRs are specific standard requirements imposed uniformly by DPR based on the proposed action taken and are required of the Proposed Project to reduce its potential environmental effects. Because these features are standard, they do not constitute mitigation measures.

Applicable BMPs related to cultural resources from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant with Standard Project Requirements Incorporated.

The potential impact to unique or non-unique archaeological resources is the same as historical resources above.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant with Standard Project Requirements Incorporated.

No human remains have been identified in the Project Area, and the geoarchaeological assessment performed by Stantec (2024) does not suggest that there is a high potential for encountering human remains. However, implementation of the Proposed Project would include ground-disturbing construction activities that could result in the inadvertent disturbance of previously undiscovered human remains, and if so, this would result in a significant impact. Procedures of conduct following the discovery of human remains on non-federal lands are mandated by procedures in existing state law; specifically, Health and Safety Code Section 7050.5, by PRC Section 5097.98, and by CEQA in CCR Section 15064.1).

According to these provisions, should human remains be encountered, all work in the immediate vicinity of the remains must cease, and any necessary steps to ensure the integrity of the immediate area must be taken. The remains are required to be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. The County Coroner would be immediately notified, and

the coroner would then determine whether the remains are Native American. If the coroner determines the remains are Native American, the coroner has 24 hours to notify the NAHC, which will in turn notify the person identified as the Most Likely Descendant (MLD) of any human remains. Further actions would be determined, in part, by the desires of the MLD, who has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery.

Implementation of Mitigation Measure CUL-2 would assure that any discovery of human remains within the Project Area would be subject to these procedural requirements in existing state law. Implementation of this mitigation measure would reduce impacts associated with the discovery or disturbance of human remains to be less than significant.

Applicable BMPs related to cultural resources from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

4.5.3 Standard Project Requirements

CUL-1 (SPR): Worker Awareness Training, Archaeological Monitoring, and Unanticipated Discovery Procedures.

Prior to the start of construction, the DPR shall retain a qualified professional archaeologist to prepare a worker awareness training program for all operators of ground-disturbing equipment and their supervisors. The program shall be designed, under the direction of DPR, to inform construction workers about: federal and state regulations pertaining to cultural resources; the purpose of monitoring; the authority of the monitors to halt construction in the event of a find; procedures for coordinating activities with the monitors and if applicable, archaeologists; and penalties and repercussions from non-compliance with the program.

In addition, DPR shall retain a qualified professional archaeologist to monitor all ground-disturbing activities associated with Project construction. Monitoring is not required for placement of equipment or fill inside excavations that were monitored, above-ground construction activities, or redistribution of soils that were previously monitored (such as the return of stockpiles to use in backfilling). The Monitoring Archaeologist shall meet or work under the direct supervision of a qualified individual meeting the Secretary of the Interior's professional qualifications standards for prehistoric and historic archaeology, or another qualified individual as determined by DPR in consultation with USACE. The Monitoring Archaeologist shall have the authority to temporarily halt ground-disturbing or construction-related work within 50 feet of any discovery of potential historical or archaeological resources to implement the following procedures.

If the Monitoring Archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required. If the Monitoring Archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, or determines that the discovery represents new significant information about a resource previously determined to be not significant,

they shall immediately notify DPR, who shall consult with cooperating agencies and consulting tribes, as appropriate, on a finding of eligibility. DPR shall determine and require implementation of appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines. Work may not resume within the no-work radius until DPR, through consultation as appropriate, determines that the resource is either: 1) is not a Historical Resource under CEQA; or 2) that the treatment measures have been completed to its satisfaction.

If the find includes human remains, or remains that are potentially human, the procedures in Standard Project Requirement CUL-2 shall be implemented.

CUL-2 (SPR): Human Remains. In the event that any human remains, or remains that are potentially human, are encountered within the Project Area, the following steps shall be taken: work shall cease immediately within 100 feet of the remains in compliance with California Health and Safety Code Sections 7050.5 and 7052; and PRC Section 5097.98-.99 The Monitoring Archaeologist will then immediately contact DPR cultural staff and work with them to ensure reasonable measures are taken to protect the area from disturbance (Assembly Bill [AB] 2641). The Monitoring Archaeologist shall notify the DPR Angeles District Superintendent, and they or their designee will contact the Los Angeles County Coroner /Medical Examiner (as per Section 7050.5 of the Health and Safety Code). The provisions of Section 7050.5 of the California Health and Safety Code, Section 5097.98 of the California PRC, and AB 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the NAHC, which then will designate a Native American MLD for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner (DPR) does not agree with the recommendations of the MLD, then the NAHC can mediate (Section 5097.94 of the PRC). If no agreement is reached, the landowner (DPR) must rebury the remains where they will not be further disturbed (Section 5097.98 of the PRC). Reburial will also include either recording the site with the NAHC or the appropriate Information Center or recording a reinternment document with the county in which the property is located (AB 2641). Work cannot resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

4.6 Energy

This IS/MND analyzes energy consumption due to the potential direct and indirect environmental impacts associated with the Project. Such impacts include the depletion of nonrenewable resources (e.g., oil, natural gas, coal) and emissions of pollutants during the construction and operational phases. The impact analysis focuses on the four sources of energy that are relevant to the Proposed Project: electricity, natural gas, the equipment-fuel necessary for Project construction, and the automotive fuel necessary for Project operations.

The consumption of energy resources results in direct and indirect environmental impacts through the depletion of nonrenewable resources (e.g., oil, natural gas, coal) and emissions of pollutants during energy production. The impact analysis focuses on the four sources of energy that are relevant to the Proposed Project: electricity, natural gas, the equipment-fuel necessary for Project construction, and the automotive fuel necessary for Project operations.

4.6.1 Environmental Setting

Energy relates directly to environmental quality. Energy use can adversely affect air quality and other natural resources. The vast majority of California's air pollution is caused by burning fossil fuels. Consumption of fossil fuels is linked to changes in global climate and depletion of stratospheric ozone. Transportation energy use is related to the fuel efficiency of cars, trucks, and public transportation; choice of different travel modes (auto, carpool, and public transit); vehicle speeds; and miles traveled by these modes. Construction and routine operation and maintenance of transportation infrastructure also consume energy. In addition, residential, commercial, and industrial land uses consume energy, typically through the usage of natural gas and electricity.

4.6.1.1 Energy Types and Sources

California relies on a regional power system comprised of a diverse mix of natural gas, renewable, hydroelectric, and nuclear generation resources. Natural gas provides California with a majority of its electricity, closely followed by renewables, large hydroelectric and nuclear (California Energy Commission [CEC] 2022a). Southern California Edison (SCE) provides electrical services to the Project Area through state-regulated public utility contracts. Southern California Edison, the largest subsidiary of Edison International, is the primary electricity supply company for much of Southern California. It provides 14 million people with electricity across a service territory of approximately 50,000 square miles.

The Southern California Gas Company provides natural gas services to the Project Area. Southern California Gas Company services approximately 21.6 million customers, spanning roughly 20,000 square miles of California.

The California Public Utilities Commission (CPUC) regulates SCE. The CPUC has developed energy efficiency programs such as smart meters, low-income programs, distribution generation programs, self-generation incentive programs, and a California solar initiative. Additionally, the CEC maintains a power plant database that describes all of the operating power plants in the state by county.

4.6.1.2 Energy Consumption

Electricity use is measured in kilowatt-hours (kWh), and natural gas use is measured in therms. Vehicle fuel use is typically measured in gallons (e.g., of gasoline or diesel fuel), although energy use for electric vehicles is measured in kWh.

The electricity consumption associated with all nonresidential uses in Los Angeles County from 2017 to 2021 is shown in Table 4.6-1. As indicated, the demand has generally decreased since 2017.

Table 4.6-1. Nonresidential Electricity Consumption in Los Angeles County 2017-2021

Year	Electricity Consumption (kilowatt hours)
2021	44,437,634,389
2020	42,736,774,915
2019	46,105,550,849
2018	47,361,083,621
2017	47,960,383,020

Source: CEC 2022b.

The natural gas consumption associated with all nonresidential uses in Los Angeles County from 2017 to 2021 is shown in Table 4.6-2. As indicated, the demand has decreased since 2017.

Table 4.6-2. Nonresidential Natural Gas Consumption in Los Angeles County 2017-2021

Year	Natural Gas Consumption (therms)
2021	1,743,418,587
2020	1,698,688,767
2019	1,812,591,804
2018	1,813,722,309
2017	1,840,583,089

Source: CEC 2022b.

Automotive fuel consumption in Los Angeles County from 2017 to 2021 is shown in Table 4.6-3. Fuel consumption demand has generally decreased since 2017.

Table 4.6-3. Automotive Fuel Consumption in Los Angeles County 2017-2021

Year	Total Fuel Consumption
2022	4,695,245,754
2021	4,724,505,393
2020	4,239,755,680

Table 4.6-3. Automotive Fuel Consumption in Los Angeles County 2017-2021

Year	Total Fuel Consumption
2019	4,724,445,036
2018	4,797,804,755

Source: CARB 2021.

4.6.2 Energy (VI) Environmental Checklist and Discussion**Would the Project:**

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

Potentially Significant Impact Less than Significant with Mitigation Incorporated Less than Significant Impact No Impact

☐☐☒☐**Less than Significant Impact.**

The impact analysis focuses on the four sources of energy that are relevant to the Proposed Project: electricity, natural gas, the equipment-fuel necessary for Project construction, and the automotive fuel necessary for Project operations. Addressing energy impacts requires an agency to make a determination as to what constitutes a significant impact. There are no established thresholds of significance, statewide or locally, for what constitutes a wasteful, inefficient, and unnecessary consumption of energy for a proposed land use project. For the purpose of this analysis, the amount of electricity and natural gas estimated to be consumed by the Project is quantified and compared to that consumed by all nonresidential land uses in Los Angeles County. Similarly, the amount of fuel necessary for Project construction and the amount of fuel necessary for Project operations is calculated and compared to that consumed in Los Angeles County.

The analysis of electricity and natural gas is based on CalEEMod modeling conducted by ECORP Consulting, Inc. (ECORP; Appendix A), which quantifies energy use for Project operations. The amount of operational automotive fuel use was estimated using the CARB's EMFAC2021 computer program, which provides projections for typical daily fuel usage in Los Angeles County (see Appendix D). The amount of total construction-related fuel use was estimated using ratios provided in the Climate Registry's General Reporting Protocol for the Voluntary Reporting Program, Version 2.1. Energy consumption associated with the Proposed Project is summarized in Table 4.6-4 (see Appendix A and Appendix D).

Table 4.6-4. Proposed Project Energy and Fuel Consumption		
Energy Type	Annual Energy Consumption	Percentage Increase Countywide
Project Energy Consumption		
Electricity Consumption	135,021 kilowatt-hours	0.0003 percent
Natural Gas Consumption	3,534 therms	0.0002 percent
Automotive Fuel Consumption		
Project Construction Year One	24,926 gallons	0.0005 percent
Project Construction Year Two	79,409 gallons	0.002 percent
Project Construction Year Three	22,759 gallons	0.0004 percent
Project Operations	14,591 gallons	0.0003 percent

Notes: The Bowtie Park Development Project (Project) increases in electricity and natural gas consumption are compared with all of the nonresidential usage in Los Angeles County in 2021, the latest year of data available. The Project increases in construction and operations automotive fuel consumption are compared with the countywide fuel consumption in 2022, the most recent full year of data.

Source: Refer to Appendix A for building energy consumption calculations and Appendix D for Fuel Consumption calculations.

As shown in Table 4.6-4, the annual electricity consumption due to operations would be 135,021 kWh, resulting in a negligible increase (0.0003 percent) in the typical annual electricity consumption attributable to all non-residential uses in Los Angeles County. This is potentially a conservative estimate since in September 2018 Governor Jerry Brown Signed Executive Order B-55-18, which established a new statewide goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." Carbon neutrality refers to achieving a net-zero carbon dioxide emissions. This can be achieved by reducing or eliminating carbon emissions, balancing carbon emissions with carbon removal, or a combination of the two. This goal is in addition to existing statewide targets for greenhouse gas (GHG) emission reduction. Governor's EO B-55-18 requires CARB to "work with relevant state agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal." Natural gas consumption due to operations would be 3,534 therms resulting in a negligible increase (0.0002 percent) in the typical annual natural gas consumption attributable to all nonresidential uses in Los Angeles County. For these reasons, the Project would not result in the inefficient, wasteful, or unnecessary consumption of building energy.

Fuel necessary for Project construction would be required for the operation and maintenance of construction equipment and the transportation of materials to the Project Area. The fuel expenditure necessary to construct the physical building and infrastructure would be temporary, lasting only as long as Project construction. As further indicated in Table 4.6-4, the Project's gasoline fuel consumption during the one-time construction period is estimated to be 24,926 gallons during the first year of construction.

This would increase the annual fuel use in the county by 0.0005 percent. The Project's gasoline fuel consumption during the second and third year of construction would be 79,409 and 22,759 gallons, respectively, increasing the countywide annual fuel use by 0.002 percent and 0.0004 percent, respectively. As such, Project construction would have a nominal effect on local and regional energy supplies. No unusual Project characteristics would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or the state. Construction contractors would purchase their own gasoline and diesel fuel from local suppliers and would judiciously use fuel supplies to minimize costs due to waste and subsequently maximize profits. Additionally, construction equipment fleet turnover and increasingly stringent state and federal regulations on engine efficiency combined with state regulations limiting engine idling times and requiring recycling of construction debris, would further reduce the amount of transportation fuel demand during Project construction. For these reasons, it is expected that construction fuel consumption associated with the Project would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature.

The Project is estimated to generate approximately 98 weekday trips (KOA 2022). As indicated in Table 4.6-4, this would result in the consumption of approximately 14,591 gallons of automotive fuel per year, which would increase the annual countywide automotive fuel consumption by 0.0003 percent. Fuel consumption associated with the vehicle trips generated by the Project during operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Would the Project:		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

The Project would be designed in a manner that is consistent with relevant energy conservation plans designed to encourage development that results in the efficient use of energy resources. The Project would be built to the Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6, of the CCR (Title 24). Title 24 was established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 is updated approximately every three years, with the most recent update of the 2022 standards that became effective on January 1, 2023. The 2022 Energy Standards improve upon the 2019 Energy Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The 2022 update to the Energy Standards encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, among other goals. The 2022 Energy Standards build and improve upon previous goals of achieving net Zero Net Energy. Buildings permitted on or after January 1, 2023, must comply with the 2022 Standards. Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments. Additionally, in January 2010, the State of California adopted the California Green Building Standards Code (CalGreen) that establishes mandatory green building standards for all buildings in California. The

code was most recently updated in 2022, effective for all applicable developments starting January 1, 2023. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. With these building standards in place, the Project would not obstruct any state or local plan for renewable energy or energy efficiency.

For these reasons, this impact would be less than significant.

4.6.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.7 Geology and Soils

4.7.1 Environmental Setting

4.7.1.1 Geomorphic Setting

The Project Area is in the Los Angeles Basin, a structural depression approximately 50 miles long and 20 miles wide in the northernmost Peninsular Ranges Geomorphic Province. The Los Angeles Basin is subdivided into four structural blocks. The Project Area is situated within the northernmost edge of the Central Block, where sediments range from 32,000 to 35,000 feet thick. The Central Block is wedge-shaped, and extends from the Santa Monica Mountains in the northwest, where it is about 10 miles wide, to the San Joaquin Hills in the southeast, where it widens to around 20 miles across (Yerkes et al. 1965). The Project Area is in the Elysian Hills, a structural anticlinorium, or uplifted fold of bedrock, which formed from fault activity 2.9 million years ago, resulting in the exposure of Miocene-aged marine rocks at the surface.

The Project Area surface geology is mapped as alluvial sediment along the Los Angeles River. Mapping by Yerkes and Campbell (2005) identifies the soils as alluvial fan deposits, older alluvial deposits, and Puente Formation likely present. These sediments consist of unconsolidated silt, sand, and gravel deposited as a result of the early Holocene or late Pleistocene erosional processes of the surrounding highlands.

The 2023 geotechnical investigation conducted by Geocon Consultants, Inc. (Geocon) found the Project Area to be underlain by artificial fill over Holocene age (Younger) alluvial deposits (Geocon 2023).

Artificial Fill

The artificial fill layer ranges from 3 to 5 feet below ground surface (bgs) and extends to a maximum depth of about 15 feet bgs. This layer consists of light to dark brown and olive brown sand and silty sand with varying amounts of gravel and lesser amounts of sandy silt and sandy clay. The artificial fill is characterized as slightly moist and soft or very loose to medium dense. The fill is likely the result of past grading or construction activities in the Project Area (Geocon 2023).

Younger Alluvium

Holocene age alluvium was encountered beneath the fill. The young alluvial deposits generally consist of light brown to brown, olive brown, and grayish brown interbedded poorly to well-graded sand, sand with silt, and silty sand with varying amounts of gravel and locally a few cobbles. The alluvial soils are characterized as slightly moist to wet and very loose to very dense or soft to stiff (Geocon 2023).

4.7.1.2 Regional Seismicity and Fault Zones

The Los Angeles River floodplain, on which the Project Area is located, has been created through centuries of alluvial deposition over Tertiary-age bedrock. Two fault systems transect the Los Angeles region: the east to northeast-trending faults of the Santa Monica Fault System, and the northwest-trending faults that may be a continuation of the Whittier Fault System. There are active faults within the immediate vicinity of the Project Area. The closest surface trace of an active fault is the Hollywood Fault located approximately 0.3 mile to the north. The Raymond Fault lies approximately 0.75 mile to the northwest, while the Elysian Park Fault lies to the southwest. The Newport-Inglewood Fault lies approximately 12 miles southwest, while the Sierra Madre Fault Zone is located approximately 12 miles northeast. The active San Andreas Fault Zone is located approximately 30 miles northeast. The Project Area is not located within an Alquist-Priolo Special Studies Zone.

4.7.1.3 Soils

Historic soils data from the NRCS was used to determine potential soil types that may occur with the BSA. Soils onsite include urban land-Palmview-Tujunga complex (0 to 5 percent slopes); urban land, commercial (0 to 5 percent slopes); and Xeropsamments, frequently flooded (0 to 2 percent slopes) (Stantec 2023a). Table 4.7-1 below describes each soil unit.

Table 4.7-1. Historic Soil Units Occurring within the BSA			
Map Unit Symbol	Map Unit Name	Description	Acres within BSA
1002	Urban land-Palmview-Tujunga complex, 0 to 5 percent slopes	A well-drained soil associated with alluvial fans at elevations between 240 to 1,990 feet; fine sandy loam, sandy loam; parent material consists of discontinuous human-transported material over alluvium derived from granite; very high runoff; 0 inches to manufactured layer.	3.38
1200	Urban land, commercial, 0 to 5 percent slopes	Associated with floodplains at 120 to 510 feet in elevation; very high runoff; 0 inches to manufactured layer.	56.03
1264	Xeropsamments, frequently flooded, 0 to 2 percent slopes	A somewhat excessively drained soil associated with rivers and channels at elevations between 100 to 460 feet; stratified sand; parent material consists of alluvium derived from granite.	20.18

Notes: BSA = Biological Survey Area.

4.7.1.4 Paleontological Resources

In September 2022, Stantec conducted a paleontological resources assessment on behalf of TNC for the Bowtie Demonstration Project on approximately 3.2 acres of land in a portion of the Bowtie parcel (Stantec 2023b; Appendix E). Subsequently, the scope of the paleontological study was expanded to include the entire 18-acre Bowtie parcel for the Proposed Project. In December 2022, a paleontological study was conducted in support of the TNC for the proposed habitat enhancement and stormwater treatment improvements occurring on the entire 18-acre parcel.

The previous assessment for the Bowtie Demonstration Project in September 2022 determined two geologic units were present in that portion of the Bowtie parcel, alluvial fan deposits at the surface underlain by the Puente Formation, with variable amounts of artificial fill present at the surface to depths of as much as 4 feet bgs. Stantec assessed the alluvial fan deposits as having low paleontological potential at the surface, transitioning to high potential within older alluvial deposits at an estimated 10 feet bgs. The Puente Formation was also assessed as having high paleontological potential and is likely present at depths of greater than 51 feet bgs (based on the results of geotechnical investigation). These paleontological potential assessments are used in the impacts assessment prepared by Stantec in December 2022 for the entire Project Area (Stantec 2023b).

The impact assessment takes into consideration all planned Project activities in terms of aerial and subsurface extents, including the possibility of subsurface geologic units having a different paleontological potential than surficial units. For example, younger surficial sediments (alluvium, lacustrine, eolian, etc.) have low potential to preserve fossil resources due to their age; yet sediments increase in age with depth and so these surficial deposits often overly older units that have high paleontological potential. In areas with this underlying geologic setting surficial work may be of low risk for impacting paleontological resources while activities that require excavations below the depth of the surficial deposits would be at greater risk of impacting paleontological resources. For this reason, the impact assessment takes into consideration both the surface and subsurface geology and is tailored to Project activities (Stantec 2023b).

4.7.2 Geology and Soils (VII) Environmental Checklist and Discussion

Would the Project:		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i)	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Refer to Division of Mines and Geology
Special Publication 42.

ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

- i. The closest surface trace of an active fault is the Hollywood Fault located approximately 0.3 mile north of the Project Area. Thus, the Project Area is not located within an Alquist-Priolo Earthquake Fault Zone. No impact would occur.

Less than Significant with Project Specific Requirements Incorporated.

- ii. The Project Area is in Southern California, which is prone to ground shaking during earthquakes. Therefore, due to its location in Southern California the Project Area is also subject to ground shaking during an earthquake, as is any other proposed development project. However, as detailed in Threshold i) directly above, the Project Area is not within a state designated Alquist Priolo Earthquake Fault Zone (DOC 2021). Additionally, the City adopted the Uniform Building Code, which requires that the construction of structures comply with the California Building Code (CBC) to reduce the hazard risks posed by earthquakes. Adhering to these codes would ensure that potential ground-shaking impacts are reduced. A less than significant impact would occur with implementation of Project Specific Requirement GEO-1. PSRs are specific Project requirements of the Proposed Project that have been incorporated to reduce its potential environmental effects. Because these features are part of Project design, they do not constitute mitigation measures.

Applicable BMPs related to geology from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

Less than Significant with Project Specific Requirements Incorporated.

- iii. According to the DOC EQ Zapp: California Earthquake Hazards Zone Application (updated September 23, 2021), the Project Area is located in an area of liquefaction potential. This is due to the high water table and soil conditions under the site. The historical high groundwater level in the vicinity of the Project Area is reported to be approximately 20 feet bgs. Groundwater encountered in the geotechnical investigation borings range between 34.5 and 41.5 feet bgs (Geocon 2023). A less than significant impact would occur with implementation of Project Specific Requirement GEO-1. PSRs are specific Project requirements of the Proposed Project that have been incorporated to reduce its potential environmental effects. Because these features are part of Project design, they do not constitute mitigation measures.

Applicable BMPs related to geology from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

No Impact.

- iv. According to the DOC EQ Zapp: California Earthquake Hazards Zone Application (updated September 23, 2021), the Project Area is not located in an area of landslide potential. No impact would occur.

Would the Project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

All excavation, grading, and construction activities would be conducted according to the CBC 2019. The Project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) standards to ensure that pollutants are not discharged in the storm drain system. The applicant shall prepare a Water Quality Management Plan (WQMP) that incorporates the water quality treatment features and low impact development (LID) site design, source control and treatment BMPs to address the NPDES requirements as part of the review process. Examples of construction phase BMPs implemented with the SWPPP include sandbags, silt fences, and detention basins. Prior to the issuance of building permits, a final WQMP will have to be submitted by the applicant and approved by the City's Engineering Division, and strict adherence to the program will be required.

Implementation of the SWPPP, including the use of storm water quality BMPs, would prevent erosion of soil from storm water runoff during Project construction (see Section 4.10 *Hydrology and Water Quality*). Once construction is completed, soils would be stabilized and monitored according to the SWPPP until a Notice of Termination for the NPDES construction permit is filed with the RWQCB. Consequently, the Proposed Project would not result in substantial erosion and/or unstable earth conditions from Project construction or operation. For these reasons, erosion-related impacts are considered to be less than significant.

Applicable BMPs related to geology from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant with Project Specific Requirements Incorporated.

The topography in the Project Area is gently sloping to the south-southeast. It is not located within the City Hillside Grading Area or Hillside Ordinance Area. Additionally, the Project Area is not located within an area identified as having a potential for seismic slope instability. There are no known landslides near the Project Area, nor is the Project Area in the path of any known or potential landslides (Geocon 2023). Therefore, the potential for slope stability hazards to adversely affect the proposed development is considered low.

Soils that are particularly subject to subsidence include those with high silt or clay content. The Project Area underlain by primarily sandy soils, and it is not located within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned in the Project Area or in the general Project vicinity. There appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases in the Project Area.

As discussed above, the Project Area is located in an area of liquefaction potential. To address the potential for unstable soils that are prone to collapse, liquefaction, or subsidence, the design and engineering of the Proposed Project would adhere to the applicable ordinances of the City/County of Los Angeles and CBC and incorporate recommendations from the Proposed Project’s site-specific geotechnical investigation. With implementation of Project Specific Requirement GEO-1, impacts would be less than significant. PSRs are specific Project requirements of the Proposed Project that have been incorporated to reduce its potential environmental effects. Because these features are part of Project design, they do not constitute mitigation measures

Applicable BMPs related to geology from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant with Project Specific Requirements Incorporated.

Based on laboratory Expansion Index and Plasticity Index testing on representative soil samples, near-surface soil is predominantly granular (sandy) and is considered non-expansive (Geocon 2023). The Proposed Project would be required to comply with CBC requirements related to expansive soils. The Project's foundations and structural designs would be required to incorporate measures prescribed in the CBC to address these design considerations and minimize related Project impacts. Appropriate construction plans would be reviewed by the City's Building Official for consistency with current building codes and implementation of the recommendations contained in the Project's geotechnical study. With implementation of Project Specific Requirement GEO-1, impacts would be reduced to less than significant. PSRs are specific Project requirements of the Proposed Project that have been incorporated to reduce its potential environmental effects. Because these features are part of Project design, they do not constitute mitigation measures.

Applicable BMPs related to geology from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

The Project does not include septic tanks or alternative wastewater disposal systems. No impact would occur.

Would the Project:		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant with Standard Project Requirements Incorporated.

A review of geologic mapping indicates that the entirety of the Bowtie parcel is mapped as alluvial fan deposits, as for the smaller parcel previously assessed. The results of this assessment show that should Project activities extend to depths of 10 feet bgs or greater, they may encounter geologic units with high paleontological potential (Stantec 2023b).

The Project plans to construct a Park entry, an internal vehicular access road, parking lots, trails and boardwalks, open native grass or turf areas, native habitat plantings, restrooms, a welcome area, and picnic tables and benches. Of these activities, those that entail ground disturbance over 10 feet in depth may extend into the high sensitivity, older layers of alluvium. Such disturbances therefore risk posing a direct adverse impact to paleontological resources. Following construction, operations and maintenance are not expected to pose an impact to resources.

Should Project-related activities encounter paleontological resources in these deeper units, the damage or destruction of those resources would constitute a direct adverse impact under CEQA. In order to adhere to state and City guidelines regarding paleontological resources, Standard Project Requirement GEO-2 would reduce impacts to less than significant. SPRs are specific standard requirements imposed uniformly by DPR based on the proposed action taken and are required of the Proposed Project to reduce its potential environmental effects. Because these features are standard, they do not constitute mitigation measures.

4.7.3 Project Specific Requirements and Standard Project Requirements

GEO-1 (PSR): DPR shall implement the Conclusions and Recommendations as listed in the final site-specific geotechnical report or most recent site-specific geotechnical evaluation.

GEO-2 (SPR): Unanticipated Paleontological Discovery. A paleontologist shall be retained as the Project paleontologist to oversee all aspects of paleontological mitigation, including the development and implementation of a Paleontological Monitoring and Mitigation Plan (PMMP) tailored to the Project plans that provides for paleontological monitoring of earthwork and ground disturbing activities into undisturbed geologic units with high paleontological potential to be conducted by a paleontological monitor meeting industry standards (Murphey et al. 2019). The PMMP should also include provisions for a Workers' Environmental Awareness Program training that communicates requirements and procedures for the inadvertent discovery of paleontological resources during construction, to be delivered by the paleontological monitor to the construction crew prior to the onset of ground disturbance.

Paleontological monitoring will be conducted by a qualified paleontological monitor for ground disturbance that exceeds 10 feet in depth across the Project Area. The Project paleontologist may reduce the frequency of monitoring or spot checks should subsurface conditions indicate low paleontological potential.

Should a potential paleontological resource be identified in the Project Area, whether by the monitor or a member of the construction crew, work should halt in a safe radius around the find (usually 50 feet) until the Project paleontologist can assess the find and, if significant, salvage the fossil for laboratory preparation and curation at the Natural History Museum of Los Angeles County.

4.8 Greenhouse Gas Emissions

The purpose of this section is to estimate GHG emissions attributable to the Project and to determine the level of impact the Project would have on the environment.

4.8.1 Environmental Setting

GHG emissions are released as byproducts of fossil fuel combustion, waste disposal, energy use, land use changes, and other human activities. This release of gases, such as carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and chlorofluorocarbons, creates a blanket around the earth that allows light to pass through but traps heat at the surface, preventing its escape into space. While this is a naturally occurring process known as the greenhouse effect, human activities have accelerated the generation of GHGs beyond natural levels. The overabundance of GHGs in the atmosphere has led to an unexpected warming of the earth and has the potential to severely impact the earth's climate system.

Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. CH₄ traps over 25 times more heat per molecule than CO₂, and N₂O absorbs 298 times more heat per molecule than CO₂ (Intergovernmental Panel on Climate Change 2014). Often, estimates of GHG emissions are presented in carbon dioxide equivalents (CO₂es), which weigh each gas by its global warming potential. Expressing GHG emissions in CO₂e takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO₂ were being emitted.

The local air quality agency regulating the SoCAB is the SCAQMD, the regional air pollution control officer for the basin. As previously stated, to provide guidance to local lead agencies on determining significance for GHG emissions in CEQA documents, SCAQMD staff convened a GHG CEQA Significance Threshold Working Group. The Working Group was formed to assist the SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research (OPR), CARB, the Attorney General's Office, a variety of city and county planning departments in the Basin, various utilities such as sanitation and power companies throughout the Basin, industry groups, and environmental and professional organizations. On September 28, 2010, SCAQMD Working Group Meeting #15 provided an interim screening level numeric "bright-line" threshold of 3,000 metric tons of CO₂e annually and an efficiency-based threshold of 3.0 metric tons of CO₂e per service population (defined as the people that work and reside in the Project Area) per year in 2035. The

SCAQMD has not announced when staff is expecting to present a finalized version of these thresholds to the governing board.

The numeric bright line and efficiency-based thresholds described above were developed to be consistent with CEQA requirements for developing significance thresholds, are supported by substantial evidence, and provide guidance to CEQA practitioners and lead agencies with regard to determining whether GHG emissions from a proposed project are significant.

The City has the Sustainable City pLAn/Green New Deal which aims to achieve the City's climate goals. On April 8, 2015, Mayor Eric Garcetti released the Sustainable City pLAn, a program of actions designed to meet short-term (2017) and long-term (2025 and 2035) targets in 14 categories designed to advance economic, environmental, and equity objectives. In 2019, the City released L.A.'s Green New Deal, which updated and superseded the 2015 Sustainable City pLAn. Rather than an adopted plan, L.A.'s Green New Deal is a mayoral initiative that consists of a program of actions designed to create sustainability-based performance targets through 2050 that advance economic, environmental, and equity objectives. L.A.'s Green New Deal is guided by four key principles: (1) a commitment to uphold the Paris Climate Agreement; (2) a promise to deliver environmental justice and equity through an inclusive green economy; (3) a plan to ensure every Angeleno has the ability to join the green economy by creating pipelines to good paying, green jobs; and (4) a determination to lead by example within City government, showing the world what an urban Green New Deal looks like in practice. While not a plan adopted solely to reduce GHG emissions, within L.A.'s Green New Deal (Sustainable City pLAn 2019), climate mitigation is one of eight explicit benefits that help define its strategies and goals. These include reducing GHG emissions through near-term outcomes such as net zero-carbon buildings, water reduction, electric vehicles, and solid waste reduction.

In December 2019, the Los Angeles City Council approved Ordinance No. 186488, which incorporates provisions of the CALGreen Code. This includes the newest version of the 2022 CALGreen Code. Projects filing building permit applications on or after January 1, 2020, must comply with the provisions of the Los Angeles Green Building Code. The City's Green Building Code has many mandatory and voluntary measures that would result in reductions of GHG emissions. The newest version (2022) of the CALGreen Code for nonresidential buildings includes expanded electric vehicle or electric vehicle capable charging space requirements and stricter compliance with indoor air quality standards in classrooms. There are several measures that remain the same, such as requiring 25 percent of hardscape be shaded or composed of alternatives that reduce heat (such as open-grid pavement); meeting the applicable energy efficiency requirements of Title 24, Part 6 of the California Energy Code, requiring each building to reduce overall potable water use by 20 percent; and compliance with Section 66.32 of the LAMC regarding construction and demolition waste diversion requirements.

In *Center for Biological Diversity v. Department of Fish and Wildlife* (2015) 62 Cal. 4th 2014, 213, 221, 227, following its review of various potential GHG thresholds proposed in an academic study [Crockett, *Addressing the Significance of Greenhouse Gas Emissions: California's Search for Regulatory Certainty in an Uncertain World* (July 2011), 4 Golden Gate U. Envtl. L. J. 203], the California Supreme Court identified the use of numeric bright-line thresholds as a potential pathway for compliance with CEQA GHG requirements. The study found numeric bright line thresholds designed to determine when small projects

were so small as to not cause a cumulatively considerable impact on global climate change was consistent with CEQA. Specifically, Public Resources Code section 21003(f) provides it is a policy of the State that "[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." The Supreme Court-reviewed study noted, "[s]ubjecting the smallest projects to the full panoply of CEQA requirements, even though the public benefit would be minimal, would not be consistent with implementing the statute in the most efficient, expeditious manner. Nor would it be consistent with applying lead agencies' scarce resources toward mitigating actual significant climate change impacts." (Crockett, *Addressing the Significance of Greenhouse Gas Emissions: California's Search for Regulatory Certainty in an Uncertain World* (July 2011), 4 Golden Gate U. Envtl. L. J. 203, 221, 227.)

Project emissions are compared to the SCAQMD bright line numeric threshold of 3,000 metric tons annually to determine if the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. The Project will also be assessed for consistency with the Sustainable City pLAN/Green New Deal, and the City of Los Angeles Green Building Code.

4.8.2 Greenhouse Gas Emissions (VIII) Environmental Checklist and Discussion

Would the Project:	Less than			
	Potentially Significant Impact	Significant with Mitigation Incorporated	Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

GHG emissions-related impacts were assessed in accordance with methodologies recommended by the SCAQMD. Where GHG emission quantification was required, emissions were modeled using CalEEMod version 2022.1. CalEEMod is a statewide land use emissions computer model designed to quantify potential GHG emissions associated with both construction and operations from a variety of land use projects. Project construction generated GHG emissions were calculated using CalEEMod model defaults for Los Angeles County. Operational GHG emissions were based on the Project site plans and traffic trip generation rates from KOA (2022).

4.8.2.1 Construction Significance Analysis

Construction-related activities that would generate GHG emissions include worker commute trips, haul trucks carrying supplies and materials to and from the Project Area, and off-road construction equipment (e.g., dozers, loaders, excavators). Table 4.8-1 illustrates the specific construction generated GHG emissions that would result from construction of the Project. Once construction is complete, the generation of these GHG emissions would cease.

Table 4.8-1. Construction-Related Greenhouse Gas Emissions	
Emissions Source	CO₂e (Metric Tons/Year)
Construction Year One	253
Construction Year Two	806
Construction Year Three	231
Total Construction Emissions	1290

Notes: CO₂e = carbon dioxide equivalent.

Source: CalEEMod version 2022.1. Refer to Appendix A for Model Data Outputs.

As shown in Table 4.8-1, Project construction would result in the generation of approximately 1,290 metric tons of CO₂e over the course of construction. Once construction is complete, the generation of these GHG emissions would cease. Consistent with SCAQMD recommendations, Project construction GHG emissions have been amortized of the expected life of the Project, which is considered to be 30 years per the SCAQMD. The amortized construction emissions are added to the annual average operational emissions (see Table 4.8-2). The construction impacts are less than significant.

4.8.2.2 Operational Significance Analysis

Operation of the Project would result in an increase in GHG emissions primarily associated with motor vehicle trips and onsite energy sources. Long-term operational GHG emissions attributed to the Project are identified in Table 4.8-2.

Table 4.8-2. Operational-Related Greenhouse Gas Emissions	
Emissions Source	CO₂e (Metric Tons/ Year)
Construction Emissions (amortized over the 30-year life of the Project)	43
Mobile	72
Area	0
Energy	61
Water	2
Waste	18
Vegetation	-24
Total	172

Table 4.8-2. Operational-Related Greenhouse Gas Emissions

Emissions Source	CO₂e (Metric Tons/ Year)
<i>SCAQMD Significance Threshold</i>	<i>3,000</i>
Exceed SCAQMD Threshold?	No

Notes: CO₂e = carbon dioxide equivalent; SCAQMD = South Coast Air Quality Management District
Emission projections predominately based on CalEEMod model defaults for Los Angeles County. Average daily vehicle trips provided by KOA Corporation (2022).

Source: California Emissions Estimator Model version 2022.1. Refer to Appendix A for Model Data Outputs.

As shown in Table 4.8-2, operational-generated emissions would not exceed the SCAQMD's numeric bright-line threshold. SCAQMD thresholds were developed based on substantial evidence that such thresholds represent quantitative levels of GHG emissions, compliance with which means that the environmental impact of the GHG emissions will normally not be cumulatively considerable under CEQA. These thresholds were developed as part of the SCAQMD GHG CEQA Significance Threshold Working Group. The working group was formed to assist the SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State OPR, CARB, the Attorney General's Office, a variety of city and county planning departments in the SoCAB, various utilities such as sanitation and power companies throughout the basin, industry groups, and environmental and professional organizations. The 3,000 metric tons of CO₂e per year value represents less than one percent of future 2050 statewide GHG emissions target.

This impact is less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

While L.A.'s Green New Deal was not adopted solely to reduce GHG emissions, climate mitigation is one of eight explicit benefits that help define its strategies and goals. The Proposed Project aims to redevelop a former railyard into a community Park and open space area for recreation along the Los Angeles River. The Proposed Project would further the Urban Ecosystem and Resilience Goals of the LA Green New Deal, including increasing access to parks and open space for local residents, expanding bike paths and trail systems throughout the city, and increase tree canopy and native plants. Additionally, the Project would be designed and operated to meet or exceed the applicable requirements of the state Green Building Standards and the City's Green Building Code. Furthermore, the Project would be subject to the 2022 Title 24 Standards which represent challenging but achievable design and construction practices that represent a major step towards meeting Zero Net Energy. Additionally, Project-generated GHG emissions would not

surpass the SCAQMD's GHG significance thresholds, which were prepared with the purpose of complying with statewide GHG-reduction efforts and the Scoping Plan. As such, the Project would in no way hinder or conflict with the GHG-reducing goals and strategies.

4.8.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.9 Hazards and Hazardous Materials

4.9.1 Environmental Setting

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency, or if it has characteristics defined as hazardous by such an agency. A hazardous material is defined by the California Health and Safety Code, Section 25501 as follows:

Hazardous material" means any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. "Hazardous materials" include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

A hazardous material is defined in 22 CCR Section 662601.10 as follows:

A substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed.

Transporters of hazardous waste in California are subject to several federal and state regulations. They must register with the California Department of Health Services (DHS) and ensure that vehicle and waste container operators have been trained in the proper handling of hazardous waste. Vehicles used for the transportation of hazardous waste must pass an annual inspection by the California Highway Patrol (CHP). Transporters must allow the CHP or DHS to inspect its vehicles and must make certain required inspection records available to both agencies. The transport of hazardous materials that are not wastes is regulated by the U.S. Department of Transportation through national safety standards.

4.9.2 Hazardous Conditions Within the Project Area

Under Government Code Section 65962.5, both the DTSC and SWRCB are required to maintain lists of sites known to have hazardous substances present in the environment. Both agencies maintain up-to-date lists on their websites. According to DTSC, the Project Area historically operated as a locomotive maintenance facility which contained features that included the track area, filter press recycling area,

above-ground storage area, and wash rack area. Investigations indicated that there are compounds present at elevated levels which may require mitigation (DTSC 2023).

DPR entered a Voluntary Clean-up Agreement for the site in December 2021 and began a supplemental investigation work plan to test soil. An investigation of the Project Area was completed in 2020. The results showed shallow soil contained concentrations of lead and petroleum-related compounds. Samples collected from test borings at five feet and below the surface were below residential screening levels. Soil samples were also conducted on March 9 and 10, 2022 to determine the extent of contamination between zero and four feet. Samples were collected at one foot, three feet and four feet below ground surface in each boring (DTSC 2022).

As previously identified in Section 4.3, Air Quality, the General Plan EIR concluded that implementation of the General Plan would not result in significant impacts on the environment, with the exception of potential impacts on soils and groundwater contamination. Soil characterization and risk assessments to determine the levels of contaminants in on-site soils is ongoing and data is not yet available at the time of preparation of this IS/MND. To account for a worst-case scenario, it was assumed that soil excavation at a depth of up to three feet would need to occur for the entire site and would need to be removed and hauled to an offsite landfill that accepts contaminated wastes. The estimated volume of soil to be exported offsite equates to 56,000 cubic yards of soil requiring 70 haul trips. It is anticipated that soil characterization and risk assessments at the site would identify that a majority, if not all, of the onsite soils do not pose a health risk and would be able to be kept onsite. Therefore, the evaluation of hazards and hazardous materials impacts as discussed below considers overly conservative assumptions that all onsite soils at up to a depth of three feet would not meet acceptable screening levels and would need to be hauled offsite to an appropriate disposal facility.

As previously identified, the Rio De Los Angeles State Park General Plan EIR concluded that implementation of the General Plan could result in potential impacts to soils and groundwater from contamination by previous industrial processes that occurred within the site from former uses prior to purchase by DPR. Mitigation measures identified with the General Plan EIR requires that DPR receive concurrence from DTSC that the Project is cleared for recreational development; that soil sampling occur and be screened for specific constituents of concern and if encountered, work must halt and the contaminated area(s) must be remediated; implement appropriate testing and handling of soil to determine appropriate disposal and treatment options; and ensure contaminated soils are hauled to a Class I landfill or other appropriate soil treatment and recycling facility. Additionally, to address potential groundwater contamination impacts, a mitigation measure was identified requiring the halting of construction if groundwater is encountered during construction until appropriate dewatering or avoidance measures is identified, or other treatment is recommended or required by the RWQCB.

4.9.3 Hazards and Hazardous Materials (IX) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Less Than Significant with Mitigation Incorporated.

As the Proposed Project would construct various new Park amenities, it would not transport, use, or dispose of any hazardous materials beyond those required for soil hauling and used for construction and maintenance during occupancy. Under a worst-case scenario requiring excavation and hauling of soil materials out of the Project Area, haul trucks would transport soils from the Project Area to a receiving landfill that accepts contaminated soils. It is estimated that up to 70 haul trips daily would be required over a construction period of 100 days. Title 49 of the Code of Federal Regulations and implemented by Title 13 of the California Code of Regulations (CCR), the United States Department of Transportation (USDOT) Office of Hazardous Materials Safety has established strict regulations for the safe transportation of hazardous materials. Appropriate documentation for all hazardous waste that is transported in connection with project-site activities would be provided as required for compliance with existing hazardous materials regulations. Hazardous wastes produced on site are subject to requirements associated with accumulation time limits, proper storage locations and containers, and proper labeling. Additionally, for removal of hazardous waste from the site, hazardous waste generators are required to use a certified hazardous waste transportation company, which must ship hazardous waste to a permitted facility for treatment, storage, recycling, or disposal. Compliance with applicable regulations would reduce impacts associated with the use, transport, storage, and sale of hazardous materials. Under the likely scenario that onsite soils would remain onsite and would be capped in place, this impact would not occur.

Other construction activities may involve limited transport, storage, use, or disposal of hazardous materials. Some examples of hazardous materials handled during construction include fueling and servicing construction equipment on-site and the use of paints and solvents during construction. These activities would be short-term and one-time events and would be subject to federal, state, and local health and safety requirements. A less than significant impact related to the use or transport of hazardous materials is expected to occur during construction.

Long-term operation of the Proposed Project would involve very little transport, storage, use, or disposal of hazardous material. Typical facility maintenance involves the limited use of hazardous materials through custodial, routine maintenance, and repair activities, including commercial cleansers, lubricants, paints, and pesticides/herbicides for landscaping purposes. These items would be stored in an appropriate place, such as a utility closet, with limited access only by appropriate employees of the Park.

Based on the results of previous soil sampling, soil at various locations within the Project Area are impacted with lead and/or petroleum hydrocarbon compounds. To achieve removal action objectives consistent with the mitigation requirements identified in the Rio De Los Angeles State Park General Plan

EIR, soil with contaminant concentrations above allowable levels would be handled as described in Mitigation Measure HAZ-1 below, which outlines the preparation of a Removal Action Work Plan (RAW) for the Proposed Project. After implementation of the RAW, groundbreaking and construction activities at the site would not likely release any known toxins or contaminants onsite or convey hazardous materials offsite. Therefore, the Project would not create a hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant with implementation of Mitigation Measure HAZ-1.

Applicable BMPs related to hazards and hazardous materials from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Less Than Significant with Mitigation Incorporated.

Based on the results of previous soil sampling, soil at various locations within the Project Area are impacted with lead and/or petroleum hydrocarbon compounds. As described above, Mitigation Measure HAZ-1 outlines the preparation of a RAW for the Proposed Project. The primary objectives of the removal action described in the RAW are to mitigate and minimize exposure of humans to the chemicals of concern (in this case lead and petroleum hydrocarbons) in shallow soil through inhalation, dermal absorption, and ingestion identified within the Project Area. The RAW would identify and evaluate remedial approaches to clean up the Project Area so that it is suitable for use as a recreation area. Using prescribed screening criteria, a preferred remedial alternative would be selected for detailed discussion. The RAW would also summarize previous field investigation results and establish site-specific cleanup goals that are protective of human health and the environment. These actions are consistent with the mitigation requirements identified in the Rio De Los Angeles State Park General Plan EIR. Thus, impacts would be less than significant with implementation of Mitigation Measure HAZ-1.

Applicable BMPs related to hazards and hazardous materials from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Less Than Significant with Mitigation Incorporated.

Multiple schools surround the Project Area including preschools, charter schools, public schools, and music schools. The nearest school is Alliance Tennenbaum Family Technology High School, which is located approximately 183 feet to the east of the Project Area. As part of the Proposed Project, prior to construction, the Project would be required to adhere to the construction specifications and applicable regulations regarding hazardous materials and hazardous waste, including disposal, and would further ensure that construction of the Proposed Project would not create a significant hazard to the public or the environment, including nearby schools.

The Project would take preventative measures to reduce potential hazards to the surrounding communities. The Project would prepare a RAW as described in Mitigation Measure HAZ-1; comply with provisions of the County's Fire Code, the Los Angeles County Department of Environmental Health's Hazardous Materials Management Division, and the California Health and Safety Code; and prepare and implement a hazardous substance management, handling, storage, disposal, and emergency response plan during all construction activities. Upon the completion of construction, the Proposed Project would serve as a recreation area and would not emit hazardous emissions or create significant impacts through the handling of hazardous or acutely hazardous materials, substances, or wastes within one-quarter mile of a school. For these reasons, a less than significant impact would occur with mitigation.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Less than Significant with Mitigation Incorporated.

Government Code Section 65962.5 requires the DTSC, the State Department of Health Services, the SWRCB, and the California Integrated Waste Management Board to compile and annually update lists of hazardous waste sites and land designated as hazardous waste property throughout the state.

California Environmental Protection Agency's (CalEPA) Cortese List Data Resources records were reviewed to help determine whether hazardous materials have been handled, stored, or generated in the Project

Area or the adjacent properties and businesses (CalEPA 2023). The list, although covering the requirements of Section 65962.5, has always been incomplete because it does not indicate if a specific site was at one time included in the abandoned site program.

The list is a compilation of the following five separate websites:

- 1) DTSC's EnviroStor – identifies waste or hazardous substances sites.
- 2) SWRCB's GeoTracker – identifies underground storage tanks for which an unauthorized release report was filed, cleanup sites, and all solid waste disposal facilities from which there is a mitigation of hazardous waste for which a regional board has notified DTSC.
- 3) A Portable Document Format of solid waste disposal sites identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit.
- 4) A list of cease-and-desist orders and clean up and abatement orders.
- 5) A list of hazardous waste facilities subject to corrective action.

GeoTracker did not identify the site as an underground storage tank for which an unauthorized release report was filed, a cleanup site, or a solid waste disposal facility from which there is a mitigation of hazardous waste for which a regional board has notified DTSC (SWRCB 2023).

A list of solid waste disposal sites with waste constitutes above hazardous waste levels outside the waste management unit was also checked. No records were listed.

The list of cease-and-desist orders and clean up and abatement orders did not include the Project Area.

The list of hazardous facilities subject to corrective action does not include the Project Area.

