

2020 LA RIVER

MASTER PLAN



FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

SCH# 2020070128

March 2022



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SCH# 2020070128

PREPARED FOR:

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MARCH 2022

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Acronyms and Abbreviations

AB	Assembly Bill
ADA	Americans with Disabilities Act
BA	Biological Assessment
BMP	best management practice
BO	Biological Opinion
BWP	Burbank Water and Power
BWRP	Burbank Water Reclamation Plant
CDFW	California Department of Fish and Wildlife
CMP	construction management plan
CNDDDB	California Natural Diversity Database
County MS4 Permit	Waste Discharge Requirements for MS4 Discharges Within the Coastal Watersheds of Los Angeles County, Except Those Discharges Originating from the City of Long Beach MS4
CRHR	California Register of Historical Resources
dB	decibels
dBA	A-weighted decibels
Design Guidelines	<i>2020 LA River Master Plan Design Guidelines</i>
DPR	Department of Parks and Recreation
EIR	environmental impact report
ESA	environmentally sensitive area
EWMP	Enhanced Watershed Program
EYCEJ	East Yard Communities for Environmental Justice
FPP	fire protection plan
GPIA	Glassell Park Improvement Association
HCMs	Historic-Cultural Monuments
HPO	Historic Preservation Ordinance
HPOZs	Historic Preservation Overlay Zones
KOP	kit of parts
LA River	Los Angeles River
LCP	Local Coastal Program

L _{eq}	equivalent noise level
L RTP	Long Range Transportation Plan
LSA	Lake and Streambed Alteration
LT	long-term
Metro	Los Angeles County Metropolitan Transportation Authority
MS4	Municipal Separate Storm Sewer System
NAHC	Native American Heritage Commission
NOD	Notice of Determination
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
PDF	portable document format
PMP	Port Master Plan
Project	LA River Master Plan
Public Works	Los Angeles County Public Works
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SCAG	Southern California Association of Governments
SDS	Safety Data Sheet
SLF	Sacred Lands File
SQMP	Stormwater Quality Management Plan
SSC	Special Species of Concern
ST	short-term
SWAP	State Wildlife Action Plan
SWPPP	Stormwater Pollution Prevention Plan
TCRs	tribal cultural resources
TDM	transportation demand management
UPRR	Union Pacific Railroad
USGS	U.S. Geological Survey
VMT	vehicle miles traveled
WEAP	worker environmental awareness program
WMP	Watershed Management Program

1.1 Purpose and Organization of This Document

This Final Program Environmental Impact Report (PEIR) (State Clearinghouse No. 2020070128) has been prepared according to the California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000, et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3) to evaluate and disclose the potential environmental impacts associated with implementation of the proposed *2020 LA River Master Plan* (Project) in Los Angeles County, California. Los Angeles County (County) through Los Angeles County Public Works (Public Works) is serving as lead agency under CEQA for the PEIR. The Final PEIR presents the environmental information and analyses that have been prepared for the proposed Project, including comments received addressing the Draft PEIR, and responses to those comments. The Final PEIR will be used by the Board of Supervisors in the decision-making process for the proposed Project. This Final PEIR is organized as follows:

- Chapter 1, *Introduction*
- Chapter 2, *Response to Comments*
- Chapter 3, *Clarifications and Modifications to the Draft PEIR*
- Appendices

The Final PEIR appendices are identified as follows and are in addition to those already included in the Draft PEIR.

- Appendix A, *Comments Received on the Draft PEIR*
- Appendix B, *Updated Draft PEIR Appendices*
 - Updated Appendix B
 - Updated Appendix H
- Appendix C, *Resumes*

The Final PEIR includes, by incorporation, the Draft EIR, along with the clarifications and modifications included in Chapter 3, and provides responses to comments received on the Draft PEIR.