However, DTSC's EnviroStor indicated that that Project Area was identified as a hazardous waste or substances site (DTSC 2023). The Project would prepare a RAW as described in Mitigation Measure HAZ-1; comply with provisions of the County's Fire Code, the Los Angeles County Department of Environmental Health's Hazardous Materials Management Division, and the California Health and Safety Code; and prepare and implement a hazardous substance management, handling, storage, disposal, and emergency response plan during all construction activities. Upon the completion of construction, the Proposed Project would serve as a recreation area and would not emit hazardous emissions or create significant impacts through the handling of hazardous or acutely hazardous materials, substances, or wastes within one-quarter mile of a school. For these reasons, a less than significant impact would occur with mitigation.

Would the Project	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the Project Area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

The Project Area is not located within an airport land use plan. No helistop/helipad is proposed, and no tall objects are proposed on the Project Area that would cause a hazard to flight. For these reasons, no impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

The City adopted a Local Hazard Mitigation Plan (City of Los Angeles 2018) that addresses response to and short-term recovery from disasters and emergency situations. Additionally, the City's General Plan includes a Public Safety Element that addresses seismic and geologic hazards, flood risk, hazardous materials, and noise hazards. The Project would comply with the Local Hazard Mitigation Plan in the event of an emergency or citywide disaster.

Implementation of the Proposed Project would increase the potential need for emergency access to and from the site. The Project design proposes access to the site from the entrance at Kerr Street. The Project includes a 20-foot-wide decomposed granite pathway through the Project Area to allow for emergency access. During the course of the City's required review of the Proposed Project's applications, the site plan would be reviewed to ensure that adequate access to and from the Project Area and around the proposed structures is provided for emergency vehicles. With adherence to the City requirements for emergency vehicle access, impacts would be less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

Some lands in proximity to the Project are at high risk for fire hazards (CAL FIRE 2023). These areas are located southwest of the Project Area across the I-5 freeway, and east of the Project Area in the Elysian Valley neighborhood. The Project Area and the surrounding area are relatively flat and located within an urban area of Los Angeles. Undeveloped wildland areas are not located in proximity to the Project Area. Further, the Project does not propose the construction of new housing or businesses. Through site plan review, construction of the Proposed Project would maintain adequate emergency access to the site and would not interfere with an emergency response plan or evacuation route. A less than significant impact would occur.

4.9.4 Mitigation Measures

HAZ-1: Preparation of a Removal Action Work Plan. The Project Proponent shall prepare a RAW prior to construction. The RAW shall meet the requirements of Health and Safety Code Section 25356.1 and to the satisfaction of the California Department of Toxic Substances Control. The RAW shall include the following information:

Site Description – Include current site conditions, ownership and operational history, site characterization activities conducted, any response actions taken, nature and extent of contamination, and risk assessment/evaluation.

- Conceptual Site Model – Discussion of the relationship between contaminant sources and receptors through migration and exposure paths.
- Removal Action Objectives – Identify goals or objectives to be achieved by the removal action.
- Identify Removal Action Alternatives – Develop and analyze removal action alternatives, at a minimum, consider effectiveness, implementability, and cost.
- Engineering Evaluation/Cost Analysis – Provide a comparison of alternatives, technical and cost evaluation, selection of a preferred alternative, and explanation of the basis for the selection.
- Implementation Details – Include details on all aspects of removal action implementation, including confirmation sampling and waste disposal.
- Sampling and Analysis Plan – Provide confirmation sampling, along with corresponding Quality Assurance Plan to confirm effectiveness of RAW, if applicable.

- Long Term Stewardship – Describe deed restrictions and any operation & maintenance requirements, if applicable.
- Health and Safety Plan – Outline methods that will be employed during the removal action to ensure the health and safety of workers and the public.
- Schedule of Activities – Include a detailed Project schedule.
- Public Involvement Process – Describe public participation activities.
- California Environmental Quality Act – Outline the CEQA approach for the removal action.
- Administrative Record – Provide a list of all documents and information relied on or considered during the removal action selection process.

4.10 Hydrology and Water Quality

4.10.1 Environmental Setting

4.10.1.1 Regional Hydrology

The Park is located in the San Fernando Valley Groundwater Basin (SFVGB), in the Upper River Area. The SFVGB includes the entire Verdugo Basin and the eastern portion of the San Fernando Valley, providing enough water to serve approximately 800,000 people.

As the Los Angeles River watershed passes the Taylor Yard complex, the Los Angeles River flows through the Glendale Narrows, a narrow valley that separates the San Fernando Valley and the Los Angeles Coastal Plain. The Los Angeles River drains a watershed that covers 834 square miles from the Santa Susana/San Gabriel Mountains to San Pedro. The section of the Los Angeles River by the Park continues to flow year-round, fed by groundwater forced up by relatively shallow.

4.10.1.2 Site Hydrology and Onsite Drainage

Groundwater flows underneath the Taylor Yard complex occur under unconfined conditions, such that levels vary with the season. Groundwater levels are relatively high during the wet season and low during the dry season. Based on data collected in 1999 and 2000, the general groundwater flow direction beneath the Taylor Yard complex is to the south-southeast with an average hydraulic gradient across the site of 0.0021 foot per foot (DPR 2005).

Taylor Yard has been graded and developed multiple times throughout the complex's history; therefore, the land remains relatively uniform and does not exhibit a high degree of slope on any part of the property. The Bowtie Parcel is relatively flat and consists of hardened dirt and slabs of concrete due to its previous use as a freight switching facility and recent remediation efforts. Local runoff from the surrounding communities of Cypress Park, Glassell Park, Elysian Valley, and Atwater Village is conveyed to storm drains that run under the Taylor Yard complex and empty into the Los Angeles River through culverts on the northeast levee.

4.10.2 Hydrology and Water Quality (X) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

Although some impervious surfaces may be needed throughout the Park, such as in parking lots, the Proposed Project would reduce the overall impervious surface area through the creation of naturalized landscapes, such as natural parkland and grassy areas. The existing hard dirt and concrete lot would be restored to a naturalized setting which permits increased groundwater infiltration. Development of the Park would have minimal potential to adversely affect groundwater recharge and would likely improve surface water quality. Although the Project Area is located within 0.25 mile of the Los Angeles River, Project implementation would not violate any water quality standards or discharge requirements, and impacts related to stormwater runoff would be less than significant. Implementation of NPDES and Los Angeles County MS4 Permit requirements, including a SWPPP would ensure that potential stormwater runoff impacts would be addressed through proper design and construction site BMPs. At a minimum, the SWPPP would include the following elements:

- Work areas, staging areas, or stockpile areas that could be subject to erosion during storm events would be stabilized with erosion control measures as appropriate. These measures could typically include silt fencing, straw bales, sandbags, filter fabric, coir rolls or wattles.
- Erosion control methods used to prevent siltation would be monitored weekly and maintained as needed.
- Stabilize and reseed disturbed upland areas with native grasses, shrubs, and trees upon completion of construction.
- Stationary equipment such as motors, pumps, generators, and welders located within or adjacent to the channel or basin will be positioned over drip pans.
- Any equipment or vehicles driven and/or operated within or adjacent to the channel or basin should be checked and maintained daily, to prevent leaks. All maintenance will occur in a designated offsite area. The designated area will include a drain pan or drop cloth and absorbent material to clean up spills.
- Fueling and equipment maintenance will be done in a designated area removed from the area of the channel or basin such that no petroleum products or other pollutants from the equipment may enter these areas via rainfall or runoff. The designated area will include a drain pan or drop cloth and absorbent materials to clean up spills.

- Materials for the containment of spills (i.e., absorbent materials, silt fencing, filter fabric, coir rolls) will be identified and be available onsite prior to commencement of construction or maintenance activities.
- Any accidental spill of hydrocarbons or coolant that may occur within the work area will be cleaned immediately. Absorbent materials will be maintained within the work area for this purpose.
- No wet concrete product will come into contact with any flowing or standing water at any time. Areas where raw cement or grout are applied or where concrete curing or finishing operations are conducted will be separated from any ponded or diverted water flows by a cofferdam or silt-free, exclusionary fencing. All equipment involved with the concrete or grouting operations will be located within a contained area while using any slurry or concrete product. A protective berm or other structure will be in place prior to maintenance and/or repair activities.
- Any spill of the grout, concrete, concrete curing, or wash water adjacent to or within the work area will be removed immediately.

Implementation of NPDES and Los Angeles County MS4 Permit requirements would reduce impacts to less than significant. Additionally, applicable BMPs related to water resources from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

The Sustainable Groundwater Management Act applies to all California Groundwater Basins and requires that high-and medium-priority groundwater basins form Groundwater Sustainability Agencies and be managed in accordance with locally developed Groundwater Sustainability Plans or Alternative Plans (California Department of Water Resources [DWR] 2020). The Proposed Project falls within San Fernando Valley Groundwater Basin, Basin 4-012. The basin covers 144,837.10 acres (DWR 2020). The basin is prioritized in the Very Low priority category based on the consideration of the eight components required in Water Code Section 10933(b) (DWR 2020).

According to the Los Angeles Department of Water and Power (LADWP) 2020 Urban Water Management Plan (UWMP), the primary LADWP sources of water supplies are water purchased from the Metropolitan Water District (MWD), the Los Angeles Aqueducts, and local groundwater. Recycled water projects are progressing and expected to be a greater portion of LADWP water supply in the future. Overall, these sources of water provide the necessary water to meet LADWP's water supply needs. According to the 2020 UWMP, the City's average water demand between 2016 and 2020 was 495,685 acre-feet per year

(LADWP 2020). The 2020 UWMP water demand projection for 2025 is approximately 642,600 acre-feet (AF) under an average weather year assuming passive conservation efforts, which is an increase of approximately 146,915 AF (LADWP 2020).

MWD's 2020 UWMP indicates that MWD will continue to provide 100 percent supply capability through 2045 for its member agencies during average, single dry, and multiple dry years. For these scenarios, there is a projected surplus of supply capability in every forecast (LADWP 2020).

The Project would increase permeable surfaces at the site and is therefore not anticipated to affect the supplies derived from local groundwater wells. The Project water usage would not increase significantly from existing conditions and would be incapable of significantly affecting water supplies, including groundwater supplies. In addition, the Project would reduce water usage by installing drought tolerant native landscaping. Therefore, the Proposed Project would not substantially deplete groundwater supplies or interfere significantly with groundwater recharge such that there would be a substantive net deficit in aquifer volume or a lowering of the local groundwater table level. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:				
i) result in substantial erosion or siltation onsite or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Less than Significant Impact.

- i) The Proposed Project would not result in large-scale topographic changes or other changes that would affect the drainage pattern of the surrounding area. The Proposed Project would not substantially alter the existing drainage patterns through the alteration of the course of a stream or river, or by other means, in a manner that would result in substantial erosion or siltation on- or offsite. Existing site drainage infrastructure would be extended to serve the

Project Area. After construction, the site would be covered with permeable and impermeable surfaces, and landscaping that would reduce any potential erosion impact. BMPs would be included as part of the SWPPP prepared for the Proposed Project and would be implemented to manage erosion and the loss of topsoil during construction-related activities. BMPs would include, but are not limited, straw wattles, silt fences, straw and wood mulch, and preservation of existing vegetation. Therefore, the Proposed Project would not result in substantial soil erosion or the loss of topsoil and a less than significant impact would occur.

Applicable BMPs related to water resources from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

Less than Significant Impact.

- ii) As discussed above, the Proposed Project would not result in large-scale topographic changes or other changes that would affect the drainage pattern of the site and surrounding area or impact water resources. Surface runoff volumes would not be increased over existing conditions, and in fact would be mitigated by the increase in permeable surfaces. The Project Area would be designed to maintain existing runoff rates and volumes and would not result in a significant change in flooding conditions on- or offsite. A less than significant impact would occur.

Applicable BMPs related to water resources from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

Less than Significant Impact.

- iii) The Proposed Project would not change the amount of runoff water or create additional sources of polluted runoff. During construction, the contractor would implement BMPs for stormwater pollution control. The Project itself would not generate pollutants that may enter the storm drain system. The proposed improvements would not exceed the capacity of the downstream stormwater drainage systems or provide additional sources of polluted runoff. Impacts would be less than significant.

Applicable BMPs related to water resources from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

No Impact.

- iv) According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, a portion of the Project Area is located within a 100-year flood hazard area (FEMA 2023). The Project would increase permeable surfaces in the Project Area and is therefore not anticipated to impede or redirect flood flows. There would be no impact to existing housing or other insurable structures from the Proposed Project.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

A portion of the Project Area is located within a 100-year floodplain (FEMA 2023). Project Area is located within the Hansen Dam and Eagle Rock Reservoir flood boundaries. However, the it is located in a heavily developed urban area, more than 18 miles from the Hansen Dam and 4.5 miles from Eagle Rock Reservoir. Hansen Dam and Eagle Rock Reservoir are continually monitored by various governmental agencies to guard against the threat of dam failure. Catastrophic failure of a major dam as a result of an earthquake is regarded as unlikely. Therefore, the potential for the Project Area to be inundated as a result of a dam failure, and potential exposure of people and structures to flooding due to dam failure, are low (DPR 2005).

Because there are no lakes or other large inland bodies of water in the vicinity of the Project Area, there is no risk of inundation by seiche. The Project Area is located approximately 16 miles inland from the Pacific Ocean at an elevation of about 340 feet above mean sea level. At this distance and elevation, the Project Area would not be at risk of inundation by tsunami (DPR 2005). No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Less than Significant with Mitigation Incorporated.

The Park is located in the SFVGB in the Upper Los Angeles River Area. The SFVGB includes the entire Verdugo Basin and the eastern portion of the San Fernando Valley, providing enough water to serve approximately 800,000 people. The Project would increase permeable surfaces at the site, and is therefore not anticipated to affect the supplies derived from local groundwater wells. The Project water usage would not increase significantly from existing conditions and would be incapable of significantly affecting water supplies, including groundwater supplies. In addition, the Project would reduce water usage by installing drought tolerant native landscaping. Therefore, the Proposed Project would not substantially deplete groundwater supplies or interfere significantly with groundwater recharge such that a sustainable groundwater management plan would be obstructed.

The Project Area is located within San Fernando Valley Area 4, a 5,860-acre area of contaminated groundwater in Los Angeles, California. Area 4 is downgradient of two other San Fernando Valley Basin Superfund Sites (Area 1 and Area 2). Numerous potentially responsible parties contaminated groundwater in the San Fernando Valley Basin with volatile organic compounds, including trichloroethylene and

perchloroethylene. Cleanup and investigative activities are ongoing (U.S. Environmental Protection Agency 2023). While the clean-up efforts at the Taylor Yard complex have not completely treated the contaminated soils and groundwater, and the treatment and eventual total site clean-up is an on-going process that will take decades to complete, the Proposed Project would have the potential to improve groundwater quality over time. As described above, Mitigation Measure HAZ-1 outlines the preparation of a RAW for the Proposed Project. As compared to existing conditions, the Project would not introduce potential sources of water pollutants. Moreover, the Project would comply with the City's LID ordinance, the primary purpose of which is to ensure that development and redevelopment projects mitigate runoff in a manner that captures rainwater and removes pollutants while reducing the volume and intensity of storm water flows. Implementation of Mitigation Measure HAZ-1 would reduce impacts to less than significant.

Applicable BMPs related to water resources and hazards and hazardous materials from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

4.10.3 Mitigation Measures

Please see Mitigation Measure HAZ-1 in Section 4.9.4.

4.11 Land Use and Planning

4.11.1 Environmental Setting

The Project Area is a sub-unit of the existing Rio de Los Angeles State Park and under its General Plan has a Land Use designation of State Park. The existing underlying City Zoning designation of the Project Area is Public Facilities. Table 1.3-1 in Section 1.0 Background describes the surrounding General Plan and Zoning designations. Please also refer to the planning documentation that is referenced in Section 2.7 Consistency with Programmatic and Planning Documentation discussing the Rio de Los Angeles General Plan and Integrated Feasibility Report for the Los Angeles River Ecosystem Restoration.

4.11.2 Land Use and Planning (XI) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

The Proposed Project would result in the development of the property to restore it to a green space, focused on nature and passive recreation. The parcel is currently undeveloped. Due to the nature of the Proposed Project, it would not physically divide an established community and no impact would occur. No mitigation is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

The Proposed Project consists of infrastructure improvements within the public Right-of-Way; as such, it would not conflict with any applicable land use plans or policies; and no impact would occur. No mitigation is required.

4.11.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.12 Mineral Resources

4.12.1 Environmental Setting

Minerals are defined as any naturally occurring chemical elements or compounds formed by inorganic processes and organic substances. Minalbe minerals are defined as a deposit of ore or minerals having a value materially in excess of the cost of developing, mining, and processing the mineral and reclaiming the Project area. The conservation, extraction, and processing of mineral resources is essential to meeting the needs of society.

The Surface Mining and Reclamation Act of 1975 (SMARA) states that cities and counties shall adopt ordinances "...that establish procedures for the review and approval of reclamation plans and financial assurances and the issuance of a permit to conduct surface mining operations..." (PRC Section 2774). The intent of this legislation is to ensure the prevention or mitigation of the adverse environmental impacts of mining, the reclamation of mined lands, and the production and conservation of mineral resources are consistent with recreation, watershed, wildlife, and public safety objectives (PRC Section 2712).

SMARA requires the State Geologist to classify land into Mineral Resource Zones (MRZs) according to the known or inferred mineral potential of that land. The process is based solely on geology, without regard to existing land use or land ownership. The primary goal of mineral land classification is to ensure that the mineral potential of land is recognized by local government decision makers and considered before land use decisions, which could preclude mining, are made. Areas subject to California mineral land classification studies are divided into the following MRZ categories that reflect varying degrees of mineral potential:

- MRZ-1: Areas of no mineral resource significance
- MRZ-2: Areas of identified mineral resource significance

- MRZ-3: Areas of undetermined mineral resource significance
- MRZ-4: Areas of unknown mineral resource significance

According to the Conservation Element of the City General Plan, the Project Area is located within MRZ-2 (City of Los Angeles 2001).

4.12.2 Mineral Resources (XII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

No mining operations exist on or in the vicinity of the Project Area, and no mining operations are proposed as part of the Project. The Project would not result in the loss of any locally or regionally known mineral. Therefore, the proposed improvements would have no impact on mineral resources.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

As discussed above, no mining operations exist on or in the vicinity of the Project Area, and no mining operations are proposed as part of the Project. Therefore, the proposed improvements would have no impact on locally important mineral resource recovery sites.

4.12.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.13 Noise

4.13.1 Environmental Setting

Noise is generally defined as sound that is loud, disagreeable, or unexpected. The selection of a proper noise descriptor for a specific source is dependent on the spatial and temporal distribution, duration, and fluctuation of the noise. The noise descriptors most often encountered when dealing with traffic, community, and environmental noise include the average equivalent noise level (L_{eq}) in addition to the

day-night average sound level (L_{dn}) and Community Noise Equivalent Level CNEL). The L_{eq} is a measure of ambient noise, while the L_{dn} and CNEL are measures of community noise. Each is applicable to this analysis and defined as follows:

- **Equivalent Noise Level (L_{eq})** is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
- **Day-Night Average (L_{dn})** is a 24-hour average L_{eq} with a 10 dBA added to noise during the hours of 10:00 pm to 7:00 am to account for noise sensitivity in the nighttime. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.4 dBA L_{dn} .
- **Community Noise Equivalent Level (CNEL)** is a 24-hour average L_{eq} with a 5-dBA weighting during the hours of 7:00 pm to 10:00 pm and a 10-dBA weighting added to noise during the hours of 10:00 pm to 7:00 am to account for noise sensitivity in the evening and nighttime, respectively.

Noise can be generated by a number of sources, including mobile sources, such as automobiles, trucks and airplanes, and stationary sources, such as construction sites, machinery, and industrial operations.

Sound spreads (propagates) uniformly outward in a spherical pattern, and the sound level decreases (attenuates) at a rate of approximately 6 decibels (dB) for each doubling of distance from a stationary or point source. Sound from a line source, such as a highway, propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of approximately 3 dB for each doubling of distance from a line source, such as a roadway, depending on ground surface characteristics (Federal Highway Administration [FHWA] 2011). Soft surfaces, such as soft dirt or grass, can absorb sound, so an excess ground-attenuation value of 1.5 dB per doubling of distance is normally assumed (FHWA 2011).

The manner in which older structures in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows (Caltrans 2002). The exterior-to-interior reduction of newer structures is generally 30 dBA or more (Harris Miller Miller & Hanson Inc. 2006).

4.13.1.1 Human Response to Noise

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally

considered low when the CNEL is below 60 dBA, moderate in the 60- to 70-dBA range, and high, above 70 dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban, residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA). Regarding increases in dBA, the following relationships should be noted in understanding this analysis:

- Except in carefully controlled laboratory experiments, a change of 1.0 dBA cannot be perceived by humans.
- Outside of the laboratory, a 3.0-dBA change is considered a just-perceivable difference.
- A change in level of at least 5.0 dBA is required before any noticeable change in community response would be expected. An increase of 5.0 dBA is typically considered substantial.
- A 10.0-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

4.13.1.2 Noise Sensitive Land Uses

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as hospitals, historic sites, cemeteries, and certain recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses.

The nearest noise sensitive receptor is Alliance Tennenbaum Family Technology High School, which is located approximately 183 feet to the east of the Project Area.

4.13.2 Vibration Fundamentals

Ground vibration can be measured several ways to quantify the amplitude of vibration produced, including through peak particle velocity (PPV) or root mean square velocity. These velocity measurements measure maximum particle velocity at one point or the average of the squared amplitude of the signal, respectively.

Vibration impacts on people can be described as the level of annoyance and can vary depending on an individual's sensitivity. Generally, low-level vibrations may cause window rattling but do not pose any threats to the integrity of buildings or structures.

4.13.3 Existing Ambient Noise Environment

The most common and significant source of noise in the City is mobile noise generated by transportation-related sources. Other sources of noise are the various land uses (i.e., industrial facilities, agricultural uses, residential and commercial) that generate stationary-source noise. The noise environment in the Proposed Project Area is impacted by various noise sources. The Project Area is currently less than 0.5 miles from the interchange between SR-2 and Interstate Highway 5 (I-5), a prominent source of noise in the area. As shown in Table 4.13-1 below, the ambient recorded noise levels range from 52.5 to 61.2 dBA L_{eq} near the Project Area, and 64.1 dBA CNEL in the Project Area.

4.13.3.1 Existing Ambient Noise Measurements

The Project Area is currently vacant, former railyard. In order to quantify existing ambient noise levels in the Project Area, ECORP conducted three short-term noise measurements (15-minutes) and one long term noise measurements in and around the Project Area on the afternoon of January 31, 2023. These short-term noise measurements are representative of typical existing noise exposure within and immediately adjacent to the Project Area during the daytime. The long-term measurement was taken from 11:21 a.m. on January 31 to 11:21 a.m. on February 1. The 15-minute measurements were taken between 10:08 a.m. and 11:06 a.m. on January 31. The average noise levels at each location are listed in Table 4.13-1.

Table 4.13-1. Existing (Baseline) Noise Measurements						
Location Number	Location	L_{eq} dBA	CNEL dBA	L_{min} dBA	L_{max} dBA	Time
Short Term Measurements						
1	Along the parkway, south of intersection at Carillon Street and La Clede Avenue	61.2	N/A	51.7	76.8	10:08 a.m. – 10:23 a.m.
2	End of cul-de-sac along Marsh Street	58.0	N/A	45.9	72.5	10:30 a.m. – 10:45 a.m.
3	Adjacent to intersection of Knox Avenue and Blake Avenue	52.5	N/A	41.7	80.0	10:51 a.m. – 11:06 a.m.
Long Term Measurement						
4	On the northern side of the Project Area	57.4	64.1	46.3	89.5	11:21 a.m. – 11:21 a.m.

Table 4.13-1. Existing (Baseline) Noise Measurements

Location Number	Location	L_{eq} dBA	CNEL dBA	L_{min} dBA	L_{max} dBA	Time
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Notes: L_{eq} is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. L_{min} is the minimum noise level during the measurement period and L_{max} is the maximum noise level during the measurement period. CNEL is a 24-hour average L_{eq} with a 5 dBA “weighting” during the nighttime hours of 7:00 p.m. to 10:00 p.m. and a 10 dBA “weighting” added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

Source: Measurements were taken by ECORP with a Larson Davis SoundExpert LxT precision sound level meter, which satisfies the American National Standards Institute for general environmental noise measurement instrumentation. Prior to the measurements, the SoundExpert LxT sound level meter was calibrated according to manufacturer specifications with a Larson Davis CAL200 Class I Calibrator. See Appendix F for noise measurement outputs.

As shown in Table 4.13-1, the ambient recorded noise levels range from 52.5 to 61.2 dBA L_{eq} over the course of the three short-term noise measurements taken in the Project vicinity. The ambient recorded noise level in the Project Area was 64.1 dBA CNEL. The most common noise in the Project vicinity is produced by automotive vehicles (e.g., cars, trucks, buses, motorcycles) on area roadways.

4.13.3.2 Regulatory Setting

City of Los Angeles General Plan

The Noise Element of the City General Plan provides policy direction for minimizing noise impacts on the community and for coordinating with surrounding jurisdictions and other entities regarding noise control. By identifying noise-sensitive land uses and establishing compatibility guidelines for land use and noise, noise considerations will influence the general distribution, location, and intensity of future land use. The result is that effective land use planning and mitigation can alleviate the majority of noise problems.

The most basic planning strategy to minimize adverse impacts on new land uses due to noise is to avoid designating certain land uses at locations within Los Angeles that would negatively affect noise-sensitive land uses. Uses such as schools, hospitals, childcare, senior care, congregate care, churches, and all types of residential uses should be located outside of any area anticipated to exceed acceptable noise levels as defined by the Noise and Land Use Compatibility Guidelines, or should be protected from noise through sound attenuation measures such as site and architectural design and sound walls. The City has adopted land use noise compatibility guidelines as a basis for planning decisions based on noise considerations. The Guidelines for Noise Compatible Land Uses are shown in Table 4.13-2. In the case that the noise levels identified at a proposed land use do not surpass the maximum allowable levels presented, the proposed land use type is considered compatible with the existing noise environment.

Table 4.13-2. Guidelines for Noise Compatible Land Use

Land Use Category	Day-Night Average Exterior Sound Level (CNEL dBA)						
	50 dBA	55 dBA	60 dBA	65 dBA	70 dBA	75 dBA	80 dBA
Residential Single Family, Duplex, Mobile Home	A	C	C	C	N	U	U
Residential Multi-Family	A	A	C	C	N	U	U
Transient Lodging, Motel, Hotel	A	A	C	C	N	U	U
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	N	U
Auditorium, Concert Hall, Amphitheater	C	C	C	C/N	U	U	U
Sports Arena, Outdoor Spectator Sports	C	C	C	C	U/C	U	U
Playground, Neighborhood Park	A	A	A	A/N	N	N/U	U
Golf Course, Riding Stable, Water Recreation, Cemetery	A	A	A	A	N	A/N	U
Office Building, Business, Commercial, Professional	A	A	A	A/C	C	C/N	U
Agriculture, Industrial, Manufacturing, Utilities	A	A	A	A	A/C	C/N	N

Notes: CNEL = Community Noise Equivalence Levels; dB = decibels; dBA = A-weighted decibels.

A= Normally Acceptable. Specified land use is satisfactory, based upon the assumption that any building involved are of normal conventional construction without any special noise insulation requirements.

C= Conditionally Acceptable. New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

N= Normally Unacceptable. New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

U= Clearly Unacceptable. New construction or development should generally not be undertaken.

Source: City of Los Angeles 1999.

In accordance with the Noise Element, a noise exposure of 65 dBA CNEL or less is considered to be the most desirable target for the exterior of a playground or neighborhood park land uses. Noise levels above 65 dBA CNEL are “normally unacceptable” playground or neighborhood park land uses.

City of Los Angeles Municipal Code

The City has numerous ordinances and enforcement practices that apply to intrusive noise and that guide new construction. The City’s comprehensive noise ordinance, found in Chapter XI of the LAMC, sets forth

sound measurement and criteria, minimum ambient noise levels for different land use zoning classifications, sound emission levels for specific uses, hours of operation for certain uses, standards for determining when noise is deemed to be a disturbance, and legal remedies for violations. Key provisions of Chapter XI of the LAMC are discussed below.

Section 112.05 of the LAMC prohibits the operation of any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet from the source of the noise between the hours of 7:00 a.m. and 10:00 p.m. when the source is located within 500 feet of a residential zone:

- 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors, and pneumatic or other powered equipment;
- 75 dBA for powered equipment of 20 horsepower or less intended for infrequent use in residential areas, including chain saws, log chippers, and powered hand tools; or
- 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools, and riding tractors.

The noise limitations above do not apply where compliance is technically infeasible, which means that the noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction device or techniques during the operation of the equipment. The limitations apply only to land uses in or within 500 feet of residential zones.

In accordance with the LAMC, a noise level increase of 5 dB over the existing average ambient noise level at an adjacent property line is considered a noise violation. This standard applies to:

- 1) radios, television sets, and similar devices defined in LAMC Section 112.01;
- 2) air conditioning, refrigeration, heating, pumping, and filtering equipment defined in LAMC Section 112.02;
- 3) powered equipment intended for repetitive use in residential areas and other machinery, equipment, and devices defined in LAMC Section 112.04; and
- 4) motor vehicles driven on-site as defined in LAMC Section 114.02.

Section 41.40 of the LAMC also prohibits construction activity (including demolition) and repair work, where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence, between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, and between 6:00 p.m. and 8:00 a.m. on Saturday. All such activities are also prohibited on Sundays and all federal holidays.

Furthermore, projects are subject to the following requirements:

- Compliance with the City's Noise Ordinance Nos. 144,331 and 161,574, which prohibit the emission or creation of noise beyond applicable levels (as described above) at adjacent uses unless technically infeasible.

- Restricting the construction and demolition activities to the hours indicated in Section 41.40 of the LAMC (i.e., between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, and between 6:00 p.m. and 8:00 a.m. on Saturday. All such activities are also prohibited on Sundays and all federal holidays).
- Compliance with the City's Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public and approved by the City's Department of Building and Safety.
- Compliance with Section 112.02 of the LAMC for all new mechanical equipment, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA.

City of Los Angeles CEQA Threshold Guide

As set forth in the L.A. CEQA Thresholds Guide, a project would normally have a significant impact on noise levels from construction if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or anytime on Sunday.

In addition, a project would normally have a significant impact on noise levels from project operations if:

- The Project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category identified in Table 4.13-2 of this acoustical analysis, or any 5 dBA or greater noise increase.

4.13.4 Noise (XIII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

4.13.4.1 Construction Noise Analysis

Onsite Construction Noise

Construction noise associated with the Proposed Project would be temporary and would vary depending on the specific nature of the activities being performed. Noise generated would primarily be associated with the operation of off-road equipment for onsite construction activities as well as construction vehicle traffic on area roadways. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., site preparation, excavation, paving). Noise generated by construction equipment, including earth movers, pile drivers, and portable generators, can reach high levels. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). During construction, exterior noise levels could negatively affect sensitive land uses in the vicinity of the construction site.

The nearby sensitive receptors to the Project Area are Alliance Tennenbaum Family Technology High School and apartment complex residences on N. Coolidge Avenue. As previously mentioned, Section 112.05 of the LAMC prohibits the operation of any powered equipment or powered hand tool that produces a maximum noise level exceeding 75 dBA within or adjacent to a residential zone. Additionally, Section 41.40 of the LAMC also prohibits construction activity (including demolition) and repair work between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, between 6:00 p.m. and 8:00 a.m. on Saturday, Sundays, and all federal holidays. Lastly, the City CEQA Thresholds Guide states that construction activities lasting more than 10 days in a three-month period, such as in the case of the Proposed Project, would be considered a substantial noise impact if such activities exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use.

The anticipated short-term construction noise levels generated for the necessary equipment were calculated using the Roadway Noise Construction Model for the site preparation, grading, building construction, paving, and painting anticipated for the Proposed Project. It is acknowledged that the majority of construction equipment is not situated at any one location during construction activities, but

rather spread throughout the Project Area and at various distances from sensitive receptors. Therefore, this analysis employs Federal Transit Administration (FTA) guidance for calculating construction noise, which recommends measuring construction noise produced by all construction equipment operating simultaneously from the center of the Project Area (FTA 2018), which in this case is approximately 581 feet from the apartment complex residences and 786 feet distant from the high school. The anticipated short-term construction noise levels generated for the necessary equipment is presented in Table 4.13-3.

Table 4.13-3 Construction Average (dBA) Noise Levels at Nearest Receptor			
Construction Phase	Estimated Exterior Construction Noise Level @ Closest Residences (dBA L_{eq})	Construction Noise Standard (dBA L_{eq})	Exceeds Standards?
Site Preparation	66.3	75	No
Grading	66.3	75	No
Building Construction, Paving, and Painting	68.1	75	No

Notes: dBA = A-weighted decibels; L_{eq} = average equivalent energy noise level.

L_{eq} is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

Construction equipment used during construction provided using the California Emissions Estimator Model (CalEEMod), version 2022.1. CalEEMod is designed to calculate air pollutant emissions from construction activity and contains default construction equipment and usage parameters for typical construction projects based on several construction surveys conducted in order to identify such parameters. Consistent with Federal Transit Administration (FTA) recommendations for calculating construction noise, construction noise was measured from the center of the Project Area (FTA 2018), which is 581 feet from the apartment complex residences.

Source: Construction noise levels were calculated by ECORP Consulting, Inc. using the Federal Highway Administration (FHWA) Roadway Noise Construction Model (FHWA 2006). Refer to Appendix F for Model Data Outputs.

As shown, no individual or cumulative construction equipment would exceed 75 dBA at the closest residence. However, as stated above, ECORP conducted a series of noise measurements, including one long term measurement, in the Project Area (see Table 4.13-1), which recorded a noise level in the Project Area of 64.1 dBA CNEL. The City CEQA Thresholds Guide states that construction activities lasting more than 10 days in a three-month period, such as in the case of the Proposed Project, would be considered a substantial noise impact if such activities exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use. The long-term noise measurement, taken by ECORP from January 31, 2023 to February 1, 2023, is the best approximation of ambient noise level in the area surrounding the Project Area. Therefore, the ambient noise measurement of 64.1 dBA CNEL is used to represent the ambient noise level of the closest sensitive receptors. Project construction would not result in an increase in 5 dBA over existing conditions (68.1 dBA – 64.1 dBA = 4.0 dBA).

As previously described, all projects in Los Angeles are subject to compliance with the City's Noise Ordinance Nos. 144,331 and 161,574, which prohibit the emission or creation of noise beyond applicable levels (as described above) at adjacent uses unless technically infeasible. Section 41.40 of the LAMC restricts the construction and demolition activities between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, and 6:00 p.m. and 8:00 a.m. on Saturdays. All such activities are also prohibited on Sundays and all federal holidays). Ordinance No. 178,048 requires a construction site notice to be provided that includes the job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice is required to be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public and approved by the City's Department of Building and Safety. The Project is required to adhere to all City regulations.

Project construction noise would be less than significant.

Applicable BMPs related to noise from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

Offsite Construction Worker Trips

Project construction would result in additional traffic on adjacent roadways over the period that construction occurs. According to CalEEMod, which is designed to model emissions for land use development projects based on several construction surveys conducted in order to identify such parameters, including those generated by worker commute trips and vendor trips, the maximum number of Project construction trips during a single construction phase is expected to be 58 one-way trips per day. According to Caltrans Technical Noise Supplement to the Traffic Noise Analysis Protocol (2013), a doubling of traffic on a roadway is required to result in an increase of 3 dB (outside of the laboratory, a 3-dBA change is considered a just-perceivable difference). The Project Area is accessible from Kerr Street and Glendale Freeway. Per the LADOT 24 Hour Traffic Volumes (2011), the intersection of Glendale Freeway and San Fernando Road, which is approximately 1,423 feet away from the Northern Boundary of the Project Area, had an average daily traffic count of 13,410 vehicles. As such, the Project would not result in a doubling of traffic on area roadways and the contribution to existing traffic noise during Project construction would not be perceptible. Additionally, it is noted that construction is temporary, and these trips would cease upon completion of the Project. Therefore, this impact is less than significant.

Operational Noise Analysis

Noise-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would each be considered noise-sensitive and may warrant unique measures for protection from intruding noise. The nearby sensitive receptors to the Project Area are Alliance Tennenbaum Family Technology High School, approximately 786 feet east from the center of the Project Area, and apartment complex residences on N. Coolidge Avenue, approximately 581 feet to the

west of the center of the Project Area. Operational noise sources associated with the Proposed Project include recreational and Park activities.

Operational Traffic Noise

The Project proposes to renovate a former railyard site into a community park with associated park features. According to the Traffic Study prepared for the Project, the Park is expected to generate approximately 98 daily trips on weekdays, under current conditions (KOA 2022). CalEEMod version 2022.1 generated defaults for the Proposed Project estimate there will be an average of approximately 23 daily trips on Saturdays and Sundays. The calculated noise levels as a result of the Project at affected sensitive land uses are compared against the Land Use Compatibility for Community Noise Exposure standards identified in Table 4.13-2 above.

Calculations using the FHWA roadway noise prediction model in conjunction with the trip generation rate identified by KOA identify Project traffic noise as 45.1 dBA CNEL (see Appendix F). This noise level lays within the Normally Acceptable ambient noise level range established by the County for the protection of residential and school land uses, the sensitive land uses in the Project Area. Thus, the Proposed Project would not result in a transportation noise exposure in excess of City’s standards.

Onsite Operational Noise

The Project is proposing the renovation of former railyard site into a community park and associated features along the Los Angeles River. The most perceivable noise producing activities that would take place in the Project Area would be playground activities or recreational noises. This is not expected to be a significant source of noise that would impact the nearby sensitive noise receptors. As such, operational noise produced as a result of the Project would result in a less than significant impact.

Would the Project:	Less than			
	Potentially Significant Impact	Significant with Mitigation Incorporated	Significant Impact	No Impact
b) Result in generation of excessive ground-borne vibration or ground-borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

4.13.4.2 Construction Vibrational Analysis

Excessive groundborne vibration impacts result from continuously occurring vibration levels. Increases in groundborne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Construction in the Project Area would have the potential to result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance.

Construction-related ground vibration is normally associated with impact equipment such as pile drivers, jackhammers, and the operation of some heavy-duty construction equipment, such as dozers and trucks. It is not anticipated that pile drivers or jackhammers would be necessary during Project construction. Vibration decreases rapidly with distance, and it is acknowledged that construction activities would occur throughout the Project Area and would not be concentrated at the point closest to sensitive receptors. Groundborne vibration levels associated with construction equipment are summarized in Table 4.13-4.

Table 4.13-4. Representative Vibration Source Levels for Construction Equipment	
Equipment Type	Peak Particle Velocity at 25 Feet (inches per second)
Large Bulldozer	0.089
Pile Driver	0.170
Loaded Trucks	0.076
Hoe Ram	0.089
Jackhammer	0.035
Small Bulldozer/Tractor	0.003
Vibratory Roller	0.210

Source: Caltrans 2020; FTA 2018

The City does not regulate vibrations associated with construction. However, a discussion of construction vibration is included for full disclosure purposes. For comparison purposes, the Caltrans (2020) recommended standard of 0.5 inches per second PPV with respect to the prevention of structural damage for commercial buildings is used as a threshold. Consistent with FTA recommendations for calculating vibration generated from construction equipment, construction vibration was measured from the center of the Project Area (FTA 2018). The nearest structure of concern to the construction site is a commercial building 235 feet east of the Project Area center. The closest residential apartment complexes are not included in this analysis because although they are 581 feet west of the Project Area's center, the Los Angeles River runs in between the Project Area and the residences, which are on the opposite side of the River. Because of this, vibrational impacts are more relevant to the commercial buildings located adjacent to the Project Area.

Based on the representative vibration levels presented for various construction equipment types in Table 4.13-4 and the construction vibration assessment methodology published by the FTA (2018), it is possible to estimate the potential project construction vibration levels. The FTA provides the following equation:

$$[PPV_{\text{equip}} = PPV_{\text{ref}} \times (25/D)^{1.5}]$$

Table 4.13-5 presents the expected Project related vibration levels at a distance of 235 feet.

Table 4.13-5 Construction Vibration Levels at 235 Feet

Receiver Peak Particle Velocity Levels (in/sec)					Peak Vibration	Threshold	Exceed Threshold ?
Large Bulldozer, Caisson Drilling, & Hoe Ram	Loaded Trucks	Jackhammer	Pile Driver	Vibratory Roller			
0.003	0.002	0.001	0.005	0.007	0.007	0.5	No

Notes: Based on the Vibration Source Levels of Construction Equipment included on Table 4.13-4 (FTA 2018).
Distance to the nearest structure of concern is approximately 235 feet measured from Project Area center.

As shown in Table 4.13-5, vibration as a result of onsite construction activities in the Project Area would not exceed 0.5 PPV at the nearest structure. Thus, onsite Project construction would not exceed the recommended threshold. Because of these reasons, this impact is less than significant.

Applicable BMPs related to noise from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

4.13.4.3 Operational Vibration Analysis

Project operations would not include the use of any stationary equipment that would result in excessive vibration levels. The Project would not accommodate any heavy-duty trucks or equipment. Therefore, the Project would result in negligible groundborne vibration impacts during operations. This impact is less than significant.

Would the Project:

- c) For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project Area to excessive noise levels?

Potentially Significant Impact Less than Significant with Mitigation Incorporated Less than Significant Impact No Impact

☐
☐
☐
☒

No Impact.

The nearest airport to the Project Area is the Hollywood Burbank Airport located approximately 9 miles northwest. According to the City's General Plan Noise Element, the Project Area is not within any of the noise contours from the airport. Therefore, the implementation of the Proposed Project would not affect airport operations, nor result in increased exposure of those on the Project Area to aircraft noise.

4.13.5 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.14 Population and Housing

4.14.1 Population and Housing (XIV) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

The Proposed Project would add new structures and amenities to the Park. The Proposed Project does not propose the construction of new housing, businesses, or extended infrastructure and therefore is not anticipated to directly or indirectly induce population growth in the area. Upon completion, the new Park amenities would be maintained by State Park staff. As such, the Proposed Project is not expected to generate a substantial permanent increase in employment opportunities in the area capable of inducing population growth. A less than significant impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

The Project involves construction of passive recreation amenities and wetland habitat restoration. As described above, the Project Area does not contain any residential structures and no people live on the property under existing conditions. The Proposed Project would not remove housing; therefore, it would not displace people. Accordingly, implementation of the Proposed Project would not displace substantial numbers of people and would not necessitate the construction of housing elsewhere. A less than significant impact would occur.

4.14.2 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.15 Public Services

4.15.1 Environmental Setting

4.15.1.1 Police Services

Police protection services in the City are provided by the Los Angeles Police Department (LAPD). The nearest police station to the Project Area is the Northeast Police Station, located at 3353 N. San Fernando Road, approximately 0.6-mile north of the site. State Park Rangers and Lifeguards perform professional and technical duties in State Park units involving operations, interpretation, resource protection, patrol, safety and law enforcement, assist with program management activities and aquatic rescue services within State Park lands. Duties include, but are not limited to: patrol (vehicle, boat, foot, etc.), issuing citations, writing reports, making physical arrests, conducting investigations, taking command in emergencies, performing search and rescue activities, and providing emergency medical aid.

4.15.1.2 Fire Services

Fire protection services in the City are provided by the Los Angeles Fire Department (LAFD). In particular, the primary duties of the LAFD Fire Development Services Unit are to conduct Fire Life Safety Plan Checks and Fire Life Safety Inspections which aim to enforce applicable standards of the Fire Code, Title 19, Uniform Building Code, City, and National codes concerning new construction and remodeling. Furthermore, the Hydrants and Access Unit reviews plans to evaluate adequacy of site access and hydrant placement. The Proposed Project is within the existing service area of the LAFD. The nearest fire station to the Project Area is LAFD Station No. 50 located approximately 0.2-mile north at 3036 Fletcher Drive.

4.15.1.3 Schools

The Project is located within the Los Angeles Unified School District (LAUSD). LAUSD currently supports 783 K-12 schools and over 429,000 students (LAUSD 2023). Multiple schools surround the Project Area including preschools, charter schools, public schools, and music schools.

4.15.1.4 Parks

There are several recreational centers within a 1-mile radius of the Project Area, including Rio de Los Angeles State Park and El Rio Canyon Park. Elysian Park, located one mile south of the Project Area, is the second largest city park in Los Angeles. Elysian Park offers hiking trails, picnic areas with barbeque pits, a man-made lake, children's play areas, playfields, and the Chavez Ravine Arboretum.

4.15.2 Public Services (XV) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other Public Facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.15.2.1 Fire Protection

Less than Significant Impact.

The Proposed Project would be required to comply with applicable fire and life safety standards and code requirements, such as fire hydrant flows, hydrant spacing, adequate fire lane turning-radius, access, and design to comply with LAFD's fire protection requirements. Upon implementation of LAFD requirements, including compliance with all applicable standards required by the LAFD as a result of the Fire Life Safety Plan Checks and Fire Life Safety Inspections processes, the Proposed Project would not place an unanticipated burden on fire protection services. In addition, emergency access to the Project Area would be maintained at all times during both Project construction and operation. As such, the Proposed Project would therefore not substantially affect response times or service ratios such that new or expanded fire facilities would be needed. Impacts would be less than significant.

Applicable BMPs related to public health and safety from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities.

4.15.2.2 Police Services

Less than Significant Impact.

The Proposed Project's site plan includes an office space for an onsite law enforcement officer, which would enhance police coverage and response time for the park. However, as the Proposed Project would not induce population growth, the Project would not affect service ratios or place an unanticipated

burden on police protection services such that new or expanded police facilities would be needed. The Proposed Project would comply with all applicable regulations required by the LAPD during the plan check process. Impacts would be less than significant.

Applicable BMPs related to public health and safety from the IFR EIS/EIR would also be implemented for the Project.

4.15.2.3 Schools

No Impact.

The Proposed Project would not increase demand for schools and would not require construction of other new or expanded school facilities. Furthermore, as discussed in this document, construction of the Project would include mitigation measures to reduce potential impacts. Therefore, the Proposed Project would not result in the need for or construction of school facilities that would result in significant impacts. Impacts would be less than significant.

4.15.2.4 Parks

No Impact.

The Proposed Project itself is a recreational facility and therefore would not cause the physical deterioration of neighboring facilities to occur. The environmental impacts of construction and operation of the Proposed Project, including required mitigation measures, are discussed in this Initial Study. Impacts would be less than significant.

4.15.2.5 Other Public Facilities

No Impact.

Physical impacts to public services are usually associated with population growth, which increases the demand for public services and facilities, including libraries. As discussed in Section 4.14, *Population and Housing*, the Proposed Project would not induce direct population growth. No impact would occur.

4.15.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.16 Recreation

4.16.1 Environmental Setting

There are 5.75 acres of Park space within a half-mile of the undeveloped Bowtie Parcel's entrance; this equates to only 1.13 acre of Park space per 1,000 residents. The existing Park space which exists within a half-mile radius consists of two local parks, Glenhurst Park and Lewis MacAdams Riverfront Park. Glenhurst Park is a small 0.39-acre neighborhood pocket park on the northeast side of the Los Angeles River which provides a small open grassy area and a play structure for children. Lewis MacAdams

Riverfront Park is a 5.36-acre neighborhood park located on the southwest side of the Los Angeles River which contains a skate park, grassy open area, picnic tables, natural habitat, stormwater retention features, and access to the river.

There are several recreational centers within a one-mile radius of the Project Area, including Rio de Los Angeles State Park and El Rio Canyon Park. Elysian Park, located one mile south of the Project Area, is the second largest city park in Los Angeles. Elysian Park offers hiking trails, picnic areas with barbeque pits, a man-made lake, children’s play areas, playfields, and the Chavez Ravine Arboretum. However, there is generally a greater demand from Los Angeles communities than can be met for recreational resources. The Project is intended to serve nearby residents in Los Angeles, residents throughout the state, and out-of-state visitors. The Proposed Project would develop a former industrial property to restore it to a vibrant green space, focused on nature and passive recreation.

4.16.2 Recreation (XVI) Materials Checklist

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

Project objectives include increasing outdoor recreational park space to underserved and economically disadvantaged residents in the Project vicinity; provide an experience of urban river and habitat restoration for the local community as well as for the region, nation, and globe; reestablish access to the river for indigenous communities who regard the area as a sacred land; restore and enhance natural habitat along the Los Angeles River, including wetlands, to attract birds and wildlife; provide educational opportunities with respect to historical, cultural, and environmental considerations; and advance the goals of the SCORP. The Proposed Project itself is a recreational facility and therefore would not cause the physical deterioration of neighboring facilities to occur. Benefits of the Project include improved aesthetic quality of the Project Area; increased quality, quantity, and diversity of recreation resources along the River, such as trails, bike paths, benches, and signage; and enhanced recreation resources along the river, such as new opportunities for outdoor education. Therefore, Proposed Project would have no adverse effect on surrounding recreational facilities.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

The Proposed Project is a recreational improvement Project on an existing recreational area. The Project would incorporate amenities such as a visitors/information center with a green roof; several vista points facing the Los Angeles River; a cultural information center to provide an educational space for Native American culture; an event space with turntable for larger crowds; internal multi-use trails for walking and biking; and open turf areas, picnic locations, and seating benches. The environmental impacts of construction and operation of the Proposed Project, including required mitigation measures, are discussed in this Initial Study. Impacts would be less than significant.

Applicable BMPs related to recreation from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities and during Project operation.

4.16.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.17 Transportation

4.17.1 Environmental Setting

KOA Corporation completed a traffic impact analysis for the Project in February 2023 (KOA 2023; Appendix G). The purpose of the study was to assess the potential traffic effects of the Proposed Project on the surrounding roadway system.

In July 2019, the City of Los Angeles Department of Transportation (LADOT) updated the City’s Transportation Assessment Guidelines (the “TAG”) to conform to the requirements of Senate Bill 743 (SB 743). The TAG replaced the Transportation Impact Study Guidelines (December 2016) and shifted the performance metric for evaluating transportation impacts under the California Environmental Quality Act (CEQA) from level of service (LOS) to vehicle miles traveled (VMT) for studies completed within the City. The TAG was updated in July 2020 and August 2022, with further refined and clarified analysis methodologies. Per the TAG, a Transportation Assessment is required when a development project is likely to add 250 or more net daily vehicle trips to the local street system. This trip generation assessment has been conducted to determine if the Project would generate 250 or more net daily vehicle trips, and thereby require the preparation of a Transportation Assessment (TA).

4.17.2 Transportation (XVII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

The Project includes multiple internal multi-use trails for walking and biking. These trails connect the Park entrance at Kerr Street to the G2 parcel south of the Project Area, allowing for a seamless connection along the Los Angeles River. Vehicular access would be provided from the existing entrance at Kerr Street, near the northwest end of the Project Area. The Project would provide 35 automobile parking spaces and two bus parking spaces in the northwest end of the Project Area. Automobile and bicycle parking would be provided in accordance with LAMC requirements.

The Project would not alter the existing roadway network. No existing roads, intersections, or bridges would be permanently closed. There would also be no change in roadway capacity.

Given that the Project is estimated to add between 12 and 98 net daily vehicle trips to the local street system on a typical weekday, the Project is not expected to result in significant impacts to the surrounding transportation system. This Project is intended to create a cohesive link for pedestrians and bicyclists along the Los Angeles River. When completed, the community will have access to a variety of outdoor recreation opportunities including walking, biking, picnicking, birdwatching, unstructured play areas, and the ability to enjoy nature steps from home. Therefore, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities, and the impact would therefore be less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

To assist in determining which development projects would conflict with CEQA Guidelines section 15064.3, subdivision (b)(1), the TAG establishes two screening criteria to evaluate the requirement of further analysis of a land use project's impact based on VMT. Both of the following criteria must be met in order to require further analysis of a land use project's VMT contribution:

- 1) The land use project would generate a net increase of 250 or more daily vehicle trips.
- 2) The land use project would generate a net increase in daily VMT.

Applying the weekday daily average trip generation rate and fitted curve equation to the Project size (14.8 acres), the Project is anticipated to generate between 12 and 98 vehicle trips on a typical weekday. As the Project will generate fewer than 250 net daily vehicle trips, the Project will not require the preparation of a TA or further VMT analysis based on the screening criteria in the TAG. A less than significant impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

Because no new roadway features would be added, the Project would not introduce hazards due to design features such as sharp curves or dangerous intersections. The Project would also not introduce incompatible uses such as farm equipment. There would be no impact.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

The Project would not result in changes to emergency access. As previously stated, the Project would not alter the roadway network, so existing emergency access routes would not be affected. The Project would comply with all design requirements and standards of the building fire code, including an approximately 20-foot-wide decomposed granite pathway through the Project Area to allow for emergency access. A less than significant impact would occur.

Applicable BMPs related to traffic from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities and during Project operation.

4.17.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.18 Tribal Cultural Resources

4.18.1 Environmental Setting

This section describes the environmental setting for TCRs, including the existing site conditions and regulatory setting, impacts that would result from the Proposed Project, and, if significant impacts are identified, the mitigation measures that would reduce these impacts.

CEQA defines a TCR as a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe that is either included or determined to be eligible for inclusion in the CRHR or a local historical register, or determined by the lead agency to be one based on substantial evidence (PRC Section 20174(a)). A cultural landscape that meets this definition is a TCR to the extent that the landscape is geographically defined in terms of size and scope (PRC Section 20174(b)). A historical resource or archeological resource that meets this definition might also be a TCR, if identified as such by a consulting tribe (PRC Section 20174(c)).

The following analysis of the potential environmental impacts related to TCRs is derived primarily from the following sources and agencies:

- ◆ Tribal consultation record between DPR and culturally affiliated tribes under AB 52 (amendment to PRC 5097.94);
- Records search information from the California Historical Resources Information System, as described in Section 4.5, *Cultural Resources*;
- Numerous sources of scholarly ethnographic literature cited herein; and
- Confidential cultural resources inventory report prepared by professionally qualified staff from Stantec (2024).

The following summary was prepared by Stantec (2024). The Project Area is in the ancestral territory of the Gabrielino (also known as Tongva). The Gabrielino were one of several Takic-speaking groups in Southern California at the time of Spanish contact. The term “Gabrielino” came from the period of missionization with Mission San Gabriel Archangel, established in 1771.

The Gabrielino occupied the southern Channel Islands, the Los Angeles basin, much of Orange County, and extended as far east as the western San Bernardino Valley. They established villages located along rivers and at the mouths of canyons. Populations ranged from 50 to 200 inhabitants. Residential structures within the villages were domed, circular, and made from thatched tule or other available wood. Gabrielino society was organized by kinship groups, with each group composed of several related families who together owned hunting and gathering territories. Settlement patterns varied according to the availability of floral and faunal resources (Stantec 2024).

The Gabrielino were fisher/hunter-gatherers that exploited a wide array of marine and terrestrial game as well as acorns, Islay, pinon nut, and a wide array of seeds, roots, and other plant materials. The Gabrielino used plank canoes (te’aat), dugout canoes, nets, shellfish hooks, harpoons, and traps to exploit a wide array of deep-sea fish, marine mammals, and shellfish. They hunted large game with bow and arrow, and

used traps, nets and throwing sticks for small game. Plant processing was done with groundstone milling equipment, baskets, and seed beaters. The Gabrielino had a wide array of decorative and ceremonial objects made from steatite, brownware ceramics, bone, shell, asphaltum, and wood (Stantec 2024).

By the late 18th century, Gabrielino had significantly dwindled due to introduced European diseases and dietary deficiencies. Gabrielino communities disintegrated as families were taken to the missions. However, current descendants of the Gabrielino are preserving Gabrielino culture. Of the Gabrielino groups or tribes, none are federally registered; however, the state does recognize several groups of Gabrielino descent. The nearest Gabrielino villages to the Project according to McCawley include Maungna, near Rancho Los Felis, and Haahamonga, near present-day Glendale (Stantec 2024).

4.18.1.1 Summary of Consultation

On October 26, 2020, contacted the California NAHC to request a search of the Sacred Lands File and a list of tribal contacts for the Bowtie parcel. On November 9, 2020, the NAHC responded and indicated that the search of the Sacred Lands File was positive, meaning that there is a recorded sacred land in the vicinity. The NAHC provided a list of tribal contacts who may have additional information.

On February 4, 2021, contacted the following individuals to invite them to consult on the Bowtie Wetland Demonstration Project.

- Gabrielino-Tongva Tribe, Charles Alvarez, Chairperson
- Fernandeno Tataviam Band of Mission Indians, Jairo Avila, Tribal Historic and Cultural Preservation Officer
- Gabrielino Tongva Indians of California Tribal Council, Robert Dorame, Chairperson
- Gabrielino/Tongva Nation, Sandonne Goad, Chairperson
- Gabrieleno/Tongva San Gabriel Band of Mission Indians, Anthony Morales, Chairperson
- Gabrieleno Band of Mission Indians – Kizh Nation, Andrew Salas, Chairperson

On June 19, 2023, contacted the following individuals to invite them to consult on the Project:

- Gabrielino-Tongva Tribe, Charles Alvarez, Chairperson
- Fernandeno Tataviam Band of Mission Indians, Sarah Brunzell, CRM Manager
- Gabrielino Tongva Indians of California Tribal Council, Christina Conley, Cultural Resource Administrator
- Gabrielino Tongva Indians of California Tribal Council, Robert Dorame, Chairperson
- Gabrielino/Tongva Nation, Sandonne Goad, Chairperson
- Gabrieleno/Tongva San Gabriel Band of Mission Indians, Anthony Morales, Chairperson
- Gabrieleno Band of Mission Indians – Kizh Nation, Andrew Salas, Chairperson

Each recipient was provided a brief description of the Project and its location, the lead agency contact information, and a notification that the tribe has 30 days to request consultation, pursuant to PRC Section 21080.3.1(d). Multiple attempts via phone and email were made to reach non-responsive representatives. As a result of the initial notification letters and follow-up contacts, received the following responses:

- On June 19, 2023, Sarah Brunzell of the Fernandeño Tataviam Band of Mission Indians responded by email to decline consultation on the Project.
- On June 26, 2023, Christina Conley from the Gabrielino Tongva Indians of California Tribal Council responded to request consultation and a monitor during all ground disturbing activities. On December 4, 2023, tribal representatives met with via virtual meeting to discuss the Project. The tribe provided comments on the use of traditional plants in the revegetation. Concern was expressed over public access to certain traditional native plants.
- On March 2, 2023, Kimberly Johnson of the Gabrieleno/Tongva San Gabriel Band of Mission Indians was contacted by phone to discuss the Project's Native Spirit Garden design concept conceptualized by the late elder Barbara Drake. A follow-up call was conducted on September 18, 2023. No response to date has been received to set up a meeting on the Park development concept. Therefore, pursuant to Section 21082.3(d)(2) of the Public Resources Code, concluded consultation with the Gabrieleno/Tongva San Gabriel Band of Mission Indians.
- On June 20, 2023, Brandy Salas of the Gabrieleno Band of Mission Indians – Kizh Nation requested consultation. On October 12, 2023, tribal representatives met with via virtual meeting to discuss Park development. The tribe provided comments on the placement and type of biological habitat for revegetation.
- All other tribes did not respond to the opportunity to consult; therefore, considers consultation concluded with the remaining tribes pursuant to Section 21082.3(d)(3) of the Public Resources Code.

Consultation is ongoing with the Gabrielino Tongva Indians of California Tribal Council and Gabrieleno Band of Mission Indians – Kizh Nation; however, the threshold for releasing the CEQA document for public review (PRC Section 21080.3.1(b) has been met. DPR will conclude consultation with these two remaining tribes prior to the certification of the EIR pursuant to PRC Section 21082.3(d).

4.18.2 Tribal Cultural Resources (XVIII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

No Impact.

- i) Tribal consultation under AB 52 resulted in general comments about the importance of traditional plant species that are important to tribal heritage. Traditional plant species would be selected in consultation with tribes and planted during restoration and maintained during the implementation of the Project as there is no geographically defined tribal vegetation landscape present within the Project Area. The record search results found no TCRs present in the APE that are eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in the Public Resources Code.

As discussed in Section 4.5 *Cultural Resources*, the USACE (with SHPO concurrence) has identified the Los Angeles River Channel as eligible for listing in the NRHP, based on its historic-period infrastructure. However, the formal recordation of the Los Angeles River Channel is still in process. According to Kizh Nation representatives, the Los Angeles River Channel is an important traditional travel corridor and noted that tribal cultural resources were often left alongside the River as people traveled. The Los Angeles River Channel is

adjacent to the Project Area, however, is not within the Project Area and no Project activities will occur in the River Channel. Therefore, there would be no impact.

Less than Significant Impact with Mitigation Incorporated.

- ii) Excavation and trenching during Project construction could encounter previously unknown buried TCRs. If encountered, Project activity could result in a substantial adverse change in the significance of a TCR. As previously identified, according to Kizh Nation representatives, the River Channel is an important traditional travel corridor and noted that tribal cultural resources were often left alongside the River as people traveled. Tribal monitoring during ground disturbing activities, coupled with procedures to identify, evaluate, and treat the discoveries, would ensure that TCRs, if encountered, are treated with care and in a culturally appropriate manner. Implementation of these enforceable mitigation measures is sufficient to reduce impacts to TCRs to less than significant.

4.18.3 Mitigation Measures

TCR-1: Tribal Monitoring. A tribal monitor from a Consulting Tribe (defined herein as those tribes that consulted with DPR for this Project) shall be retained to monitor all ground-disturbing activities associated with Project construction. Monitoring is not required for placement of equipment or fill inside excavations that were monitored, above-ground construction activities, or redistribution of soils that were previously monitored (such as the return of stockpiles to use in backfilling).

In the event that more than one Consulting Tribe requests to provide a monitor for activities subject to this measure, DPR will allow for representation of the interested tribes in a mutually agreeable monitoring schedule. In the event that none of the Consulting Tribes choose to enter into a monitoring contract, or otherwise fail to respond to the offer to do so, DPR shall allow construction to proceed without a tribal monitor present as long as the offers to all Consulting Tribes were extended and documented.

No later than five business days prior to the start of ground disturbing activities, the construction supervisor or their designee shall notify the contracted Consulting Tribe(s) of the construction schedule. Should the contracted Consulting Tribe(s) choose not to provide a tribal monitor for any given day, or if the monitor does not report to the Project location at the scheduled time, or if the monitor is present but not actively observing activity, work may proceed without a monitor as long as the notification was made and documented. Unless there is a hiatus of construction activity that exceeds 14 days, daily updates to construction schedules can be made through email, text, phone, or other methods and frequencies agreed upon between the monitor(s) and construction supervisor. If a hiatus in ground disturbance of more than 14 days occurs, then notice of at least five business days before resuming work will be required to be given and documented.

The tribal monitor shall have the authority to temporarily halt ground disturbance within 50 feet of the discovery for a duration long enough to examine potential TCRs that may

become unearthed during the activity. If no TCRs are identified at the discovery location, then construction activities shall proceed and no agency notifications are required. In the event that a TCR is identified, the monitor shall flag off the discovery location and notify DPR immediately to consult with tribal representatives and cooperating agencies on appropriate and respectful treatment. DPR shall determine and require implementation of appropriate treatment measures, if the find is determined to be a TCR under CEQA, as defined in Public Resources Code 5024.1. Work may not resume within the no-work radius until DPR, through consultation as appropriate, determines that the resource is either: 1) is not a TCR under CEQA; or 2) that the treatment measures have been completed to its satisfaction. Work cannot resume at the stop-work location until authorized to do so by an authorized representative of DPR.

4.19 Utilities and Service Systems

LADWP provides power to 3.9 million people in a 465-square-mile service area that includes Los Angeles. In addition to serving residents and businesses in their territory, LADWP uses its electricity to light public roads and power the water supply system. LADWP holds powerline easements and rights-of-way along the River in the Project vicinity. Aboveground transmission lines run along the River through the Project Area. Substations and service buildings are also present in the Project vicinity. LADWP also provides water to Los Angeles's residents and businesses, over 60,000 fire hydrants, and for irrigation and recreation. Los Angeles Sanitation and Environment (LASAN) is responsible for installing, operating, and maintaining the City's wastewater infrastructure. LASAN's wastewater program provides collection, conveyance, treatment, and disposal of 550 million gallons of wastewater per day for over four million people in a 600-square-mile area. LASAN also provides solid waste services to the Project Area.

The proposed Park infrastructure would include utilities, lighting, fencing, and security measures. The Project Area includes utility rights of way and easements held by the City, Los Angeles County Flood Control District, Southern Pacific Telecommunications Company, and Southern Pacific Railroad. Due diligence research shows these easements do not impact the ability to develop the Bowtie as a natural open space Park and they can be integrated seamlessly into the design of the Park. The Project also includes a visitor center and restrooms, which would tie into existing sewer and water infrastructure in the proximity of the Project Area.

4.19.1 Utilities and Service Systems (XIX) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

As discussed in Section 4.10 *Hydrology and Water Quality* and below in threshold (b), the Project would not result in significant additional demand on water supplies. The Project includes a visitor center and restrooms, which would tie into existing sewer and water infrastructure in the proximity of the site. These facilities are not anticipated to require new or expanded water or wastewater facilities.

The Project would continue to connect to the existing storm drain system operated and maintained by the City. The Proposed Project would not result in large-scale topographic changes or other changes that would affect the drainage pattern of the site and surrounding area or impact water resources. Surface runoff volumes would not be increased over existing conditions, and in fact would be mitigated by the increase in permeable surfaces. The site would be designed to maintain existing runoff rates and volumes and would not result in a significant change in flooding conditions on- or offsite. The Proposed Project would comply with current regulations pertaining to retention/detention of site runoff into storm drains and receiving waters, as well as LID requirements that would apply to the construction and operation (e.g., proposed catch basin) of the Proposed Project to further reduce storm water runoff. The proposed improvements would not exceed the capacity of the downstream stormwater drainage systems or provide additional sources of polluted runoff. Impacts would be less than significant.

As discussed in Section 6 *Energy*, Project construction is expected to have a nominal effect on local and regional energy supplies. No unusual Project characteristics would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or the state. Energy consumption associated with the Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Additionally, the Proposed Project would not result in a direct or indirect increase in population or in any use that would require energy supplies beyond what was already evaluated and planned for in the City General Plan. The Project would not require new or expanded electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

Overall, the proposed improvements are not expected to require relocation or reconstruction of existing utilities. Impacts would be less than significant.

Would the Project:

- b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less than Significant Impact.

According to the 2020 UWMP, MWD will continue to provide 100 percent supply capability through 2045 for its member agencies during average, single dry, and multiple dry years. For these scenarios, there is a projected surplus of supply capability in every forecast (LADWP 2020). There would be a decrease in impermeable surfaces in the Project Area compared to existing conditions, and as such, the Project would not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

Additionally, the Proposed Project would incorporate various features to reduce water demand onsite. Water-wise, California-friendly shrubs, grasses, and groundcovers would reduce overall water use in the landscape. Groundcovers or bark mulch would also help conserve water, lower the soil temperature, and reduce evapotranspiration. The Project would also comply with the Water Shortage Contingency Plan outlined in the UWMP. For example, limits may be applied to the number of days, frequency, and duration of outdoor watering. The Project would also include low-flow toilets and faucets in compliance with California Title 20 Water Efficiency Standards.

Water would be required during construction of the Project for dust suppression. Water usage for construction purposes would be temporary. It is possible that reclaimed water could be used for dust suppression, reducing the quantity of potable water required. Therefore, the Project would not impede sustainable groundwater management of the basin. Impacts would be less than significant.

Would the Project:

- c) Result in a determination by the wastewater treatment provider, which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less than Significant Impact.

LASAN operates and maintains the City's wastewater infrastructure. The City's wastewater collection system serves over four million residential and business customers in a 600 square mile service area that includes Los Angeles and 29 contracting cities and agencies. Over 6,700 miles of public sewers connect to the City's four wastewater treatment and water reclamation plants, which have a combined capacity to

treat an average of 580 million gallons per day of wastewater. Of the four reclamation plants, the Los Angeles-Glendale Water Reclamation Plant is located in the eastern San Fernando Valley. The plant has a capacity of 80 million gallons per day (LASAN 2019). Due to the nature of the proposed recreation area, the Project is anticipated to have a negligible impact on the capacity of this wastewater treatment plant. Impacts would be less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

LASAN manages solid waste collection in the City, which involves public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. Solid waste generated in the City is currently disposed of at the Sunshine Canyon Landfill. The solid waste generated by the Project would result in a negligible impact to the 12,100 tons of waste per day received at Sunshine Canyon Landfill (CalRecycle 2023). Furthermore, the Proposed Project would comply with federal, State, and local statutes and regulations related to solid waste, such as AB 939. As there is adequate remaining daily landfill capacity in the region to accommodate Project-generated waste, impacts related to solid waste and waste facilities would be less than significant.

Applicable BMPs related to utilities and public from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities and during Project operation..

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact.

The Project would comply with all State and local statutes and regulations related to solid waste, including the City's Space Allocation Ordinance (Ordinance No. 171,687), as well as AB 939 and the City's Zero Waste Plan through source reduction and recycling programs, including the City's Curbside Recycling Program and Waste Hauler Permit Program. A less than significant impact would occur.

Applicable BMPs related to utilities and public from the IFR EIS/EIR would also be implemented prior to or during ground disturbance activities and during Project operation..

4.19.2 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.20 Wildfire

4.20.1 Environmental Setting

Government Code 51175-89 directs the California Department of Forestry and Fire Protection (CAL FIRE) to identify areas of very high Fire Hazard Severity Zones within Local Responsibility Areas. Mapping of the areas, referred to as Very High Fire Hazard Severity Zones (VHFHSZ), is based on data and models of potential fuels over a 30 to 50-year time horizon and their associated expected fire behavior, and expected burn probabilities to quantify the likelihood and nature of vegetation fire exposure to buildings. According to the CAL FIRE VHFHSZ Map, the Project Area is not located within a VHFHSZ (CAL FIRE 2023). However, some lands in proximity to the Project are designated VHFHSZ. These areas are located southwest of the Project Area across the I-5 freeway, and east of the Project Area in the Elysian Valley neighborhood.

4.20.2 Wildfire (XX) Environmental Checklist and Discussion

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact.

The LAFD provides fire protection and emergency response for the Project Area and greater Los Angeles area. The LAFD also provides several other services to the City, including Fire Life Safety Plan Checks and Fire Life Safety Inspections which aim to enforce applicable standards of the Fire Code, Title 19, Uniform Building Code, City, and National codes concerning new construction and remodeling. Furthermore, the Hydrants and Access Unit reviews plans to evaluate adequacy of site access and hydrant placement. Additionally, the Proposed Project is not located within a state responsibility area or in a VHFHSZ. Furthermore, through site plan review, construction of the Proposed Project would maintain adequate emergency access to the site and would not interfere with an emergency response plan or evacuation route. No impact would occur.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentrations from, a wildfire or the uncontrolled spread of a wildfire?

Potentially
Significant
Impact☐Less than
Significant with
Mitigation
Incorporated☐Less than
Significant
Impact☐No
Impact☒

No Impact.

The Project Area and the surrounding area are relatively flat and located within an urban area of Los Angeles. Undeveloped wildland areas are not located on or adjacent to the Project Area, and the Project Area is not at high risk to frequent high windspeeds, downslopes, downstream flooding, or landslides that may exacerbate wildfire risk. Additionally, the Proposed Project is not located within a state responsibility area or in a VHFHSZ. Visitors of the Project Area would not be exposed to exacerbated wildfire risks or associated pollutant concentrations and uncontrolled spreads from such wildfires. No impact would occur.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Potentially
Significant
Impact☐Less than
Significant with
Mitigation
Incorporated☐Less than
Significant
Impact☐No
Impact☒

No Impact.

As discussed in Section 4.19, *Utilities and Service Systems*, the Project would not require the installation or expansion of any utilities that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. The Project would be served by existing infrastructure, including roads and utilities. Therefore, the Proposed Project would not require additional roads, fuel breaks, emergency water sources, power lines or other utilities that would exacerbate fire risk and temporary or ongoing impacts to the environment would not occur. Additionally, the Proposed Project is not located within a state responsibility area or in a VHFHSZ. No impact would occur.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact.

The Proposed Project is not located within a state responsibility area or in VHFHSZ. The Project Area is not at high risk to frequent high windspeeds, downslopes, downstream flooding, or landslides that may exacerbate wildfire risk. Visitors to the Project Area would not be exposed to exacerbated wildfire risks or associated pollutant concentrations and uncontrolled spreads from such wildfires. No impact would occur.

4.20.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.21 Mandatory Findings of Significance

4.21.1 Mandatory Findings of Significance (XXI) Environmental Checklist and Discussion

Does the Project:

- a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Less than Significant Impact with Standard Project Requirements, Project Specific Requirements, and/or Mitigation Incorporated.

Impacts to biological resources, cultural resources, geology and soils (including paleontological resources), hazards and hazardous materials, and TCRs are discussed in the respective sections of this IS/MND. The Proposed Project's impacts would be less than significant with implementation of SPRs, PSRs and Mitigation Measures.

Impacts from the Proposed Project on all other environmental issue areas are discussed in corresponding sections of this Initial Study. As discussed in their respective sections of this Initial Study document, no significant impacts have been identified.

Does the Project:	Less than Significant Impact			
	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact with Standard Project Requirements, Project Specific Requirements, and/or Mitigation Incorporated.

Cumulative impacts are defined as two or more individual (and potentially less than significant) project effects that, when considered together or in concert with other projects combine to result in a significant impact within an identified geographic area. In order for a project to contribute to cumulative impacts, it must result in some level of impact on a project specific level.

The Proposed Project’s contribution to cumulative impacts would not be considerable with the incorporation of Standard Project Requirements, Project Specific Requirements and/or Mitigation Measures. Furthermore, other foreseeable projects would be subject to CEQA and would undergo the same level of review as the Proposed Project and include mitigation measures to minimize potentially significant impacts.

The analysis within this Initial Study demonstrates that the Project would not have any individually limited, but cumulatively considerable impacts. As presented in the analysis provided in this Initial Study, the Project has no impact, a less than significant impact, or a less than significant impact with implementation of SPRs, PSRs, or mitigation with respect to all environmental issues. Due to the limited scope of direct physical impacts to the environment associated with this development project, the Project’s impacts are Project-specific in nature. With implementation of the proposed mitigation measures found throughout this document, the Project will not result in significant, unavoidable, adverse environmental impacts. Impacts from the Proposed Project would not be cumulatively considerable.

Does the Project:		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c)	Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Less than Significant Impact with Standard Project Requirements, Project Specific Requirements, and/or Mitigation Incorporated.

As identified in this IS/MND, the impact categories of Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials and TCRs may have adverse effects on human beings, either directly or indirectly. However, all of the Project’s impacts on human beings, both direct and indirect, were identified and mitigated as necessary, to less than significant impact, or less than significant impact with mitigation. Direct and indirect impacts to human beings would be less than significant with the implementation of Standard Project Requirements, Project Specific Requirements, and/or Mitigation Measures identified in this IS/MND.

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LIST OF APPENDICES

Appendix A – Air Quality/Greenhouse Gas Emissions Assessment

Appendix B – Biological Resources Assessment

Appendix C – Cultural Resources Assessment (Confidential)

Appendix D – Energy Impact Assessment

Appendix E – Paleontological Resources Assessment

Appendix F – Noise Assessment

Appendix G – Traffic Impact Assessment

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Air Quality/Greenhouse Gas Emissions Assessment

Bowtie Park Development Project Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

1.2. Land Use Types

1.3. User-Selected Emission Reduction Measures by Emissions Sector

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

2.2. Construction Emissions by Year, Unmitigated

2.3. Construction Emissions by Year, Mitigated

2.4. Operations Emissions Compared Against Thresholds

2.5. Operations Emissions by Sector, Unmitigated

2.6. Operations Emissions by Sector, Mitigated

3. Construction Emissions Details

3.1. Site Preparation (2023) - Unmitigated

3.2. Site Preparation (2023) - Mitigated

3.3. Site Preparation (2024) - Unmitigated

3.4. Site Preparation (2024) - Mitigated

3.5. Grading (2024) - Unmitigated

3.6. Grading (2024) - Mitigated

3.7. Building Construction (2024) - Unmitigated

3.8. Building Construction (2024) - Mitigated

3.9. Building Construction (2025) - Unmitigated

3.10. Building Construction (2025) - Mitigated

3.11. Paving (2024) - Unmitigated

3.12. Paving (2024) - Mitigated

3.13. Architectural Coating (2024) - Unmitigated

3.14. Architectural Coating (2024) - Mitigated

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

4.1.2. Mitigated

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

4.2.2. Electricity Emissions By Land Use - Mitigated

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

4.2.4. Natural Gas Emissions By Land Use - Mitigated

4.3. Area Emissions by Source

4.3.2. Unmitigated

4.3.1. Mitigated

4.4. Water Emissions by Land Use

4.4.2. Unmitigated

4.4.1. Mitigated

4.5. Waste Emissions by Land Use

4.5.2. Unmitigated

4.5.1. Mitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.6.2. Mitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.7.2. Mitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.8.2. Mitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.9.2. Mitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.2.2. Mitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.3.2. Mitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.9.2. Mitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.1.2. Mitigated

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.10.4. Landscape Equipment - Mitigated

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.11.2. Mitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.12.2. Mitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.13.2. Mitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.14.2. Mitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.15.2. Mitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

5.18.2.2. Mitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Bowtie Park Development Project
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	0.50
Precipitation (days)	8.60
Location	34.1060813906592, -118.24265405295753
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	3977
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
City Park	11.0	Acre	11.0	0.00	0.00	0.00	—	—
Parking Lot	1.00	Acre	1.00	0.00	0.00	—	—	—
Health Club	10.0	1000sqft	0.23	10,000	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-10-A	Water Exposed Surfaces
Construction	C-11	Limit Vehicle Speeds on Unpaved Roads
Construction	C-12	Sweep Paved Roads
Water	W-5	Design Water-Efficient Landscapes

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.45	5.86	37.1	32.7	0.08	1.47	4.42	5.89	1.36	1.64	3.00	—	9,027	9,027	0.39	0.41	6.05	9,164
Mit.	4.45	5.86	37.1	32.7	0.08	1.47	3.22	4.69	1.36	1.17	2.52	—	9,027	9,027	0.39	0.41	6.05	9,164
% Reduced	—	—	—	—	—	—	27%	20%	—	29%	16%	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	5.03	4.09	43.7	38.1	0.08	1.84	8.65	10.5	1.70	4.20	5.89	—	9,013	9,013	0.40	0.50	0.20	9,144
Mit.	5.03	4.09	43.7	38.1	0.08	1.84	6.10	7.94	1.70	2.88	4.58	—	9,013	9,013	0.40	0.50	0.20	9,144
% Reduced	—	—	—	—	—	—	30%	24%	—	31%	22%	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	2.51	2.36	20.7	19.5	0.04	0.84	2.40	3.24	0.78	0.98	1.76	—	4,805	4,805	0.21	0.20	1.30	4,871
Mit.	2.51	2.36	20.7	19.5	0.04	0.84	1.74	2.58	0.78	0.69	1.47	—	4,805	4,805	0.21	0.20	1.30	4,871
% Reduced	—	—	—	—	—	—	28%	20%	—	30%	17%	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.46	0.43	3.77	3.55	0.01	0.15	0.44	0.59	0.14	0.18	0.32	—	795	795	0.03	0.03	0.22	806
Mit.	0.46	0.43	3.77	3.55	0.01	0.15	0.32	0.47	0.14	0.13	0.27	—	795	795	0.03	0.03	0.22	806
% Reduced	—	—	—	—	—	—	28%	20%	—	30%	17%	—	—	—	—	—	—	—
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	75.0	100	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Mit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	75.0	100	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Mit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2024	4.45	5.86	37.1	32.7	0.08	1.47	4.42	5.89	1.36	1.64	3.00	—	9,027	9,027	0.39	0.41	6.05	9,164
2025	1.37	1.15	10.5	13.4	0.02	0.43	0.07	0.50	0.40	0.02	0.41	—	2,508	2,508	0.10	0.03	0.35	2,519
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	5.03	4.09	43.7	38.1	0.07	1.84	8.65	10.5	1.70	4.20	5.89	—	8,401	8,401	0.40	0.50	0.20	8,562
2024	4.64	3.78	39.7	35.4	0.08	1.63	8.64	10.3	1.51	4.20	5.70	—	9,013	9,013	0.40	0.50	0.19	9,144
2025	1.37	1.15	10.5	13.3	0.02	0.43	0.07	0.50	0.40	0.02	0.41	—	2,505	2,505	0.10	0.03	0.01	2,516
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.90	0.73	7.79	6.79	0.01	0.33	1.54	1.87	0.30	0.75	1.05	—	1,497	1,497	0.07	0.09	0.58	1,526
2024	2.51	2.36	20.7	19.5	0.04	0.84	2.40	3.24	0.78	0.98	1.76	—	4,805	4,805	0.21	0.20	1.30	4,871
2025	0.76	0.63	5.83	7.38	0.01	0.24	0.04	0.28	0.22	0.01	0.23	—	1,388	1,388	0.06	0.02	0.09	1,394
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.16	0.13	1.42	1.24	< 0.005	0.06	0.28	0.34	0.06	0.14	0.19	—	248	248	0.01	0.01	0.10	253
2024	0.46	0.43	3.77	3.55	0.01	0.15	0.44	0.59	0.14	0.18	0.32	—	795	795	0.03	0.03	0.22	806
2025	0.14	0.12	1.06	1.35	< 0.005	0.04	0.01	0.05	0.04	< 0.005	0.04	—	230	230	0.01	< 0.005	0.01	231

2.3. Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	4.45	5.86	37.1	32.7	0.08	1.47	3.22	4.69	1.36	1.17	2.52	—	9,027	9,027	0.39	0.41	6.05	9,164
2025	1.37	1.15	10.5	13.4	0.02	0.43	0.07	0.50	0.40	0.02	0.41	—	2,508	2,508	0.10	0.03	0.35	2,519
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	5.03	4.09	43.7	38.1	0.07	1.84	6.10	7.94	1.70	2.88	4.58	—	8,401	8,401	0.40	0.50	0.20	8,562

2024	4.64	3.78	39.7	35.4	0.08	1.63	6.08	7.72	1.51	2.88	4.39	—	9,013	9,013	0.40	0.50	0.19	9,144
2025	1.37	1.15	10.5	13.3	0.02	0.43	0.07	0.50	0.40	0.02	0.41	—	2,505	2,505	0.10	0.03	0.01	2,516
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.90	0.73	7.79	6.79	0.01	0.33	1.09	1.41	0.30	0.51	0.82	—	1,497	1,497	0.07	0.09	0.58	1,526
2024	2.51	2.36	20.7	19.5	0.04	0.84	1.74	2.58	0.78	0.69	1.47	—	4,805	4,805	0.21	0.20	1.30	4,871
2025	0.76	0.63	5.83	7.38	0.01	0.24	0.04	0.28	0.22	0.01	0.23	—	1,388	1,388	0.06	0.02	0.09	1,394
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.16	0.13	1.42	1.24	< 0.005	0.06	0.20	0.26	0.06	0.09	0.15	—	248	248	0.01	0.01	0.10	253
2024	0.46	0.43	3.77	3.55	0.01	0.15	0.32	0.47	0.14	0.13	0.27	—	795	795	0.03	0.03	0.22	806
2025	0.14	0.12	1.06	1.35	< 0.005	0.04	0.01	0.05	0.04	< 0.005	0.04	—	230	230	0.01	< 0.005	0.01	231

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.43	0.63	0.31	2.93	0.01	0.01	0.20	0.21	0.01	0.04	0.05	32.4	799	831	3.30	0.03	1.95	924
Mit.	0.43	0.63	0.31	2.93	0.01	0.01	0.20	0.21	0.01	0.04	0.05	32.4	799	831	3.30	0.03	1.95	924
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.35	0.56	0.33	2.33	0.01	0.01	0.20	0.21	0.01	0.04	0.05	32.4	773	806	3.30	0.03	0.10	897
Mit.	0.35	0.56	0.33	2.33	0.01	0.01	0.20	0.21	0.01	0.04	0.05	32.4	773	806	3.30	0.03	0.10	897
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.32	0.54	0.28	2.17	< 0.005	0.01	0.16	0.17	0.01	0.03	0.04	32.4	661	693	3.29	0.02	0.69	783
Mit.	0.32	0.54	0.28	2.17	< 0.005	0.01	0.16	0.17	0.01	0.03	0.04	32.4	661	693	3.29	0.02	0.69	783
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.06	0.10	0.05	0.40	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	5.36	109	115	0.54	< 0.005	0.11	130
Mit.	0.06	0.10	0.05	0.40	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	5.36	109	115	0.54	< 0.005	0.11	130
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	55.0	55.0	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	3,000
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	No
Mit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	No
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	55.0	55.0	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	3,000
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	No
Mit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	No

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.34	0.31	0.21	2.42	0.01	< 0.005	0.20	0.20	< 0.005	0.04	0.04	—	566	566	0.03	0.02	1.90	576
Area	0.08	0.32	< 0.005	0.43	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.79	1.79	< 0.005	< 0.005	—	1.79
Energy	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	369	369	0.03	< 0.005	—	370
Water	—	—	—	—	—	—	—	—	—	—	—	1.13	7.62	8.75	0.12	< 0.005	—	12.5
Waste	—	—	—	—	—	—	—	—	—	—	—	31.2	0.00	31.2	3.12	0.00	—	109
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Vegetation	—	—	—	—	—	—	—	—	—	—	—	—	-146	-146	—	—	—	-146
Total	0.43	0.63	0.31	2.93	0.01	0.01	0.20	0.21	0.01	0.04	0.05	32.4	799	831	3.30	0.03	1.95	924
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.34	0.31	0.23	2.25	0.01	< 0.005	0.20	0.20	< 0.005	0.04	0.04	—	543	543	0.03	0.02	0.05	551
Area	—	0.25	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	369	369	0.03	< 0.005	—	370
Water	—	—	—	—	—	—	—	—	—	—	—	1.13	7.62	8.75	0.12	< 0.005	—	12.5
Waste	—	—	—	—	—	—	—	—	—	—	—	31.2	0.00	31.2	3.12	0.00	—	109
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Vegetation	—	—	—	—	—	—	—	—	—	—	—	—	-146	-146	—	—	—	-146
Total	0.35	0.56	0.33	2.33	0.01	0.01	0.20	0.21	0.01	0.04	0.05	32.4	773	806	3.30	0.03	0.10	897
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.26	0.24	0.18	1.80	< 0.005	< 0.005	0.16	0.16	< 0.005	0.03	0.03	—	429	429	0.02	0.02	0.64	436
Area	0.05	0.30	< 0.005	0.30	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.22	1.22	< 0.005	< 0.005	—	1.23
Energy	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	369	369	0.03	< 0.005	—	370
Water	—	—	—	—	—	—	—	—	—	—	—	1.13	7.62	8.75	0.12	< 0.005	—	12.5

Waste	—	—	—	—	—	—	—	—	—	—	—	31.2	0.00	31.2	3.12	0.00	—	109
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Vegetation	—	—	—	—	—	—	—	—	—	—	—	—	-146	-146	—	—	—	-146
Total	0.32	0.54	0.28	2.17	< 0.005	0.01	0.16	0.17	0.01	0.03	0.04	32.4	661	693	3.29	0.02	0.69	783
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.05	0.04	0.03	0.33	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	71.0	71.0	< 0.005	< 0.005	0.11	72.1
Area	0.01	0.05	< 0.005	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.20	0.20	< 0.005	< 0.005	—	0.20
Energy	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	61.0	61.0	< 0.005	< 0.005	—	61.3
Water	—	—	—	—	—	—	—	—	—	—	—	0.19	1.26	1.45	0.02	< 0.005	—	2.07
Waste	—	—	—	—	—	—	—	—	—	—	—	5.17	0.00	5.17	0.52	0.00	—	18.1
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Vegetation	—	—	—	—	—	—	—	—	—	—	—	—	-24.1	-24.1	—	—	—	-24.1
Total	0.06	0.10	0.05	0.40	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	5.36	109	115	0.54	< 0.005	0.11	130

2.6. Operations Emissions by Sector, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.34	0.31	0.21	2.42	0.01	< 0.005	0.20	0.20	< 0.005	0.04	0.04	—	566	566	0.03	0.02	1.90	576
Area	0.08	0.32	< 0.005	0.43	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.79	1.79	< 0.005	< 0.005	—	1.79
Energy	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	369	369	0.03	< 0.005	—	370
Water	—	—	—	—	—	—	—	—	—	—	—	1.13	7.62	8.75	0.12	< 0.005	—	12.5
Waste	—	—	—	—	—	—	—	—	—	—	—	31.2	0.00	31.2	3.12	0.00	—	109
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05

Vegetation	—	—	—	—	—	—	—	—	—	—	—	—	-146	-146	—	—	—	-146
Total	0.43	0.63	0.31	2.93	0.01	0.01	0.20	0.21	0.01	0.04	0.05	32.4	799	831	3.30	0.03	1.95	924
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.34	0.31	0.23	2.25	0.01	< 0.005	0.20	0.20	< 0.005	0.04	0.04	—	543	543	0.03	0.02	0.05	551
Area	—	0.25	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	369	369	0.03	< 0.005	—	370
Water	—	—	—	—	—	—	—	—	—	—	—	1.13	7.62	8.75	0.12	< 0.005	—	12.5
Waste	—	—	—	—	—	—	—	—	—	—	—	31.2	0.00	31.2	3.12	0.00	—	109
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Vegetation	—	—	—	—	—	—	—	—	—	—	—	—	-146	-146	—	—	—	-146
Total	0.35	0.56	0.33	2.33	0.01	0.01	0.20	0.21	0.01	0.04	0.05	32.4	773	806	3.30	0.03	0.10	897
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.26	0.24	0.18	1.80	< 0.005	< 0.005	0.16	0.16	< 0.005	0.03	0.03	—	429	429	0.02	0.02	0.64	436
Area	0.05	0.30	< 0.005	0.30	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.22	1.22	< 0.005	< 0.005	—	1.23
Energy	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	369	369	0.03	< 0.005	—	370
Water	—	—	—	—	—	—	—	—	—	—	—	1.13	7.62	8.75	0.12	< 0.005	—	12.5
Waste	—	—	—	—	—	—	—	—	—	—	—	31.2	0.00	31.2	3.12	0.00	—	109
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Vegetation	—	—	—	—	—	—	—	—	—	—	—	—	-146	-146	—	—	—	-146
Total	0.32	0.54	0.28	2.17	< 0.005	0.01	0.16	0.17	0.01	0.03	0.04	32.4	661	693	3.29	0.02	0.69	783
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.05	0.04	0.03	0.33	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	71.0	71.0	< 0.005	< 0.005	0.11	72.1
Area	0.01	0.05	< 0.005	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.20	0.20	< 0.005	< 0.005	—	0.20
Energy	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	61.0	61.0	< 0.005	< 0.005	—	61.3

Water	—	—	—	—	—	—	—	—	—	—	—	0.19	1.26	1.45	0.02	< 0.005	—	2.07
Waste	—	—	—	—	—	—	—	—	—	—	—	5.17	0.00	5.17	0.52	0.00	—	18.1
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Vegetation	—	—	—	—	—	—	—	—	—	—	—	—	-24.1	-24.1	—	—	—	-24.1
Total	0.06	0.10	0.05	0.40	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	5.36	109	115	0.54	< 0.005	0.11	130

3. Construction Emissions Details

3.1. Site Preparation (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.70	3.95	39.7	35.5	0.05	1.81	—	1.81	1.66	—	1.66	—	5,295	5,295	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	—	7.67	7.67	—	3.94	3.94	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.84	0.70	7.08	6.32	0.01	0.32	—	0.32	0.30	—	0.30	—	943	943	0.04	0.01	—	946

Dust From Material Movement:	—	—	—	—	—	—	1.37	1.37	—	0.70	0.70	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.29	1.15	< 0.005	0.06	—	0.06	0.05	—	0.05	—	156	156	0.01	< 0.005	—	157
Dust From Material Movement:	—	—	—	—	—	—	0.25	0.25	—	0.13	0.13	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.08	0.11	1.21	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	239	239	0.01	0.01	0.03	242
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.23	0.06	3.82	1.41	0.02	0.04	0.76	0.79	0.04	0.20	0.24	—	2,866	2,866	0.17	0.45	0.17	3,006
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.02	0.23	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	43.3	43.3	< 0.005	< 0.005	0.08	43.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.04	0.01	0.69	0.25	< 0.005	0.01	0.13	0.14	0.01	0.04	0.04	—	510	510	0.03	0.08	0.50	536
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.16	7.16	< 0.005	< 0.005	0.01	7.26
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.01	< 0.005	0.13	0.05	< 0.005	< 0.005	0.02	0.03	< 0.005	0.01	0.01	—	84.5	84.5	0.01	0.01	0.08	88.7
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3.2. Site Preparation (2023) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.70	3.95	39.7	35.5	0.05	1.81	—	1.81	1.66	—	1.66	—	5,295	5,295	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	—	5.11	5.11	—	2.63	2.63	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.84	0.70	7.08	6.32	0.01	0.32	—	0.32	0.30	—	0.30	—	943	943	0.04	0.01	—	946
Dust From Material Movement	—	—	—	—	—	—	0.91	0.91	—	0.47	0.47	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.29	1.15	< 0.005	0.06	—	0.06	0.05	—	0.05	—	156	156	0.01	< 0.005	—	157

Dust From Material Movement	—	—	—	—	—	—	0.17	0.17	—	0.09	0.09	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.08	0.11	1.21	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	239	239	0.01	0.01	0.03	242
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.23	0.06	3.82	1.41	0.02	0.04	0.76	0.79	0.04	0.20	0.24	—	2,866	2,866	0.17	0.45	0.17	3,006
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.02	0.23	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	43.3	43.3	< 0.005	< 0.005	0.08	43.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.04	0.01	0.69	0.25	< 0.005	0.01	0.13	0.14	0.01	0.04	0.04	—	510	510	0.03	0.08	0.50	536
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.16	7.16	< 0.005	< 0.005	0.01	7.26
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.13	0.05	< 0.005	< 0.005	0.02	0.03	< 0.005	0.01	0.01	—	84.5	84.5	0.01	0.01	0.08	88.7

3.3. Site Preparation (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.34	3.65	36.0	32.9	0.05	1.60	—	1.60	1.47	—	1.47	—	5,296	5,296	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	—	7.67	7.67	—	3.94	3.94	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.40	0.34	3.31	3.03	< 0.005	0.15	—	0.15	0.14	—	0.14	—	487	487	0.02	< 0.005	—	489
Dust From Material Movement	—	—	—	—	—	—	0.71	0.71	—	0.36	0.36	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.60	0.55	< 0.005	0.03	—	0.03	0.02	—	0.02	—	80.6	80.6	< 0.005	< 0.005	—	80.9
Dust From Material Movement	—	—	—	—	—	—	0.13	0.13	—	0.07	0.07	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.10	1.12	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	234	234	0.01	0.01	0.03	237
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.21	0.06	3.66	1.35	0.02	0.04	0.74	0.78	0.04	0.20	0.24	—	2,821	2,821	0.15	0.45	0.17	2,960
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.11	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	21.9	21.9	< 0.005	< 0.005	0.04	22.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.02	0.01	0.34	0.12	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	259	259	0.01	0.04	0.26	272
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.62	3.62	< 0.005	< 0.005	0.01	3.67
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	43.0	43.0	< 0.005	0.01	0.04	45.1

3.4. Site Preparation (2024) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.34	3.65	36.0	32.9	0.05	1.60	—	1.60	1.47	—	1.47	—	5,296	5,296	0.21	0.04	—	5,314

Dust From Material Movement	—	—	—	—	—	—	5.11	5.11	—	2.63	2.63	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.40	0.34	3.31	3.03	< 0.005	0.15	—	0.15	0.14	—	0.14	—	487	487	0.02	< 0.005	—	489
Dust From Material Movement	—	—	—	—	—	—	0.47	0.47	—	0.24	0.24	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.60	0.55	< 0.005	0.03	—	0.03	0.02	—	0.02	—	80.6	80.6	< 0.005	< 0.005	—	80.9
Dust From Material Movement	—	—	—	—	—	—	0.09	0.09	—	0.04	0.04	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.10	1.12	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	234	234	0.01	0.01	0.03	237
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.21	0.06	3.66	1.35	0.02	0.04	0.74	0.78	0.04	0.20	0.24	—	2,821	2,821	0.15	0.45	0.17	2,960

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.11	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	21.9	21.9	< 0.005	< 0.005	0.04	22.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.02	0.01	0.34	0.12	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	259	259	0.01	0.04	0.26	272
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.62	3.62	< 0.005	< 0.005	0.01	3.67
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	43.0	43.0	< 0.005	0.01	0.04	45.1

3.5. Grading (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.19	3.52	34.3	30.2	0.06	1.45	—	1.45	1.33	—	1.33	—	6,598	6,598	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	3.59	3.59	—	1.43	1.43	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.19	3.52	34.3	30.2	0.06	1.45	—	1.45	1.33	—	1.33	—	6,598	6,598	0.27	0.05	—	6,621

Dust From Material Movement:	—	—	—	—	—	—	3.59	3.59	—	1.43	1.43	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.49	1.25	12.2	10.7	0.02	0.52	—	0.52	0.47	—	0.47	—	2,350	2,350	0.10	0.02	—	2,358
Dust From Material Movement:	—	—	—	—	—	—	1.28	1.28	—	0.51	0.51	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.27	0.23	2.23	1.96	< 0.005	0.09	—	0.09	0.09	—	0.09	—	389	389	0.02	< 0.005	—	390
Dust From Material Movement:	—	—	—	—	—	—	0.23	0.23	—	0.09	0.09	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.10	1.51	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	282	282	0.01	0.01	1.11	287
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.16	0.05	2.69	1.03	0.01	0.03	0.56	0.59	0.03	0.15	0.18	—	2,146	2,146	0.12	0.34	4.93	2,256
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.10	0.09	0.11	1.28	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	268	268	0.01	0.01	0.03	271
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.16	0.04	2.79	1.03	0.01	0.03	0.56	0.59	0.03	0.15	0.18	—	2,147	2,147	0.12	0.34	0.13	2,252
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.04	0.48	0.00	0.00	0.09	0.09	0.00	0.02	0.02	—	96.7	96.7	< 0.005	< 0.005	0.17	98.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.06	0.02	1.01	0.36	0.01	0.01	0.20	0.21	0.01	0.05	0.06	—	764	764	0.04	0.12	0.76	803
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	16.0	16.0	< 0.005	< 0.005	0.03	16.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.18	0.07	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	127	127	0.01	0.02	0.13	133