1.2 Project Background and Location

The proposed Project is along a 51-mile-long, approximately 2-mile-wide (i.e., 1 mile on each side) corridor of the Los Angeles River (LA River) in Los Angeles County and spans through 18 jurisdictions (17 cities and unincorporated County areas). The river encompasses an 834-square-mile watershed and flows from its headwaters at river mile 51.0 in Canoga Park within the City of Los Angeles to river mile 0.0 in Long Beach, where the river meets the Pacific Ocean. The LA River was channelized between the late 19th and mid-20th centuries to protect lives and

property from flooding as the Los Angeles region rapidly grew and transformed to a largely urbanized area. Today, nearly 1 million people live within 1 mile of the river.

Design information for the proposed *2020 LA River Master Plan* is at a conceptual level; therefore, the environmental impact analysis is presented at a programmatic level and does not include project-specific or site-specific analysis.

1.3 Environmental Review Process

1.3.1 Public Circulation

1.3.1.1 Notice of Preparation

The County, in accordance with CEQA, prepared a Notice of Preparation (NOP), which was released to the public and filed with the State Clearinghouse in the Office of Planning and Research on July 7, 2020. The NOP provided notice to the public and public agencies that a PEIR would be prepared, described the proposed Project that would be evaluated in the PEIR, listed the probable environmental effects of the Project, and identified the date, time, and location for an online scoping meeting, which was held virtually on July 29, 2020 due to the ongoing COVID-19 pandemic.

The NOP was distributed to involved public agencies and interested parties for a 30-day public review period (July 7, 2020 through August 6, 2020). A copy of the NOP is included in Appendix A of the Draft PEIR, along with written comments provided by the public and public agencies in response to the NOP. These comments were considered during preparation of the Draft PEIR.

1.3.1.2 Draft PEIR

Notification of the availability of the Draft PEIR was sent to the public and interested or affected agencies for review. Release of the PEIR to the public began a 45-day comment period, extending from February 1, 2021 to March 18, 2021. During that timeframe, members of the public and public agencies had the opportunity to review the Draft PEIR and provide comments on the document, including adequacy of the impact analyses.

On March 4, 2021, in response to comments initially received, the review period was extended to April 2, 2021. The review period was extended a second time to May 13, 2021 to provide additional review time to all interested parties. In total, the review period extended from February 1, 2021 to May 13, 2021, for a total of 101 days.

1.3.1.3 Comments Received on the Draft PEIR

A total of 202 written comment letters were received on the Draft PEIR, and 57 oral comments were received at the public meeting.

Section 15088 of the State CEQA Guidelines requires that the lead agency evaluate comments on environmental issues received from persons and agencies that reviewed the Draft PEIR and prepare a written response to significant environmental issues raised. The response to comments is included in Chapter 2 of this Final PEIR. A list of agencies and interested parties who commented on the Draft PEIR is provided below. A copy of each numbered comment letter is provided in Appendix A.

Lettered responses to each comment are provided in Chapter 2, *Response to Comments*, of this Final PEIR.

The following agencies, organizations, and individuals submitted written comments on the Draft PEIR.

Agencies

- Santa Monica Mountains Conservancy
- City of Burbank
- California Department of Transportation
- California Coastal Commission
- California Department of Fish and Wildlife
- Water Replenishment District
- County of Los Angeles Department of Parks and Recreation
- City of Los Angeles
- Los Angeles County Metropolitan Transportation Authority
- City of Long Beach
- Southern California Regional Rail Transit Authority
- City of Paramount
- Eco-Rapid Transit Joint Powers Authority
- City of Torrance Transit Department
- City of Los Angeles Department of Public Works, Bureau of Engineering

Organizations

- Studio City Neighborhood Council Transportation Committee
- East Yard Communities for Environmental Justice
- art HYPE
- Glassell Park Improvement Association
- Los Feliz Neighborhood Council
- Atwater Village Neighborhood Council
- Boulevard Management
- Friends of Griffith Park
- Griffith Park Advisory Board
- LA River Walkers & Watchers
- Los Angeles Waterkeeper