3.6. Grading (2024) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.19	3.52	34.3	30.2	0.06	1.45	—	1.45	1.33	—	1.33	—	6,598	6,598	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	2.39	2.39	—	0.95	0.95	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	4.19	3.52	34.3	30.2	0.06	1.45	—	1.45	1.33	—	1.33	—	6,598	6,598	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	2.39	2.39	—	0.95	0.95	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.49	1.25	12.2	10.7	0.02	0.52	—	0.52	0.47	—	0.47	—	2,350	2,350	0.10	0.02	—	2,358
Dust From Material Movement	—	—	—	—	—	—	0.85	0.85	—	0.34	0.34	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.27	0.23	2.23	1.96	< 0.005	0.09	—	0.09	0.09	—	0.09	—	389	389	0.02	< 0.005	—	390
Dust From Material Movement	—	—	—	—	—	—	0.16	0.16	—	0.06	0.06	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.10	1.51	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	282	282	0.01	0.01	1.11	287
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.16	0.05	2.69	1.03	0.01	0.03	0.56	0.59	0.03	0.15	0.18	—	2,146	2,146	0.12	0.34	4.93	2,256

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.11	1.28	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	268	268	0.01	0.01	0.03	271
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.16	0.04	2.79	1.03	0.01	0.03	0.56	0.59	0.03	0.15	0.18	—	2,147	2,147	0.12	0.34	0.13	2,252
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.04	0.48	0.00	0.00	0.09	0.09	0.00	0.02	0.02	—	96.7	96.7	< 0.005	< 0.005	0.17	98.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.06	0.02	1.01	0.36	0.01	0.01	0.20	0.21	0.01	0.05	0.06	—	764	764	0.04	0.12	0.76	803
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	16.0	16.0	< 0.005	< 0.005	0.03	16.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.18	0.07	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	127	127	0.01	0.02	0.13	133

3.7. Building Construction (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.39	0.32	3.01	3.52	0.01	0.13	—	0.13	0.12	—	0.12	—	643	643	0.03	0.01	—	645
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.55	0.64	< 0.005	0.02	—	0.02	0.02	—	0.02	—	106	106	< 0.005	< 0.005	—	107
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.32	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	59.3	59.3	< 0.005	< 0.005	0.23	60.2
Vendor	< 0.005	< 0.005	0.06	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	52.9	52.9	< 0.005	0.01	0.14	55.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.27	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	56.2	56.2	< 0.005	< 0.005	0.01	56.9
Vendor	< 0.005	< 0.005	0.06	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	52.9	52.9	< 0.005	0.01	< 0.005	55.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	< 0.005	0.01	0.08	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	15.3	15.3	< 0.005	< 0.005	0.03	15.5
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	14.2	14.2	< 0.005	< 0.005	0.02	14.8

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.53	2.53	< 0.005	< 0.005	< 0.005	2.57
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.35	2.35	< 0.005	< 0.005	< 0.005	2.45
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.8. Building Construction (2024) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.39	0.32	3.01	3.52	0.01	0.13	—	0.13	0.12	—	0.12	—	643	643	0.03	0.01	—	645
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.07	0.06	0.55	0.64	< 0.005	0.02	—	0.02	0.02	—	0.02	—	106	106	< 0.005	< 0.005	—	107
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.32	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	59.3	59.3	< 0.005	< 0.005	0.23	60.2
Vendor	< 0.005	< 0.005	0.06	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	52.9	52.9	< 0.005	0.01	0.14	55.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.27	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	56.2	56.2	< 0.005	< 0.005	0.01	56.9
Vendor	< 0.005	< 0.005	0.06	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	52.9	52.9	< 0.005	0.01	< 0.005	55.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	< 0.005	0.01	0.08	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	15.3	15.3	< 0.005	< 0.005	0.03	15.5
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	14.2	14.2	< 0.005	< 0.005	0.02	14.8
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.53	2.53	< 0.005	< 0.005	< 0.005	2.57
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.35	2.35	< 0.005	< 0.005	< 0.005	2.45
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Building Construction (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.75	0.62	5.78	7.22	0.01	0.24	—	0.24	0.22	—	0.22	—	1,328	1,328	0.05	0.01	—	1,332
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	1.06	1.32	< 0.005	0.04	—	0.04	0.04	—	0.04	—	220	220	0.01	< 0.005	—	221
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.29	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	58.1	58.1	< 0.005	< 0.005	0.21	58.9
Vendor	< 0.005	< 0.005	0.06	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	52.0	52.0	< 0.005	0.01	0.14	54.4
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.25	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	55.0	55.0	< 0.005	< 0.005	0.01	55.7
Vendor	< 0.005	< 0.005	0.06	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	52.0	52.0	< 0.005	0.01	< 0.005	54.3
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.14	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	30.9	30.9	< 0.005	< 0.005	0.05	31.4
Vendor	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	28.8	28.8	< 0.005	< 0.005	0.03	30.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.12	5.12	< 0.005	< 0.005	0.01	5.19
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.77	4.77	< 0.005	< 0.005	0.01	4.98
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.10. Building Construction (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.75	0.62	5.78	7.22	0.01	0.24	—	0.24	0.22	—	0.22	—	1,328	1,328	0.05	0.01	—	1,332
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	1.06	1.32	< 0.005	0.04	—	0.04	0.04	—	0.04	—	220	220	0.01	< 0.005	—	221
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.29	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	58.1	58.1	< 0.005	< 0.005	0.21	58.9
Vendor	< 0.005	< 0.005	0.06	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	52.0	52.0	< 0.005	0.01	0.14	54.4
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.25	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	55.0	55.0	< 0.005	< 0.005	0.01	55.7
Vendor	< 0.005	< 0.005	0.06	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	52.0	52.0	< 0.005	0.01	< 0.005	54.3
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.14	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	30.9	30.9	< 0.005	< 0.005	0.05	31.4
Vendor	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	28.8	28.8	< 0.005	< 0.005	0.03	30.1

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.12	5.12	< 0.005	< 0.005	0.01	5.19
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.77	4.77	< 0.005	< 0.005	0.01	4.98
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Paving (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.01	0.85	7.81	10.0	0.01	0.39	—	0.39	0.36	—	0.36	—	1,512	1,512	0.06	0.01	—	1,517
Paving	—	0.09	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.07	0.64	0.82	< 0.005	0.03	—	0.03	0.03	—	0.03	—	124	124	0.01	< 0.005	—	125
Paving	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.12	0.15	< 0.005	0.01	—	0.01	0.01	—	0.01	—	20.6	20.6	< 0.005	< 0.005	—	20.6

Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.07	1.13	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	212	212	0.01	0.01	0.84	215
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	16.7	16.7	< 0.005	< 0.005	0.03	17.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.77	2.77	< 0.005	< 0.005	< 0.005	2.81
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.12. Paving (2024) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	1.01	0.85	7.81	10.0	0.01	0.39	—	0.39	0.36	—	0.36	—	1,512	1,512	0.06	0.01	—	1,517
Paving	—	0.09	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.07	0.64	0.82	< 0.005	0.03	—	0.03	0.03	—	0.03	—	124	124	0.01	< 0.005	—	125
Paving	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.12	0.15	< 0.005	0.01	—	0.01	0.01	—	0.01	—	20.6	20.6	< 0.005	< 0.005	—	20.6
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.07	1.13	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	212	212	0.01	0.01	0.84	215
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.01	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	16.7	16.7	< 0.005	< 0.005	0.03	17.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.77	2.77	< 0.005	< 0.005	< 0.005	2.81
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Architectural Coating (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	0.14	0.91	1.15	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architect ural Coatings	—	3.49	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.0	11.0	< 0.005	< 0.005	—	11.0
Architect ural Coatings	—	0.29	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.82	1.82	< 0.005	< 0.005	—	1.82
Architectural Coatings	—	0.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.06	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	11.9	11.9	< 0.005	< 0.005	0.05	12.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.94	0.94	< 0.005	< 0.005	< 0.005	0.95
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.16	0.16	< 0.005	< 0.005	< 0.005	0.16
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.14. Architectural Coating (2024) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	0.14	0.91	1.15	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	3.49	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.0	11.0	< 0.005	< 0.005	—	11.0
Architectural Coatings	—	0.29	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.82	1.82	< 0.005	< 0.005	—	1.82
Architectural Coatings	—	0.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.06	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	11.9	11.9	< 0.005	< 0.005	0.05	12.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.94	0.94	< 0.005	< 0.005	< 0.005	0.95
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.16	0.16	< 0.005	< 0.005	< 0.005	0.16
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

City Park	0.34	0.31	0.21	2.42	0.01	< 0.005	0.20	0.20	< 0.005	0.04	0.04	—	566	566	0.03	0.02	1.90	576
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Health Club	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.34	0.31	0.21	2.42	0.01	< 0.005	0.20	0.20	< 0.005	0.04	0.04	—	566	566	0.03	0.02	1.90	576
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	0.34	0.31	0.23	2.25	0.01	< 0.005	0.20	0.20	< 0.005	0.04	0.04	—	543	543	0.03	0.02	0.05	551
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Health Club	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.34	0.31	0.23	2.25	0.01	< 0.005	0.20	0.20	< 0.005	0.04	0.04	—	543	543	0.03	0.02	0.05	551
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	0.05	0.04	0.03	0.33	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	71.0	71.0	< 0.005	< 0.005	0.11	72.1
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Health Club	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.05	0.04	0.03	0.33	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	71.0	71.0	< 0.005	< 0.005	0.11	72.1

4.1.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	0.34	0.31	0.21	2.42	0.01	< 0.005	0.20	0.20	< 0.005	0.04	0.04	—	566	566	0.03	0.02	1.90	576

Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Health Club	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.34	0.31	0.21	2.42	0.01	< 0.005	0.20	0.20	< 0.005	0.04	0.04	—	566	566	0.03	0.02	1.90	576
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	0.34	0.31	0.23	2.25	0.01	< 0.005	0.20	0.20	< 0.005	0.04	0.04	—	543	543	0.03	0.02	0.05	551
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Health Club	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.34	0.31	0.23	2.25	0.01	< 0.005	0.20	0.20	< 0.005	0.04	0.04	—	543	543	0.03	0.02	0.05	551
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	0.05	0.04	0.03	0.33	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	71.0	71.0	< 0.005	< 0.005	0.11	72.1
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Health Club	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.05	0.04	0.03	0.33	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	71.0	71.0	< 0.005	< 0.005	0.11	72.1

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	72.2	72.2	0.01	< 0.005	—	72.5
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	183	183	0.01	< 0.005	—	184
Total	—	—	—	—	—	—	—	—	—	—	—	—	255	255	0.02	< 0.005	—	257
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	72.2	72.2	0.01	< 0.005	—	72.5
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	183	183	0.01	< 0.005	—	184
Total	—	—	—	—	—	—	—	—	—	—	—	—	255	255	0.02	< 0.005	—	257
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	11.9	11.9	< 0.005	< 0.005	—	12.0
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	30.3	30.3	< 0.005	< 0.005	—	30.5
Total	—	—	—	—	—	—	—	—	—	—	—	—	42.3	42.3	< 0.005	< 0.005	—	42.5

4.2.2. Electricity Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	72.2	72.2	0.01	< 0.005	—	72.5

Health Club	—	—	—	—	—	—	—	—	—	—	—	—	183	183	0.01	< 0.005	—	184
Total	—	—	—	—	—	—	—	—	—	—	—	—	255	255	0.02	< 0.005	—	257
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	72.2	72.2	0.01	< 0.005	—	72.5
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	183	183	0.01	< 0.005	—	184
Total	—	—	—	—	—	—	—	—	—	—	—	—	255	255	0.02	< 0.005	—	257
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	11.9	11.9	< 0.005	< 0.005	—	12.0
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	30.3	30.3	< 0.005	< 0.005	—	30.5
Total	—	—	—	—	—	—	—	—	—	—	—	—	42.3	42.3	< 0.005	< 0.005	—	42.5

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Health Club	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	113	113	0.01	< 0.005	—	114

Total	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	113	113	0.01	< 0.005	—	114
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Health Club	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	113	113	0.01	< 0.005	—	114
Total	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	113	113	0.01	< 0.005	—	114
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Health Club	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	18.7	18.7	< 0.005	< 0.005	—	18.8
Total	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	18.7	18.7	< 0.005	< 0.005	—	18.8

4.2.4. Natural Gas Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Health Club	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	113	113	0.01	< 0.005	—	114
Total	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	113	113	0.01	< 0.005	—	114

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Health Club	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	113	113	0.01	< 0.005	—	114
Total	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	113	113	0.01	< 0.005	—	114
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Health Club	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	18.7	18.7	< 0.005	< 0.005	—	18.8
Total	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	18.7	18.7	< 0.005	< 0.005	—	18.8

4.3. Area Emissions by Source

4.3.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.22	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landscape	0.08	0.07	< 0.005	0.43	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.79	1.79	< 0.005	< 0.005	—	1.79
Total	0.08	0.32	< 0.005	0.43	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.79	1.79	< 0.005	< 0.005	—	1.79
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.22	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	0.25	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.01	0.01	< 0.005	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.20	0.20	< 0.005	< 0.005	—	0.20
Total	0.01	0.05	< 0.005	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.20	0.20	< 0.005	< 0.005	—	0.20

4.3.1. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Consumer Products	—	0.22	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.08	0.07	< 0.005	0.43	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.79	1.79	< 0.005	< 0.005	—	1.79
Total	0.08	0.32	< 0.005	0.43	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.79	1.79	< 0.005	< 0.005	—	1.79
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.22	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	0.25	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.01	0.01	< 0.005	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.20	0.20	< 0.005	< 0.005	—	0.20
Total	0.01	0.05	< 0.005	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.20	0.20	< 0.005	< 0.005	—	0.20

4.4. Water Emissions by Land Use

4.4.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Health Club	—	—	—	—	—	—	—	—	—	—	—	1.13	7.62	8.75	0.12	< 0.005	—	12.5
Total	—	—	—	—	—	—	—	—	—	—	—	1.13	7.62	8.75	0.12	< 0.005	—	12.5
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Health Club	—	—	—	—	—	—	—	—	—	—	—	1.13	7.62	8.75	0.12	< 0.005	—	12.5
Total	—	—	—	—	—	—	—	—	—	—	—	1.13	7.62	8.75	0.12	< 0.005	—	12.5
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Health Club	—	—	—	—	—	—	—	—	—	—	—	0.19	1.26	1.45	0.02	< 0.005	—	2.07
Total	—	—	—	—	—	—	—	—	—	—	—	0.19	1.26	1.45	0.02	< 0.005	—	2.07

4.4.1. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Health Club	—	—	—	—	—	—	—	—	—	—	—	1.13	7.62	8.75	0.12	< 0.005	—	12.5
Total	—	—	—	—	—	—	—	—	—	—	—	1.13	7.62	8.75	0.12	< 0.005	—	12.5
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Health Club	—	—	—	—	—	—	—	—	—	—	—	1.13	7.62	8.75	0.12	< 0.005	—	12.5
Total	—	—	—	—	—	—	—	—	—	—	—	1.13	7.62	8.75	0.12	< 0.005	—	12.5
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Health Club	—	—	—	—	—	—	—	—	—	—	—	0.19	1.26	1.45	0.02	< 0.005	—	2.07
Total	—	—	—	—	—	—	—	—	—	—	—	0.19	1.26	1.45	0.02	< 0.005	—	2.07

4.5. Waste Emissions by Land Use

4.5.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.51	0.00	0.51	0.05	0.00	—	1.78
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Health Club	—	—	—	—	—	—	—	—	—	—	—	30.7	0.00	30.7	3.07	0.00	—	107
Total	—	—	—	—	—	—	—	—	—	—	—	31.2	0.00	31.2	3.12	0.00	—	109
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.51	0.00	0.51	0.05	0.00	—	1.78
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Health Club	—	—	—	—	—	—	—	—	—	—	—	30.7	0.00	30.7	3.07	0.00	—	107
Total	—	—	—	—	—	—	—	—	—	—	—	31.2	0.00	31.2	3.12	0.00	—	109
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.08	0.00	0.08	0.01	0.00	—	0.30
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Health Club	—	—	—	—	—	—	—	—	—	—	—	5.09	0.00	5.09	0.51	0.00	—	17.8
Total	—	—	—	—	—	—	—	—	—	—	—	5.17	0.00	5.17	0.52	0.00	—	18.1

4.5.1. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.51	0.00	0.51	0.05	0.00	—	1.78
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Health Club	—	—	—	—	—	—	—	—	—	—	—	30.7	0.00	30.7	3.07	0.00	—	107
Total	—	—	—	—	—	—	—	—	—	—	—	31.2	0.00	31.2	3.12	0.00	—	109
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.51	0.00	0.51	0.05	0.00	—	1.78
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Health Club	—	—	—	—	—	—	—	—	—	—	—	30.7	0.00	30.7	3.07	0.00	—	107
Total	—	—	—	—	—	—	—	—	—	—	—	31.2	0.00	31.2	3.12	0.00	—	109
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	0.08	0.00	0.08	0.01	0.00	—	0.30
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Health Club	—	—	—	—	—	—	—	—	—	—	—	5.09	0.00	5.09	0.51	0.00	—	17.8
Total	—	—	—	—	—	—	—	—	—	—	—	5.17	0.00	5.17	0.52	0.00	—	18.1

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01

4.6.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00

Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
-------	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

4.7.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
------------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Shrubland	—	—	—	—	—	—	—	—	—	—	—	—	-146	-146	—	—	—	-146
Total	—	—	—	—	—	—	—	—	—	—	—	—	-146	-146	—	—	—	-146
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Shrubland	—	—	—	—	—	—	—	—	—	—	—	—	-146	-146	—	—	—	-146
Total	—	—	—	—	—	—	—	—	—	—	—	—	-146	-146	—	—	—	-146
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Shrubland	—	—	—	—	—	—	—	—	—	—	—	—	-24.1	-24.1	—	—	—	-24.1
Total	—	—	—	—	—	—	—	—	—	—	—	—	-24.1	-24.1	—	—	—	-24.1

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sequest	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Shrubland	—	—	—	—	—	—	—	—	—	—	—	—	-146	-146	—	—	—	-146

Total	—	—	—	—	—	—	—	—	—	—	—	—	-146	-146	—	—	—	-146
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Shrubland	—	—	—	—	—	—	—	—	—	—	—	—	-146	-146	—	—	—	-146
Total	—	—	—	—	—	—	—	—	—	—	—	—	-146	-146	—	—	—	-146
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Shrubland	—	—	—	—	—	—	—	—	—	—	—	—	-24.1	-24.1	—	—	—	-24.1
Total	—	—	—	—	—	—	—	—	—	—	—	—	-24.1	-24.1	—	—	—	-24.1

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	10/2/2023	2/16/2024	5.00	100	—
Grading	Grading	2/17/2024	8/16/2024	5.00	130	—
Building Construction	Building Construction	8/17/2024	10/10/2025	5.00	300	—
Paving	Paving	8/17/2024	9/27/2024	5.00	30.0	—
Architectural Coating	Architectural Coating	8/17/2024	9/27/2024	5.00	30.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40

Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	40.0	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT

Grading	—	—	—	—
Grading	Worker	20.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	30.4	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	4.20	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	1.64	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	0.84	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	40.0	20.0	HHDT

Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	30.4	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	4.20	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	1.64	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	0.84	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	15,000	5,000	2,614

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	24,348	0.00	150	0.00	—
Grading	31,652	0.00	390	0.00	—
Paving	0.00	0.00	0.00	0.00	1.00

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
City Park	0.00	0%
Parking Lot	1.00	100%
Health Club	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2023	0.00	690	0.05	0.01

2024	0.00	690	0.05	0.01
2025	0.00	690	0.05	0.01

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
City Park	98.0	21.6	24.1	27,933	716	157	176	204,025
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Health Club	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
City Park	98.0	21.6	24.1	27,933	716	157	176	204,025
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Health Club	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.1.2. Mitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
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0	0.00	15,000	5,000	2,614
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5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
City Park	0.00	690	0.0489	0.0069	0.00
Parking Lot	38,159	690	0.0489	0.0069	0.00
Health Club	96,862	690	0.0489	0.0069	353,365

5.11.2. Mitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
City Park	0.00	690	0.0489	0.0069	0.00
Parking Lot	38,159	690	0.0489	0.0069	0.00

Health Club	96,862	690	0.0489	0.0069	353,365
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5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
City Park	0.00	0.00
Parking Lot	0.00	0.00
Health Club	591,431	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
City Park	0.00	0.00
Parking Lot	0.00	0.00
Health Club	591,431	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
City Park	0.95	0.00
Parking Lot	0.00	0.00
Health Club	57.0	0.00

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
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City Park	0.95	0.00
Parking Lot	0.00	0.00
Health Club	57.0	0.00

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
City Park	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
City Park	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Health Club	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Health Club	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
City Park	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
City Park	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Health Club	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Health Club	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
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5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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5.17. User Defined

Equipment Type	Fuel Type
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5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
Shrubland	0.00	9.50

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres
Shrubland	0.00	9.50

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	12.3	annual days of extreme heat
Extreme Precipitation	6.65	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about $\frac{3}{4}$ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	63.6
AQ-PM	89.1
AQ-DPM	91.5
Drinking Water	59.7

Lead Risk Housing	78.8
Pesticides	0.00
Toxic Releases	73.9
Traffic	91.7
Effect Indicators	—
CleanUp Sites	98.5
Groundwater	96.3
Haz Waste Facilities/Generators	98.8
Impaired Water Bodies	72.2
Solid Waste	85.1
Sensitive Population	—
Asthma	49.8
Cardio-vascular	29.4
Low Birth Weights	68.4
Socioeconomic Factor Indicators	—
Education	67.3
Housing	95.5
Linguistic	83.6
Poverty	76.2
Unemployment	82.3

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	40.66469909
Employed	67.86860003

Median HI	23.95739766
Education	—
Bachelor's or higher	55.99897344
High school enrollment	100
Preschool enrollment	95.7141024
Transportation	—
Auto Access	26.75477993
Active commuting	60.60567176
Social	—
2-parent households	47.9019633
Voting	36.71243424
Neighborhood	—
Alcohol availability	20.74939048
Park access	81.35506224
Retail density	48.53073271
Supermarket access	42.48684717
Tree canopy	64.94289747
Housing	—
Homeownership	22.10958553
Housing habitability	22.03259335
Low-inc homeowner severe housing cost burden	15.30861029
Low-inc renter severe housing cost burden	38.13678943
Uncrowded housing	23.08481971
Health Outcomes	—
Insured adults	27.4990376
Arthritis	81.7
Asthma ER Admissions	29.7

High Blood Pressure	79.0
Cancer (excluding skin)	57.8
Asthma	94.4
Coronary Heart Disease	72.1
Chronic Obstructive Pulmonary Disease	89.8
Diagnosed Diabetes	45.6
Life Expectancy at Birth	71.9
Cognitively Disabled	13.1
Physically Disabled	46.5
Heart Attack ER Admissions	35.7
Mental Health Not Good	73.6
Chronic Kidney Disease	64.9
Obesity	63.7
Pedestrian Injuries	93.1
Physical Health Not Good	64.0
Stroke	80.6
Health Risk Behaviors	—
Binge Drinking	48.9
Current Smoker	80.3
No Leisure Time for Physical Activity	59.5
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	56.6
Elderly	43.9
English Speaking	12.8
Foreign-born	90.5

Outdoor Workers	42.6
Climate Change Adaptive Capacity	—
Impervious Surface Cover	20.2
Traffic Density	91.7
Traffic Access	87.4
Other Indices	—
Hardship	56.7
Other Decision Support	—
2016 Voting	43.2

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	97.0
Healthy Places Index Score for Project Location (b)	48.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Longer Site Preparation and Grading phases to account for soil remediation and land forming. Building Construction, Paving, and Architectural Coating to occur simultaneously.
Land Use	Recreational Park to include
Operations: Vehicle Data	Daily Trip Rate Provided by Traffic Report (KOA 2022).
Construction: Trips and VMT	70 hauling trips per day

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Bowtie Parcel Project

Biological Resources Technical Report

March 16, 2023

Prepared for:

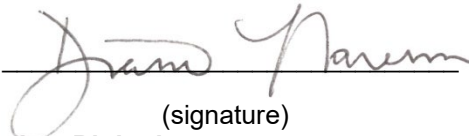
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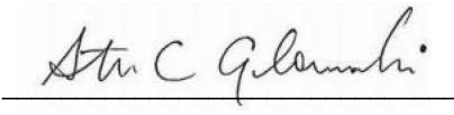
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BOWTIE PARCEL PROJECT

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Table of Contents

ACRONYMS AND ABBREVIATIONS	III
1.0 INTRODUCTION	1
1.1 PROJECT LOCATION	1
1.2 PROJECT DESCRIPTION	1
2.0 METHODOLOGIES.....	2
2.1 LITERATURE REVIEW	3
2.2 BIOLOGICAL SURVEYS AND HABITAT ASSESSMENT	3
2.2.1 Site Reconnaissance and Wildlife Surveys.....	3
2.2.2 Vegetation Mapping	4
2.2.3 Aquatic Resources	5
3.0 REGULATORY ENVIRONMENT	6
3.1 FEDERAL REGULATIONS	6
3.1.1 Federal Endangered Species Act.....	6
3.1.2 Migratory Bird Treaty Act.....	6
3.1.3 Federally Regulated Habitats	7
3.1.4 National Environmental Policy Act.....	7
3.2 STATE REGULATIONS	7
3.2.1 California Environmental Quality Act	7
3.2.2 California Endangered Species Act.....	7
3.2.3 Section 1602 of the California Fish and Game Code	8
3.2.4 Porter-Cologne Water Quality Control Act	8
3.2.5 State-Regulated Habitats	9
3.2.6 Native Plant Protection Act.....	9
3.3 LOCAL REGULATIONS	9
3.3.1 Los Angeles County General Plan – Chapter 9, Conservation and Natural Resources Element	9
3.3.2 City of Los Angeles General Plan.....	11
3.4 OTHER APPLICABLE REGULATIONS, PLANS, AND STANDARDS	12
3.4.1 California Native Plant Society Rare Plant Program	12
4.0 EXISTING CONDITIONS	12
4.1 SETTING.....	12
4.2 VEGETATION AND LAND COVERS	13
4.2.1 Vegetation Communities and Land Cover Types.....	14
4.2.2 Common Plant Species Observed.....	15
4.3 COMMON WILDLIFE	17
4.3.1 Terrestrial Invertebrates	17
4.3.2 Fish	18
4.3.3 Amphibians	18
4.3.4 Reptiles	18
4.3.5 Birds.....	19
4.3.6 Mammals	20



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

Contents

4.4	AQUATIC RESOURCES	22
4.5	SOILS.....	23
5.0	SPECIAL-STATUS BIOLOGICAL RESOURCES	23
5.1	SPECIAL STATUS NATURAL COMMUNITIES.....	24
5.2	DESIGNATED CRITICAL HABITAT	24
5.3	SPECIAL STATUS PLANTS	24
5.4	SPECIAL STATUS WILDLIFE.....	32
5.5	WILDLIFE CORRIDORS AND SPECIAL LINKAGES	53
5.5.1	Wildlife Movement in the BSA	54
6.0	REFERENCES.....	55

LIST OF TABLES

Table 1: Vegetation Communities and Land Cover Types Occurring within the Biological Study Area and Impacts.....	13
Table 2: Plant Species Observed in the Biological Study Area	15
Table 3: Wildlife Species Observed in the BSA	21
Table 4: Historic Soil Units Occurring within the Biological Survey Area.....	23
Table 5: Known and Potential Occurrences of Special Status Plant Taxa within the BSA.....	25
Table 6: Known and Potential Occurrences of Special-Status Wildlife Taxa within the Biological Study Area.....	34

LIST OF APPENDICES

APPENDIX A: FIGURES

APPENDIX B: PHOTOGRAPHIC LOG



Acronyms and Abbreviations

BRTR	Biological Resource Technical Report
BSA	Biological Study Area
CCC	California Coastal Commission
CCH	Consortium of California Herbaria
CCMP	California Coastal Management Program
CDFG	California Department of Fish and Game
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFS	Cubic Feet Per Second
CFR	Code of Federal Regulations
CNDDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CRPR	California Rare Plant Rank
CWA	Clean Water Act
DCH	Designated Critical Habitat
FESA	Endangered Species Act
FGC	California Fish and Game Code
FR	Federal Register
GPS	Global Positioning System
JSA	Jurisdictional Survey Area
LA	Los Angeles
LSAA	Lake or Streambed Alteration Agreement
MBTA	Migratory Bird Treaty Act
MCVII	second edition of <i>The Manual for California Vegetation</i>
NEPA	National Environmental Policy Act



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

Acronyms and Abbreviations

NPPA	Native Plant Protection Act
NRCS	Natural Resources Conservation Service
RWQCB	Regional Water Quality Control Board
SEA	Significant Ecological Area
Secretary	Secretary of the Interior
SSC	Species of Special Concern
TNC	The Nature Conservancy
USACE	United States Army Corps of Engineers
USC	United States Code
USFWS	U.S. Fish & Wildlife Service
USGS	U.S. Geological Survey
WOTS	Waters of the State
WOTUS	Waters of the United States



1.0 INTRODUCTION

This Biological Resources Technical Report (BRTR) is intended to document the biological resources that are associated with the Bowtie Parcel Project (Project) located in the City of Los Angeles, California (Appendix A, Figure 1). The surveys conducted and the discussions presented in this BRTR are intended to support planning and regulatory agency permitting and associated documentation. Reconnaissance surveys were conducted by Stantec biologists on November 21, 2022, within accessible portions of the Project Area and within a surrounding 300-foot buffer zone. This approximate 79-acre area is defined as the Biological Study Area (BSA) (Appendix A, Figure 2). This BRTR describes the existing environmental conditions that occur within the BSA and surrounding areas and evaluates the potential for biological resources to occur based on those conditions, with a special emphasis on special-status plant and wildlife species, wildlife corridors, and special-status and sensitive natural communities.

1.1 PROJECT LOCATION

The Project is located in the City of Los Angeles, California, between the communities of Glassel Park and Elysian Valley, approximately 0.5 miles northeast of the I-5 and Glendale Fwy intersection. Specifically, the Project is located within the Bowtie Parcel, a partial concrete, post-industrial landscape on the east bank of the Los Angeles River (LA River) (Figure 1). The Project Area covers the entire parcel, except for a small portion in the northwestern end that was surveyed for the Bowtie Demonstration Project in May of 2022.

The Project is surrounded by industrial and residential land uses in the north and east, with a few concentrated commercial areas in the vicinity; railroad tracks bordering the east of the Parcel are active for Amtrak, Metrolink, and freight trains.

A photographic log is provided in Appendix B which depicts representative environmental conditions within the Project Area.

1.2 PROJECT DESCRIPTION

The Project will be led by The Nature Conservancy in partnership with California State Parks. The Bowtie Parcel is an approximately 18-acre strip of land located on the east bank of the LA River in northeast Los Angeles and is a sub-unit of Rio de Los Angeles State Park. The purpose of this project is to transform a neglected brownfield into a natural public green space providing the surrounding communities and the greater city of Los Angeles with much-needed outdoor recreation opportunities and access to the LA River. The property is generally bound by California State Route 2 (SR-2) to the northwest, the Union Pacific Railroad to the north and east, and the LA River to the south and west. The Bowtie parcel was a part of Taylor Yard, the former headquarters of Southern Pacific Railroad. Taylor Yard is comprised of several parcels and the Bowtie parcel is referenced as the G1 parcel. Vehicles enter the parcel by an entrance off Kerr Street on the northern portion of the Project Area. Project implementation will require soil remediation to address previous site contamination associated with the former use as a railroad



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

2.0 Methodologies

maintenance facility. Park improvements would consist of the construction of a park entry, an internal vehicular access road, parking lots, trails and boardwalks, open native grass/turf areas, native habitat plantings, restrooms, a welcome area, and picnic tables and benches. The Bowtie Project will create a direct connection and access to the Glendale Narrows section of the LA River and complements two additional projects planned for the site by creating and facilitating access among these projects: the Stormwater Demonstration Project (in partnership with the Nature Conservancy) and the Paseo del Rio Riverfront Trail Project (in partnership with the Mountains Recreation and Conservancy Authority and City of Los Angeles).

Additional goals of the Project are to increase outdoor recreational park space to underserved and economically disadvantaged residents in the Project vicinity; provide an experience of urban river and habitat restoration for the local community as well as for the region, nation, and globe; reestablish access to the river for indigenous communities who regard the area as a sacred land; restore and enhance natural habitat along the LA River, including wetlands, to attract birds and wildlife; provide educational opportunities with respect to historical, cultural, and environmental considerations; and advance the goals of the Statewide Comprehensive Outdoor Recreation Plan (SCORP). Policy documents, including the Rio de Los Angeles General Plan and LA River Master Plan (LARMP), have acknowledged the need for a reimagined and revitalized LA River and is a critical component of fulfilling the ecosystem restoration goals identified in the U.S. Army Corps of Engineers (USACE) LA River Ecosystem Restoration Feasibility Study (ARBOR).

The site includes utility rights of way and easements held by the City of Los Angeles, LA County Flood Control District, Southern Pacific Telecommunications Company, and Southern Pacific Railroad. Due diligence research shows these easements do not impact the ability to develop the Bowtie as a natural open space park and they can be integrated seamlessly into the design of the park.

Because the Bowtie is located along the Pacific Flyway, a critical migratory bird path, the park's plant palette will be predominately native with an emphasis on habitat for wildlife. Park infrastructure will include utilities, lighting, fencing, and security measures.

2.0 METHODOLOGIES

This biological resources assessment of the BSA included, but was not limited to, a literature review, reconnaissance-level survey, non-protocol survey to detect the presence of special-status plant and wildlife species, and a non-protocol avian survey to document the presence of birds, including federal and state threatened or endangered listed species, if present. Stantec Biologists conducted the initial reconnaissance-level surveys on November 21, 2022. Prior to the survey, a preliminary literature review of readily available resources was performed. The survey was conducted on foot within the BSA, where accessible, based on terrain and availability of public access.



2.0 Methodologies

2.1 LITERATURE REVIEW

A literature search focused on the BSA was conducted prior to the field survey. The BSA is located within the USGS Venice, California, 7.5-minute topographic quadrangle. A search of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) was conducted in the BSA and a surrounding 10-mile buffer area to determine special-status plants, wildlife, and vegetation communities that have been documented within the vicinity of the BSA (CDFW 2022). The database included portions of the following quadrangles surrounding the BSA:

- Beverly Hills
- Burbank
- Condor Peak
- Inglewood
- Hollywood
- Los Angeles
- South Gate
- Whittier
- Pasadena
- Mt Wilson
- El Monte
- Sunland
- Van Nuys

Stantec obtained a list of federally listed species and species that are proposed or are candidates for federal listing with the potential to occur in the vicinity of the Project Area, using the Information for Planning and Consultation tool on December 9, 2022. Additional data regarding the potential occurrence of special-status species and policies relating to these special-status natural resources were gathered from the following sources:

- State and Federally Listed Endangered and Threatened Animals of California (CDFW 2022b)
- Special Animals List (CDFW 2022c)
- State and Federally Listed Endangered, Threatened, and Rare Plants of California (CDFW 2022d)
- California Sensitive Natural Communities (CDFW 2021)
- Inventory of Rare and Endangered Vascular Plants of California (CNPS 2022)
- Consortium of California Herbaria (CCH 2022)

2.2 BIOLOGICAL SURVEYS AND HABITAT ASSESSMENT

2.2.1 Site Reconnaissance and Wildlife Surveys

Stantec conducted a habitat assessment and reconnaissance-level surveys to document the environmental conditions present within the BSA. The primary goal of these initial surveys was to identify and assess habitat that may be capable of supporting special-status plant or wildlife species and determine the potential need for additional focused surveys for special-status resources. Biologists recorded all incidental plant and wildlife observations. However, this assessment did not include focused, protocol-level surveys for rare plants or wildlife or other special-status resources.



2.0 Methodologies

The survey was conducted on November 21, 2022, during a season and time of day when many fall/winter resident bird species and some migratory bird species would be expected to be present and exhibiting normal activity, small mammals would be active and detectable visually or by sign, and above-ground amphibian and reptile movement would generally be detectable. However, it should be noted that some wildlife species and individuals may have been difficult to detect due to their elusive nature, cryptic morphology, or nocturnal behavior. Furthermore, many bird species normally present during the summer may not have been present during the survey because of their winter migratory behavior. The survey was conducted during daylight hours when temperatures were such that reptiles and other wildlife would be active (i.e., between 65-95 degrees Fahrenheit).

The BSA was investigated on foot (where accessible) by experienced field biologists walking throughout publicly accessible areas at an average pace of approximately one mile per hour while visually scanning for wildlife and their sign and listening to wildlife songs and calls. Biologists paused as necessary to listen for wildlife or to identify, record, or enumerate any observed species. Species present were identified and recorded through direct visual observation, sound, or their sign (e.g., scat, tracks, etc.). Species identifications conform to the most up-to-date field guides and technical literature.

2.2.2 Vegetation Mapping

Vegetation descriptions and nomenclature are based on the second edition of *A Manual of California Vegetation* (MCVII) (Sawyer et al. 2009), where applicable, and have been defined to the alliance level. Vegetation maps were prepared by recording tentative vegetation type boundaries over recent aerial photograph base maps using the ESRI Collector for ArcGIS app on an Apple iPad coupled with a Bad Elf GNSS Surveyor sub-meter external global positioning system (GPS) unit. Mapping was further refined in the office using ESRI ArcGIS (version 10.7) with aerial photograph base maps with an accuracy of 1 foot. Most boundaries shown on the maps are accurate within approximately 3 feet; however, boundaries between some vegetation types are less precise due to difficulties in interpreting aerial imagery and accessing stands of vegetation.

Vegetation communities can overlap in many characteristics and over time may shift from one community type to another. All vegetation maps and descriptions are subject to variability for the following reasons:

In some cases, vegetation boundaries result from distinct events, such as wildfire or flooding, but vegetation types usually tend to integrate on the landscape, without precise boundaries between them. Even distinct boundaries caused by fire or flood can be disguised after years of post-disturbance succession. Mapped boundaries represent best professional judgment, but usually should not be interpreted as literal delineations between sharply defined vegetation types.

Natural vegetation tends to exist in generally recognizable types, but also may vary over time and geographic region. Written descriptions cannot reflect all local or regional variation. Many (perhaps most) stands of natural vegetation do not strictly fit into any named type. Therefore, a mapped unit is given the best name available in the classification system being used, but this name does not imply that the vegetation unambiguously matches written descriptions.



BOWTIE PARCEL PROJECT
Biological Resources Technical Report

2.0 Methodologies

Vegetation tends to be patchy. Small patches of one named type are often included within larger stands mapped as units of another type.

2.2.3 Aquatic Resources

A formal jurisdictional waters delineation per US Army Corps of Engineers (USACE) guidelines was not conducted as part of this assessment. The BSA was evaluated for potential waters subject to jurisdiction pursuant to Section 1600 et seq. of the California Fish and Game Code (FGC), California Regional Water Quality Control Boards (RWQCB) regulations (Clean Water Act [CWA] Section 401 and Porter-Cologne Water Quality Control Act Waste Discharge Requirement), and USACE CWA Section 404 regulations. Prior to conducting the field assessment, Stantec reviewed current and historic aerial imagery, topographic maps, soil maps (USDA, 2020), local and state hydric soils lists, and the National Wetlands Inventory (USFWS, 2020a) to evaluate the potential active channels and wetland features that occur within the BSA. During the field assessment, hydrologic features were noted and mapped later via aerial imagery. Field data were further manipulated in the office using GIS. The results of the assessment are summarized below in Section 4.4.



3.0 Regulatory Environment

3.0 REGULATORY ENVIRONMENT

3.1 FEDERAL REGULATIONS

3.1.1 Federal Endangered Species Act

Federal Endangered Species Act (FESA) provisions protect federally listed threatened and endangered species and their habitats from unlawful “take” and ensure that federal actions do not jeopardize the continued existence of a listed species or result in the destruction or adverse modification of Designated Critical Habitat (DCH). Under FESA, take is defined as “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any of the specifically enumerated conduct.” The U.S. Fish and Wildlife Service (USFWS) regulations define harm to mean “an act which actually kills or injures wildlife.” Such an act “may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering” (50 Code of Federal Regulations [CFR] Section 17.3).

DCH is defined in FESA Section 3(5)(A) as “(i) the specific areas within the geographical area occupied by the species on which are found those physical or biological features: (I) essential to the conservation of the species; (II) which may require special management considerations or protection; and (ii) specific areas outside the geographical area occupied by the species upon a determination by the Secretary of Commerce or the Secretary of the Interior (Secretary) that such areas are essential for the conservation of the species.” The effects analyses for DCH must consider the role of the critical habitat in both the continued survival and the eventual recovery (i.e., the conservation) of the species in question, consistent with the recent Ninth Circuit judicial opinion, *Gifford Pinchot Task Force v. USFWS*.

Activities that may result in “take” of listed species are regulated by USFWS. USFWS produced an updated list of candidate species December 2, 2016 (81 Federal Register [FR] 87246). Candidate species are not afforded any legal protection under FESA; however, candidate species typically receive special attention from federal and state agencies during the environmental review process.

3.1.2 Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) of 1918 (16 United States Code [USC] 703-711) makes it unlawful to possess, buy, sell, purchase, barter or take any migratory bird listed in Title 50 of CFR Part 10. Take is defined as possession or destruction of migratory birds, their nests, and eggs. Disturbances that cause nest abandonment or loss of reproductive effort or the loss of habitats upon which these birds depend may be a violation of the MBTA. The MBTA prohibits killing, possessing, or trading in migratory birds except in accordance with regulations prescribed by the Secretary. The MBTA encompasses whole birds, parts of birds, bird nests, and eggs.



3.0 Regulatory Environment

3.1.3 Federally Regulated Habitats

Areas that meet the regulatory definition of “waters of the United States” are subject to the jurisdiction of the USACE under provisions of Section 404 of the CWA (1972). “Navigable waters of the United States” are subject to jurisdiction under Section 10 of the RHA (1899). WOTUS may include all waters used or potentially used for interstate commerce, including all waters subject to the ebb and flow of the tide, all interstate waters, all other waters (e.g., intrastate lakes, rivers, streams, mudflats, sandflats, playa lakes, natural ponds, etc.), all impoundments of waters otherwise defined as WOTUS, tributaries of waters otherwise defined as WOTUS, territorial seas, and wetlands (i.e., “Special Aquatic Sites”) adjacent to WOTUS (33 CFR, Section 328.3).

Construction activities within WOTUS are regulated by USACE. For example, the placement of fill into such waters must comply with permit requirements of USACE. No USACE permit would be effective in the absence of State Water Quality Certification pursuant to Section 401 of the CWA. As a part of the permit process, the USACE works directly with the USFWS to assess potential project impacts on biological resources.

3.1.4 National Environmental Policy Act

The National Environmental Policy Act (NEPA) of 1969 requires all federal agencies to examine the environmental impacts of their actions, incorporate environmental information, and use public participation in the planning and implementation of all actions. Federal agencies must integrate NEPA into other planning requirements and prepare appropriate NEPA documents to facilitate better environmental decision-making. NEPA requires federal agencies to review and comment on federal agency environmental plans and documents when the agency has jurisdiction by law or special expertise with respect to any environmental impacts involved (42 USC 4321- 4327; 40 CFR 1500-1508).

3.2 STATE REGULATIONS

3.2.1 California Environmental Quality Act

The California Environmental Quality Act (CEQA) establishes state policy to prevent significant and avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures. CEQA applies to actions directly undertaken, financed, or permitted by state lead agencies. Regulations for implementation are found in the CEQA Guidelines published by the California Natural Resources Agency. These guidelines establish an overall process for the environmental evaluation of projects.

3.2.2 California Endangered Species Act

Provisions of the California Endangered Species Act protect state-listed threatened and endangered species. The CDFW regulates activities that may result in take of individuals (i.e., take is defined as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”). Habitat degradation or modification is not expressly included in the definition of take under the California Fish and Game Code



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

3.0 Regulatory Environment

(FGC). Additionally, the FGC contains lists of vertebrate species designated as “fully protected” (FGC Sections 3511 [birds], 4700 [mammals], 5050 [reptiles and amphibians], and 5515 [fish]). Such species may not be taken or possessed.

In addition to federal and State-listed species, the CDFW also has produced a list of Species of Special Concern (SSC), Fully Protected (FP), and Watch List (WL) species to serve as a “watch list.” Species on these lists are of limited distribution or the extent of their habitats has been reduced substantially, such that threat to their populations may be imminent. SSC may receive special attention during environmental review, but they do not have statutory protection. Fully Protected species may not be possessed or taken under any circumstances, and no incidental take permits are issued by CDFW for “take” of these species.

Birds of prey are protected in California under the FGC. FGC Section 3503.5 states that it is “unlawful to ‘take’, possess, or destroy any birds of prey (in the order Falconiformes or Strigiformes) or to ‘take’, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this Code or any regulation adopted pursuant thereto.” Construction disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings or otherwise lead to nest abandonment. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered take by the CDFW. Under Sections 3503 and 3503.5 of the FGC, activities that would result in the taking, possessing, or destroying of any birds-of-prey, taking or possessing of any migratory nongame bird as designated in the MBTA, or the taking, possessing, or needlessly destroying of the nest or eggs of any raptors or non-game birds protected by the MBTA, or the taking of any non-game bird pursuant to FGC Section 3800 are prohibited.

3.2.3 Section 1602 of the California Fish and Game Code

Section 1602 of the FGC requires any person, state or local governmental agency, or public utility which proposes a project that will substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake, or use materials from a streambed, or result in the disposal or deposition of debris, waste, or other material containing crumbled, flaked, or ground pavement where it can pass into any river, stream, or lake, to first notify the CDFW of the proposed project. This includes rivers or streams that flow at least periodically or permanently through a bed or channel with banks that support fish or other aquatic life and watercourses having a surface or subsurface flow that support or have supported riparian vegetation. Based on the notification materials submitted, the CDFW would determine whether the proposed project may impact fish or wildlife resources.

If the CDFW determines that a proposed project may substantially adversely affect existing fish or wildlife resources, a Lake or Streambed Alteration Agreement (LSAA) would be required. A completed CEQA document must be submitted to CDFW before an LSAA would be issued.

3.2.4 Porter-Cologne Water Quality Control Act

The RWQCBs regulate the “discharge of waste” to “waters of the state” (WOTS). All projects proposing to discharge waste that could affect WOTS must file a Waste Discharge Report with the appropriate RWQCB. The board responds to the report by issuing Waste Discharge Requirements or by waiving them for that project discharge. Both terms “discharge of waste” and WOTS are broadly defined such that



3.0 Regulatory Environment

discharges of waste include fill, any material resulting from human activity, or any other “discharge.” Isolated wetlands within California, which are no longer considered WOTUS, as defined by Section 404 of the CWA, are addressed under the Porter Cologne Water Quality Control Act. The Project Area falls under the jurisdiction of the Region 4 – Los Angeles RWQCB.

3.2.5 State-Regulated Habitats

The California State Water Resources Control Board is the state agency (together with the RWQCBs) charged with implementing water quality certification in California. See section 3.1.6 above.

3.2.6 Native Plant Protection Act

Under FGC Sections 1900 to 1913, the Native Plant Protection Act (NPPA) requires all state agencies to use their authority to carry out programs to conserve endangered and rare native plants. Provisions of NPPA prohibit the taking of listed plants from the wild and require notification of the CDFW at least 10 days in advance of any change in land use. This allows CDFW to salvage listed plant species that would otherwise be destroyed. A project applicant is required to conduct botanical inventories and consult with CDFW during project planning to comply with the provisions of the NPPA and sections of CEQA that apply to rare or endangered plants.

3.3 LOCAL REGULATIONS

3.3.1 Los Angeles County General Plan – Chapter 9, Conservation and Natural Resources Element

3.3.1.1 Open Space Resources Component

The Open Space Resources Component of the Conservation and Natural Resources Element of the Los Angeles County General Plan contains policies and programs that are designed to preserve and manage dedicated open space areas through preservation, acquisition, and easements.

The Goals and Policies relative to natural resources that apply to the BSA are as follows:

Goal 1: *Open space areas that meet the diverse needs of Los Angeles County*

Policy 1.2: *Protect and conserve natural resources, natural areas, and available open spaces*

Policy C/NR 1.4: *Create, support and protect an established network of dedicated open space areas that provide regional connectivity, between the southwestern extent of the Tehachapi Mountains to the Santa Monica Mountains, and from the southwestern extent of the Mojave Desert to Puente Hills and Chino Hills.*

Policy 1.5: *Provide and improve access to dedicated open space and natural areas for all users that considers sensitive biological resources*



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

3.0 Regulatory Environment

3.3.1.2 Biological Resources Component

The Biological Resources Component of the Conservation and Natural Resources Element of the Los Angeles County General Plan contains policies and practices which are designed to preserve biotic diversity, monitor Significant Ecological Areas (SEAs), and coordinate environmental protection.

The Goals and Policies relative to biological resources that apply to the BSA are as follows:

Goal 3: *Permanent, sustainable preservation of genetically and physically diverse biological resources and ecological systems including: habitat linkages, forests, coastal zone, riparian habitats, streambeds, wetlands, woodlands, alpine habitat, chaparral, shrublands, and SEAs.*

Policy 3.3: *Restore upland communities and significant riparian resources, such as degraded streams, rivers, and wetlands to maintain ecological function- acknowledging the importance of incrementally restoring ecosystem values when complete restoration is not feasible.*

Policy 3.6: *Assist state and federal agencies and other agencies, as appropriate, with the preservation of special status species and their associated habitat and wildlife movement corridors through the administration of the SEAs and other programs.*

Policy 3.7: *Participate in inter-jurisdictional collaborative strategies that protect biological resources.*

3.3.1.3 Local Water Resources Component

The Local Water Resources Component of the Conservation and Natural Resources Element of the Los Angeles County General Plan contains policies and practices that are designed to effectively manage and preserve invaluable local water resources.

The Goals and Policies relative to local water resources that apply to the BSA are as follows:

Goal 5: *Protected and useable local surface water resources.*

Policy 5.4: *Actively engage in implementing all approved Enhanced Watershed Management Programs/Watershed Management Programs and Coordinated Integrated Monitoring Programs/ Integrated Monitoring Programs or other County-involved TMDL implementation and monitoring plans.*

Policy 5.6: *Minimize point and non-point source water pollution.*

Policy 5.7: *Actively support the design of new and retrofit of existing infrastructure to accommodate watershed protection goals.*

Goal 7: *Protected and healthy watersheds.*



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

3.0 Regulatory Environment

Policy 7.1: Support the LID philosophy, which mimics the natural hydrologic cycle using undeveloped conditions as a base, in public and private land use planning and development design.

Policy 7.2: Support the preservation, restoration, and strategic acquisition of available land for open space to preserve watershed uplands, natural streams, drainage paths, wetlands, and rivers, which are necessary for the healthy function of watersheds

Policy 7.3: Actively engage with stakeholders to incorporate the LID philosophy in the preparation and implementation of watershed and river master plans, ecosystem restoration projects, and other related natural resource conservation aims, and support the implementation of existing efforts, including Watershed Management Programs and Enhanced Watershed Management Programs.

Policy 7.4: Promote the development of multi-use regional facilities for stormwater quality improvement, groundwater recharge, detention/attenuation, flood management, retaining non-stormwater runoff, and other compatible uses.

3.3.2 City of Los Angeles General Plan

The City of Los Angeles General Plan provides a comprehensive long-range view of the city and includes a Land Use Element that is made up of 35 community plans and 10 technical elements. The pertinent technical elements include a Conservation Element and an Open Space Element.

3.3.2.1 Conservation Element

The Conservation Element primarily addresses preservation, conservation, protection, and enhancement of the City's natural resources. The natural resources or processes that should be or are subject to preservation, conservation, protection, and enhancement efforts include endangered species, erosion, habitats, and open space and parks. In addition, the Conservation Element identifies applicable regulations and the Conservation Element policies with regard to each type of resource.

3.3.2.2 Open Space Element

The Open Space Element consists of an Open Space Plan that serves to guide the identification, preservation, conservation, and acquisition of open space within the City of Los Angeles. The Open Space Plan was adopted in 1973; an update is pending. The BSA supports several of the characteristics used to define "Open Space" in the Open Space Element of the City's General Plan. Specifically, it provides "opportunities for recreation and education", preserves scenic, cultural or historic values, conserves or preserves natural resources or ecologically important areas, and protects or preserves lands for managed production of natural resources.



4.0 Existing Conditions

3.4 OTHER APPLICABLE REGULATIONS, PLANS, AND STANDARDS

3.4.1 California Native Plant Society Rare Plant Program

The mission of the California Native Plant Society (CNPS) Rare Plant Program is to develop current, accurate information on the distribution, ecology, and conservation status of California's rare and endangered plants and to use this information to promote science-based plant conservation in California. Once a species has been identified as being of potential conservation concern, it is put through an extensive review process. Once a species has gone through the review process, information on all aspects of the species (e.g., listing status, habitat, distribution, threats, etc.) is entered into the online CNPS Rare Plant Inventory and given a California Rare Plant Rank (CRPR). The Rare Plant Program currently recognizes more than 1,600 plant taxa (species, subspecies and varieties) as rare or endangered in California.

Vascular plants listed as rare or endangered by the CNPS, but which might not have a designated status under state endangered species legislation, are defined by the following CRPRs:

- CRPR 1A: Plants considered by the CNPS to be extinct in California
- CRPR 1B: Plants rare, threatened, or endangered in California and elsewhere
- CRPR 2: Plants rare, threatened, or endangered in California, but more numerous elsewhere
- CRPR 3: Plants about which we need more information – a review list
- CRPR 4: Plants of limited distribution – a watch list

In addition to the CRPR designations above, the CNPS adds a Threat Rank as an extension added onto the CRPR and designates the level of endangerment by a 0.1 to 0.3 ranking, with 0.1 being the most endangered and 0.3 being the least endangered and are described as follows:

- 0.1: Seriously threatened in California (high degree/immediacy of threat)
- 0.2: Fairly threatened in California (moderate degree/immediacy of threat)
- 0.3: Not very threatened in California (low degree or immediacy of threats or no current threats known)

4.0 EXISTING CONDITIONS

4.1 SETTING

As depicted in Figures 1 and 2 in Appendix A, the BSA is located between the communities of Glassel Park and Elysian Valley, approximately 0.5 miles northeast of the I-5 and Glendale Fwy intersection. Specifically, the Project is located at the Bowtie Parcel, a partial concrete, post-industrial landscape on the east bank of the LA River. The parcel is approximately 3,800 feet long, and is slightly curved, following a bend in the LA River. The parcel is wider at the ends, which gives it the approximate shape of a bowtie (see Appendix A: Figures 1 and 2). The elevation of the BSA is approximately 320 ft to 370 ft above sea level.



4.0 Existing Conditions

The Project is surrounded by industrial and residential land uses in the north and east, with a few concentrated commercial areas in the vicinity; railroad tracks bordering the east of the Parcel are active for Amtrak, Metrolink and freight trains.

A photographic log is provided in Appendix B, which depicts representative environmental conditions within the Project Area.

4.2 VEGETATION AND LAND COVERS

As defined in MCVII, a vegetation alliance is “a category of vegetation classification which describes repeating patterns of plants across a landscape. Each alliance is defined by plant species composition, and reflects the effects of local climate, soil, water, disturbance, and other environmental factors” (Sawyer et al. 2009).

Within the BSA, Stantec biologists mapped four plant communities defined by Sawyer et al. (2009), one novel plant community, and two land cover types. These are described below, summarized in Table 1, and depicted in Figure 3 included in Appendix A.

Table 1: Vegetation Communities and Land Cover Types Occurring within the Biological Study Area and Impacts

Vegetation Community/Land Cover Type	Habitat Type	Acreage within BSA	Acreage of Permanent Project Impacts	Acreage of Temporary Project Impacts
Fountaingrass swards	Upland	11.77	8.56	0.00
Gooding's willow – red willow riparian woodland and forest	Riverine	2.67	0.00	0.00
Ornamental non-native	Upland	3.58	0.39	0.00
California buckwheat scrub	Upland	0.94	0.35	0.00
Deerweed – silver lupine – yerba santa scrub	Upland	0.10	0.02	0.00
Disturbed/Developed	Upland	46.88	4.74	0.00
Open water	Riverine	4.88	0.00	0.00
Total		79.59	14.06	0.00



4.0 Existing Conditions

4.2.1 Vegetation Communities and Land Cover Types

4.2.1.1 Vegetation Communities

Fountaingrass swards; *Pennisetum setaceum* – *Pennisetum ciliare* Herbaceous Semi-Natural Alliance

Vegetation characteristic of the *Pennisetum setaceum* – *Pennisetum ciliare* herbaceous seminatural alliance was mapped throughout the Project Area. The applicable membership rule for this alliance is *Pennisetum* spp. > 50% relative cover in herbaceous layer and combined with other non-native plants > 90% relative cover. In the BSA, this alliance is dominated by crimson fountaingrass (*Pennisetum setaceum*). Other species that occur within this community include Mexican fan palm (*Washingtonia robusta*), coyote brush (*Baccharis pilularis*), deerweed (*Acmispon glaber*), and mulefat (*Baccharis salicifolia*). There are occasional clumps of California buckwheat (*Eriogonum fasciculatum*) throughout this community; however, the clumps are not large enough to map as their own community. Mexican fan palm becomes dominant in some areas where this community transitions to Mexican fan palm scrub, a novel plant community described below.

Gooding's willow – red willow riparian woodland and forest; *Salix gooddingii* - *Salix laevigata* Forest & Woodland Alliance

Vegetation characteristic of the *Salix gooddingii* – *Salix laevigata* forest and woodland alliance was mapped within the LA River in the southern portion of the BSA. The applicable membership rule for this alliance is *Salix gooddingii* and/or *Salix laevigata* > 50% relative cover in the tree canopy. This alliance is considered a state-sensitive vegetation community and has a State Rarity Rank of S3 (Sawyer et al. 2009). In the BSA, this alliance is dominated by red willow (*Salix laevigata*) in the open tree canopy with white mulberry (*Morus alba*) occurring occasionally. The shrub layer is sparse to absent. In the understory, there is a variety of wetland and riparian plants, including cattail (*Typha* sp.), bulrushes (*Schoenoplectus* sp.), and spotted ladythumb (*Persicaria maculosa*).

California buckwheat scrub; *Eriogonum fasciculatum* Shrubland Alliance

Vegetation characteristic of the *Eriogonum fasciculatum* shrubland alliance was mapped adjacent to the concrete canal embankment just south of the Project site within the BSA. The applicable membership rule for this alliance is California buckwheat > 50% relative cover in the shrub canopy; other shrubs, if present, < 50% relative cover. In the BSA, California buckwheat dominates the shrub canopy. Other shrubs include California sage (*Artemisia californica*), bush sunflower (*Encelia californica*), and white sage (*Salvia apiana*). Shrubs are less than < 2 m in height and shrub canopy is continuous. The herbaceous layer is variable but has grasses. Non-native crimson fountaingrass and Mexican fan palms also occur within this area. Within the BSA, this alliance transitions into the fountain grass swards herbaceous semi-natural alliance. Due to presence, height, maturity, and density of native plant species observed only in this area, where they were intermixed with the surrounding non-native plant species, this alliance appears to have been planted or seeded within approximately the last five years.



4.0 Existing Conditions

Deerweed – silver lupine – yerba santa scrub; *Lotus scoparius* - *Lupinus albifrons* - *Eriodictyon* spp. Shrubland Alliance

Vegetation characteristic of the *Lotus scoparius* – *Lupinus albifrons* – *Eriodictyon* spp. shrubland alliance was mapped adjacent to the concrete canal embankment. The applicable membership rule for this alliance is thick leaved yerba santa (*Eriodictyon crassifolium*) > 50% relative cover in the shrub canopy with low to moderate cover. In the BSA this plant community is heavily dominated by thick leaved yerba santa in the shrub layer along with the occasional white sage. A few Mexican fan palms are found in the tree layer. Crimson fountaingrass is found throughout the herbaceous layer.

Ornamental Non-native

This land cover type was used to describe landscaped areas within the buffer around the Project Area that were observed from the edge of the Project Area and through aerial imagery, and to describe disturbed areas in the parcel where non-native ornamental plants had volunteered. The landscaped areas were observed from a distance from the edges of the study area and are not described in detail. The disturbed areas consist of various ornamental and non-native plants such as acacias (*Acacia* sp.), common fig (*Ficus carica*), tree tobacco (*Nicotiana glauca*), retama (*Parkinsonia aculeata*), and Brazilian peppertree (*Schinus terebinthifolius*) in the tree layer, and star thistle (*Centaurea solstitialis*), climbing fig (*Ficus plumila*), crimson fountaingrass, and native California buckwheat occurring in the herbaceous layer.

Disturbed/Developed

This landcover type was mapped where there was compacted soil, gravel, concrete cover, or buildings.

4.2.2 Common Plant Species Observed

Plants observed during the November 21, 2022, reconnaissance-level surveys were recorded; however, a focused, floristic-level survey was not conducted. The reconnaissance-level surveys resulted in the documentation of 43 species of native and non-native plants within the BSA, a detailed list of which is provided in Table 2.

Table 2: Plant Species Observed in the Biological Study Area

Scientific Name	Common Name
ANACARDIACEAE	CASHEW FAMILY
<i>Malosma laurina</i>	laurel sumac
<i>Schinus terebinthifolius</i>	Brazilian pepper tree*
APIACEAE	CARROT FAMILY
<i>Apium graveolens</i>	garden celery*
<i>Conium maculatum</i>	poison hemlock*
ASTERACEAE	ASTER FAMILY
<i>Artemisia californica</i>	California sagebrush



BOWTIE PARCEL PROJECT
Biological Resources Technical Report

4.0 Existing Conditions

<i>Baccharis pilularis</i>	coyote brush
<i>Baccharis salicifolia</i>	mulefat
<i>Centaurea solstitialis</i>	star thistle*
<i>Encelia californica</i>	bush sunflower
<i>Erigeron canadensis</i>	horseweed
<i>Heterotheca grandiflora</i>	telegraph weed
<i>Isocoma menziesii</i>	Menzies' goldenbush
<i>Lactuca serriola</i>	prickly lettuce*
<i>Malacothrix saxatilis</i>	cliff aster
<i>Pseudognaphalium californicum</i>	California cudweed
<i>Salvia apiana</i>	white sage
<i>Sonchus oleraceus</i>	common sow thistle*
<i>Xanthium strumarium</i>	rough cocklebur
BRASSICACEAE	CABBAGE FAMILY
<i>Brassica nigra</i>	black mustard*
<i>Hirschfeldia incana</i>	short podded mustard*
EUPHORBIACEAE	SPURGE FAMILY
<i>Ricinus communis</i>	castor bean*
FABACEAE	PEA FAMILY
<i>Acacia redolens</i>	bank catclaw*
<i>Acmispon glaber</i>	deerweed
<i>Melilotus officinalis</i>	yellow sweetclover*
<i>Parkinsonia aculeata</i>	retama*
<i>Vachellia schaffneri</i>	Schaffner's acacia*
BORAGINACEAE	BORAGE FAMILY
<i>Eriodictyon crassifolium</i>	thick leaved yerba santa
MORACEAE	FIG FAMILY
<i>Ficus pumila</i>	climbing fig*
<i>Ficus carica</i>	common fig*
<i>Morus alba</i>	white mulberry*
ONAGRACEAE	PRIMROSE FAMILY
<i>Ludwigia peploides</i>	floating water primrose*
POLYGONACEAE	BUCKWHEAT FAMILY
<i>Eriogonum fasciculatum</i>	California buckwheat
<i>Persicaria maculosa</i>	spotted ladythumb*



4.0 Existing Conditions

SALICACEAE	WILLOW FAMILY
<i>Salix lasiolepis</i>	red willow
SOLANACEAE	POTATO FAMILY
<i>Nicotiana glauca</i>	tree tobacco*
ARECACEAE	PALM FAMILY
<i>Washingtonia robusta</i>	Mexican fan palm*
CYPERACEAE	SEDGE FAMILY
<i>Cyperus eragrostis</i>	tall flat sedge
<i>Schoenoplectus californicus</i>	California bulrush
<i>Schoenoplectus americanus</i>	American three-square bulrush
POACEAE	GRASS FAMILY
<i>Arundo donax</i>	giant reed*
<i>Pennisetum setaceum</i>	crimson fountaingrass*
<i>Polypogon monspeliensis</i>	rabbitsfoot grass*
TYPHACEAE	CATTAIL FAMILY
<i>Typha</i> sp.	cattail sp.

* Non-native Species

4.3 COMMON WILDLIFE

This section describes the common wildlife observed during the November 21, 2022, reconnaissance survey and those wildlife species expected to occur within the BSA based on habitat characteristics, previous studies, surveys of the northwestern end of the Bowtie Parcel conducted by Stantec on May 26, 2022, and species known to occur in the region.

4.3.1 Terrestrial Invertebrates

As in all ecological systems, invertebrates inhabiting the BSA play a crucial role in a number of biological processes. They serve as the primary or secondary food sources for a variety of bird, reptile, and mammal predators; they provide important pollination vectors for numerous plant species; they act as components in controlling pest populations; and they support the naturally occurring maintenance of an area by consuming detritus and contributing to necessary soil nutrients. Though heavily urbanized, habitat conditions within the BSA provide a suite of microhabitat conditions for a wide variety of terrestrial insects and other invertebrates that are known to adapt to such disturbance. A focused insect survey was not performed within the BSA for this Project. During the field reconnaissance two insects were observed, the non-native honeybee (*Apis mellifera*) and a harvester ant species (*Pogonomyrmex* sp.); however, a variety of other common insects were observed during the previous reconnaissance survey of the northwestern end of the Bowtie Parcel Project conducted by Stantec on May 26, 2022. These included the non-native honeybee, Argentine ant (*Linepithema humile*), and cabbage white butterfly (*Pieris rapae*), and the native flame skimmer dragonfly (*Libellula saturata*), cloudless sulphur butterfly (*Phoebis sennae*),



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

4.0 Existing Conditions

and water strider (Gerridae family). Focused insect surveys were performed within the LA River and in other upland areas near the Bowtie Parcel for TNC in 2014 and 2015. These insect surveys found 102 different families of insects (TNC 2016).

4.3.2 Fish

There were no fish observed in the LA River during the survey. In the previous reconnaissance survey of the northwestern end of the Bowtie Parcel conducted by Stantec on May 26, 2022, common carp (*Cyprinus carpio*) and an unknown bass species (Centrarchidae family) that could not be identified because it was being eaten by a great blue heron at the time of observation were observed. Although not observed during the survey, other non-native fish species observed during previous surveys and known to occur in the Glendale Narrows portion of the LA River include black bullhead (*Ameriurus melas*), mosquitofish (*Gambusia affinis*), green sunfish (*Lepomis cyanellus*), largemouth bass (*Micropterus salmoides*), tilapia (*Oreochromis* sp.), fathead minnow (*Pimephales promelas*), and Amazon sailfin catfish (*Pteroplichthys pardalis*) (FOLAR 2008, TNC 2016). No native fish species historically occupying the Glendale Narrows portion of the LA River remain in the river, based on results from recently performed fish surveys (TNC 2016).

4.3.3 Amphibians

Amphibians typically require a source of standing or flowing water to lay their egg masses and to complete their life cycle. However, some terrestrial amphibian species can survive in drier areas by remaining in moist environments found beneath leaf litter and fallen logs, or by burrowing into the soil. These amphibian species are highly cryptic and often difficult to detect.

No amphibians were observed during the reconnaissance survey; however, the survey was performed during the day when frogs are typically inactive and are not calling. Therefore, it is not unexpected that other amphibian species were not observed during the reconnaissance survey. During the previous reconnaissance survey of the northwestern end of the Bowtie Parcel conducted by Stantec on May 26, 2022, a western toad (*Anaxyrus boreas*) was observed.

Other amphibians known to occur within the LA River watershed include California tree frog (*Pseudacris cadaverina*), Pacific chorus frog (*Pseudacris regilla*), and non-native American bullfrog (*Lithobates catesbeianus*). Focused surveys for amphibians performed in 2015 for TNC's LA River Study recorded western toad, as well as Pacific chorus frog and American bullfrog in the river near the BSA (TNC 2016).

4.3.4 Reptiles

The number and type of reptile species that may occur at a given site is related to a number of biotic and abiotic features. These include the diversity of plant communities, substrates, soil types, and presence of refugia such as rock piles, boulders, and native debris. Many reptile species, even if present, are difficult to detect because they are cryptic and their behavioral characteristics (e.g., foraging, thermoregulatory behavior, fossorial nature, camouflage) limit their ability to be observed during most surveys.

Furthermore, many species are only active within relatively narrow thermal limits, avoiding both cold and



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

4.0 Existing Conditions

hot conditions, and most species take refuge in microhabitats that are not directly visible to the casual observer, such as rodent burrows, in crevices, under rocks and boards, and in dense vegetation, where they are protected from unsuitable environmental conditions and predators (USACE and CDFG, 2010). In some cases, they are only observed when flushed from their refugia. Weather conditions during the survey were favorable for reptile activity.

The only reptile observed during the site reconnaissance was the native common side-blotched lizard (*Uta stansburiana*). In the previous reconnaissance survey conducted by Stantec on May 26, 2022, the native western fence lizard (*Sceloporus occidentalis*) was observed. Other species of reptile known to occur within the LA River watershed include native western pond turtle (*Actinemys marmorata*), western whiptail (*Aspidoscelis tigris*), western rattlesnake (*Crotalus oreganus*), southern alligator lizard (*Elgaria multicarinata*), California king snake (*Lampropeltis californiae*), striped racer (*Masticophis lateralis*), gopher snake (*Pituophis catenifer*), and non-native red-eared slider (*Trachemys scripta elegans*).

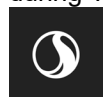
Focused surveys for reptiles performed in 2015 for TNC's LA River Study (TNC 2016), which included 12 daytime surveys and one night survey, recorded western fence lizards, as well as side-blotched lizards and southern alligator lizards within the Bowtie Parcel, and red-eared slider turtles in the LA River corridor. Side-blotched lizards were not found in other areas outside of the Bowtie Parcel during the 2015 reptile surveys.

4.3.5 Birds

Birds were identified by sight and were observed throughout the BSA, especially birds associated with the LA River corridor. Bird species observed within the river corridor included the native mallard duck (*Anas platyrhynchos*), great egret (*Ardea alba*), great blue heron (*Ardea herodias*), Canada goose (*Branta canadensis*), American coot (*Fulica americana*), black-necked stilt (*Himantopus mexicanus*), hooded merganser (*Lophodytes cucullatus*), belted kingfisher (*Megasceryle alcyon*), double-crested cormorant (*Nannopterum auritum*), and osprey (*Pandion haliaetus*). Upland bird species observed included native Cooper's hawk (*Accipiter cooperii*), American crow (*Corvus brachyrhynchos*), northern mockingbird (*Mimus polyglottus*), and black phoebe (*Sayornis nigricans*).

Other bird species that were observed during the previous reconnaissance survey conducted by Stantec on May 26, 2022, included the native Anna's hummingbird (*Calypte anna*), hermit thrush (*Catharus guttatus*), killdeer (*Charadrius vociferus*), common raven (*Corvus corax*), snowy egret (*Egretta thula*), common yellowthroat (*Geothlypis trichas*), house finch (*Haemorrhous mexicanus*), barn swallow (*Hirundo rustica*), California gull (*Larus californicus*), song sparrow (*Mesospiza melodia*), black-crowned night heron (*Nycticorax nycticorax*), cliff swallow (*Petrochelidon pyrrhonota*), Allen's hummingbird (*Selasphorus sasin*), yellow-rumped warbler (*Setophaga coronata*), yellow warbler (*Setophaga petechia*), lesser goldfinch (*Spinus psaltria*), northern rough-winged swallow (*Stelgidopteryx serripennis*), mourning dove (*Zenaida macroura*), and the non-native rock pigeon (*Columba livia*), scaley-breasted munia (*Lonchura punctulata*), house sparrow (*Passer domesticus*), and European starling (*Sturnus vulgaris*).

Focused bird surveys for TNC's LA River Study were performed for several months in 2015 at Marsh Park, which is across the river south of the Bowtie Parcel. Many of the same bird species were observed during TNC surveys and the Stantec reconnaissance surveys. Other bird species recorded during TNC's



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

4.0 Existing Conditions

LA River Study included native black-chinned hummingbird (*Archilochus alexandri*), ruby-crowned kinglet (*Corthylio calendula*), orange-crowned warbler (*Leiothlypis celata*), brown-headed cowbird (*Molothrus ater*), hooded oriole (*Oriolus xanthornus*), bushtit (*Psaltiriparus minimus*), and Bewick's wren (*Thryomanes bewickii*) (TNC 2016). Because many of the bird species found in the LA River corridor are migratory and the LA River is within the Pacific Flyway avian migratory corridor, bird species diversity near the Bowtie Parcel is remarkably high, and the bird species present in the BSA will change throughout the year.

4.3.6 Mammals

Generally, the distribution of mammals on a given site is associated with the presence of factors such as access to perennial water, topographical and structural components (e.g., rock piles, vegetation) that provide cover and support prey base, and the presence of suitable soils for fossorial mammals (e.g., soft-soil areas).

No terrestrial mammal species were observed during the surveys. During the May 26, 2022, reconnaissance survey of the northern portion of the Bowtie Parcel, native ground squirrel (*Otospermophilus beecheyi*) and cottontail rabbit (*Sylvilagus* sp.) were observed. Other mammals not observed during the reconnaissance survey that are tolerant of urban spaces and known to occur in the Los Angeles region include coyote (*Canis latrans*), opossum (*Deidelphis virginiana*), striped skunk (*Mephitis mephitis*), and raccoon (*Procyon lotor*). Most of these species were observed or photographed (using trail cameras) near the Bowtie Parcel during TNC LA River Study (TNC 2016).

4.3.6.1 Bat Habitat

No bat surveys were performed within the Project Area. However, a bat habitat assessment was performed during the foot surveys. Suitable bat roosting habitat within the Project Area consisted of several untrimmed palm trees near the northern entrance gate to the property and the middle section of the parcel. The untrimmed palm trees would be suitable for tree roosting bats such as the western yellow bat (*Lasiurus xanthinus*). No bat guano or other bat sign was observed near the base of the palm trees.

Although no bat surveys were performed within the Bowtie Parcel in November 2022, bat emergence surveys were conducted near the northern portion of the Bowtie Parcel by Stantec biologists on May 26, 2022. No bats were detected during the May 26 survey. However, bats are common in the LA River corridor for much of the year and are known to use the LA River corridor for foraging and for roosting on the numerous bridges over the river (S. Glowacki; Stantec; pers. obs., Remington and Cooper 2014, TNC 2016). As Part of TNC's LA River Study, bat detectors were placed on the Sunnynook Pedestrian Bridge approximately two miles upstream of the Bowtie parcel for several weeks in late summer 2015. Five species of bats were detected during the study, and all have previously been documented in the Los Angeles County area. The most frequently detected bat species was the Yuma myotis (*Myotis yumanensis*), followed by the Mexican free-tailed bat (*Tadarida brasiliensis*) (TNC 2016). Less common bat species detected included the California myotis (*Myotis californicus*), canyon bat (*Parastrellus hesperus*), and big brown bat (*Eptesicus fuscus*) (TNC 2016).

All wildlife species observed within the BSA in May 2022 and November 2022 are summarized in Table 3.



4.0 Existing Conditions

Table 3: Wildlife Species Observed in the BSA

Scientific Name	Common Name	Native Status
INVERTEBRATES		
<i>Apis mellifera</i>	honeybee	non-native
<i>Gerridae family*</i>	water strider	native
<i>Libellula saturata*</i>	flame skimmer dragonfly	native
<i>Phoebis sennae*</i>	cloudless sulphur butterfly	native
<i>Pieris rapae*</i>	cabbage white butterfly	non-native
<i>Pogonomyrmex sp.</i>	harvester ant	native
FISH		
<i>Cyprinus carpio*</i>	common carp	non-native
<i>Centrarchidae* family</i>	unknown bass species	non-native
REPTILES		
<i>Sceleporous occidentalis*</i>	western fence lizard	native
<i>Uta stansburiana</i>	common side-blotched lizard	native
BIRDS		
<i>Accipiter cooperii</i>	Cooper's hawk	native
<i>Anas platyrhynchos</i>	mallard duck	native
<i>Ardea alba</i>	great egret	native
<i>Ardea herodias</i>	great blue heron	native
<i>Branta canadensis</i>	Canada goose	native
<i>Calypste anna*</i>	Anna's hummingbird	native
<i>Catharus guttatus*</i>	hermit thrush	native
<i>Charadrius vociferus*</i>	killdeer	native
<i>Columba livia*</i>	rock pigeon	non-native
<i>Corvus brachyrhynchos</i>	American crow	native
<i>Corvus corax*</i>	common raven	native
<i>Egretta thula</i>	snowy egret	native
<i>Fulica americana</i>	American coot	native
<i>Geothlypis trichas*</i>	common yellowthroat	native
<i>Haemorhous mexicanus*</i>	house finch	native
<i>Himantopus mexicanus</i>	black-necked stilt	native
<i>Hirundo rustica*</i>	barn swallow	native
<i>Larus californicus*</i>	California gull	native



4.0 Existing Conditions

<i>Lonchura punctulata</i> *	scaley-breasted munia	non-native
<i>Lophodytes cucullatus</i>	hooded merganser	native
<i>Megaceryle alcyon</i>	belted kingfisher	native
<i>Mesospiza melodia</i> *	song sparrow	native
<i>Mimus polyglottus</i>	northern mockingbird	native
<i>Nycticorax nycticorax</i>	black-crowned night heron	native
<i>Pandion haliaetus</i>	osprey	native
<i>Passer domesticus</i> *	house sparrow	non-native
<i>Petrochelidon pyrrhonota</i> *	cliff swallow	native
<i>Sayornis nigricans</i>	black phoebe	native
<i>Selasphorus sasin</i> *	Allen's hummingbird	native
<i>Setophaga coronata</i> *	yellow-rumped warbler	native
<i>Setophaga petechia</i> *	yellow warbler	native
<i>Spinus psaltria</i> *	lesser goldfinch	native
<i>Sturnus vulgaris</i> *	European starling	non-native
<i>Stelgidopteryx serripennis</i> *	northern rough-winged swallow	native
<i>Zenaida macroura</i> *	mourning dove	native
MAMMALS		
<i>Otospermophilus beecheyi</i> *	ground squirrel	native
<i>Sylvilagus sp.</i> *	cottontail rabbit	native

* Denotes species observed on May 26, 2022

4.4 AQUATIC RESOURCES

There are three key agencies that regulate activities within inland streams, wetlands, and riparian areas in California: the USACE Regulatory Program regulates activities pursuant to Section 404 of the federal CWA and Section 10 of the Rivers and Harbors Act; the CDFW regulates activities under the FGC Sections 1600-1607; and the RWQCB regulates activities under Section 401 of the CWA and the California Porter-Cologne Water Quality Control Act.

There are no potential jurisdictional features within the Project Area. Immediately adjacent (southwest) to the Project Area and within the BSA is the LA River (Figure 4). The Project Area is located in the upland area adjacent to the concrete-lined banks of the LA River channel. The LA River is considered to be WOTUS and under the jurisdiction of the USACE up to the OHWM, and waters of the state under jurisdiction of the RWQCB. The river channel up to the top of the concrete banks and within any adjacent riparian zone vegetation is considered to be under the jurisdiction of the CDFW.



5.0 Special-Status Biological Resources

4.5 SOILS

Prior to conducting the delineation, historic soils data from the Natural Resources Conservation Service was used to determine potential soil types that may occur within the BSA; this data was used to determine where hydric soils have historically occurred (Appendix A, Figure 5). Table 4 identifies the soils historically known to occur within the BSA and provides a summary of characteristics of these soils.

Table 4: Historic Soil Units Occurring within the Biological Survey Area

Map Unit Symbol	Map Unit Name	Description	Acres within BSA
1002	Urban land-Palmview-Tujunga complex, 0 to 5 percent slopes	A well-drained soil associated with alluvial fans at elevations between 240 to 1,990 feet; fine sandy loam, sandy loam; parent material consists of discontinuous human-transported material over alluvium derived from granite; very high runoff; 0 inches to manufactured layer.	3.38
1200	Urban land, commercial, 0 to 5 percent slopes	Associated with floodplains at 120 to 510 feet in elevation; very high runoff; 0 inches to manufactured layer	56.03
1264	Xeropsammets, frequently flooded, 0 to 2 percent slopes	A somewhat excessively drained soil associated with rivers and channels at elevations between 100 to 460 feet; stratified sand; parent material consists of alluvium derived from granite	20.18

5.0 SPECIAL-STATUS BIOLOGICAL RESOURCES

The background information presented above combined with habitat assessments performed during the surveys was used to evaluate special-status natural communities and special-status plant and animal taxa that either occur or may have the potential to occur within the BSA and adjacent habitats. For the purposes of this BRTR, special-status taxa are defined as plants or animals that:

- Have been designated as either rare, threatened, or endangered by CDFW or the USFWS, and are protected under either the California Endangered Species Act or FESA
- Are candidate species being considered or proposed for listing under these same acts
- Are recognized as SSC by the CDFW
- Are ranked by CNPS as CRPR 1, 2, 3, or 4 plant species
- Are fully protected by the FGC, Sections 3511, 4700, 5050, or 5515
- Are of expressed concern to resource/regulatory agencies, or local jurisdictions



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

5.1 SPECIAL STATUS NATURAL COMMUNITIES

Special-status natural communities are defined by CDFW (2020) as, "...communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects." All vegetation within the state is ranked with an "S" rank; however, only those that are of special concern (S1-S3 rank) are evaluated under CEQA.

One vegetation community identified within the BSA is listed as sensitive: Gooding's willow - red willow riparian woodland and forest. This community has a state rank of S3/Vulnerable; vulnerable in the state due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation from the state. No sensitive communities occur within the proposed Project Area.

5.2 DESIGNATED CRITICAL HABITAT

Critical habitat is defined by the USFWS (2020b) as, "...a term defined and used in the Endangered Species Act. It is specific geographic areas that contain features essential to the conservation of an endangered or threatened species and that may require special management and protection. Critical habitat may also include areas that are not currently occupied by the species but will be needed for its recovery."

There is no designated critical habitat for any listed plant or wildlife species within the BSA.

5.3 SPECIAL STATUS PLANTS

Table 5 presents a list of special-status plants, including federally and state listed species and CRPR 1-4 species that are known to occur within 10 miles of the BSA (Appendix A, Figures 6 and 6a provide a depiction of known species locations).

Record searches of the CNDDDB, the CNPS Online Inventory, and the Consortium of Critical Herbaria was performed for special-status plant taxa. Each of the taxa identified in the record searches was assessed for their potential to occur within the BSA based on the following criteria:

Present: Taxa were observed within the BSA during recent botanical surveys or population has been acknowledged by CDFW, USFWS, or local experts.

High: Both a documented recent record (within 10 years) exists of the taxa within the BSA or immediate vicinity (approximately 5 miles) and the environmental conditions (including soil type) associated with taxa presence occur within the BSA.

Moderate: Both a documented recent record (within 10 years) exists of the taxa within the BSA or the immediate vicinity (approximately 5 miles) and the environmental conditions associated with taxa presence are marginal or limited within the BSA, or the BSA is located within the known current distribution of the taxa and the environmental conditions (including soil type) associated with taxa presence occur within the BSA.



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Low: A historical record (over 10 years) exists of the taxa within the BSA or general vicinity (approximately 10 miles), and the environmental conditions (including soil type) associated with taxa presence are marginal or limited within the BSA.

Not Likely to Occur: The environmental conditions associated with taxa presence do not occur within the BSA.

While many of the species listed below in Table 5 have a low potential to occur within the BSA, they are not expected to occur within the Project Area due to the lack of suitable habitat.

Table 5: Known and Potential Occurrences of Special Status Plant Taxa within the BSA

Species	Status	Habitat and Distribution	Blooming Period	Potential to Occur
<i>Arenaria paludicola</i> marsh sandwort	FE, SE, 1B.1, S1	Marshes and swamps (fresh water or brackish); sandy substrates; found in open habitats. Elevation range: 3-170 m.	March-August	Low: Marginally suitable habitat occurs within the BSA. The nearest and most recently recorded occurrence is approximately 6.35 miles southwest of the BSA; however, this observation is from over 120 years ago in 1900.
<i>Astragalus brauntonii</i> Braunton's milk-vetch	FE, 1B.1, S2	Chaparral, valley grasslands, coastal sage scrub, and closed-cone pine forest. Occurs in disturbed habitat and requires gravelly clay soils. Elevation range: 4-640 m.	January-August	Low: Marginally suitable habitat occurs within the BSA. The nearest recorded occurrence is approximately 7 miles west of the BSA; however, this observation is from more than 80 years ago in 1930.
<i>Astragalus tener</i> var. <i>titi</i> coastal dunes milk-vetch	FE, SE 1B.1, S1	Coastal bluff scrub (sandy), coastal dunes, and coastal prairie (mesic). Often in vernal mesic areas. Elevation range: 1-50 m.	March-May	Low: Marginally suitable habitat occurs within the BSA. The nearest and most recently recorded occurrence is approximately 9 miles south southwest of the BSA; however, this observation was recorded 90 years ago in 1930.



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Species	Status	Habitat and Distribution	Blooming Period	Potential to Occur
<i>Atriplex parishii</i> Parish's brittle scale	1B.1, S1	Native to Central and Southern California often found in dry lake beds, playas, and ephemeral vernal pools. Saline and alkaline soils. Elevation range: 0-470 m.	June-October	Not Likely to Occur: No suitable habitat occurs within the BSA. The nearest recorded occurrence is approximately 4.5 miles northwest of the BSA.
<i>Atriplex serenana</i> var. <i>davidsonii</i> Davidson's salt scale	1B.2, S1	Coastal scrub, bluffs, Chenopod scrub, playas, and vernal pools from southern California to Baja California. Elevation range: 0-200 m.	April-October	Not Likely to Occur: No suitable habitat occurs within the BSA. The nearest and most recently recorded occurrence is approximately 2 miles to the south southwest of the BSA; however, this observation is from more than 120 years ago.
<i>Berberis nevinii</i> Nevin's barberry	FE, SE, S1, 1B.1	Chaparral of inland canyons and foothills in southern California. It is also widely cultivated in gardens and parks. Elevation range: 40-2280 m.	March-June	Not Likely to Occur: Marginally suitable habitat occurs within the BSA. The nearest and most recently recorded occurrence is a planted population approximately 3 miles west northwest of the BSA located in Griffith Park. It was not observed during the field survey and is not likely to occur.
<i>Calochortus clavatus</i> var. <i>gracilis</i> slender mariposa-lily	S2S3, 1B.2	Valley and foothill grassland, coastal scrub, and chaparral. Elevation range: 5-2540 m.	May-July	Not Likely to Occur: No suitable habitat occurs within the BSA. The nearest recorded occurrences are from within the past 20 years, presumed extant, and located 4 miles west northwest and 9 miles north northwest.



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Species	Status	Habitat and Distribution	Blooming Period	Potential to Occur
<i>Calochortus plummerae</i> Plummer's mariposa-lily	4.2, S4	Chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, and valley and foothill grassland. Granite and rocky substrates. Elevation range: 100-1,700 m.	May-July	Not Likely to Occur: No suitable habitat occurs within the BSA. The nearest and most recently recorded occurrences are approximately 4 and 9 miles north northeast of the BSA from within the past 30 years.
<i>Calystegia felix</i> lucky morning-glory	1B.1, S1	Historically associated with wetland and marshy places, but possibly in drier situations as well. Possibly silty loam and alkaline, meadows and seeps (sometimes alkaline), and riparian scrub (alluvial). Elevation range: 30-215 m.	March-September	Low: Marginally suitable habitat occurs within the BSA. The nearest and most recently recorded occurrences are approximately 2 miles west southwest and 7 miles southwest of the BSA from more than 120 years ago in 1899.
<i>Centromadia parryi</i> ssp. <i>australis</i> southern tarplant	1B.1, S2	Marshes and swamps (margins), valley and foothill grasslands (vernally mesic), and vernal pools; often in disturbed sites near the coast at marsh edges; also, in alkaline soils sometimes with saltgrass. Elevation range: 0-480 m.	May-November	Not Likely to Occur: No suitable habitat occurs within the BSA. The nearest and most recently recorded occurrence are approximately 2 miles and 8 miles northeast of the BSA from 1930 and 1950.
<i>Centromadia pungens</i> ssp. <i>laevis</i> smooth tarplant	1B.1, S2	Chenopod scrub, meadows and seeps, playas, riparian woodland, and valley and foothill grasslands. Elevation range: 0-610 m.	April-September	Not Likely to Occur: No suitable habitat occurs within the BSA. The nearest recorded occurrence is approximately five miles east northeast of the BSA from 1901.



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Species	Status	Habitat and Distribution	Blooming Period	Potential to Occur
<i>Chorizanthe parryi</i> var. <i>fernandina</i> San Fernando Valley spineflower	FC, SE, 1B.1, S1	Annual; sandy areas in coastal scrub and native grasslands; Los Angeles and Ventura Counties. Elevation range: 150-1220 m.	April-July	Not Likely to Occur: No suitable habitat occurs within the BSA. The nearest and most recently recorded occurrence is five miles northwest of the BSA; however, this observation is from more than 130 years ago in 1890.
<i>Chorizanthe parryi</i> var. <i>parryi</i> Parry's spineflower	1B.1, S2	Annual; Chaparral, cismontane woodland, coastal scrub, and valley and foothill grassland. Elevation range: 275-1220 m.	April-June	Not Likely to Occur: No suitable habitat occurs within the BSA. The nearest and most recently recorded occurrences are six and eight miles north northeast of the BSA; however, one observation is from more than 100 years ago in 1919 and the other observation does not have a date associated with it.
<i>Dodechahema leptoceras</i> slender-horned spineflower	FE, SE, 1B.1, S2	Annual. Chaparral, cismontane woodland, and coastal scrub. Southern California. Elevation range: 200-760 m.	April-June	Not Likely to Occur: No suitable habitat occurs within the BSA. The nearest recorded occurrences are 6 and 7 miles northeast and north of the BSA from 1920 and 1916.
<i>Dudleya multicaulis</i> many-stemmed dudleya	1B.2, S2	Chaparral, coastal scrub, and valley and foothill grassland. Elevation range: 15-790 m.	April-July	Not Likely to Occur: No suitable habitat occurs within the BSA. The nearest recorded occurrence is approximately 3 miles west from 1925.
<i>Helianthus nuttallii</i> ssp. <i>parishii</i> Los Angeles sunflower	1A, SH	Marshes and swamps (coastal salt and freshwater). Elevation range: 10-1,525 m.	August-October	Not Likely to Occur: No suitable habitat occurs within the BSA. The nearest recorded occurrence is approximately 6 miles east northeast of the BSA from 1901.



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Species	Status	Habitat and Distribution	Blooming Period	Potential to Occur
<i>Horkelia cuneata</i> var. <i>puberula</i> mesa horkelia	1B.1, S1	Chaparral, cismontane woodland, and coastal scrub. Sandy or gravelly sites. Elevation range: 15-1,645 m.	February-July	Not Likely to Occur: No suitable habitat occurs within the BSA. The nearest and most recent recorded occurrences are approximately 2 miles north northeast and 9 miles northeast of the BSA from 1906 and 1967.
<i>Lasthenia glabrata</i> ssp. <i>coulteri</i> Coulter's goldfields	1B.1	Marshes and swamps (coastal salt), playas, and vernal pools; Usually found on alkaline soils in playas, sinks, and grasslands. Elevation range: 1-1,375 m.	February-June	Not Likely to Occur: No suitable habitat occurs within the BSA. The nearest and most recently recorded occurrences are approximately 5 miles east northeast and 10 miles southwest of the BSA from 1882 and 1934.
<i>Lepidium virginicum</i> var. <i>robinsonii</i> Robinson's peppergrass	S3	Chaparral and coastal scrub. Elevation range: 5-885 m.	January-July	Not Likely to Occur: Suitable habitat does not occur with the BSA. The nearest and most recently recorded occurrences are approximately 4 miles south southeast and 9 miles east northeast of the BSA from 1950 and 1994.
<i>Malacothamnus davidsonii</i> Davidson's bush-mallow	1B.2, S2	Chaparral, cismontane woodland, coastal scrub, and riparian woodland. Elevation range: 185-1140 m.	June-January	Not Likely to Occur: Suitable habitat does not occur within the BSA. The nearest and most recently recorded occurrences are approximately 8 miles north northwest and 9 miles northwest of the BSA from 2003 and 2015.



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Species	Status	Habitat and Distribution	Blooming Period	Potential to Occur
<i>Nasturtium gambelii</i> Gambel's water cress	FE, ST, 1B.1, S1	Marshes and swamps (freshwater or brackish). Elevation range: 5-330 m.	April-October	Not Likely to Occur: No suitable habitat occurs within the BSA. The nearest and most recently recorded occurrence is approximately 7 miles southwest of the BSA from 1904.
<i>Navarretia prostrata</i> prostrate vernal pool navarretia	1B.2, S2	Coastal scrub, valley and foothill grassland, vernal pools, meadows, and seeps. Alkaline soils in grassland, or in vernal pools. Mesic, alkaline sites. Elevation range: 3-1,235 m.	April-June	Not Likely to Occur: No suitable habitat occurs within the BSA. The nearest recorded occurrence is 3 miles southwest of the BSA from 1907.
<i>Pseudognaphalium leucocephalum</i> white rabbit-tobacco	2B.2, S2	Chaparral, cismontane woodland, coastal scrub, and riparian woodland. Elevation range: 0-2100 m.	(July) August- November (December)	Low: Marginally suitable habitat occurs with the BSA. The nearest and most recently recorded occurrences are approximately 4 miles west southwest and 8 miles north of the BSA from 1907 and 1932.
<i>Quercus dumosa</i> Nuttall's scrub oak	1B.1, S3	Closed-cone coniferous forest, chaparral, and coastal scrub. Generally, on sandy soils near the coast; sometimes on clay loam. Elevation range: 15-640 m.	February-May (May-August)	Not Likely to Occur: Suitable habitat does not occur within the BSA. The nearest and most recently recorded occurrences are approximately 2 miles west from 1924 and 10 miles southwest from 2009.
<i>Ribes divaricatum</i> var. <i>Parishii</i> Parish's gooseberry	1A, SX	Riparian woodland. Elevation range: 65-300 m.	February-April	Low: Marginally suitable habitat occurs within the LA River in the BSA. The nearest recorded occurrence is 1 mile east northeast from the BSA from 1893.



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Species	Status	Habitat and Distribution	Blooming Period	Potential to Occur
<i>Sidalcea neomexicana</i> salt spring checkerbloom	2B.2, S2	Playas, chaparral, coastal scrub, lower montane coniferous forest, Mojavean desert scrub, alkali springs, and marshes. Elevation range: 3-2,380 m.	March-June	Not Likely to Occur: No suitable habitat occurs within the BSA. The nearest recorded occurrences are approximately 3 miles south and 9 miles southwest of the BSA from 1902 and 1922.
<i>Spermolepis lateriflora</i> western bristly scaleseed	2A, SH	Sonoran Desert scrub. Elevation range: 365-670 m.	March-April	Not Likely to Occur: Suitable habitat does not occur within the BSA. The nearest recorded occurrence is approximately 8 miles north of the BSA from 1930.
<i>Symphyotrichum defoliatum</i> San Bernardino aster	1B.2, S2	Meadows and seeps, cismontane woodland, coastal scrub, lower montane coniferous forest, marshes and swamps, and valley and foothill grassland. Vernal mesic grassland or near ditches, streams and springs, or disturbed areas. Elevation range: 3-2,045 m.	July-November	Low: Marginally suitable habitat occurs within the BSA. The nearest and most recently recorded occurrences are approximately 4 miles west and 6 miles southwest of the BSA; however, these observations are from more than 110 years ago in 1893 and 1904.
<i>Symphyotrichum greatae</i> Greata's aster	1B.3, S2	Broadleaved upland forest, chaparral, cismontane woodland, lower montane coniferous forest, and riparian woodland. Elevation range: 300-2010 m.	June-Oct	Low: Marginally suitable habitat occurs in the BSA in the L.A. River corridor. The nearest recorded occurrences are approximately 1 mile south and 9 miles north northeast of the BSA from 1932 and 1991.
<i>Thelypteris puberula</i> var. <i>sonorensis</i> Sonoran maiden fern	2B.2, S2	Meadows and seeps (seeps and streams) and riparian habitats. Elevation range: 50-610 m.	January-Sept	Low: Marginally suitable habitat occurs within the BSA in the L.A. River corridor. The nearest and most recently recorded occurrence is approximately 8 miles north northeast from the BSA from 1967.



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Species	Status	Habitat and Distribution	Blooming Period	Potential to Occur
Status Codes <i>Federal Designation</i> FE = Federally Endangered FC = Federal Candidate Species for Listing <i>CDFW State Designation</i> SE = State Endangered ST = State Threatened <i>State Ranking</i> S1 = Critically Imperiled S2 = Imperiled S3 = Vulnerable S4 = Apparently Secure S5 = Secure SH = Possibly Extirpated SX = Presumed Extirpated		<i>CNPS CRPR Designation</i> 1A = Plants considered by the CNPS to be extinct in California 1B = Plants rare, threatened, or endangered in California and elsewhere. 2A. Presumed extinct in California, extant and more common elsewhere. 2B. Rare or endangered in California, more common elsewhere. 3. Plants for which we need more information - Review list 4. Plants of limited distribution - Watch list .1 = Seriously threatened in California (high degree/immediacy of threat). .2 = Fairly threatened in California (moderate degree/immediacy of threat). .3 = Not very threatened in California (low degree/immediacy of threat). BSA = Biological Study Area m = meter		

5.4 SPECIAL STATUS WILDLIFE

Special-status taxa include those listed as threatened or endangered under the FESA or California Endangered Species Act, taxa proposed for such listing, SSC, and other taxa that have been identified by USFWS, CDFW, or local jurisdictions as unique or rare and that have the potential to occur within the BSA.

The CNDDDB was queried for occurrences of special-status wildlife taxa within a 10-mile radius of the BSA discussed in Section 2.0. Table 6 summarizes the special-status wildlife taxa known to occur regionally and their potential for occurrence in the BSA (Appendix A, Figures 6, 6b and 6c provide a depiction of previously reported species locations). Each of the taxa identified in the database reviews/searches were assessed for its potential to occur within the BSA based on the following criteria:

Present: Taxa (or sign) were observed in the BSA or in the same watershed (aquatic taxa only) during the most recent surveys, or a population has been acknowledged by CDFW, USFWS, or local experts.