- Los Angeles Conservancy
- Riverpark Coalition
- Forest Lawn Memorial-Park Association
- Heal the Bay
- Sacred Places Institute
- Resource Conservation District of the Santa Monica Mountains
- Center for Biological Diversity

Elected Officials

- U.S. Representative, 40th District, California

Interested Individuals

- | | |
|-----------------------------------|----------------------|
| • Paul Rabinov | • Bruce Boyer |
| • Connie Elliott | • Robert Fox |
| • Julia Borovay | • Brent Fischer |
| • David Swanson | • Sheryl Avery |
| • Alina Zehnali | • Tilly Hinton |
| • Margaret Daret-Quiroz | • Greg Linton |
| • Naomi Turner | • Jessie Cowley |
| • Peter Cardenas | • Keshav Boddula |
| • Carrie Sutkin | • Ryan Conroy |
| • Kevin Greutert | • Sallie Neubauer |
| • Brent Fischer | • Richard Niederberg |
| • Allen Escobedo | • John Samore |
| • Dean Scalia | • Patricia Frias |
| • Veta Gashgai | • Eloise Hess |
| • Armando Simental | • Lorna Paisley |
| • Dr. Ricardo Morelli | • Stephen F. Jones |
| • Jacqueline Teeter | • George Rubio |
| • Flor Burrola | • Avital Oehler |
| • gloriarevive (no name provided) | • Glenn Claycomb |
| • Donna Thomas | • Schuyler Johnson |
| • Vasken Hagopian | • Monica Wyatt |

- Elizabeth L.
- Shirley Otis-Green
- Ashley Kramer
- Jon Gerfen
- Antonio Juan Gomez
- Veronica Ann Villegas
- Albert Alfasso
- Theresa (Les) Hew
- Rosemary Leibowitz
- Leslie Klein
- Meryll Edelstein
- Ron Cyger
- Andy Birch
- Ari Martinez
- Sara Boscoe
- Nancy Salem
- Amy Wolfberg
- Erica Silverman
- Richard Barth
- Gregory Hachigian
- Susan Gilliland
- Frank D. Gilliland
- Bella Liu
- Donald White & Lisa Chang
- Pollito Gnoche
- Jeffrey Boyd
- Grace Wong
- Rob Bender
- Ken Unger
- Ron Hirst
- Sarah De Santiago
- Miles Griffis
- Robert Karn
- Marianne Vogel Bender
- Deloris Jones
- Michael Connor
- Lisa Petrus
- Molly Hill
- David Joyce
- Ann Cantrell
- Allison McSurely
- Erica Roach
- Allen Arslanian
- Jesse Ross
- Robert Leyland
- Jeffrey Sapin
- Jon Fisher
- Calvin Bonn
- Cesar Estrada
- Christine Rowe
- Steve Appleton
- Aida Ashouri
- Elena Tucci
- Joyce Dillard
- Katherine Kato
- Anonymous
- Erin Judge
- Anthea Raymond
- Teresa Austin
- Andrew Lewis
- Adele Slaughter
- Jessica Prieto
- Laurie Hoffman
- Brandon Contreras

- Cindy Donis
- Ellen Dixon
- Zihua Zhao
- Mary Gonnelli
- Daisy Oliver
- Marcus Fox
- Serena Steers
- Michael Cowley
- T. Sanchez
- Luke Ginger
- Nina Beckhardt
- Brian Bastien
- Jamila Cervantes
- Laurie Angel
- Naomi Zamazal
- Gabriela Tovat
- Corliss Lee
- Renee Lawler
- Connie Elliot
- Ann Cantrell
- Wendy Zimmerman
- Karen Barnett
- Jasmine Gonzalez
- Seymour Liao
- Erica Rich
- Lena
- Veronica Soto
- Michael Berg
- Marianne Bender
- Scott Edwards
- Felicia Bander
- Unidentified Speaker 1
- Ramona Ballhaus
- Mr. Captain Obvious
- Unidentified Speaker 2
- Unidentified Speaker 3
- Unidentified Speaker 4
- Mr. Reki
- Jessica Prieto
- Ms. Ayvazian