High: Habitat (including soils) for the taxa occurs onsite, and a known occurrence occurs within the BSA or adjacent areas (within 5 miles of the BSA) within the past 20 years; however, these taxa were not detected during the most recent surveys.

Moderate: Habitat (including soils) for the taxa occurs onsite, and a known regional record occurs within the database search, but not within 5 miles of the BSA or within the past 20 years; or a known occurrence occurs within 5 miles of the BSA and within the past 20 years and marginal or limited amounts of habitat occurs onsite; or the taxa's range includes the geographic area and suitable habitat exists.

Low: Limited habitat for the taxa occurs within the BSA and no known occurrences were found within the database search and the taxa's range includes the geographic area.



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Not Likely to Occur: The environmental conditions associated with taxa presence do not occur within the BSA.

While many of the species listed in Table 6 have some potential to occur within the BSA, they are generally not expected to occur within the Project Area due to the lack of suitable habitat.



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Table 6: Known and Potential Occurrences of Special-Status Wildlife Taxa within the Biological Study Area

Taxa		Status	Habitat Type	Comments	Occurrence Potential
Scientific Name	Common Name				
INVERTEBRATES					
<i>Bombus crotchii</i>	Crotch bumble bee	SC, S2	Coastal California east to the Sierra-Cascade crest and south into Mexico. Food plant genera include <i>Antirrhinum</i> , <i>Phacelia</i> , <i>Clarkia</i> , <i>Dendromecon</i> , <i>Eschscholzia</i> , and <i>Eriogonum</i> .	The nearest recorded occurrence of this species is within the BSA in 2020, and there are multiple occurrences within 5 miles within the past 20 years. California buckwheat (<i>Eriogonum fasciculatum</i>), a food plant for the species occurs within the BSA, but there is none within the Project Area.	High
<i>Danaus plexippus</i>	monarch butterfly	S2, CAN	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby. Food plant genus <i>Asclepias</i> .	No suitable habitat for food or roosting occurs within the BSA.	Not Likely to Occur
<i>Eugnosta busckana</i>	Busck's gallmoth	SH	Coastal scrub dune habitat.	Suitable habitat does not occur within the BSA. The nearest recorded occurrence of this species is 7.4 miles west southwest from the BSA in 1929.	Not Likely to Occur



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Taxa		Status	Habitat Type	Comments	Occurrence Potential
Scientific Name	Common Name				
<i>Glyptostoma gabrielense</i>	San Gabriel chestnut snail	S2	Microhabitats with sufficient moisture in rocky hills and mountains at relatively low elevations. Historic range includes the San Gabriel Mountain Range within the city of Pasadena, Millard Canyon, Mt. Lowe and the Dominguez Hills.	Suitable habitat does not occur within the BSA. The nearest recorded occurrence of this species is approximately 0.5 mile south of the BSA in 1944. There are three occurrences from 2020 between 9 and 10 miles from the BSA, all to the east or northeast.	Not Likely to Occur
<i>Gonidea angulata</i>	western ridged mussel	S1S2	Prefers constant water flow and stable stream bottoms such as sand and gravel bars in areas of slow-moving water. Streams with wide floodplains and ample sand and gravel.	The portion of the BSA that contains the LA River has suitable habitat for this species, and the nearest recorded occurrence was within the BSA in 1993. However, the species was not observed on site during the field survey. It is not expected to occur within the Project Area due to lack of suitable habitat.	Moderate
AMPHIBIANS					
<i>Rana muscosa</i>	southern mountain yellow-legged frog	FE, SE, WL, S1	Occur in the Sierra Nevada range of California. Inhabit lakes, ponds, marshes, meadows, and streams at elevations typically ranging from 1,370 to 3,660 meters.	The elevation of the BSA is lower than the elevation where this species typically occurs. The nearest occurrence is 8 miles north northeast from the BSA in 1936.	Not Likely to Occur



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Taxa		Status	Habitat Type	Comments	Occurrence Potential
Scientific Name	Common Name				
<i>Spea hammondi</i>	western spadefoot toad	SSC, S3	Occurs in the Central Valley and adjacent foothills and the non-desert areas of Southern California and Baja California. Grassland habitats and valley-foothill hardwood woodlands. Vernal pools and other temporary rain pools, cattle tanks, and occasionally pools of intermittent streams are essential for breeding and egg-laying. Burrows in loose soils during dry season.	Marginally suitable habitat occurs within the LA River portion of the BSA. Two occurrences have been recorded within three miles, but both are from 1921, over 100 years ago.	Low
<i>Taricha torosa</i>	Coast Range newt	SSC, S4	Species of Special Concern status extends only to populations found from Monterey County to San Diego, excluding a population in the southern Sierra Nevada mountains. Southern populations tend to use permanent streams for breeding, and in southern California are also limited by the availability of rocky canyons with clear, cold water (Thomson, 2016).	Although a portion of the LA River is included in the BSA, the type of river and water quality is not suitable for this species. So, no suitable habitat occurs within the BSA. The closest occurrence is 8 miles north northeast of the BSA from 2003.	Not Likely to Occur



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Taxa		Status	Habitat Type	Comments	Occurrence Potential
Scientific Name	Common Name				
REPTILES					
<i>Anniella stebbinsi</i>	Southern California legless lizard	SSC, S3	Generally, south of the transverse range, extending to northwestern Baja California; occurs in sandy or loose loamy soils under sparse vegetation; disjunct populations in the Tehachapi and Piute mountains in Kern County; variety of habitats; generally in moist, loose soil; they prefer soils with a high moisture content.	Marginally suitable habitat occurs within the LA River within the BSA. Five species occurrences occur within five miles within the past ten years. The closest of these was approximately ½ mile to the east of the BSA in 2013. This species was not observed during the field survey.	Moderate
<i>Arizona elegans occidentalis</i>	California glossy snake	SSC, S2	Occurs in grasslands, fields, coastal sage scrub, and chaparral from the central San Joaquin Valley south to the Tehachapi Mountains and along the base of the Coast Range mountains farther south to San Quintin, Baja California. It prefers loose soil that allows for burrowing.	Suitable habitat doesn't occur within the BSA. No occurrences within a 5-mile radius of the BSA. The closest occurrence was in 1889 and 5 ½ miles to the east.	Not Likely to Occur



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Taxa		Status	Habitat Type	Comments	Occurrence Potential
Scientific Name	Common Name				
<i>Emys marmorata</i>	western pond turtle	SSC, S3	Ranges widely along the west coast of the U.S. down into the Baja California peninsula. Variety of aquatic water bodies; Needs upland area for nesting habitat; Soils need to be loose enough to allow for nest excavation.	Marginally suitable habitat occurs within the BSA. The nearest CNDDDB records were 6 miles west northwest of the BSA in 1917. Species was observed in the LA River approximately 5 miles upstream of Bowtie Parcel in 2017 by Stantec biologists.	Moderate
<i>Phrynosoma blainvillii</i>	coast horned lizard	SSC, S4	Primarily in sandy soil in open areas, especially sandy washes and floodplains, in many plant communities. Requires open areas for sunning, bushes for cover, patches of loose soil for burial, and an abundant supply of ants or other insects. Occurs west of the deserts from northern Baja California north to Shasta County below 2,400 meters (8,000 feet) elevation.	Suitable habitat does not occur within the BSA. The most recent occurrence was 5 miles east southeast of the BSA in 1974. In 1931 the species was recorded 3.5 miles north northeast of the BSA.	Not Likely to Occur
BIRDS					
<i>Accipiter cooperii</i>	Cooper's hawk	WL, S4	Uses a variety of habitats, including mixed and deciduous forests, open woodlands, riparian woodlands, open pinyon woodlands, and forests. Can be found in city habitats and suburban areas.	Suitable foraging habitat occurs in the LA River corridor, but habitat is disturbed. This species was observed in the BSA eating a prey item in the river corridor in November 2022.	Moderate for Nesting/High for Foraging



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Taxa		Status	Habitat Type	Comments	Occurrence Potential
Scientific Name	Common Name				
<i>Accipiter striatus</i>	sharp-shinned hawk	WL, S4	Forages in openings at edges of woodlands, hedgerows, brushy pastures, and shorelines, especially where migrating birds are found. Typically nests in dense, small-tree stands of conifers, which are cool, moist, well shaded, with little ground-cover, and near water.	Marginally suitable foraging habitat occurs within the LA River corridor. There is one occurrence recorded on eBird approximately in Lewis McAdams Riverfront Park, approximately 0.6 miles southwest of the BSA from 2022 and one occurrence at the Frogtown area approximately 1 mile downstream of the BSA from 2022.	Not Likely to Occur for Nesting/Moderate for Foraging
<i>Agelaius tricolor</i>	tri-color blackbird	ST	Breeds in marshes, brushy swamps, hayfields; forages also in cultivated land and along edges of water. Breeds most commonly in freshwater marsh, but also in wooded or brushy swamps, rank weedy fields, hayfields, and upper edges of salt marsh.	Suitable habitat occurs in river corridor, but habitat is disturbed within the LA River corridor. There are numerous occurrences near the BSA on eBird, including at the Lewis MacAdams Riverfront Park across the LA River from the BSA in 2022, and the Frogtown area approximately 1 mile downstream of the BSA in January 2023.	Moderate for Nesting/Moderate for Foraging



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Taxa		Status	Habitat Type	Comments	Occurrence Potential
Scientific Name	Common Name				
<i>Aimophila ruficeps canescens</i>	southern California rufous-crowned sparrow	WL, S3	Breeding habitat includes vegetated scrubland on hillsides and canyons, coastal sage scrub, coastal bluff scrub, low-growing serpentine chaparral, and along the edges of tall chaparral habitats.	Marginally suitable breeding and foraging habitat occurs within the BSA. There is one occurrence 5 miles west of the BSA in 2014.	Moderate for Nesting/Moderate for Foraging
<i>Athene cunicularia</i>	burrowing owl	SSC, BCC, S3	Open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. Owls are found in microhabitats highly altered by humans, including flood risk management and irrigation basins, dikes, banks, abandoned fields surrounded by agriculture, and road cuts and margins. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	Marginally suitable breeding and foraging habitat occurs within the BSA. The nearest and most recent occurrence was recorded on site in 1921.	Low for Nesting/Low for Foraging
<i>Ardea alba</i>	great egret	SA, S4	Fresh and saline emergent wetlands, along the margins of estuaries, lakes, and slow-moving streams, on mudflats and salt ponds, and in irrigated croplands and pastures. Nests in large trees and roosts in trees.	Suitable habitat occurs within the LA River corridor. There are no CNDDB occurrences recorded from within 10 miles of the BSA. This species was observed in the LA River corridor during the survey.	Moderate for Nesting/High for Foraging



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Taxa		Status	Habitat Type	Comments	Occurrence Potential
Scientific Name	Common Name				
<i>Ardea herodias</i>	great blue heron	SA, S4	Shallow estuaries, fresh and saline emergent wetlands, riverine and rocky marine shores, croplands, pastures and in mountains above foothills. Usually nests in colonies.	Suitable habitat occurs within the LA River corridor. There are no CNDDDB occurrences recorded from within 10 miles of the BSA. This species was observed in the LA River during the survey.	Moderate for Nesting/High for Foraging
<i>Buteo swainsoni</i>	Swainson's hawk	ST, S3	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees. Requires adjacent suitable foraging areas such as grasslands, or alfalfa or grain fields supporting rodent populations.	No suitable habitat for nesting or foraging occurs within the BSA. The nearest occurrence was recorded in 1880 almost seven miles east of the BSA.	Not Likely to Occur for Nesting /Not Likely to Occur for Foraging
<i>Calypte costae</i>	Costa's hummingbird	SA, BCC, S4	Primary habitats are desert wash, edges of desert riparian and valley foothill riparian, coastal scrub, desert scrub, desert succulent shrub, lower-elevation chaparral, and palm oasis.	Marginally suitable habitat occurs within the BSA. There are occurrences recorded on eBird at Lewis MacAdams Riverfront Park approximately 0.6 miles west of the BSA in 2022 and in the Frogtown area approximately 1 mile south of the BSA in 2016.	Low for Nesting/Moderate for Foraging



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Taxa		Status	Habitat Type	Comments	Occurrence Potential
Scientific Name	Common Name				
<i>Chaetura vauxi</i>	Vaux's swift	SSC, BCC, S1S2	Open sky over forest, lakes, and rivers. Often feeds low over water, especially in morning and evening or during unsettled weather. Nests in coniferous and mixed forest.	Marginally suitable nesting habitat foraging and habitat occurs within the BSA. There are occurrences recorded on eBird at the Taylor Yard area and Rio de Los Angeles State Park approximately 0.25 mile east of the BSA in 2013 and 2022 respectively.	Low for Nesting/Low for Foraging
<i>Coturnicops noveboracensis</i>	yellow rail	SSC, BCC, S1S2	Summer resident in eastern Sierra Nevada in Mono County. Freshwater marshlands.	No suitable habitat occurs within the BSA for nesting or foraging. The species was recorded 3 miles west southwest of the BSA in 1952.	Not Likely to Occur for Nesting/Not Likely to Occur for Foraging
<i>Elanus leucurus</i>	white-tailed kite	FP, S3S4	Open groves, river valleys, marshes, and grasslands. Occurs in lowlands of California west of the Sierra Nevada range and the southeast deserts. It is found in the Central Valley and along the entire California coast.	Marginally suitable nesting habitat and foraging habitat occurs within the BSA. There is one occurrence recorded on eBird at the Frogtown area approximately 1 mile downstream of the BSA in 1999.	Low for Nesting/Low for Foraging



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Taxa		Status	Habitat Type	Comments	Occurrence Potential
Scientific Name	Common Name				
<i>Empidonax traillii extimus</i>	southwestern willow flycatcher	FE, SE, S1	Rare and local breeder in extensive riparian areas of dense willows or (rarely) tamarisk, usually with standing water, in the southwestern U.S.	Marginally suitable nesting habitat occurs and suitable foraging habitat occurs within the BSA. There are two occurrences from within the site and within five miles of the site, but they are from over 90 years ago. There is an eBird occurrence of willow flycatcher from Rio De Los Angeles State Park approximately 0.6 miles south of the BSA from 2022 and from the Frogtown area approximately 1 mile south of the BSA in 2018. These occurrences were not confirmed at the subspecies level.	Low for Nesting/Moderate for Foraging
<i>Egretta thula</i>	snowy egret	SA, S4	Coastal estuaries, fresh and saline emergent wetlands, ponds, slow-moving rivers, irrigation ditches, and wet fields. Dense marshes are required for nesting. Also nests in low trees.	Suitable habitat occurs within the LA River corridor. There are no CNDDB occurrences recorded from within 10 miles of the BSA. This species was observed in the LA River corridor during the survey.	Low for Nesting/High for Foraging



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Taxa		Status	Habitat Type	Comments	Occurrence Potential
Scientific Name	Common Name				
<i>Falco peregrinus anatum</i>	American peregrine falcon	FP, S3S4	Coastal sage scrub communities that are associated with coastal dunes, perennial grasslands, annual grasslands, croplands, pastures, coast Douglas-fir-hardwood forests, coastal oak woodlands, montane hardwood woodlands, closed-cone pine-cypress woodlands, chamise-red shank chaparral, and mixed-chaparral communities.	Marginally suitable nesting and foraging habitat occurs within the BSA. There is one recorded occurrence within 1 mile north of the BSA in 2005, and an occurrence recorded on eBird across the LA River from the BSA at Lewis MacAdams Riverfront Park in 2022.	Moderate for Nesting/High for Foraging
<i>Larus californicus</i>	California gull	WL, BCC, S4	A fairly common nester at alkali and freshwater lacustrine habitats east of the Sierra Nevada and Cascades, and an abundant visitor to coastal and interior lowlands in nonbreeding season. Preferred habitats are sandy beaches, mudflats, rocky intertidal, and pelagic areas of marine and estuarine habitats, as well as fresh and saline emergent wetlands, lacustrine, riverine, and cropland habitats, landfill dumps, and open lawns in cities.	Suitable foraging habitat occurs within the LA river corridor. Two recorded occurrences in 2022 in eBird, including one in the BSA and one in the Rio de Los Angeles State Park, approximately 0.6 miles from the BSA.	Not Likely to Occur for Nesting/Moderate for Foraging



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Taxa		Status	Habitat Type	Comments	Occurrence Potential
Scientific Name	Common Name				
<i>Nannopterum auritum</i>	double-crested cormorant	WL, S4	Inland lakes, in fresh, salt and estuarine waters. Feeds mainly on fish but also on crustaceans and amphibians.	Suitable foraging habitat occurs within the LA river corridor. There are no CNDDDB occurrences within 10 miles of the BSA. An occurrence was recorded in eBird from 2022, from the Bowtie Parcel hotspot (specific location not available).	Not Likely to Occur for Nesting/Moderate for Foraging
<i>Nycticorax nycticorax</i>	black-crowned night heron	SA, S4	Lowlands and foothills throughout most of California, including the Salton Sea and Colorado River areas. Nests in large colonies. Feeds along the margins of lacustrine, large riverine, and fresh and saline emergent habitats. Nests in dense-foliaged trees; dense, fresh or brackish emergent wetlands; or dense shrubbery or vine tangles; usually near aquatic or emergent feeding areas.	Suitable habitat occurs within the LA River corridor. This species was observed within the river corridor adjacent to the Bowtie Parcel during surveys.	Not Likely to Occur for Nesting/High for Foraging



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Taxa		Status	Habitat Type	Comments	Occurrence Potential
Scientific Name	Common Name				
<i>Pandion haliaetus</i>	osprey	WL, S4	Forages in shallow inland waters along rivers, streams, marshes, and reservoirs. Wintering and nonbreeding birds also feed in shallow coastal marine habitats. Suitable nesting habitat includes power poles and towers, as well as large living and dead trees.	Suitable foraging habitat occurs within the LA River corridor. This species was observed within the river corridor adjacent to the Bowtie Parcel during surveys.	Moderate for Nesting/High for Foraging
<i>Pelecanus erythrorhynchos</i>	American white pelican	SSC, BCC, S1S2	Forage in shallow inland waters, such as open areas in marshes and along lake or river edges; wintering and nonbreeding birds also feed in shallow coastal marine habitats.	Suitable foraging habitat occurs within the LA River corridor. There are occurrences recorded on eBird in Lewis McAdams Riverfront Park approximately 0.6 miles southwest of the BSA from 2022, in the Frogtown area approximately 1 mile south of the BSA from 2021, and in the Rio de Los Angeles State Park, approximately 0.6 miles from the BSA from 2022.	Not Likely to Occur for Nesting/High for Foraging



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Taxa		Status	Habitat Type	Comments	Occurrence Potential
Scientific Name	Common Name				
<i>Plegadis chihi</i>	white-faced ibis	WL, S3S4	Feeds in fresh emergent wetlands, shallow lacustrine waters, muddy ground of wet meadows, and irrigated or flooded pastures and croplands. Nests in dense, fresh emergent wetlands.	Marginally suitable foraging habitat occurs within the LA River corridor. There is one occurrence recorded on eBird in Lewis McAdams Riverfront Park approximately 0.6 miles southwest of the BSA from 2022, and one occurrence recorded in Frogtown approximately 1 mile downstream from the BSA from 2023.	Not Likely to Occur for Nesting/Low for Foraging
<i>Poliioptila californica californica</i>	coastal California gnatcatcher	FT, SSC, S2	Obligate, permanent resident of coastal sage scrub below 2500 feet in Southern California. Low, coastal sage scrub in arid washes and on mesas and slopes with California sagebrush (<i>Artemisia californica</i>) as a dominant or co-dominant species. Not all areas classified as coastal sage scrub are occupied.	Marginally suitable nesting and foraging habitat occurs within the BSA. However, the only occurrences within 20 years are all at least 9 miles away.	Low for Nesting/Low for Foraging
<i>Riparia riparia</i>	bank swallow	ST, S2	Low areas along rivers, streams, ocean coasts, and reservoirs. Nesting habitat is vertical banks of fine textured soils, most commonly along streams and rivers. Forage in open areas and avoid places with tree cover.	Marginally suitable nesting and foraging habitat occurs within the BSA along the LA River. However, the BSA is outside of the breeding range of this species. The only recorded occurrence was recorded within site in 1894.	Not Likely to Occur for Nesting/Low for Foraging



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Taxa		Status	Habitat Type	Comments	Occurrence Potential
Scientific Name	Common Name				
<i>Setophaga petechia</i>	yellow warbler	SSC, S3S4	Yellow warblers generally occupy riparian vegetation in close proximity to water along streams and in wet meadows. They can be found roosting and nesting in willows and cottonwoods in river corridors.	Suitable nesting habitat and foraging habitat occurs in vegetated sections of the LA River corridor. This species was observed in May 2022 by Stantec biologists within the LA River corridor adjacent to the Bowtie Parcel.	Moderate for Nesting/Moderate for Foraging
<i>Vireo bellii pusillus</i>	least Bell's vireo	FE, SE, S2	Summer resident of Southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 feet. Often inhabits structurally diverse woodlands along watercourses including cottonwood-willow and oak woodlands and mulefat scrub. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, <i>Baccharis</i> , or mesquite.	Marginally suitable nesting habitat and suitable foraging habitat occurs within the BSA along the LA River. All the CNDDDB occurrences within 5 miles of the BSA are from over 100 years ago. More recent occurrences, from 2013 and 2015, are 7 and 10 miles to the east and northeast of the BSA. Recent occurrences were recorded on eBird in Rio de Los Angeles State Park approximately 0.6 miles from the BSA in June 2022, and in the Frogtown area approximately 1 mile south of the BSA in May 2021.	Low for Nesting/Moderate for Foraging



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Taxa		Status	Habitat Type	Comments	Occurrence Potential
Scientific Name	Common Name				
MAMMALS					
<i>Antrozous pallidus</i>	pallid bat	SSC, S3	Desert, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	No suitable habitat occurs within the site. All occurrences are more than 50 years old and are recorded more than 5 miles from the BSA.	Not Likely to Occur
<i>Eumops perotis californicus</i>	western mastiff bat	SSC, S3S4	Many open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, chaparral. Roosts in crevices in cliff faces, high buildings, bridges, trees, and tunnels. In California, most records are from rocky areas at low elevations.	No suitable habitat occurs within the BSA. All occurrences within 5 miles are from over 30 years ago.	Not Likely to Occur
<i>Lasionycteris noctivagans</i>	silver-haired bat	S3S4	Coastal and montane forest. Forages over streams, ponds, and brushy areas, and requires follows of trees for roost habitat. Conifer and mixed conifer/hardwood forests. Roosts mainly in hollows or crevices of trees, but may also roost in rock crevices, mines, or caves. Forages over streams, ponds, and brushy areas.	No suitable habitat occurs within the BSA. The nearest record of this species in over 6 miles to the north northeast of the BSA and was recorded almost 45 years ago.	Not Likely to Occur



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Taxa		Status	Habitat Type	Comments	Occurrence Potential
Scientific Name	Common Name				
<i>Lasiurus cinereus</i>	hoary bat	S4	Forages over a wide range of habitats but prefers open habitats with access to water and trees for roosting. Typically solitary, roosting in the foliage of shrubs or coniferous and deciduous trees. Roosts are usually near the edge of a clearing.	Marginally suitable habitat. The nearest occurrence was recorded $\frac{3}{4}$ of a mile west southwest of the BSA in 1977. The most recent record was 1.5 miles to the west in 1992.	Low
<i>Lasiurus xanthinus</i>	western yellow bat	SSC, S3	Occurs in Los Angeles and San Bernardino Counties south to the Mexican border. Valley foothill riparian, desert riparian, desert wash, and palm oasis habitats below 600 m.	Untrimmed palm trees are present in the BSA. There is an occurrence 1 mile north northwest of the BSA from 1984.	Moderate
<i>Microtus californicus stephensi</i>	south coast marsh vole	SSC, S2	Occurs in the area of tidal marshes in Los Angeles, Orange, and southern Ventura Counties.	No suitable habitat is present within the BSA. The nearest occurrence was recorded 10 miles to the southwest 45 years ago.	Not Likely to Occur
<i>Neotoma lepida intermedia</i>	San Diego desert woodrat	SSC, S3S4	Inhabits most of southern California, with range extending northward along the coast to Monterey Co., and along the Coast Range to San Francisco Bay. Joshua tree, pinyon-juniper, mixed and chamise-redshank chaparral, sagebrush, and most desert habitats. Also found in other habitats.	Marginally suitable habitat occurs within the BSA within the low-quality coastal scrub. Two occurrences from 2006 were documented approximately 5 miles west northwest of the site.	Moderate



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Taxa		Status	Habitat Type	Comments	Occurrence Potential
Scientific Name	Common Name				
<i>Nyctinomops macrotis</i>	big free-tailed bat	SSC, S3	Limited distribution in California. Prefers rugged, rocky canyons, but will also roost in buildings, caves, and occasionally in holes in trees.	No suitable habitat occurs within the BSA. Two occurrences 3 miles south and 5 miles northwest of the BSA were recorded in 1987 and 1985, respectively.	Not Likely to Occur
<i>Onychomys torridus ramona</i>	southern grasshopper mouse	SSC, S3	Low, semi-open, and open scrub habitats, including chaparral, coastal sage scrub, and low sagebrush.	Marginally suitable habitat occurs within the BSA in the low-quality coastal scrub. The only recorded occurrence is within 1 mile south of the BSA but over 100 years ago.	Low
<i>Perognathus longimembris brevinasus</i>	Los Angeles pocket mouse	SSC, S1S2	The habitat of Los Angeles pocket mice includes lower elevation grassland, alluvial sage scrub, and coastal sage scrub.	Marginally suitable habitat occurs within the BSA in the disturbed coastal scrub. The only recorded occurrence is from 9 miles west northwest of the BSA in 1903.	Low
<i>Taxidea taxus</i>	American badger	SSC, S3	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils, and open and uncultivated ground. Preys on burrowing rodents. Digs burrows.	No suitable habitat occurs within the BSA. There is one occurrence within the site, but the observation date is unknown.	Not Likely to Occur



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Taxa		Status	Habitat Type	Comments	Occurrence Potential
Scientific Name	Common Name				

State Rankings:

S1 = Critically Imperiled
 S2 = Imperiled
 S3 = Vulnerable
 S4 = Apparently Secure
 S5 = Secure
 SH = Possibly Extirpated
 SX = Presumed Extirpated
 SC = State Candidate for Listing
 SD = State Delisted
 SA = CDFW Special Animal
 SE = State Endangered
 ST = State Threatened
 FP= CDFW Fully Protected
 SSC = CDFW Species of Special Concern
 WL = CDFW Watch List

Federal Rankings:

CAN = Federal Listing Candidate
 FE = Federally Endangered
 FT = Federally Threatened
 FD = Federally Delisted
 BCC = USFWS Bird of Conservation Concern

Bird Species Occurrence Potential:

The first Occurrence Potential determination is based on nesting habitat and the second determination is based on foraging habitat.

BSA=Biological Study Area
 CNDDDB =California Natural Diversity Database



5.0 Special-Status Biological Resources

5.5 WILDLIFE CORRIDORS AND SPECIAL LINKAGES

Linkages and corridors facilitate regional animal movement and are generally centered in or around waterways, riparian corridors, flood control channels, contiguous habitat, and upland habitat. Drainages generally serve as movement corridors because wildlife can move easily through these areas, and fresh water is available. Corridors also offer wildlife unobstructed terrain for foraging and for dispersal of young individuals.

As the movements of wildlife species are more intensively studied using radio-tracking devices, there is mounting evidence that some wildlife species do not necessarily restrict their movements to some obvious landscape element, such as a riparian corridor. For example, recent radio-tracking and tagging studies of Coast Range newts, California red-legged frogs, southwestern pond turtles, and two-striped garter snakes found that long-distance dispersal involved radial or perpendicular movements away from a water source with little regard to the orientation of the assumed riparian “movement corridor” (Bulger et al. 2002; Hunt 1993; Ramirez 2002, 2003a, 2003b; Rathbun et al. 1992; Trenham 2002). Likewise, carnivores do not necessarily use riparian corridors as movement corridors, frequently moving overland in a straight line between two points when traversing large distances (Beier 1993, 1995; Newmark 1995; Noss et al. 1996, n.d.). In general, the following corridor functions can be utilized when evaluating impacts to wildlife movement corridors:

Movement corridors are physical connections that allow wildlife to move between patches of suitable habitat. Simberloff et al. (1992) and Beier and Loe (1992) correctly state that for most species, we do not know what corridor traits (length, width, adjacent land use, etc.) are required for a corridor to be useful. But, as Beier and Loe (1992) also note, the critical features of a movement corridor may not be its physical traits but rather how well a particular piece of land fulfills several functions, including allowing dispersal, plant propagation, genetic interchange, and recolonization following local extirpation.

Dispersal corridors are relatively narrow, linear landscape features embedded in a dissimilar matrix that link two or more areas of suitable habitat that would otherwise be fragmented and isolated from one another by rugged terrain, changes in vegetation, or human-altered environments. Corridors of habitat are essential to the local and regional population dynamics of a species because they provide physical links for genetic exchange and allow animals to access alternative territories as dictated by fluctuating population densities.

Habitat linkages are broader connections between two or more habitat areas. This term is commonly used as a synonym for a wildlife corridor (Meffe and Carroll 1997). Habitat linkages may themselves serve as source areas for food, water, and cover, particularly for small- and medium-size animals.

Travel routes are usually landscape features, such as ridgelines, drainages, canyons, or riparian corridors, within larger natural habitat areas that are frequently used by animals to facilitate movement and provide access to water, food, cover, den sites, and other necessary resources. A travel route is generally preferred by a species because it provides the least amount of topographic resistance in moving from one area to another yet still provides adequate food, water, or cover (Meffe and Carroll 1997).



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

5.0 Special-Status Biological Resources

Wildlife crossings are small, narrow areas of limited extent that allow wildlife to bypass an obstacle or barrier. Crossings typically are human-made and include culverts, underpasses, drainage pipes, bridges, tunnels to provide access past roads, highways, pipelines, or other physical obstacles. Wildlife crossings often represent “choke points” along a movement corridor because useable habitat is physically constricted at the crossing by human-induced changes to the surrounding areas (Meffe and Carroll 1997).

5.5.1 Wildlife Movement in the BSA

The BSA is located in a heavily developed area but contains localized portions of open space and riparian habitat along the LA River. The LA River was identified as a potential riparian habitat connection by the California Essential Habitat Connectivity Project (Spencer et al. 2010). Although, degraded and disturbed in many parts, the LA River is still an important wildlife corridor for many riparian and wildlife species (USACE 2015). Numerous species of fish, amphibians, mammals, waterfowl, songbirds, raptors, and invertebrates use the LA River corridor for foraging and movement.

Within the BSA, the level of surrounding urban development, presence of physical barriers, and lack of native habitat outside of the LA River, would significantly constrain the passage of most large terrestrial wildlife known to occur in the region. Terrestrial wildlife corridors between the BSA and other areas of open space are extremely constrained by roadways, and commercial and residential development. However, wildlife movement between the river corridor and the BSA would be relatively unconstrained if existing fencing near the upper riverbank is removed or modified to allow for wildlife passage.



BOWTIE PARCEL PROJECT

Biological Resources Technical Report

6.0 References

6.0 REFERENCES

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Biological Resources Technical Report

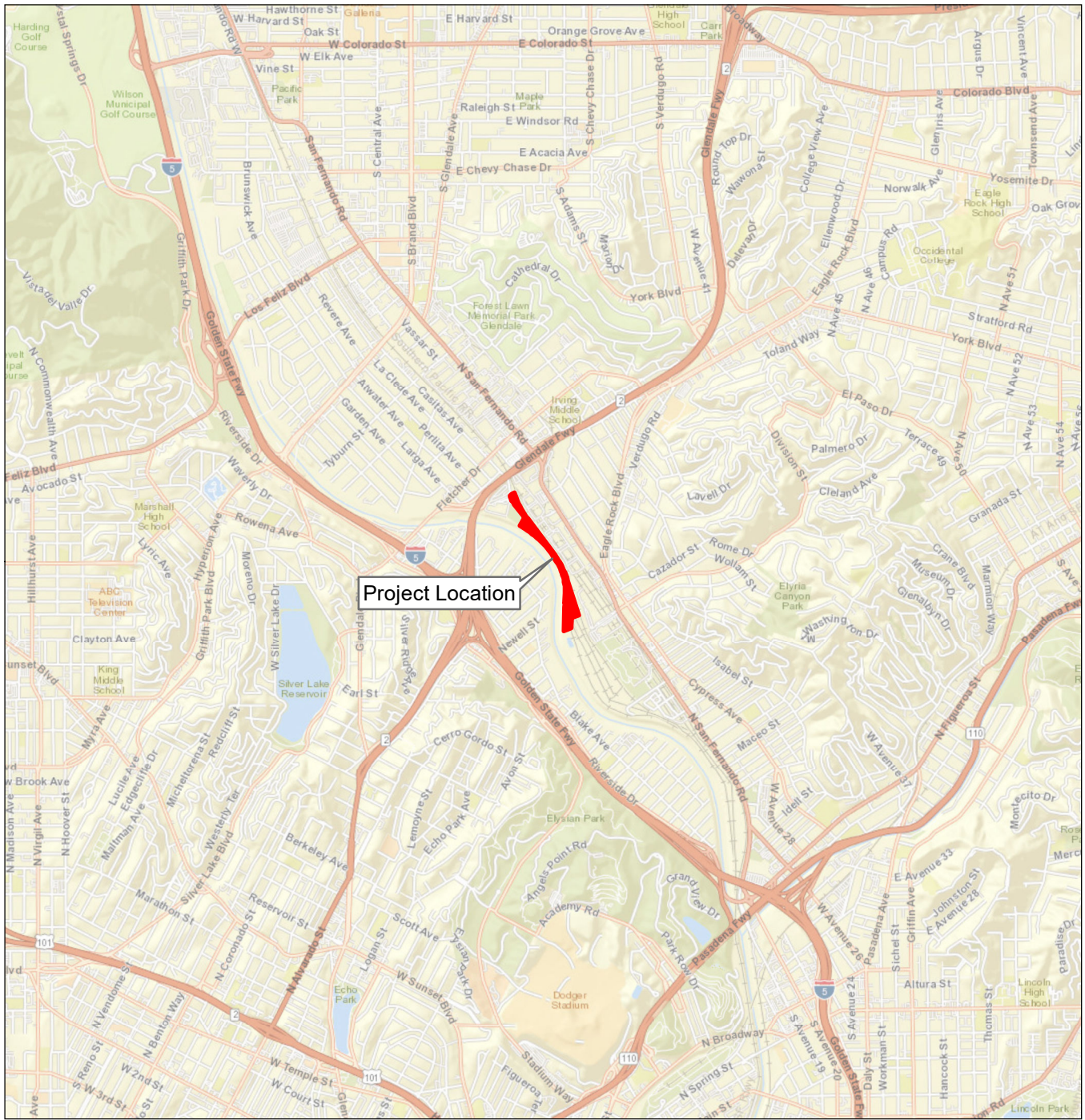
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APPENDIX A FIGURES





 Project Location

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Project Location Prepared by GM on 2022-12-08
APN: 5442-002-914, 5442-002-825 TR by SET on 2022-12-08
Los Angeles County, CA IR by JV on 2022-12-08

Client/Project 184031605
Nature Conservancy

Bowtie Parcel Project
Biological Resources Technical Report

Figure No.

1

Title

Regional Location Map

Notes

1. Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet

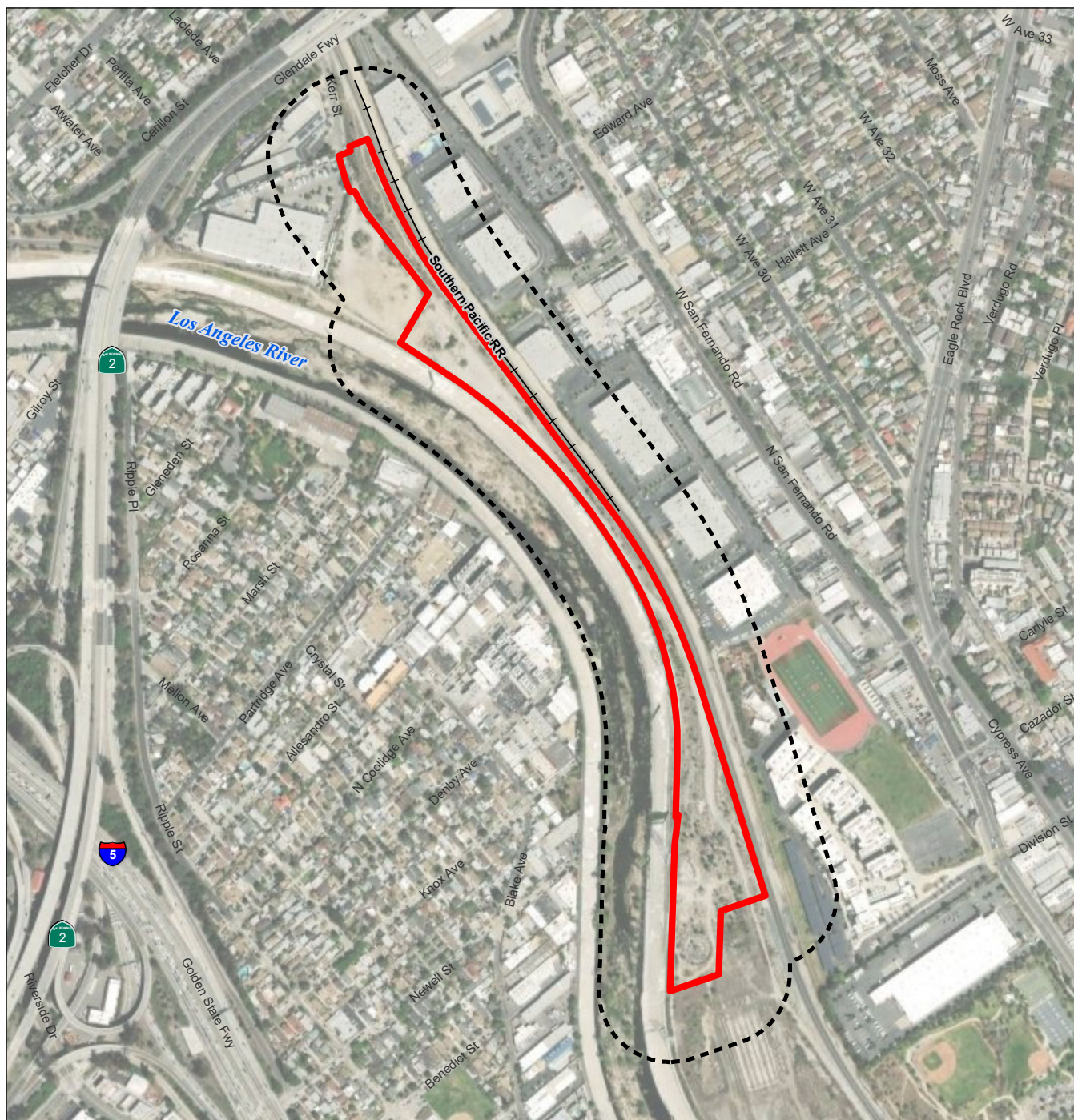
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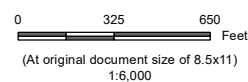
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-  Project Site
 Biological Survey Area



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Nature Conservancy
Bowtie Parcel Project
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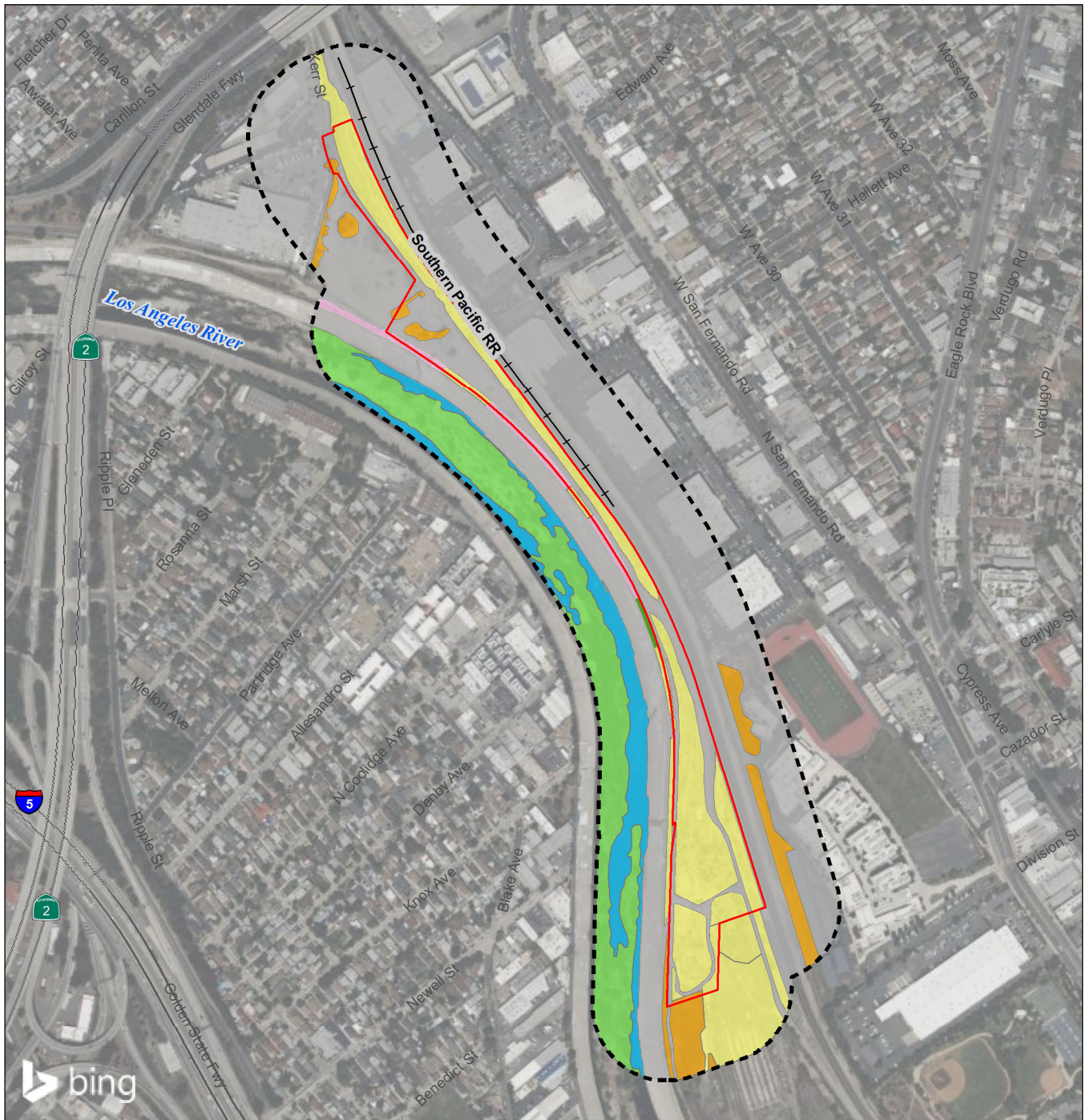
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2

Title
Project Area

Notes

- Notes**
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 2. Data Sources: Stantec 2022.
 3. Background: Sources: Esri, GEBCO, NOAA, National Geographic, Garmin, HERE, Geonames.org, and other contributors
Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

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- Project Site
- Biological Survey Area
- Vegetation Communities and Land Cover Types**
- California buckwheat scrub
- Deerweed - silver lupine - yerba santa scrub
- Disturbed/Developed
- Fountain grass swards
- Gooding's willow - red willow riparian woodland and forest
- Open Water
- Ornamental Non-Native

Notes

1. Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet
2. Data Sources: Stantec 2022.
3. Background: Sources: Esri, GEBCO, NOAA, National Geographic, Garmin, HERE, Geonames.org, and other contributors
- © 2022 Microsoft Corporation © 2022 Maxar © CNES (2022) Distribution Airbus DS

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Los Angeles County, CA

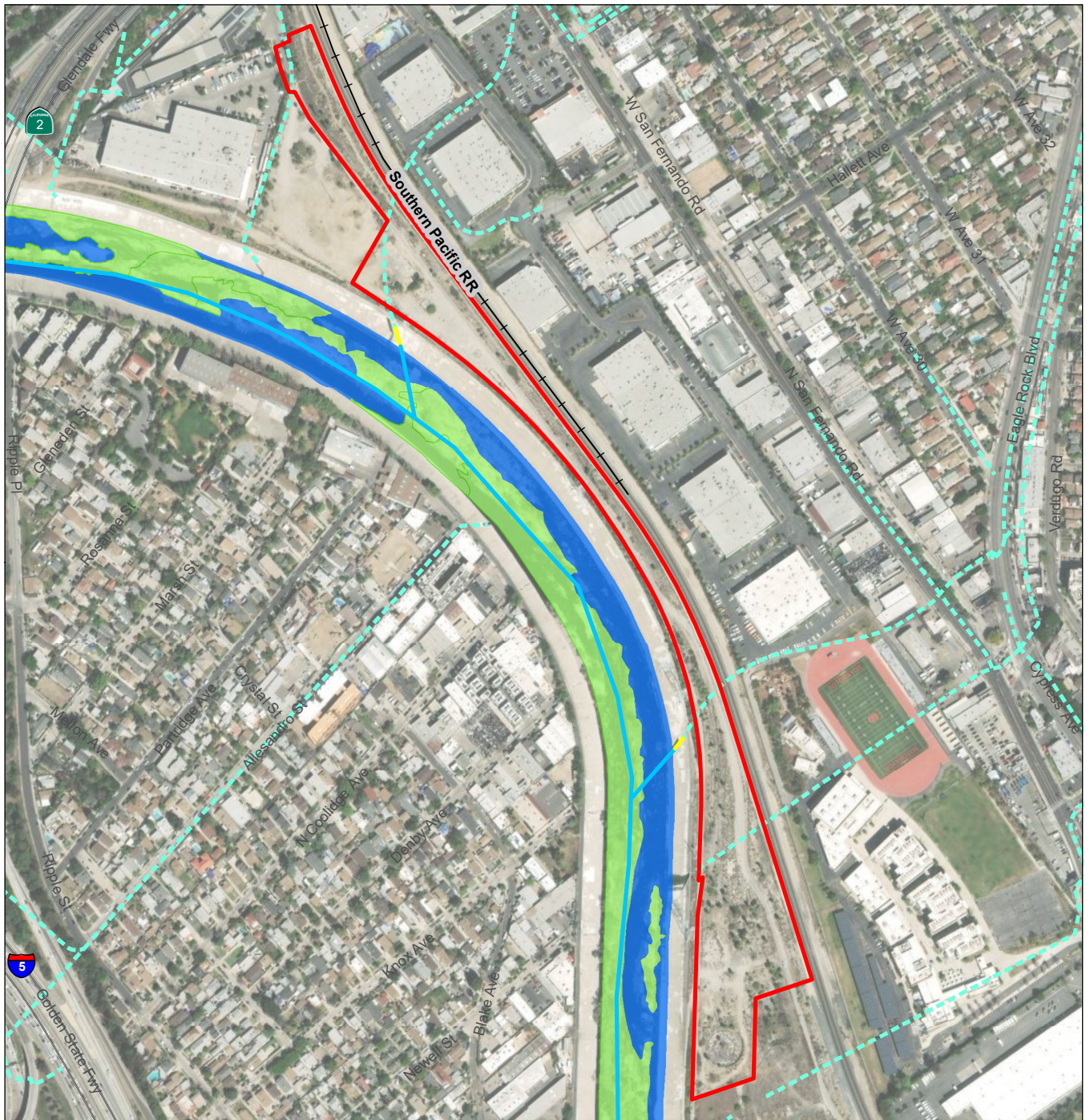
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Figure No.
3

Title
Vegetation Communities and Land Cover Types

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- Project Site
- National Hydrography Database (NHD)**
- Artificial Path
- Connector
- Pipeline
- National Wetlands Inventory (NWI)**
- Freshwater Forested/Shrub Wetland
- Riverine

Notes

1. Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet
 2. Data Sources: Stantec 2022. Waters data from NWI and NHD 2022.
 3. Background: Sources: Esri, GEBCO, NOAA, National Geographic, Garmin, HERE, Geonames.org, and other contributors
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Project Location
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Los Angeles County, CA

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Figure No.
4

Title
Aquatic Resources



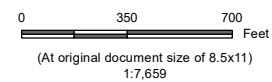
- Project Site
- Biological Survey Area

Soils

- 1002
- 1200
- 1264

Notes

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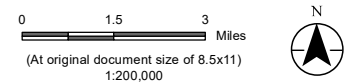
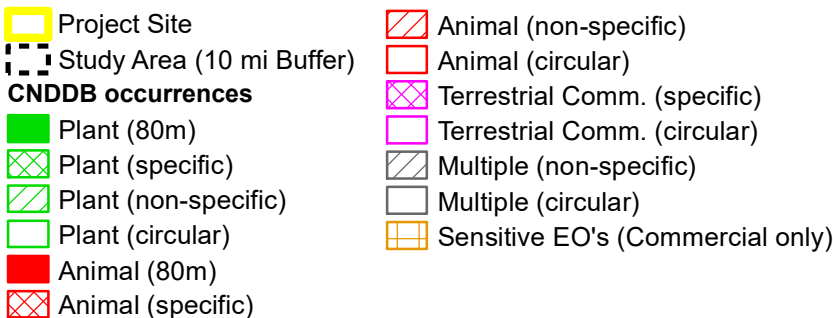
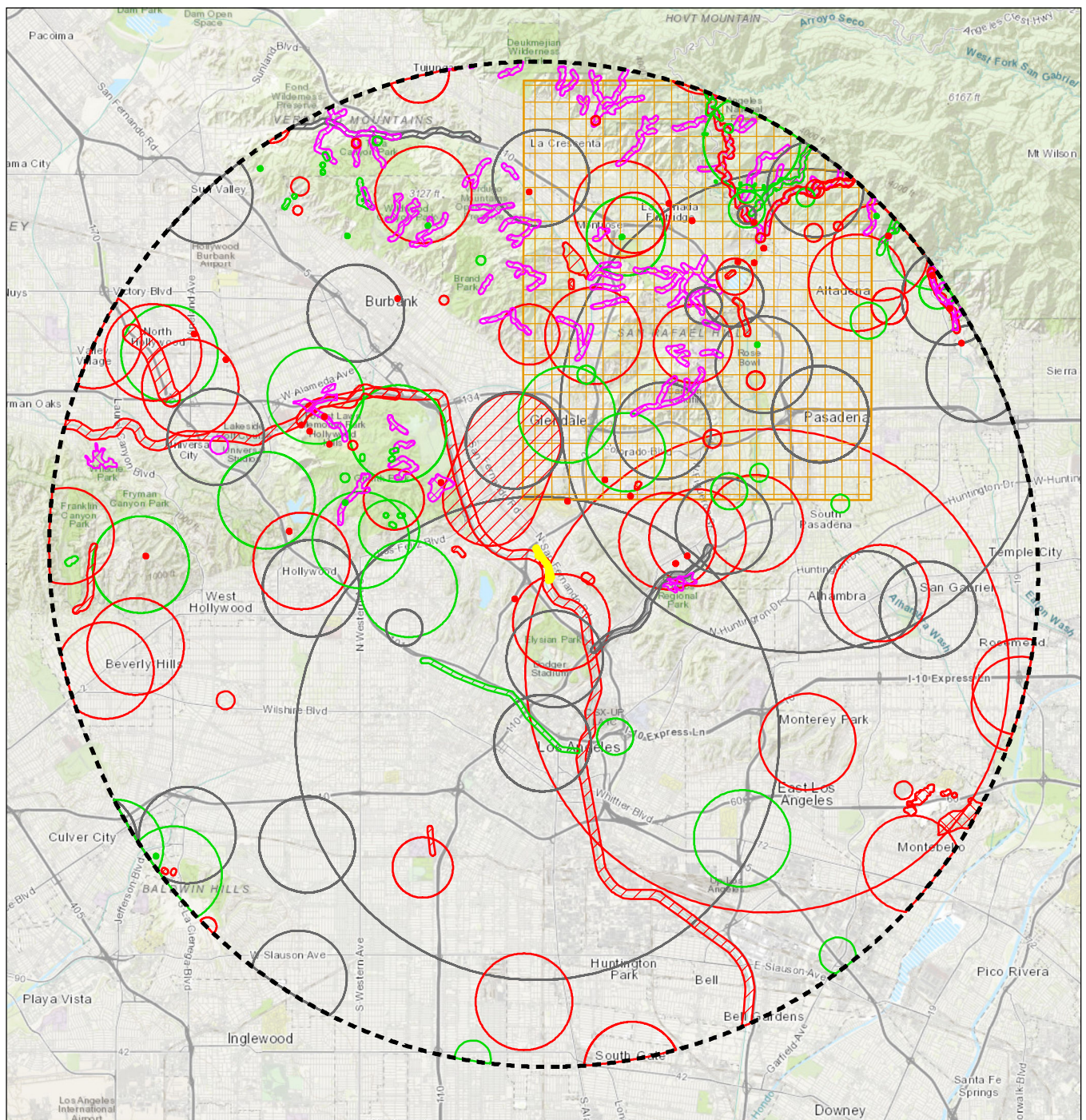


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Los Angeles County, CA IR by JV on 2022-12-08

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Figure No.
5

Title
Historic Soils



Project Location
APN: 5442-002-914, 5442-002-825
Los Angeles County, CA

Prepared by GM on 2022-12-08
TR by SET on 2022-12-08
IR by JV on 2022-12-08

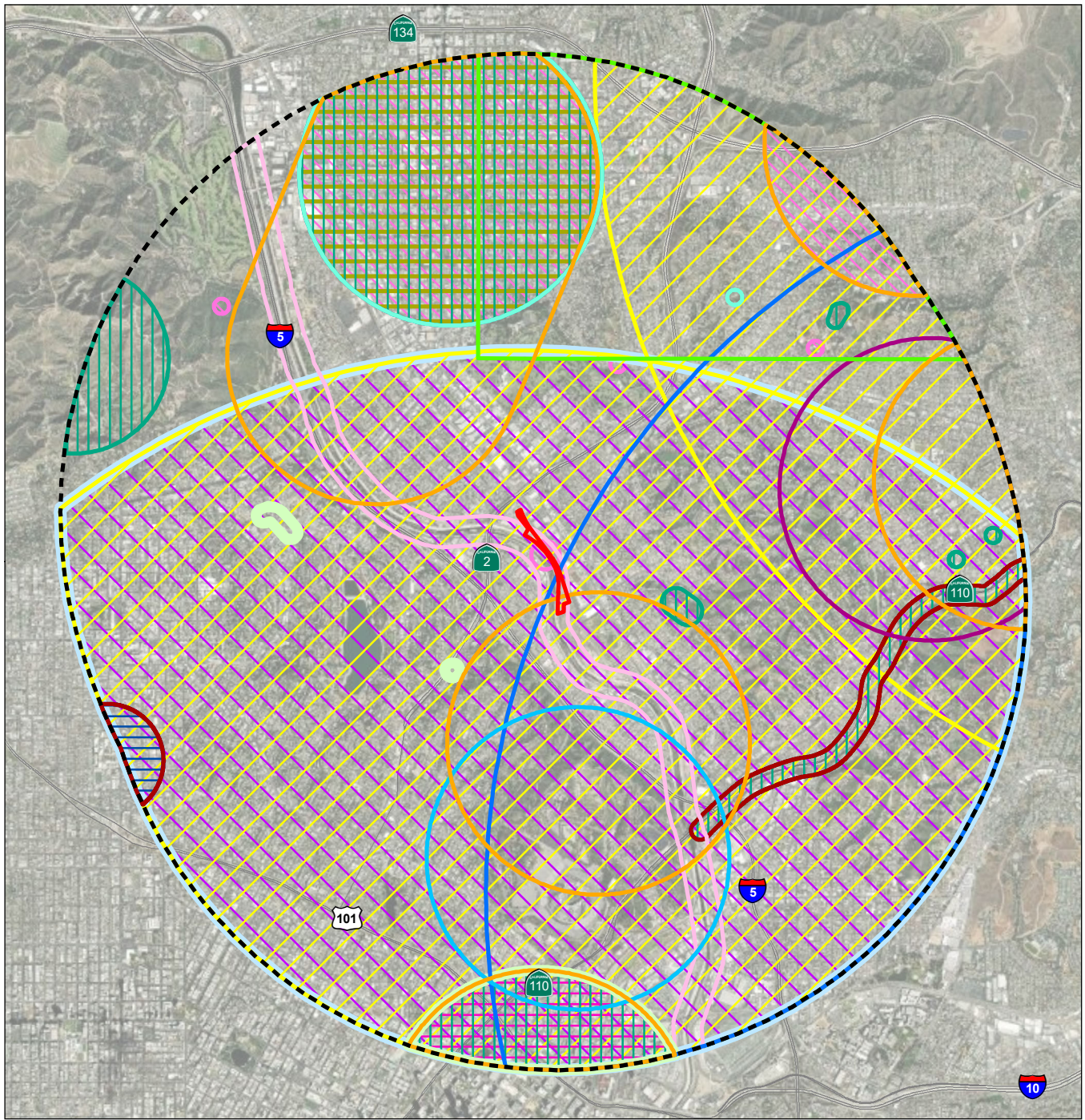
Client/Project
Nature Conservancy
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Figure No.
6

Title
10 Mile CNDDB Results

Notes

1. Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet
2. Data Sources: Stantec 2022. CNDDB data from CDFW 2022.
3. Background: Sources: Esri, GEBCO, NOAA, National Geographic, Garmin, HERE, Geonames.org, and other contributors
Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community



- | | | |
|---------------------------|------------------------------------|--------------------------------|
| Project Site | Southern California legless lizard | least Bell's vireo |
| Study Area (3 mi Buffer) | bank swallow | southwestern willow flycatcher |
| CNDDB Occurrences | big free-tailed bat | western mastiff bat |
| American badger | burrowing owl | western ridged mussel |
| American peregrine falcon | coastal California gnatcatcher | western spadefoot |
| Crotch bumble bee | hoary bat | western yellow bat |
| San Gabriel chestnut | | yellow rail |

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Project Location
APN: 5442-002-914, 5442-002-825
Los Angeles County, CA

Prepared by GM on 2022-12-08
TR by SET on 2022-12-08
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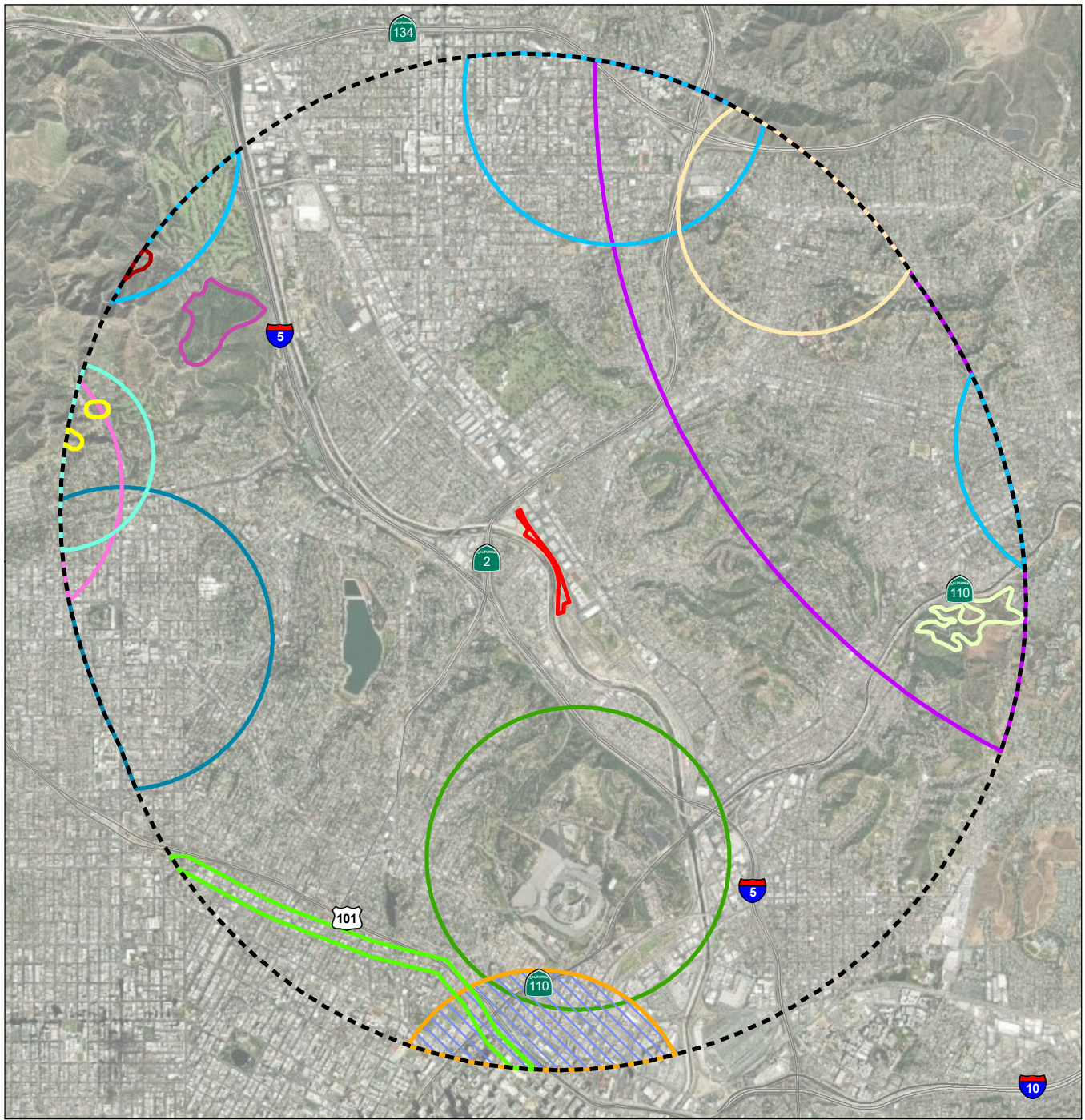
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Figure No.
7A

Title
3 Mile CNDDB Results - Wildlife

Notes
1. Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet
2. Data Sources: Stantec 2022. CNDDB data from CDFW 2022.
3. Background: Sources: Esri, GEBCO, NOAA, National Geographic, Garmin, HERE, Geonames.org, and other contributors
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- | | |
|----------------------------|---|
| Project Site | Southern Sycamore Alder Riparian Woodland |
| Study Area (3 mi Buffer) | Walnut Forest |
| CNDDDB occurrences | lucky morning-glory |
| California Walnut Woodland | many-stemmed dudleya |
| Davidson's saltscale | mesa horkelia |
| Greata's aster | prostrate vernal pool navarretia |
| Nevin's barberry | salt spring checkerbloom |
| Nuttall's scrub oak | southern tarplant |
| Parish's gooseberry | |

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Feet
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Project Location
APN: 5442-002-914, 5442-002-825
Los Angeles County, CA

Prepared by GM on 2022-12-08
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Figure No.
7B


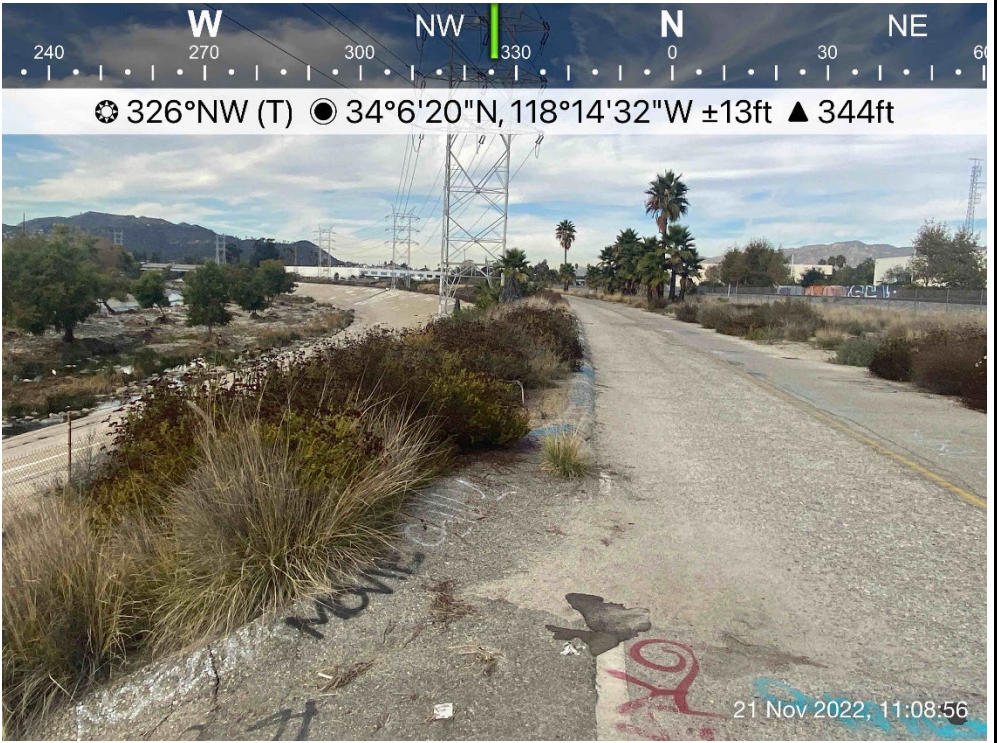
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3 Mile CNDDDB Results - Plants and Terrestrial Communities



Notes
1. Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet
2. Data Sources: Stantec 2022. CNDDDB data from CDFW 2022.
3. Background: Sources: Esri, GEBCO, NOAA, National Geographic, Garmin, HERE, Geonames.org, and other contributors
Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community


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APPENDIX B PHOTOGRAPHIC LOG

Client:	The Nature Conservancy	Project:	Bowtie Demonstration Project
Site Name:	Bowtie Parcel	Site Location:	34° 6' 29.21"N 118°14'40.29"W
Photograph ID: 1	 <p> E 90 120 SE 150 180 S 210 SW 240 ☼ 168°S (T) ● 34°6'29"N, 118°14'40"W ±19ft ▲ 371ft 21 Nov 2022, 11:17:57 </p>		
Photo Location: Bowtie Parcel, Los Angeles			
Direction: S			
Survey Date: 11/21/2022			
Comments: Disturbed/developed area within northern portion of Project Area			
Photograph ID: 2	 <p> NE 60 E 90 120 SE 150 180 S 210 SW ☼ 137°SE (T) ● 34°6'27"N, 118°14'39"W ±32ft ▲ 335ft 21 Nov 2022, 11:21:41 </p>		
Photo Location: Bowtie Parcel, Los Angeles			
Direction: SE			
Survey Date: 11/21/2022			
Comments: Disturbed/paved portion of Project Area on left, vegetated upper bank in foreground, and Los Angeles River corridor adjacent to Project Area on right.			

Client:	The Nature Conservancy	Project:	Bowtie Demonstration Project
Site Name:	Bowtie Parcel	Site Location:	34° 6' 29.21"N 118°14'40.29"W
Photograph ID: 3			
Photo Location: Bowtie Parcel, Los Angeles			
Direction: SE			
Survey Date: 11/21/2022			
Comments: Mid-portion of Project Area.			
Photograph ID: 4			
Photo Location: Bowtie Parcel, Los Angeles			
Direction: NW			
Survey Date: 11/21/2022			
Comments: Mid-portion of Project Area with California buckwheat scrub (restored) in foreground.			

Client:	The Nature Conservancy	Project:	Bowtie Demonstration Project
Site Name:	Bowtie Parcel	Site Location:	34° 6' 29.21"N 118°14'40.29"W
Photograph ID: 5	<div> <div>SWW 240 270 300 330 0 30 NW</div> <div> <div>312°NW (T) 34°6'20"N, 118°14'32"W ±13ft ▲ 341ft</div>  <div>21 Nov 2022, 11:09:22</div> </div> </div>		
Photo Location: Bowtie Parcel, Los Angeles			
Direction: NW			
Survey Date: 11/21/2022			
Comments: California buckwheat scrub (restored) in mid-portion of Project Area and east bank of Los Angeles River.			
Photograph ID: 6	<div> <div>S 180 210 240 270 300 330 0 NW</div> <div> <div>266°W (T) 34°6'16"N, 118°14'37"W ±177ft ▲ 382ft</div>  <div>21 Nov 2022, 13:19:43</div> </div> </div>		
Photo Location: Bowtie Parcel, Los Angeles			
Direction: W			
Survey Date: 11/21/2022			
Comments: Los Angeles River and willow riparian wetland vegetation west of Project Area.			

Client:	The Nature Conservancy	Project:	Bowtie Demonstration Project
Site Name:	Bowtie Parcel	Site Location:	34° 6' 29.21"N 118°14'40.29"W
Photograph ID: 7			
Photo Location: Bowtie Parcel, Los Angeles			
Direction: SW			
Survey Date: 11/21/2022			
Comments: Ornamental non-native vegetation in Project Area.			

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**Proposed Project
Total Construction-Related and Operational
Gasoline Usage
Construction**

Table 1. Construction in First Calendar Year			
Action	Carbon Dioxide Equivalents (CO ₂ e) in Metric Tons ¹	Conversion of Metric Tons to Kilograms ²	Construction Equipment Emission Factor ²
Project Construction	253	253,000	10.15
Total Gallons Consumed During First Calendar Year of Construction:			24,926

Table 2. Construction in Second Calendar Year			
Action	Carbon Dioxide Equivalents (CO ₂ e) in Metric Tons ¹	Conversion of Metric Tons to Kilograms ²	Construction Equipment Emission Factor ²
Project Construction	806	806,000	10.15
Total Gallons Consumed During First Calendar Year of Construction:			79,409

Table 3. Construction in Third Calendar Year			
Action	Carbon Dioxide Equivalents (CO ₂ e) in Metric Tons ¹	Conversion of Metric Tons to Kilograms ²	Construction Equipment Emission Factor ²
Project Construction	231	231,000	10.15
Total Gallons Consumed During First Calendar Year of Construction:			22,759

Sources:			
¹ ECORP Consulting. 2023. Bowtie Development Park ISMND Air Quality subsection.			
² Climate Registry. 2016. <i>General Reporting Protocol for the Voluntary Reporting Program version 2.1</i> . January 2016. http://www.theclimateregistry.org/wp-content/uploads/2014/11/General-Reporting-Protocol-Version-2.1.pdf			

Proposed Project
Total Construction-Related and Operational
Gasoline Usage

Operations

Table 4. Average Miles per Gallon in Los Angeles County in 2026 ³								
Area	Sub-Area	Cal. Year	Season	Veh_tech	EMFAC 2021 Category	Total Onroad Vehicle Gallons Consumed in Los Angeles County in 2026	Total Onroad Vehicle Miles Traveled in Los Angeles County in 2026	Total Passenger Vehicle Miles per Gallon in Los Angeles County in 2026
Sub-Areas	Los Angeles County	2026	Annual	All Vehicles	All Vehicles	4,377,404,492	105,276,925,989	24.05
Sources: ³ California Air Resource Board. 2021. EMFAC2021 Mobile Emissions Model.								

Table 5. Total Gallons During Project Operations				
Project Onroad Vehicle Daily Trips ³	Estimated Miles per Trip ⁴	Project Onroad Vehicle Daily Miles Traveled	Project Onroad Vehicle Daily Fuel Consumption	Project Onroad Vehicle Annual Fuel Consumption
98	9.81	961.38	39.97	14,591
Sources: ³ KOA 2022; ⁴ CalEEMod 2022.1.				

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APPENDIX E

Paleontological Resources Assessment



**Final Addendum Paleontological
Resource Assessment for the
California Department of Parks
and Recreation Bowtie Park
Development Project, Los
Angeles, California**

May 1, 2023

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**FINAL ADDENDUM PALEONTOLOGICAL RESOURCE ASSESSMENT FOR THE CALIFORNIA
DEPARTMENT OF PARKS AND RECREATION BOWTIE PARK DEVELOPMENT PROJECT, LOS
ANGELES, CALIFORNIA**

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**FINAL ADDENDUM PALEONTOLOGICAL RESOURCE ASSESSMENT FOR THE CALIFORNIA
DEPARTMENT OF PARKS AND RECREATION BOWTIE PARK DEVELOPMENT PROJECT, LOS
ANGELES, CALIFORNIA**

Table of Contents

EXECUTIVE SUMMARY	VII
ABBREVIATIONS	IX
GLOSSARY	X
1.0 INTRODUCTION.....	1
1.1 PROJECT DESCRIPTION	1
1.2 PROJECT LOCATION	2
1.3 PALEONTOLOGICAL RESOURCES	2
2.0 REGULATORY FRAMEWORK.....	6
2.1 STATE OF CALIFORNIA.....	6
2.1.1 California Environmental Quality Act.....	6
2.1.2 Public Resources Code.....	7
2.2 LOCAL REGULATIONS	7
2.2.1 City of Los Angeles	7
3.0 PROFESSIONAL STANDARDS	7
4.0 GEOLOGIC SETTING.....	8
5.0 METHODOLOGY	8
5.1 RESULTS OF PREVIOUS ANALYSIS	9
5.2 PALEONTOLOGICAL RESOURCES IMPACTS ASSESSMENT	9
6.0 RESULTS	10
6.1 PROJECT AREA GEOLOGY AND PALEONTOLOGY	10
6.2 POTENTIAL IMPACTS TO PALEONTOLOGICAL RESOURCES FROM PROJECT ACTIVITIES	11
7.0 RECOMMENDATIONS AND MANAGEMENT CONSIDERATIONS.....	13
8.0 REFERENCES.....	14
LIST OF FIGURES	
Figure 1. Project Location	4
Figure 2. Geologic Map of Project Area.....	12



Executive Summary

In September 2022, Stantec Consulting Services Inc. (Stantec) conducted a paleontological resources assessment on behalf of the Nature Conservancy for the California Department of Parks and Recreation (State Parks)'s Bowtie Demonstration Project on approximately 3.2 acres of land in a portion of the Bowtie parcel in the City of Los Angeles, California. Subsequently, the scope of the paleontological study was expanded to include the entire 18-acre Bowtie parcel for the Bowtie Development Project (the Project), led by State Parks. The current paleontological study was conducted for the proposed habitat enhancement and stormwater treatment improvements occurring on the entire 18-acre parcel.

The proposed Project is subject to compliance with the California Environmental Quality Act (CEQA) and City of Los Angeles requirements regarding the Project's potential impacts on paleontological resources. As part of this compliance, a paleontological resources assessment was conducted to assess potential impacts of the proposed Project on paleontological resources.

This paleontological resource investigation consisted of an assessment of potential impacts from the Project on paleontological resources. This assessment was based on the results of the September 2022 analysis for the Bowtie Demonstration Project, which included a museum records search from the Natural History Museum of Los Angeles County, as well as a review of the results of geotechnical studies conducted on the site, the most recent geologic mapping, and relevant scientific literature. Like the smaller Bowtie Demonstration Project previously assessed, the larger Bowtie Parcel consists of alluvial fan sediments at the surface, which have low-to-high paleontological potential, increasing with depth, likely underlain by the Puente Formation, with high paleontological potential, at an undetermined depth.

Currently available Project plans do not include complete specifications for depth or type of ground disturbance. Ground disturbance that occurs into geologic units with high paleontological potential may encounter paleontological resources. While the exact depth of high potential sediments in the subsurface is undetermined, given the depths of other fossil localities in the area, depths of 10 feet below ground surface is reasonable for the transition from low to high potential sediments. In order to avoid impacts to paleontological resources, Stantec recommends the following mitigation activities for the Project:

1. A paleontologist shall be retained as the project paleontologist to oversee all aspects of paleontological mitigation, including the development and implementation of a Paleontological Monitoring and Mitigation Plan (PMMP) tailored to the Project plans that provides for paleontological monitoring of earthwork and ground disturbing activities into undisturbed geologic units with high paleontological potential to be conducted by a paleontological monitor meeting industry standards (Murphey et al. 2019). The PMMP should also include provisions for a Workers' Environmental Awareness Program training that communicates requirements and procedures for the inadvertent discovery of paleontological resources during construction, to be delivered by the paleontological monitor to the construction crew prior to the onset of ground



**FINAL ADDENDUM PALEONTOLOGICAL RESOURCE ASSESSMENT FOR THE CALIFORNIA
DEPARTMENT OF PARKS AND RECREATION BOWTIE PARK DEVELOPMENT PROJECT, LOS
ANGELES, CALIFORNIA**

disturbance. As the Project is on California State Parks lands, a permit will be required from State Parks for this work.

2. Paleontological monitoring will be conducted by a qualified paleontological monitor for ground disturbance that exceeds 10 feet in depth across the Project Area. The project paleontologist may reduce the frequency of monitoring should subsurface conditions indicate low paleontological potential.
3. Should a potential paleontological resource be identified in the Project Area, whether by the monitor or a member of the construction crew, work should halt in a safe radius around the find (usually 50 feet) until the project paleontologist can assess the find and, if significant, salvage the fossil for laboratory preparation and curation at the Natural History Museum of Los Angeles County.

Based on the findings in this study and the implementation of the above mitigation activities, the proposed Project would not adversely impact paleontological resources. Therefore, no additional paleontological resource studies are recommended or required at this time. Changes to the Project location or plans from those assessed in this study will require additional assessment for impacts to paleontological resources.



**FINAL ADDENDUM PALEONTOLOGICAL RESOURCE ASSESSMENT FOR THE CALIFORNIA
DEPARTMENT OF PARKS AND RECREATION BOWTIE PARK DEVELOPMENT PROJECT, LOS
ANGELES, CALIFORNIA**

Abbreviations

bgs	Below ground surface
CEQA	California Environmental Quality Act
City	City of Los Angeles
LACM	Natural History Museum of Los Angeles County
Ma	Million years ago
Project	Bowtie Demonstration Project
PMMP	Paleontological Monitoring and Mitigation Plan
PRPA	Paleontological Resources Preservation Act
SVP	Society of Vertebrate Paleontology



**FINAL ADDENDUM PALEONTOLOGICAL RESOURCE ASSESSMENT FOR THE CALIFORNIA
DEPARTMENT OF PARKS AND RECREATION BOWTIE PARK DEVELOPMENT PROJECT, LOS
ANGELES, CALIFORNIA**

Glossary

Paleontological Monitor	An individual who has academic training (B.S., B.A., M.A., or M.S.) with an emphasis in paleontology or demonstrated equivalent experience (a minimum of two years of cumulative professional or nonprofessional work in laboratory preparation, curation, or field work related to paleontology, as well as documented self-taught knowledge of the discipline of paleontology). [Murphey et al. 2019]
Paleontological Monitoring	Full-time observation of construction activities in high potential geologic units by a paleontological monitor, under supervision of the project paleontologist.
Paleontological Resource	Any fossilized remains, traces, or imprints of organisms, preserved in or on the earth's crust, that are of paleontological interest and that provide information about the history of life on earth, except that the term does not include— (A) any materials associated with an archaeological resource (as defined in section 3(1) of the Archaeological Resources Protection Act of 1979 (16 U.S.C. 470bb(1)); or (B) any cultural item (as defined in section 2 of the Native American Graves Protection and Repatriation Act (25 U.S.C. 3001)). [Paleontological Resources Preservation Act; Sec. 6301: Definitions]
Project Paleontologist	A paleontological principal investigator is someone with an advanced academic degree (M.A., M.S. or Ph.D.) with an emphasis in paleontology or demonstrated equivalent professional experience (e.g., minimum of 3 years [or 75 projects] of project experience with paleontological mitigation is considered equivalent to a graduate degree), in combination with 2 years (or 50 projects) of demonstrated professional experience and competency with paleontological resource mitigation projects at the level of field supervisor. [Murphey et al. 2019]



FINAL ADDENDUM PALEONTOLOGICAL RESOURCE ASSESSMENT FOR THE CALIFORNIA DEPARTMENT OF PARKS AND RECREATION BOWTIE PARK DEVELOPMENT PROJECT, LOS ANGELES, CALIFORNIA

1.0 Introduction

1.0 INTRODUCTION

In September 2022, Stantec Consulting Services Inc. (Stantec) conducted a paleontological resources assessment on behalf of the Nature Conservancy for the Bowtie Demonstration Project on portions of approximately 3.2 acres of land in the Bowtie parcel in the City of Los Angeles (the City), California. The Bowtie Development Project (the Project) encompasses the entire 18-acre Bowtie Parcel and is led by California Department of Parks and Recreation (State Parks). The current paleontological study was conducted in support of the Bowtie Development Project occurring on the entire 18-acre parcel using the data and research generated for the previous 3.2-acre parcel.

The proposed Project is subject to compliance with the California Environmental Quality Act (CEQA) and the City requirements regarding the Project's potential impacts on paleontological resources. As part of this compliance, a paleontological resources assessment was conducted to assess potential impacts of the proposed Project on paleontological resources.

1.1 PROJECT DESCRIPTION

The Bowtie parcel (the Project Area) is an 18-acre strip of land located on the east bank of the Los Angeles River in northeast Los Angeles and is a sub-unit of Rio de Los Angeles State Park. The Project will transform a neglected brownfield into a vibrant public green space providing the surrounding communities and the greater city of Los Angeles with much-needed outdoor recreation opportunities and access to the Los Angeles River. The Bowtie parcel was a part of Taylor Yard, which was the primary switching yard for freight operations on the Southern Pacific Railroad in the Los Angeles area. Taylor Yard is comprised of several parcels, of which the Bowtie parcel is referenced as the G1 parcel. Vehicles enter the parcel by an entrance off Kerr Street on the northern portion of the Project Area. Project implementation will require soil remediation to address previous site contamination associated with the former use as a railroad maintenance facility. Park improvements would consist of the construction of a park entry, an internal vehicular access road, parking lots, trails and boardwalks, open native grass or turf areas, native habitat plantings, restrooms, a welcome area, and picnic tables and benches. The Bowtie Project will create a direct connection and access to the Glendale Narrows section of the Los Angeles River and complements two additional projects planned for the site by creating and facilitating access among these projects: the Stormwater Demonstration Project (in partnership with the Nature Conservancy) and the Paseo del Rio Riverfront Trail Project (in partnership with the Mountains Recreation and Conservancy Authority and the City).

Additional goals of the Project are to increase outdoor recreational park space to underserved and economically disadvantaged residents in the Project vicinity; provide an experience of urban river and habitat restoration for the local community as well as for the region, nation, and globe; reestablish access to the river for indigenous communities who regard the area as a sacred land; restore and enhance



FINAL ADDENDUM PALEONTOLOGICAL RESOURCE ASSESSMENT FOR THE CALIFORNIA DEPARTMENT OF PARKS AND RECREATION BOWTIE PARK DEVELOPMENT PROJECT, LOS ANGELES, CALIFORNIA

1.0 Introduction

natural habitat along the Los Angeles River, including wetlands to attract birds and wildlife; provide educational opportunities with respect to historical, cultural, and environmental considerations; and advance the goals of the Statewide Comprehensive Outdoor Recreation Plan. Policy documents, including the Rio de Los Angeles General Plan and Los Angeles River Master Plan, have acknowledged the need for a reimagined and revitalized Los Angeles River and is a critical component of fulfilling the ecosystem restoration goals identified in the U.S. Army Corps of Engineers Los Angeles River Ecosystem Restoration Feasibility Study.

The site includes utility rights of way and easements held by the City, Los Angeles County Flood Control District, Southern Pacific Telecommunications Company, and Southern Pacific Railroad. Due diligence research shows these easements do not impact the ability to develop the Bowtie as a natural open space park and they can be integrated seamlessly into the design of the park.

Because the Bowtie parcel is located along the Pacific Flyway, a critical migratory bird path, the park's plant palette will be predominately native with an emphasis on habitat for wildlife. Park infrastructure will include utilities, lighting, fencing, and security measures.

1.2 PROJECT LOCATION

The proposed Project is located in Los Angeles, California, bound by California State Route 2 to the northwest, the Union Pacific Railroad to the north and east, and the Los Angeles River to the south and west, between the communities of Glassell Park and Elysian Valley, approximately 0.5 miles northeast of the Interstate 5 and Glendale Freeway intersection (Figure 1). The Project Area is located on Los Angeles County Assessor Parcel Numbers 5442-002-914 and 5442-002-825. Specifically, the Project Area is located in portions of Section 4, Township 1 South, Range 13 West, as depicted on the Los Angeles, California United States Geological Survey 7.5-minute series topographic quadrangle, on lands owned by California State Parks.

1.3 PALEONTOLOGICAL RESOURCES

Fossils are any evidence of ancient life. This includes the remains of the body of an organism, such as bones, skin impressions, shell, or leaves, as well as traces of an organism's activity, such as footprints or burrows, called trace fossils. In addition to the fossils themselves, geologic context is an important component of paleontological resources, and includes the stratigraphic placement of the fossil as well as the lithology of the rock in order to assess paleoecologic setting, depositional environment, and taphonomy. Fossils are protected by federal, state, and local regulations as nonrenewable natural resources.

While CEQA does not define a significance threshold for paleontological resources, the standards of the Society of Vertebrate Paleontology (SVP) are often used in the absence of a legal definition of significance. The SVP defines significant paleontological resources as:



**FINAL ADDENDUM PALEONTOLOGICAL RESOURCE ASSESSMENT FOR THE CALIFORNIA
DEPARTMENT OF PARKS AND RECREATION BOWTIE PARK DEVELOPMENT PROJECT, LOS
ANGELES, CALIFORNIA**

1.0 Introduction

identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological



FINAL ADDENDUM PALEONTOLOGICAL RESOURCE ASSESSMENT FOR THE CALIFORNIA DEPARTMENT OF PARKS AND RECREATION BOWTIE PARK DEVELOPMENT PROJECT, LOS ANGELES, CALIFORNIA

1.0 Introduction

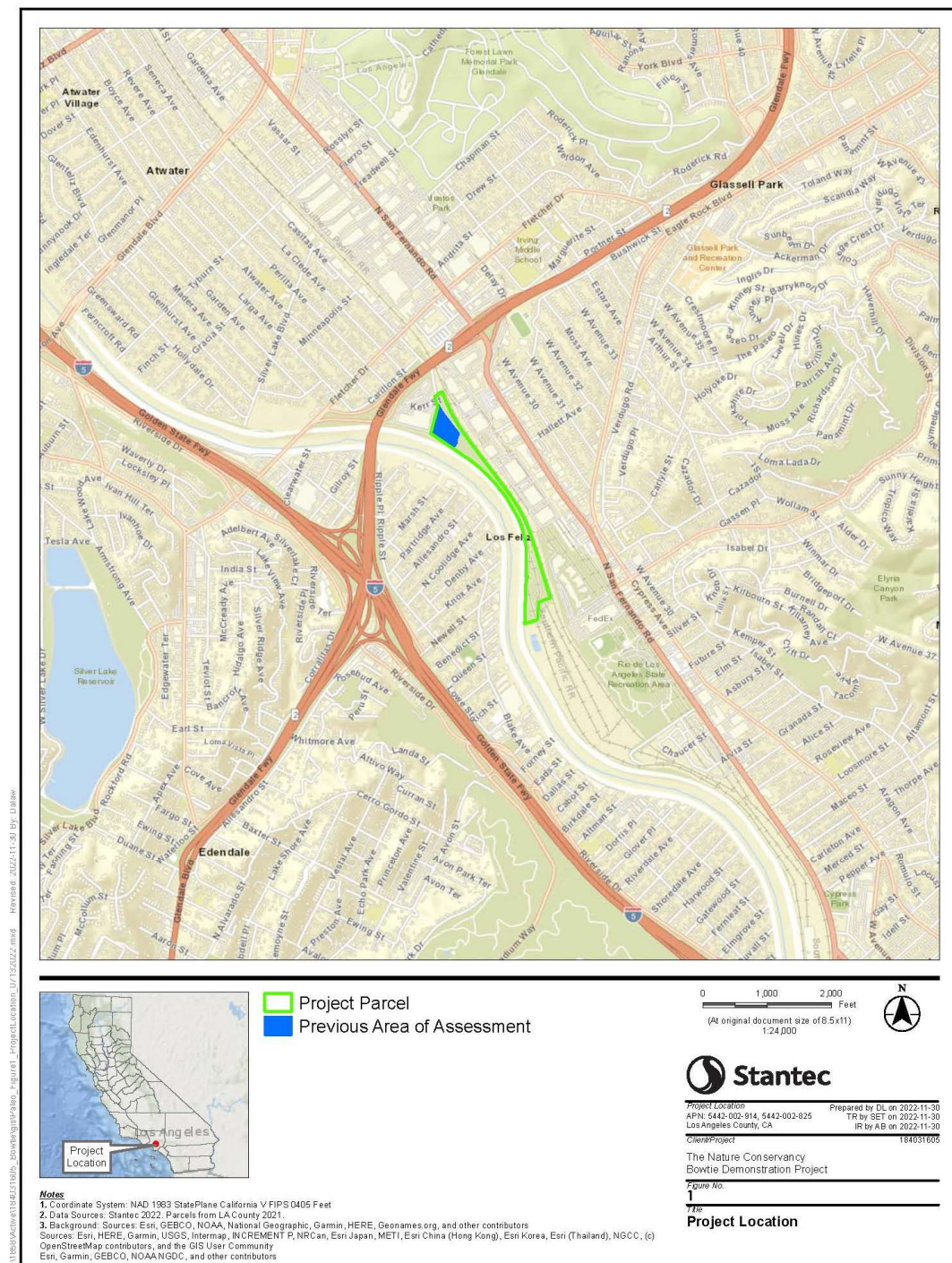


Figure 1. Project Location



FINAL ADDENDUM PALEONTOLOGICAL RESOURCE ASSESSMENT FOR THE CALIFORNIA DEPARTMENT OF PARKS AND RECREATION BOWTIE PARK DEVELOPMENT PROJECT, LOS ANGELES, CALIFORNIA

1.0 Introduction

resources are considered to be older than recorded human history and/or older than middle Holocene (i. e., older than about 5,000 radiocarbon years). [SVP 2010: 11].

Furthermore, the Paleontological Resources Preservation Act (PRPA) defines paleontological resources as:

Any fossilized remains, traces, or imprints of organisms, preserved in or on the earth's crust, that are of paleontological interest and that provide information about the history of life on earth, except that the term does not include— (A) any materials associated with an archaeological resource (as defined in section 3(1) of the Archaeological Resources Protection Act of 1979 (16 U.S.C. 470bb(1)); or (B) any cultural item (as defined in section 2 of the Native American Graves Protection and Repatriation Act (25 U.S.C. 3001)). [PRPA Sec. 6301]

Using this definition, the concept of scientific importance, or significance, is included in the definition of paleontological resources; thus, not all fossils are considered to be paleontological resources under the PRPA.

It should be noted that the threshold for significance varies with a variety of factors, including geologic unit, geographic area, and the current state of scientific research, and may also vary between different agencies (Murphey et al. 2019). Numerous paleontological studies have developed criteria for the assessment of significance for fossil discoveries (e.g., Eisentraut and Cooper 2002, Murphey et al. 2019, Murphey and Daitch 2007, Scott and Springer 2003). In general, these studies assess fossils as significant if one or more of the following criteria apply:

- The fossils provide information on the evolutionary relationships and developmental trends among organisms, living or extinct.
- The fossils provide data useful in determining the age(s) of the rock unit or sedimentary stratum, including data important in determining the depositional history of the region and the timing of geologic events, through biochronology or biostratigraphy and the correlation with isotopic dating.
- The fossils provide ecological data, such as the development of biological communities, the interaction between paleobotanical and paleozoological biotas, or the biogeography of lineages.
- The fossils demonstrate unusual or spectacular circumstances in the history of life.
- The fossils provide information on the preservational pathways of paleontological resources, including taphonomy, diagenesis, or preservational biases in the fossil record.
- The fossils are in short supply and/or in danger of being depleted or destroyed by the elements, vandalism, or commercial exploitation, and are not found in other geographic locations.



FINAL ADDENDUM PALEONTOLOGICAL RESOURCE ASSESSMENT FOR THE CALIFORNIA DEPARTMENT OF PARKS AND RECREATION BOWTIE PARK DEVELOPMENT PROJECT, LOS ANGELES, CALIFORNIA

2.0 Regulatory Framework

- The fossils inform our understanding of anthropogenic affects to global environments or climate.

A geologic unit known to contain significant paleontological resources is considered sensitive to adverse impacts if there is a high probability that earth-moving or ground-disturbing activities in that rock unit will either disturb or destroy fossil remains directly or indirectly. This definition of sensitivity differs fundamentally from the definition for archaeological resources as follows:

It is extremely important to distinguish between archaeological and paleontological (fossil) resource sites when defining the sensitivity of rock units. The boundaries of archaeological sites define the areal extent of the resource. Paleontological sites, however, indicate that the containing sedimentary rock unit or formation is fossiliferous. The limits of the entire rock formation, both areal and stratigraphic, therefore define the scope of the paleontological potential in each case. [Society of Vertebrate Paleontology [SVP] 2010: 2].

Many archaeological sites contain features that are visually detectable on the surface. In contrast, fossils are often contained within surficial sediments or bedrock and are therefore not observable or detectable unless exposed by erosion or human activity.

In summary, in the absence of observable paleontological resources on the surface, paleontologists must assess the potential of geologic units as a whole to yield paleontological resources based on their known potential to produce significant fossils elsewhere. Monitoring by experienced paleontologists greatly increases the probability that fossils will be discovered during ground-disturbing activities and that, if these remains are significant, successful mitigation and salvage efforts may be undertaken to prevent adverse impacts to these resources.

2.0 REGULATORY FRAMEWORK

California has enacted multiple laws and regulations that provide for the protection of paleontological resources. This investigation was conducted to meet these requirements regarding paleontological resources on the lands proposed for development.

2.1 STATE OF CALIFORNIA

2.1.1 California Environmental Quality Act

CEQA (Public Resources Code Sections 21000 et seq) requires that before approving most discretionary projects, the Lead Agency must identify and examine any significant adverse environmental effects that may result from activities associated with such projects. As updated in 2016, CEQA separates the consideration of paleontological resources from cultural resources (Public Resources Code Section 21083.09). The Appendix G checklist (Title 14, Division 6, Chapter 3, California Code of Regulations



FINAL ADDENDUM PALEONTOLOGICAL RESOURCE ASSESSMENT FOR THE CALIFORNIA DEPARTMENT OF PARKS AND RECREATION BOWTIE PARK DEVELOPMENT PROJECT, LOS ANGELES, CALIFORNIA

1.0

15000 et seq.) requires an answer to the question, “Will the proposed project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?” Under these requirements, Stantec has conducted a paleontological resources assessment to determine impacts of the proposed project on paleontological resources within the Project Area.

2.1.2 Public Resources Code

The California Public Resources Code (Chapter 1.7, Sections 5097 and 30244) includes additional state-level requirements for the assessment and management of paleontological resources. These statutes require reasonable mitigation of adverse impacts to paleontological resources resulting from development on state lands, define the removal of paleontological sites or features from state lands as a misdemeanor, and prohibit the removal of any paleontological site or feature from state land without permission of the applicable jurisdictional agency.

3.0 PROFESSIONAL STANDARDS

The SVP (2010), the Bureau of Land Management (2008, 2016), and a number of scientific studies (Eisentraut and Cooper 2002; Murphey et al. 2019; Scott and Springer 2003) have developed guidelines for professional qualifications, conducting paleontological assessments, and developing mitigation measures for the protection of paleontological resources. These guidelines are broadly similar, and include the use of museum records searches, scientific literature reviews, and, in some cases, field surveys to assess the potential of an area to preserve paleontological resources. Should that potential be high, accepted mitigation measures include paleontological monitoring, data recordation of all fossils encountered, collection and curation of significant fossils and associated data, and in some cases screening of sediment for microfossils.

This study has been conducted in accordance with these guidelines and the recommendations provided herein meet these standards. This report uses the paleontological potential scale developed by the SVP (2010):

High Potential. Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered are considered to have a high potential for containing additional significant paleontological resources. Rock units classified as having high potential for producing paleontological resources include, but are not limited to, sedimentary formations that are temporally or lithologically suitable for the preservation of fossils (e. g., middle Holocene and older, fine-grained fluvial sandstones, argillaceous and carbonate-rich paleosols, cross-bedded point bar sandstones, fine-grained marine sandstones, etc.), some volcanoclastic formations (e. g., ashes or tephros), and some low-grade metamorphic rocks.

Undetermined Potential. Rock units for which little information is available in the literature or museum records concerning their paleontological content, geologic age, and depositional



FINAL ADDENDUM PALEONTOLOGICAL RESOURCE ASSESSMENT FOR THE CALIFORNIA DEPARTMENT OF PARKS AND RECREATION BOWTIE PARK DEVELOPMENT PROJECT, LOS ANGELES, CALIFORNIA

4.0 Geologic Setting

environment are considered to have undetermined potential. Further study and field work is necessary to determine if these rock units have high or low potential to contain significant paleontological resources.

Low Potential. Rock units that are poorly represented by fossil specimens in institutional collections or based on general scientific consensus, only preserve fossils in rare circumstances (e. g., basalt flows or Recent colluvium) have low paleontological potential.

No Potential. Some rock units have no potential to contain significant paleontological resources, for instance high-grade metamorphic rocks (such as gneisses and schists) and plutonic igneous rocks (such as granites and diorites).

4.0 GEOLOGIC SETTING

The Project Area is located in the Los Angeles Basin, a structural depression approximately 50 miles long and 20 miles wide in the northernmost Peninsular Ranges geomorphic province and just to the south of the Transverse Ranges geomorphic province (Ingersoll and Rumelhart 1999). The Los Angeles Basin developed as a result of tectonic forces and the San Andreas fault zone, with subsidence occurring 18 to 3 million years ago (Ma) (Critelli et al. 1995). While sediments dating back to the Cretaceous (66 Ma) are preserved in the basin, continuous sedimentation began in the middle Miocene (around 13 Ma) (Yerkes et al. 1965). Since that time, sediments have been eroding into the basin from the surrounding highlands, resulting in thousands of feet of accumulation (Yerkes et al. 1965). Most of these sediments are marine, until sea level dropped in the Pleistocene and deposition of the terrestrial alluvial sediments that compose the uppermost units in the Los Angeles Basin began.

The Los Angeles Basin is subdivided into four structural blocks, with the Project Area occurring in the Central Block, where sediments range from 32,000 to 35,000 feet thick (Yerkes et al. 1965). The Central Block is wedge-shaped, extending from the Santa Monica Mountains in the northwest, where it is about 10 miles wide, to the San Joaquin Hills to the southeast, where it widens to around 20 miles across (Yerkes et al. 1965).

5.0 METHODOLOGY

Stantec conducted an assessment of potential impacts from the Project on paleontological resources. This assessment is based on a previous analysis of existing data conducted by Stantec (2022) for a 3.2-acre portion of the larger Bowtie parcel. This previous assessment used a records search from the Natural History Museum of Los Angeles County (LACM) as well as a review of the relevant scientific literature and the most recent geologic mapping to assess the paleontological potential of the geologic units mapped at the surface or expected to be present in the subsurface, using the paleontological



FINAL ADDENDUM PALEONTOLOGICAL RESOURCE ASSESSMENT FOR THE CALIFORNIA DEPARTMENT OF PARKS AND RECREATION BOWTIE PARK DEVELOPMENT PROJECT, LOS ANGELES, CALIFORNIA

5.0 Methodology

potential scale of the SVP (2010) (Stantec 2022). For the current impacts assessment, Stantec reviewed geologic data to confirm the previous study was applicable to the larger Project Area currently under assessment and then reviewed currently available Project plans to assess what, if any, impacts the Project might pose to paleontological resources.

The paleontological impacts assessment presented here was conducted by Stantec Principal Paleontologist Alyssa Bell, Ph.D. Geographic Information System (GIS) maps and figures were drafted by GIS technician Danny Law, B.S. This report was authored by Alyssa Bell and Paleontologist Ben Kerridge, M.A. and peer reviewed by Business Center Practice Leader Geraldine Aron, M.S. Senior Principal Scientist Michael Weber coordinated all work and provided quality assurance and control of this report.

5.1 RESULTS OF PREVIOUS ANALYSIS

The previous assessment by Stantec (2022) determined two geologic units were present in that portion of the Bowtie parcel, alluvial fan deposits at the surface underlain by the Puente Formation, with variable amounts of artificial fill present at the surface to depths of as much as 4 feet below ground surface (bgs). Stantec (2022) assessed the alluvial fan deposits as having low paleontological potential at the surface, transitioning to high potential at an estimated 10 feet bgs. The Puente Formation was assessed as having high paleontological potential and is likely present at depths of greater than 51 feet bgs (based on the results of the geotechnical studies) (Stantec 2022).

These paleontological potential assessments are used in the impacts assessment presented here for the current Project.

5.2 PALEONTOLOGICAL RESOURCES IMPACTS ASSESSMENT

Impacts to paleontological resources can be classified as direct, indirect, or cumulative. Impacts can also be considered as adverse impacts or as positive impacts. Direct adverse impacts on paleontological resources are the result of damage or destruction of these nonrenewable resources by surface disturbing actions including construction excavations. Therefore, in areas that contain paleontologically sensitive geologic units, ground disturbance has the potential to adversely impact paleontological resources, by damaging or destroying them and rendering them permanently unavailable to science and society. Positive direct impacts; however, may result when paleontological resources are identified during construction and the appropriately documented and salvaged, thus ensuring the specimens are protected for future study and education.

Indirect adverse impacts typically include those effects which result from the continuing implementation of management decisions and resulting activities, including normal ongoing operations of facilities constructed within a given Project Area. They also occur as the result of the construction of new roads and trails in areas that were previously less accessible. This increases public access and therefore increases the likelihood of the loss of paleontological resources through vandalism and unlawful



FINAL ADDENDUM PALEONTOLOGICAL RESOURCE ASSESSMENT FOR THE CALIFORNIA DEPARTMENT OF PARKS AND RECREATION BOWTIE PARK DEVELOPMENT PROJECT, LOS ANGELES, CALIFORNIA

6.0 RESULTS

collecting, thus constituting an adverse indirect impact. Human activities that increase erosion also cause indirect impacts to surface and subsurface fossils as the result of exposure, transport, weathering, and reburial.

Cumulative adverse impacts can result from incrementally minor but collectively significant actions taking place over time. The incremental loss of paleontological resources over time from construction-related surface disturbance or vandalism and unlawful collection would represent a significant cumulative adverse impact, because it would result in the destruction of non-renewable paleontological resources and the associated irretrievable loss of scientific information.

Positive impacts can result from the preservation of significant paleontological resources identified during construction, a direct impact, or following Project activities, an indirect impact. By successfully identifying, salvaging, and curating significant paleontological resources in a federally accredited repository, they are preserved in perpetuity and may contribute to scientific understanding and public education and awareness.

The impact assessment conducted here takes into consideration all planned project activities in terms of aerial and subsurface extents, including the possibility of subsurface geologic units having a different paleontological potential than surficial units. For example, younger surficial sediments (alluvium, lacustrine, eolian, etc.) have low potential to preserve fossil resources due to their age; yet sediments increase in age with depth and so these surficial deposits often overly older units that have high paleontological potential. In areas with this underlying geologic setting surficial work may be of low risk for impacting paleontological resources while activities that require excavations below the depth of the surficial deposits would be at greater risk of impacting paleontological resources. For this reason, the impact assessment takes into consideration both the surface and subsurface geology and is tailored to Project activities.

6.0 RESULTS

The results of the paleontological resources assessment are described below.

6.1 PROJECT AREA GEOLOGY AND PALEONTOLOGY

A review of geologic mapping indicates that the entirety of the Bowtie parcel is mapped as alluvial fan deposits (Yerkes and Campbell 2005), as for the smaller parcel previously assessed (Stantec 2022) (Figure 2). Given the overall similarity of the geologic mapping, the results of the previous assessment (Stantec 2022) are applicable to the larger Bowtie parcel that constitutes the current Project area and additional analysis is not needed.



6.0 RESULTS

6.2 POTENTIAL IMPACTS TO PALEONTOLOGICAL RESOURCES FROM PROJECT ACTIVITIES

The Project plans to construct a park entry, an internal vehicular access road, parking lots, trails and boardwalks, open native grass or turf areas, native habitat plantings, restrooms, a welcome area, and picnic tables and benches. Specific construction plans for ground disturbance depths and methods are not currently available for review.

Of these activities, those that entail ground disturbance over 10 feet in depth may extend into the high sensitivity, older layers of alluvium. Such disturbances therefore risk posing a direct adverse impact to paleontological resources. Following construction, operations and maintenance are not expected to pose an impact to resources. Because this Project has the potential to cause direct adverse impacts, Stantec has developed recommendations for mitigating these impacts, presented below.



FINAL ADDENDUM PALEONTOLOGICAL RESOURCE ASSESSMENT FOR THE CALIFORNIA DEPARTMENT OF PARKS AND RECREATION BOWTIE PARK DEVELOPMENT PROJECT, LOS ANGELES, CALIFORNIA

6.0 RESULTS

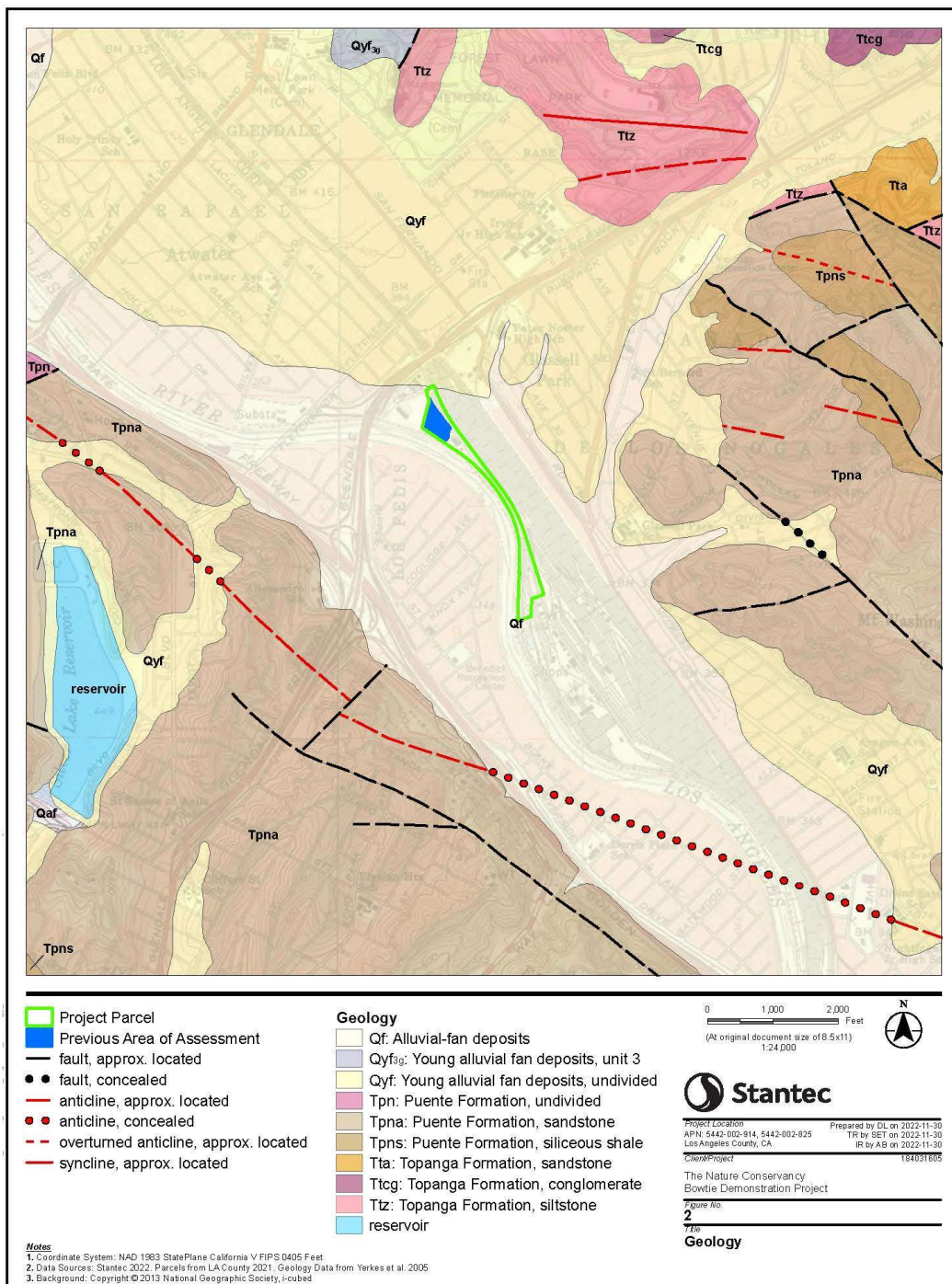


Figure 2. Geologic Map of Project Area



7.0 Recommendations and Management Considerations

7.0 RECOMMENDATIONS AND MANAGEMENT CONSIDERATIONS

As part of the current paleontological impacts assessment, a previous analysis of the paleontological potential of geologic units in the Bowtie parcel (Stantec 2022) was used to assess the potential of the Project to impact paleontological resources.

The results of this assessment show that should Project activities extend to depths of 10 feet bgs or greater, they may encounter geologic units with high paleontological potential. Should Project-related activities encounter paleontological resources in these deeper units, the damage or destruction of those resources would constitute a direct adverse impact under CEQA. In order to adhere to state and City guidelines regarding paleontological resources, Stantec recommends the following:

1. A paleontologist shall be retained as the project paleontologist to oversee all aspects of paleontological mitigation, including the development and implementation of a Paleontological Monitoring and Mitigation Plan (PMMP) tailored to the Project plans that provides for paleontological monitoring of earthwork and ground disturbing activities into undisturbed geologic units with high paleontological potential to be conducted by a paleontological monitor meeting industry standards (Murphey et al. 2019). The PMMP should also include provisions for a Workers' Environmental Awareness Program training that communicates requirements and procedures for the inadvertent discovery of paleontological resources during construction, to be delivered by the paleontological monitor to the construction crew prior to the onset of ground disturbance.
2. Paleontological monitoring will be conducted by a qualified paleontological monitor for ground disturbance that exceeds 10 feet in depth across the Project Area. The project paleontologist may reduce the frequency of monitoring or spot checks should subsurface conditions indicate low paleontological potential.
3. Should a potential paleontological resource be identified in the Project Area, whether by the monitor or a member of the construction crew, work should halt in a safe radius around the find (usually 50 feet) until the project paleontologist can assess the find and, if significant, salvage the fossil for laboratory preparation and curation at the Natural History Museum of Los Angeles County.

These recommendations meet the standards of the SVP (2010) and conform to industry best practices (e.g., Murphey et al. 2019; Scott and Springer 2003). Based on the findings in this study the proposed project will not cause an adverse impact to paleontological resources with the incorporation of the above mitigation recommendations. Therefore, no additional paleontological resources studies are recommended or required at this time. Should the project location or plans change, this assessment will need to be revised to address those changes.



FINAL ADDENDUM PALEONTOLOGICAL RESOURCE ASSESSMENT FOR THE CALIFORNIA DEPARTMENT OF PARKS AND RECREATION BOWTIE PARK DEVELOPMENT PROJECT, LOS ANGELES, CALIFORNIA

8.0 References

8.0 REFERENCES

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APPENDIX F

Noise Assessment

BASELINE NOISE MEASUREMENTS

Site Number: 1			
Recorded By: Lindsay Liegler			
Job Number: 2022-270.01			
Date: 1/31/2023			
Time: 10:08 a.m. – 10:23 a.m.			
Location: On the parkway, south of the intersection of Carillon Street and La Clede Avenue			
Source of Peak Noise: Vehicles on Highway 2 and Carillon Street; neighborhood noises			
Noise Data			
Leq (dB)	Lmin (dB)	Lmax (dB)	Peak (dB)
61.2	51.7	76.8	100.9

Equipment						
Category	Type	Vendor	Model	Serial No.	Cert. Date	Note
Sound	Sound Level Meter	Larson Davis	LxT SE	0005120	11/29/2021	
	Microphone	Larson Davis	377B02	334361	11/30/2021	
	Preamp	Larson Davis	PRMLxT1L	042852	11/30/2021	
	Calibrator	Larson Davis	CAL200	14105	11/10/2021	
Weather Data						
Est.	Duration: 15 mins			Sky: Clear		
	Note: dBA Offset = 0.11			Sensor Height (ft): 3.5 feet		
	Wind Ave Speed (mph)		Temperature (degrees Fahrenheit)		Barometer Pressure (hPa)	
	5		56		30.12	

Photo of Measurement Location



Measurement Report

Report Summary

Meter's File Name	LxT_Data.460.s		Computer's File Name	LxTse_0005120-20230131 100822-LxT_Data.460.ldbin	
Meter	LxT SE	0005120			
Firmware	2.404				
User					
Job Description					
Note					
Start Time	2023-01-31 10:08:22	Duration	0:15:00.2		
End Time	2023-01-31 10:23:22	Run Time	0:15:00.2	Pause Time	0:00:00.0

Results

Overall Metrics

LA _{eq}	61.2 dB		
LA _E	90.8 dB	SEA	--- dB
EA	132.7 μPa²h		
LZ _{peak}	100.9 dB	2023-01-31 10:09:28	
LA _{Smax}	76.8 dB	2023-01-31 10:13:39	
LA _{Smin}	51.7 dB	2023-01-31 10:22:19	
LA _{eq}	61.2 dB		
LC _{eq}	73.1 dB	LC _{eq} - LA _{eq}	11.9 dB
LA _{Ieq}	67.6 dB	LA _{Ieq} - LA _{eq}	6.3 dB

Exceedances

	Count	Duration
--	-------	----------

L _{AS} > 85.0 dB	0	0:00:00.0
L _{AS} > 115.0 dB	0	0:00:00.0
L _{Zpeak} > 135.0 dB	0	0:00:00.0
L _{Zpeak} > 137.0 dB	0	0:00:00.0
L _{Zpeak} > 140.0 dB	0	0:00:00.0

Community Noise	LDN	LDay	LNight	
	61.2 dB	61.2 dB	0.0 dB	
	LDEN	LDay	LEve	LNight
	61.2 dB	61.2 dB	--- dB	--- dB

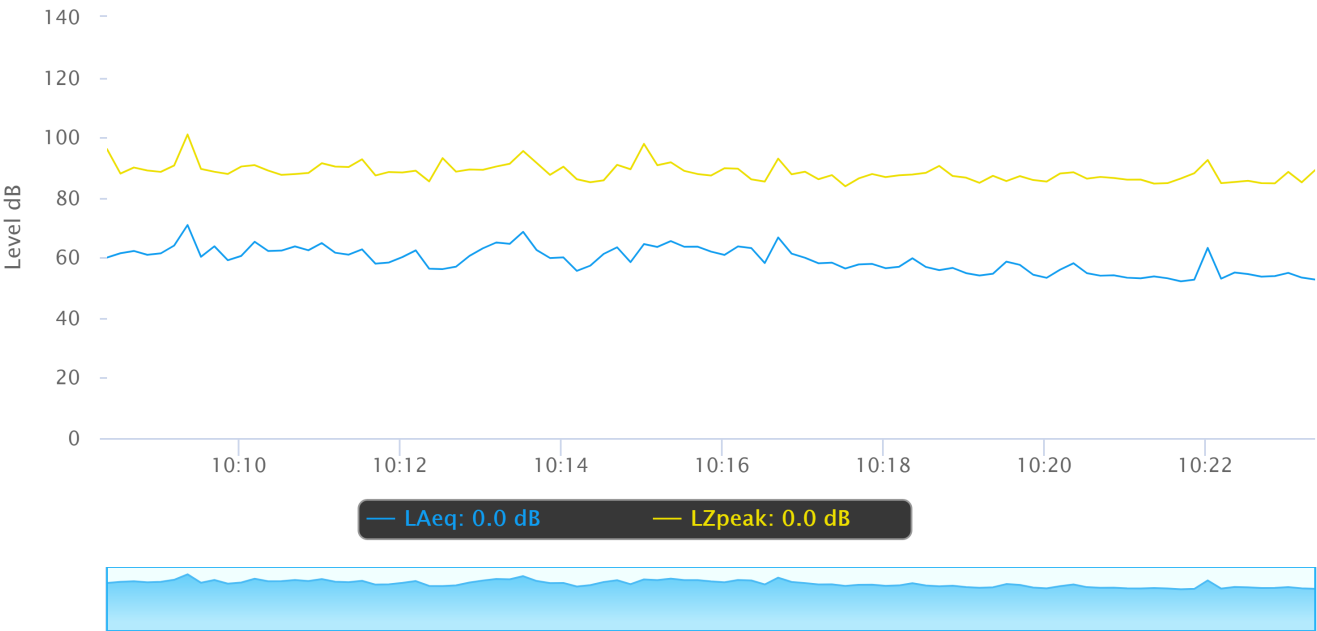
Any Data	A	C		Z		
	Level	Time Stamp	Level	Time Stamp	Level	Time Stamp
L _{eq}	61.2 dB		73.1 dB		--- dB	
L _S (max)	76.8 dB	2023-01-31 10:13:39	--- dB		--- dB	
L _S (min)	51.7 dB	2023-01-31 10:22:19	--- dB		--- dB	
L _{Peak} (max)	--- dB		--- dB		100.9 dB	2023-01-31 10:09:28

Overloads	Count	Duration	OBA Count	OBA Duration
	0	0:00:00.0	9	0:00:28.0

Statistics

LAS 5.0	66.3 dB
LAS 10.0	64.5 dB
LAS 33.3	60.4 dB
LAS 50.0	58.2 dB
LAS 66.6	56.4 dB
LAS 90.0	53.7 dB

Time History



Site Number: 2			
Recorded By: Lindsay Liegler			
Job Number: 2022-270.01			
Date: 1/31/2023			
Time: 10:30 a.m. – 10:45 a.m.			
Location: End of cul-de-sac along Marsh Street			
Source of Peak Noise: Skateboarding activities at adjacent Marsh Skate Park			
Noise Data			
Leq (dB)	Lmin (dB)	Lmax (dB)	Peak (dB)
58.0	45.9	72.5	103.7

Equipment						
Category	Type	Vendor	Model	Serial No.	Cert. Date	Note
Sound	Sound Level Meter	Larson Davis	LxT SE	0005120	11/29/2021	
	Microphone	Larson Davis	377B02	334361	11/30/2021	
	Preamp	Larson Davis	PRMLxT1L	042852	11/30/2021	
	Calibrator	Larson Davis	CAL200	14105	11/10/2021	
Weather Data						
Est.	Duration: 15 mins			Sky: Clear		
	Note: dBA Offset = 0.11			Sensor Height (ft): 3.5 feet		
	Wind Ave Speed (mph)		Temperature (degrees Fahrenheit)		Barometer Pressure (hPa)	
	5		56		30.12	

Photo of Measurement Location



Measurement Report

Report Summary

Meter's File Name	LxT_Data.461.s	Computer's File Name	LxTse_0005120-20230131 103042-LxT_Data.461.ldbin		
Meter	LxT SE	0005120			
Firmware	2.404				
User				Location	
Job Description					
Note					
Start Time	2023-01-31 10:30:42	Duration	0:15:00.1		
End Time	2023-01-31 10:45:42	Run Time	0:15:00.1	Pause Time	0:00:00.0

Results

Overall Metrics

L _{Aeq}	58.0 dB		
L _{AE}	87.5 dB	SEA	--- dB
EA	62.9 µPa²h		
L _{Zpeak}	103.7 dB	2023-01-31 10:34:45	
L _{ASmax}	72.5 dB	2023-01-31 10:32:31	
L _{ASmin}	45.9 dB	2023-01-31 10:42:07	
L _{Aeq}	58.0 dB		
L _{Ceq}	68.5 dB	L _{Ceq} - L _{Aeq}	10.5 dB
L _{AIeq}	66.1 dB	L _{AIeq} - L _{Aeq}	8.2 dB

Exceedances

	Count	Duration
L _{AS} > 85.0 dB	0	0:00:00.0
L _{AS} > 115.0 dB	0	0:00:00.0
L _{Zpeak} > 135.0 dB	0	0:00:00.0
L _{Zpeak} > 137.0 dB	0	0:00:00.0
L _{Zpeak} > 140.0 dB	0	0:00:00.0

Community Noise

Community Noise	LDN	LDay	LNight	
	58.0 dB	58.0 dB	0.0 dB	
	LDEN	LDay	LEve	LNight
	58.0 dB	58.0 dB	--- dB	--- dB

Any Data

A	C	Z
Level	Level	Level
L _{eq}	58.0 dB	68.5 dB
L _{S(max)}	72.5 dB	--- dB
L _{S(min)}	45.9 dB	--- dB
L _{Peak(max)}	--- dB	103.7 dB
		2023-01-31 10:34:45

Overloads

Count	Duration	OBA Count	OBA Duration
0	0:00:00.0	12	0:00:32.3

Statistics

L _{AS} 5.0	63.1 dB
L _{AS} 10.0	61.5 dB
L _{AS} 33.3	57.0 dB
L _{AS} 50.0	54.5 dB
L _{AS} 66.6	52.2 dB
L _{AS} 90.0	49.0 dB

Site Number: 3			
Recorded By: Lindsay Liegler			
Job Number: 2022-270.01			
Date: 1/31/2023			
Time: 10:51 a.m. – 11:06 a.m.			
Location: On sidewalk at northern intersection of Knox Avenue and Blake Avenue			
Source of Peak Noise: Vehicles along Know Avenue and Blake Avenue			
Noise Data			
Leq (dB)	Lmin (dB)	Lmax (dB)	Peak (dB)
52.5	41.7	80.0	96.9

Equipment						
Category	Type	Vendor	Model	Serial No.	Cert. Date	Note
Sound	Sound Level Meter	Larson Davis	LxT SE	0005120	11/29/2021	
	Microphone	Larson Davis	377B02	334361	11/30/2021	
	Preamp	Larson Davis	PRMLxT1L	042852	11/30/2021	
	Calibrator	Larson Davis	CAL200	14105	11/10/2021	
Weather Data						
Est.	Duration: 15 mins			Sky: Clear		
	Note: dBA Offset = 0.11			Sensor Height (ft): 3.5 feet		
	Wind Ave Speed (mph)		Temperature (degrees Fahrenheit)		Barometer Pressure (hPa)	
	5		56		30.12	

Photo of Measurement Location



Measurement Report

Report Summary

Meter's File Name	LxT_Data.462.s		Computer's File Name	LxTse_0005120-20230131 105154-LxT_Data.462.ldbin		
Meter	LxT SE	0005120				
Firmware	2.404					
User						Location
Job Description						
Note						
Start Time	2023-01-31 10:51:54		Duration	0:14:55.6		
End Time	2023-01-31 11:06:49		Run Time	0:14:55.6	Pause Time 0:00:00.0	

Results

Overall Metrics

LA _{eq}	52.5 dB		
LAE	82.1 dB	SEA	--- dB
EA	17.9 μPa²h		
LZ _{peak}	96.9 dB	2023-01-31 11:01:40	
LAS _{max}	80.0 dB	2023-01-31 10:51:54	
LAS _{min}	41.7 dB	2023-01-31 10:53:24	
LA _{eq}	52.5 dB		
LC _{eq}	66.0 dB	LC _{eq} - LA _{eq}	13.4 dB
LAI _{eq}	57.7 dB	LAI _{eq} - LA _{eq}	5.2 dB

Exceedances

Count

Duration

L _{AS} > 85.0 dB	0	0:00:00.0
L _{AS} > 115.0 dB	0	0:00:00.0
L _{Zpeak} > 135.0 dB	0	0:00:00.0
L _{Zpeak} > 137.0 dB	0	0:00:00.0
L _{Zpeak} > 140.0 dB	0	0:00:00.0

Community Noise

LDN

LDay

LNight

52.5 dB

52.5 dB

0.0 dB

LDEN

LDay

LEve

LNight

52.5 dB

52.5 dB

--- dB

--- dB

Any Data

A

C

Z

	Level	Time Stamp	Level	Time Stamp	Level	Time Stamp
L _{eq}	52.5 dB		66.0 dB		--- dB	
L _{S(max)}	80.0 dB	2023-01-31 10:51:54	--- dB		--- dB	
L _{S(min)}	41.7 dB	2023-01-31 10:53:24	--- dB		--- dB	
L _{Peak(max)}	--- dB		--- dB		96.9 dB	2023-01-31 11:01:40

Overloads

Count

Duration

OBA Count

OBA Duration

0

0:00:00.0

2

0:00:05.9

Statistics

L _{AS} 5.0	56.8 dB
L _{AS} 10.0	53.4 dB
L _{AS} 33.3	48.3 dB
L _{AS} 50.0	46.6 dB
L _{AS} 66.6	45.1 dB
L _{AS} 90.0	43.2 dB

Site Number: 4 – Long Term			
Recorded By: Lindsay Liegler			
Job Number: 2022-270.01			
Date: 1/31/2023 – 2/1/2023			
Time: 11:21 a.m. – 11:21 a.m.			
Location: ~300 feet south of Kern Street. In northern area of Project Site			
Source of Peak Noise: Industrial activity to the West, train tracks to the east			
Noise Data			
CNEL (dB)	Lmin (dB)	Lmax (dB)	L_{eq} (dB)
64.1	46.3	89.5	57.4

Equipment						
Category	Type	Vendor	Model	Serial No.	Cert. Date	Note
Sound	Sound Level Meter	Larson Davis	LxT SE	0005120	11/29/2021	
	Microphone	Larson Davis	377B02	334361	11/30/2021	
	Preamp	Larson Davis	PRMLxT1L	042852	11/30/2021	
	Calibrator	Larson Davis	CAL200	14105	11/10/2021	
Weather Data						
Est.	Duration: 24 hours			Sky: Clear		
	Note: dBA Offset = 0.11			Sensor Height (ft): 3 ft		
	Wind Ave Speed (mph)	Temperature (degrees Fahrenheit)		Barometer Pressure (hPa)		
	5	58		30.12		

Photo of Measurement Location



Measurement Report

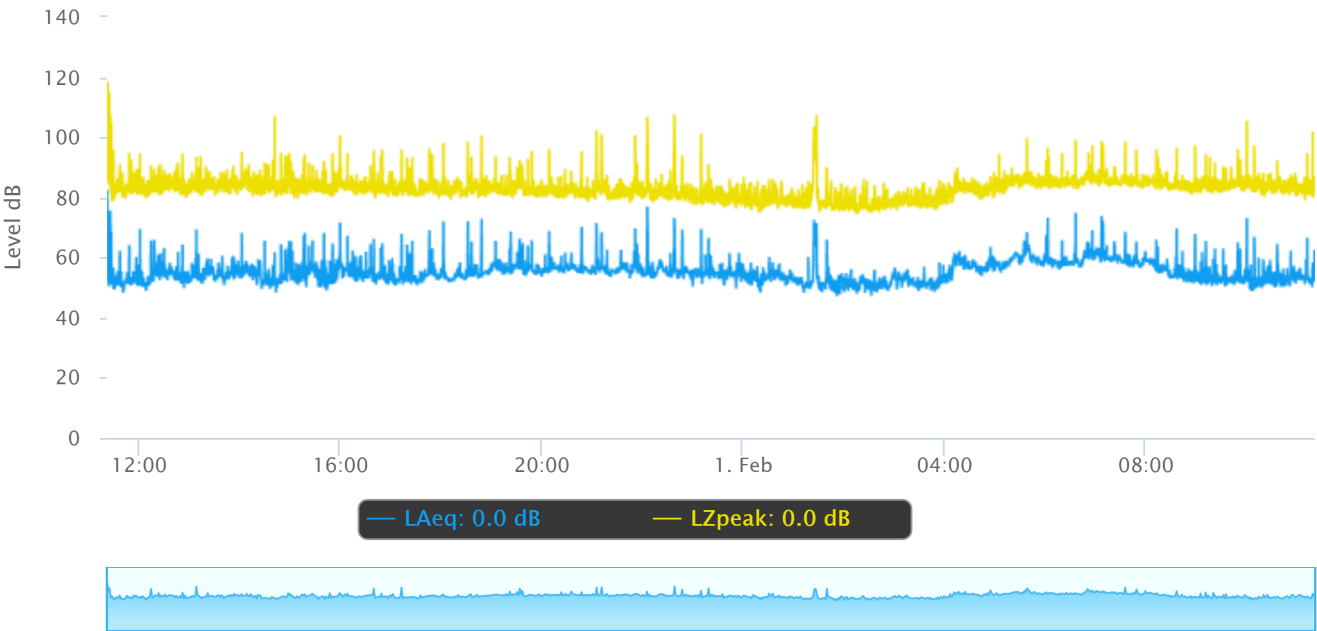
Report Summary

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Meter	LxT SE	0005120	
Firmware	2.404		
User		Location	
Job Description			
Note			
Start Time	2023-01-31 11:21:46	Duration	24:00:00.0
End Time	2023-02-01 11:21:46	Run Time	24:00:00.0
		Pause Time	0:00:00.0

Results

Overall Metrics						
L _{Aeq}	57.4 dB					
L _{AE}	106.7 dB	SEA	---	dB		
EA	5.2 mPa ² h					
L _{Zpeak}	118.5 dB	2023-01-31 11:21:59				
L _{ASmax}	89.5 dB	2023-01-31 11:21:59				
L _{ASmin}	46.3 dB	2023-02-01 01:51:45				
L _{Aeq}	57.4 dB					
L _{Ceq}	70.6 dB	L _{Ceq} - L _{Aeq}	13.2 dB			
L _{AIeq}	61.0 dB	L _{AIeq} - L _{Aeq}	3.6 dB			
Exceedances						
		Count	Duration			
L _{AS} > 85.0 dB		2	0:00:03.9			
L _{AS} > 115.0 dB		0	0:00:00.0			
L _{Zpeak} > 135.0 dB		0	0:00:00.0			
L _{Zpeak} > 137.0 dB		0	0:00:00.0			
L _{Zpeak} > 140.0 dB		0	0:00:00.0			
Community Noise						
	LDN	LDay	LNight			
	63.8 dB	57.3 dB	0.0 dB			
	LDEN	LDay	LEve	LNight		
	64.1 dB	57.3 dB	57.6 dB	57.4 dB		
Any Data						
	A		C		Z	
	Level	Time Stamp	Level	Time Stamp	Level	Time Stamp
L _{eq}	57.4 dB		70.6 dB		---	dB
L _{S(max)}	89.5 dB	2023-01-31 11:21:59	---	dB	---	dB
L _{S(min)}	46.3 dB	2023-02-01 01:51:45	---	dB	---	dB
L _{Peak(max)}	---	dB	---	dB	118.5 dB	2023-01-31 11:21:59
Overloads						
	Count	Duration	OBA Count	OBA Duration		
	0	0:00:00.0	122	0:17:18.2		
Statistics						
LAS 5.0	60.7 dB					
LAS 10.0	59.1 dB					
LAS 33.3	55.9 dB					
LAS 50.0	54.6 dB					
LAS 66.6	53.3 dB					
LAS 90.0	51.2 dB					

Time History



ROADWAY CONSTRUCTION NOISE MODEL OUTPUTS

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 2/2/2023 Case
Description: Site Prep Noise at School

Description Affected Land Use
 School School

Description	Impact Device	Usage(%)	Equipment		Receptor Distance (feet)
			Spec Lmax (dBA)	Actual Lmax (dBA)	
Tractor	No	40	84		786
Tractor	No	40	84		786
Tractor	No	40	84		786
Tractor	No	40	84		786
Dozer	No	40		81.7	786
Dozer	No	40		81.7	786
Dozer	No	40		81.7	786

Calculated (dBA)

Equipment	*Lmax	Leq
Tractor	60.1	56.1
Tractor	60.1	56.1
Tractor	60.1	56.1
Tractor	60.1	56.1
Dozer	57.7	53.8
Dozer	57.7	53.8
Dozer	57.7	53.8
Total	60.1	63.7

*Calculated Lmax is the Loudest value.

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 2/2/2023
Case Description: Grading Noise at School

Description **Affected Land Use**
 School School

Description	Impact Device	Usage(%)	Equipment		Receptor Distance (feet)
			Spec Lmax (dBA)	Actual Lmax (dBA)	
Excavator	No	40		80.7	786
Excavator	No	40		80.7	786
Grader	No	40	85		786
Tractor	No	40	84		786
Tractor	No	40	84		786
Dozer	No	40		81.7	786
Scraper	No	40		83.6	786

Calculated (dBA)

Equipment	*Lmax	Leq
Excavator	56.8	52.8
Excavator	56.8	52.8
Grader	61.1	57.1
Tractor	60.1	56.1
Tractor	60.1	56.1
Dozer	57.7	53.8
Scraper	59.7	55.7
Total	61.1	63.6

*Calculated Lmax is the Loudest value.

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 2/1/2023

Building Construction, Paving, and Painting at School

Case Description:

Affected Land Use

School

Description	Impact Device	Usage(%)	Equipment		Receptor Distance (feet)
			Spec Lmax (dBA)	Actual Lmax (dBA)	
Crane	No	16		80.6	786
Gradall	No	40		83.4	786
Gradall	No	40		83.4	786
Gradall	No	40		83.4	786
Generator	No	50		80.6	786
Tractor	No	40	84		786
Tractor	No	40	84		786
Tractor	No	40	84		786
Welder / Torch	No	40		74	786
Paver	No	50		77.2	786
Paver	No	50		77.2	786
Roller	No	20		80	786
Roller	No	20		80	786
Pavement Scarafier	No	20		89.5	786
Pavement Scarafier	No	20		89.5	786

Calculated (dBA)

Equipment	*Lmax	Leq
Crane	56.6	48.7
Gradall	59.5	55.5
Gradall	59.5	55.5
Gradall	59.5	55.5
Generator	56.7	53.7
Tractor	60.1	56.1
Tractor	60.1	56.1
Tractor	60.1	56.1
Welder / Torch	50.1	46.1
Paver	53.3	50.3
Paver	53.3	50.3
Roller	56.1	49.1
Roller	56.1	49.1
Pavement Scarafier	65.6	58.6
Pavement Scarafier	65.6	58.6
Total	65.6	66.5

*Calculated Lmax is the Loudest value.

Roadway Construction Noise Model (RCNM), Version 1.1

Report date: 2/2/2023
Case Description: Site Prep Noise at Residences

Description
 Apartments
Land Use
 Residential

Description	Impact Device	Usage(%)	Equipment	Actual Lmax (dBA)	Receptor Distance (feet)
			Spec Lmax (dBA)		
Tractor	No	40	84		581
Tractor	No	40	84		581
Tractor	No	40	84		581
Tractor	No	40	84		581
Dozer	No	40		81.7	581
Dozer	No	40		81.7	581
Dozer	No	40		81.7	581

Calculated (dBA)

Equipment	*Lmax	Leq
Tractor	62.7	58.7
Tractor	62.7	58.7
Tractor	62.7	58.7
Tractor	62.7	58.7
Dozer	60.4	56.4
Dozer	60.4	56.4
Dozer	60.4	56.4
Total	62.7	66.3

*Calculated Lmax is the Loudest value.

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 2/2/2023

Case Description: Grading Noise at Residences

Description
Apartments

Affected Land Use
Residential

Description	Impact Device	Usage(%)	Equipment		Receptor Distance (feet)
			Spec Lmax (dBA)	Actual Lmax (dBA)	
Excavator	No	40		80.7	581
Excavator	No	40		80.7	581
Grader	No	40	85		581
Tractor	No	40	84		581
Tractor	No	40	84		581
Dozer	No	40		81.7	581
Scraper	No	40		83.6	581

Calculated (dBA)

Equipment	*Lmax	Leq
Excavator	59.4	55.4
Excavator	59.4	55.4
Grader	63.7	59.7
Tractor	62.7	58.7
Tractor	62.7	58.7
Dozer	60.4	56.4
Scraper	62.3	58.3
Total	63.7	66.3

*Calculated Lmax is the Loudest value.

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 2/1/2023

Case Description: Residences - Building Construction, Paving, and Painting

Description **Land Use**
 Apartments Residential

Description	Impact Device	Usage(%)	Equipment		Receptor Distance (feet)	Estimated Shielding (dBA)
			Spec Lmax (dBA)	Actual Lmax (dBA)		
Crane	No	16		80.6	581	0
Gradall	No	40		83.4	581	0
Gradall	No	40		83.4	581	0
Generator	No	50		80.6	581	0
Backhoe	No	40		77.6	581	0
Gradall	No	40		83.4	581	0
Backhoe	No	40		77.6	581	0
Backhoe	No	40		77.6	581	0
Welder / Torch	No	40		74	581	0
Paver	No	50		77.2	581	0
Paver	No	50		77.2	581	0
Roller	No	20		80	581	0
Roller	No	20		80	581	0
Pavement Scarafier	No	20		89.5	581	0
Pavement Scarafier	No	20		89.5	581	0

Calculated (dBA)

Equipment	*Lmax	Leq
Crane	59.2	51.3
Gradall	62.1	58.1
Gradall	62.1	58.1
Generator	59.3	56.3
Backhoe	56.3	52.3
Gradall	62.1	58.1
Backhoe	56.3	52.3
Backhoe	56.3	52.3
Welder / Torch	52.7	48.7
Paver	55.9	52.9
Paver	55.9	52.9
Roller	58.7	51.7
Roller	58.7	51.7
Pavement Scarafier	68.2	61.2
Pavement Scarafier	68.2	61.2
Total	68.2	68.1

*Calculated Lmax is the Loudest value.

**FEDERAL HIGHWAY ADMINISTRATION TRAFFIC
NOISE MODEL OUTPUTS**

TRAFFIC NOISE LEVELS

Project Number: 2022-270.01

Project Name: Bowtie Development Park

Background Information

Model Description: FHWA Highway Noise Prediction Model (FHWA-RD-77-108) with California Vehicle Noise (CALVENO) Emission Levels.

Analysis Scenario(s): **Existing +Project**

Source of Traffic Volumes: KOA (2022)

Community Noise Descriptor: L_{dn}: _____ CNEL: _____ x _____

Assumed 24-Hour Traffic Distribution:	Day	Evening	Night
Total ADT Volumes	77.70%	12.70%	9.60%
Medium-Duty Trucks	87.43%	5.05%	7.52%
Heavy-Duty Trucks	89.10%	2.84%	8.06%

Traffic Noise Levels

Analysis Condition	Roadway Segment	Land Use	Lanes	Median Width	Peak	ADT	Design	Dist. from	Alpha	Barrier	Vehicle Mix		Peak Hour	24-Hour
					Hour						Volume	Speed	Center to	Factor
State Street														
	Glendale Freeway	Residential	2	0	133.4	98	55	100	0.5	0	1.8%	0.7%	57.2	45.1

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MONTEREY PARK ORANGE ONTARIO SAN DIEGO CULVER CITY

Email Transmittal

February 8, 2023

Mr. Wes Pringle, P.E.
Transportation Engineer
Metro Development Review
City of Los Angeles Department of Transportation
100 S. Main Street, 9th Floor
Los Angeles, CA 90012

Re: Trip Generation & VMT Screening Assessment for the Bowtie Park Development Project, City of Los Angeles

Dear Wes,

The California Department of Parks and Recreation ("State Parks") proposes to develop public park uses on an 18-acre parcel, known as the Bowtie parcel, in the northeast portion of the City of Los Angeles (the "City"). The Bowtie Park Development Project (the "Project") will occupy approximately 15.5 acres of the Bowtie parcel and will provide greenspace for natural habitat and passive recreation opportunities. The Project site is located in the Northeast Los Angeles Community Plan Area at 2780 W. Casitas Avenue, and it is presently undeveloped. The Bowtie parcel was a part of the Taylor Yard rail yard complex, the former headquarters of Southern Pacific Railroad. The site is generally bounded by the Glendale Freeway (State Route 2) to the northwest, the Union Pacific Railroad to the north and east, and the Los Angeles River to the south and west. The Project Site Location Map is shown in Figure 1. In order to determine the level of transportation analysis required for the Project, a trip generation and vehicle miles traveled (VMT) screening analysis has been performed. The results are presented in this technical letter.

PROJECT DESCRIPTION

The conceptual site plan is provided in Figure 2. The Project's proposed greenspace will include habitat restoration and enhancement; viewing opportunities for local wildlife; walking, jogging, and biking trails; shaded picnic areas; historical, cultural, and environmental programming; and unstructured play areas. The Project site will be located within the 18-acre Bowtie parcel, which includes the adjacent 2.5-acre Demonstration Project that will incorporate a publicly accessible wetland maintained through the use and treatment of dry-weather flow and stormwater. The Nature Conservancy serves as lead agency for the Demonstration Project.

Project objectives include increasing outdoor recreational park space to overburdened and economically disadvantaged residents in the Project vicinity; providing an experience of urban river and habitat restoration for the local community as

well as for the region, nation, and globe; reestablishing access to the river for indigenous communities who regard the area as a sacred land; restoring and enhancing natural habitat along the Los Angeles River, including wetlands, to attract birds and wildlife; providing educational opportunities with respect to historical, cultural, and environmental considerations; and advancing the goals of the Statewide Comprehensive Outdoor Recreation Plan (SCORP). Policy documents, including the Rio de Los Angeles General Plan and Los Angeles River Master Plan (LARMP), have acknowledged the need for a reimagined and revitalized Los Angeles River, and the Project is a critical component of fulfilling the ecosystem restoration goals identified in the U.S. Army Corps of Engineers (USACE) Los Angeles River Ecosystem Restoration Feasibility Study (ARBOR).

The Project will result in the development of the property to restore it to a vibrant green space, focused on nature and passive recreation. Project implementation will require soil remediation to address previous site contamination associated with the former use as a railroad maintenance facility. Proposed park improvements will consist of the following:

- Construction of a park entry and internal vehicular access road with turnouts for passenger drop-off/pick-up and a turnaround point
- Construction of parking spaces along the internal vehicular access road along the eastern perimeter of the Project site
- An internal maintenance road for State Park maintenance staff, fire access route, and utility access easement constructed with decomposed granite
- A welcoming kiosk with restrooms housed within an earthen mound with a green roof (natural vegetation roof)
- Several vista points facing the Los Angeles River
- A native collection garden to provide outdoor educational space
- An event space with turntable for larger crowds
- Internal multi-use trails for walking and biking
- Open turf areas, picnic locations, and seating benches

Vehicular access will be provided from Kerr Street, near the northwest end of the Project site. Project automobile and bicycle parking will be provided in accordance with Los Angeles Municipal Code (LAMC) requirements. Soil remediation should start in fall 204, and Project construction is scheduled for early 2025.

TRANSPORTATION ASSESSMENT SCREENING CRITERIA

In July 2019, the City of Los Angeles Department of Transportation (LADOT) updated the City's *Transportation Assessment Guidelines* (the "TAG") to conform to the requirements of Senate Bill 743 (SB 743). The TAG replaced the *Transportation Impact Study Guidelines* (December 2016) and shifted the performance metric for evaluating transportation impacts under the California Environmental Quality Act (CEQA) from level of service (LOS) to VMT for studies completed within the City. The TAG was updated in July 2020 and August 2022, with further refined and clarified analysis methodologies. Per the TAG, a Transportation Assessment (TA) is required when a development project is likely to add 250 or more net daily vehicle trips to the local street system. This trip generation assessment has been conducted to determine if the Project would generate 250 or more net daily vehicle trips, and thereby require the preparation of a TA.

The City has updated the TAG to ensure compliance with Section 15064.3, subdivision (b)(1) of the CEQA Guidelines, which asks if a development project would result in a substantial increase in VMT. The TAG sets the following criterion for determining significant transportation impacts based on VMT:

For a land use project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?

To assist in determining which development projects would conflict with CEQA Guidelines section 15064.3, subdivision (b)(1), the TAG establishes two screening criteria to evaluate the requirement of further analysis of a land use project's impact based on VMT. Both of the following criteria must be met in order to require further analysis of a land use project's VMT contribution:

1. The land use project would generate a net increase of 250 or more daily vehicle trips.
2. The land use project would generate a net increase in daily VMT.

PROJECT TRIP GENERATION ASSESSMENT

Along with the updated TAG, the LADOT developed the VMT Calculator Version 1.3 v141 (the "VMT Calculator"). The VMT Calculator estimates the daily vehicle trips, daily VMT, daily household VMT per capita, and daily work VMT per employee for land use projects. The VMT Calculator utilizes average daily trip generation rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (9th Edition, 2012) and empirical trip generation data to determine the base daily trips associated with a land use project. The number of daily trips is further refined using data from the Environmental Protection Agency's Mixed-Use Model and the City's Travel Demand Forecasting Model.

While the VMT Calculator is typically utilized to determine the net daily trip generation for a development project, it cannot be used for the Project. The VMT Calculator contains a set of land-use categories with trip generation rates and corresponding trip type data that can be chosen as best matching a land use project's characteristics. The land use categories within the VMT Calculator are limited to housing, lodging, commercial retail/restaurant, office, industrial, and educational uses. Therefore, in order to determine the vehicle trip potential for the Project's recreational land use, trip rates and equations were used from the latest version of the ITE *Trip Generation Manual* (11th Edition, 2021).

Information was obtained from the *Trip Generation Manual* for ITE Land Use Code (LUC) 411 – Public Park. The Public Park trip rates and equations were applied to develop the Project's trip generation. Table 1 presents the trip generation rates used to generate the weekday daily and peak-hour traffic volumes for the Project.

Table 1: Project Weekday Trip Generation Rates¹

Land Use	Time Period	Trip Generation Rate/Equation and Directional Distribution ²		
		Rate/Equation	IB	OB
Public Park, ITE LUC 411 - General Urban/Suburban setting ¹				
	Daily	T = 0.78 trips per AC [Average Rate]		
	Daily	T = 0.64 (AC) + 88.46 [Fitted Curve Equation]		
	AM Peak Hour	T = 0.02 trips per AC	59%	41%
	PM Peak Hour	T = 0.11 trips per AC	55%	45%
¹ Source: Institute of Transportation Engineers (ITE) <i>Trip Generation Manual</i> (11th Edition, 2021).				
² AC = Acres. IB = Inbound. OB = Outbound.				

As the trip rates/equations from Table 1 are based on samples from a general urban/suburban setting, they do not account for such trip-reducing factors as significant transit usage and walk trip potential. The Project is located in an urbanized area with multiple nearby bus lines and a mix of residential, commercial, industrial, and educational land uses within a comfortable walking distance. Thus, the baseline trip estimates using the above rates reflect a conservative condition. Trip-reducing factors are important considerations in determining the actual traffic-generating characteristics of a development project and, therefore, adjustments should be made to the Project's baseline trip generation estimates. However, as a conservative measure, no trip-reducing factors were applied in the Project trip generation calculations.

Applying the weekday daily average trip generation rate and fitted curve equation to the Project size (15.5 acres), the Project is anticipated to generate between 12 and 98 vehicle trips on a typical weekday. As the Project will generate fewer than 250 net daily vehicle trips, the Project will not require the preparation of a TA or further VMT analysis based on the screening criteria in the TAG.

PROJECT TRANSPORTATION IMPACTS

Per the TAG, a TA is required when a development project is likely to add 250 or more net daily vehicle trips to the local street system. Given that the Project is estimated to add between 12 and 98 net daily vehicle trips to the local street system on a typical weekday, the Project is not expected to result in significant impacts to the surrounding transportation system. Therefore, neither a TA nor further analysis of transportation impacts is required for the Project.

Please contact me if you have any questions.

Sincerely,



Ryan J. Kelly, TE
Senior Engineer
TR 2547

RK
C22769

FIGURE 1

PROJECT SITE LOCATION MAP



FIGURE 1

12/29/2022
FN: JC28160/PROJ-SITE LOCATION

FIGURE 2

CONCEPTUAL PROJECT SITE PLAN



Walking Path



Visitor Information Area



Bioswale



Dry Streambed



Woodland Trail



Multi Use Access Road



Multi Modal Riverfront Trail



Wetland Habitat Planting



Wetland Boardwalk



River Overlook



Passive Recreation Turf



Sloping Meadow



Native Plant Garden



Informal Gathering Space

Conceptual Plan



Land and Water Conservation Fund
Outdoor Recreation Legacy Partnership Program

The Bowtie Park Development Project



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