1.3.2 Public Meetings, Newspaper Ads, and E-mails

An online scoping meeting for the PEIR was held on July 29, 2020. When the Draft PEIR was released for public review on February 1, 2021, it was posted on Public Works' website (pw.lacounty.gov/go/larmpceqa). Following Governor Newsom's Executive Order N-28-20 relating to the threat of COVID-19, the Los Angeles County Board of Supervisors announced that all Los Angeles County facilities were to be closed to members of the public beginning March 16, 2020. Since then, Public Works closed all public buildings and in-person services and only recently reopened Public Works' public counters for in-person services starting on October 4, 2021.

Notification of the availability of the PEIR was sent to the public and interested or affected agencies for review. Release of the PEIR to the public began a 45-day comment period, extending from February 1, 2021 to March 18, 2021. During that timeframe, members of the public and public agencies had the opportunity to review the PEIR and provide comments on the document, including adequacy of the impact analyses.

On March 4, 2021, in response to comments initially received, the review period was extended to April 2, 2021 (60 days). The review period was extended a second time to May 13, 2021 to provide additional review time to all interested parties. In total, the review period extended from February 1, 2021 to May 13, 2021, for a total of 101 days.

The County held one community meeting on March 3, 2021 to inform interested parties about the Draft PEIR's analysis of the proposed Project and to gather input from interested persons and agencies on the content of the Draft PEIR. Due to COVID-19, the public meeting was held online from 6 p.m. to 8 p.m. on Zoom, and a call-in number was provided.

The general topics of oral public comments made at these meetings were transcribed and presented in Chapter 2, *Response to Comments*. As the lead agency under CEQA, the County provided responses to the comments received on the Draft PEIR.

Public notice of the availability of the PEIR was provided in the following publications:

- *Glendale Independent*
- *Grunion Gazette*
- *L.A. Watts Times*
- *Long Beach Press Telegram*
- *Paramount Journal*
- *Los Angeles Times*
- *Excelsior LA*
- *The Canyon News*
- *Monterey Park Press*
- *The Downey Patriot*
- *The Signal Tribune*
- *South Bay Daily Breeze*
- *La Opinion*
- *Los Angeles Times en Español (Hoy Los Angeles)*
- *Los Angeles Daily News*

Due to COVID-19 precautions, the County, City of Los Angeles, and City of Long Beach libraries were closed starting in March 2020 and remained closed when the Draft PEIR was released on February 1, 2021. A flyer with information about the availability of the document on Public Works' website (pw.lacounty.gov/go/larmpceqa) and the March 3, 2021 community meeting was posted in a visible spot at the following library locations:

- Billie Jean King Main Library, Long Beach
- Long Beach Public Library – Bret Harte Neighborhood Library, Long Beach
- Michelle Obama Neighborhood Library, Long Beach
- East Rancho Dominguez Library, East Rancho Dominguez
- Paramount Library, Paramount
- Hollydale Library, South Gate
- Lynwood Library, Lynwood
- Cudahy Library, Cudahy
- Bell Gardens Library, Bell Gardens
- Bell Library, Bell
- Maywood Cesar Chavez Library, Maywood

- Huntington Park Library, Huntington Park
- Glendale Central Library, Glendale
- Burbank Public Library, Burbank
- Los Angeles Public Library, Los Angeles

On April 19, 2020, the County announced that select libraries would be re-opened for in-person services. As part of the phased re-opening, a hardcopy of the Draft PEIR was made available from April 22, 2021 through the 101-day review period at the following library locations:

- Leland R. Weaver Library, South Gate
- Huntington Park Library, Huntington Park
- Glendale Central Library, Glendale

2.1 Requirements for Responding to Comments on a Draft EIR

Lead agencies are required to evaluate all comments on environmental issues received on the Draft PEIR and prepare a written response pursuant to State CEQA Guidelines Section 15088. Written responses should address the environmental issue(s) raised and provide a detailed response. Rationale must be provided when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good-faith and reasoned analysis. As long as a good-faith effort at full disclosure is made in the EIR (State CEQA Guidelines Section 15204), lead agencies need only to respond to significant environmental issues associated with the project and do not need to provide all the information requested by commenters.

State CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft PEIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the Project might be avoided or mitigated. State CEQA Guidelines Section 15204 also notes that commenters should provide an explanation and evidence supporting their comments. Pursuant to State CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

State CEQA Guidelines Section 15088 also recommends that, where the response to comments results in revisions to the Draft PEIR, those revisions should be noted as a revision to the Draft PEIR or in a separate section of the Final PEIR. Chapter 3, *Clarifications and Modifications to the Draft PEIR*, outlines the revisions to the Draft PEIR.

2.2 List of Commenters

The public agencies and private citizens who submitted comments on the Draft PEIR during the public review period are listed below (arranged by date of correspondence). The comment letters and their responses are arranged by public agencies (A), organizations (O), elected officials (EO), individuals (I), and oral comments (OC).

List of Commenters

No.	Name	Agency/Organization	Date
Agencies			
A1	Brian Baldauf	Santa Monica Mountains Conservancy	February 5, 2021
A2	Patrick Prescott	City of Burbank	February 16, 2021
A3	Daniel Rynn	City of Burbank	February 18, 2021
A4	Miya Edmonson	California Department of Transportation	February 25, 2021
A5	Shahar Amitay	California Coastal Commission	February 25, 2021
A6	Erinn Wilson-Olgin	California Department of Fish and Wildlife	April 28, 2021

No.	Name	Agency/Organization	Date
A7	City Council: Bob Frutos, Jess A. Talamantes, Sharon Springer, Konstantine Anthony, Nick Schultz	City of Burbank	April 13, 2021
A8	John D. S. Allen	Water Replenishment District	May 10, 2021
A9	Sean Woods	County of Los Angeles Department of Parks and Recreation	May 6, 2021
A10	Michelle Levy	City of Los Angeles	May 13, 2021
A11	Shine Ling	Los Angeles County Metropolitan Transportation Authority	May 13, 2021
A12	Thomas B. Modica	City of Long Beach	May 12, 2021
A13	Todd McIntyre	Southern California Regional Rail Authority	May 13, 2021
A14	John King	City of Paramount	May 13, 2021
A15	Michael R. Kodama	Eco-Rapid Transit	May 13, 2021
A16	Irma R. Muñoz	Santa Monica Mountains Conservancy	May 13, 2021
A17	Daniel Lim	City of Torrance Transit Department	March 16, 2021
A18	Dr. Jan Green Rebstock	City of Los Angeles Department of Public Works, Bureau of Engineering	May 19, 2021
Organizations			
O1	Barry Johnson	Studio City Neighborhood Council Transportation Committee	February 8, 2021
O2	Jessica Prieto	East Yard Communities for Environmental Justice	February 10, 2021
O3	KW Sarrow	art HYPE	March 7, 2021
O4	Helen Schpak	Glassell Park Improvement Association	March 15, 2021
O5	Jon Deutsch	Los Feliz Neighborhood Council	March 15, 2021
O6	Courtney Morris, Edward Morrissey	Atwater Village Neighborhood Council	March 11, 2021
O7	Lynda Burton	Boulevard Management	January 14, 2021
O8	Gerry Hans	Friends of Griffith Park	May 11, 2021
O9	Jason Greenwald	Griffith Park Advisory Board	May 12, 2021
O10	Michael J. Connor	LA River Walkers & Watchers	May 12, 2021
O11	Kelly Clark	Los Angeles Waterkeeper	May 12, 2021
O12	Michael J. Connor, Bob Akre, Sandra Knapton, Joe Macias, Evelyn Aleman	LA River Walkers & Watchers	May 13, 2021
O13	Adrian Scott Fine	Los Angeles Conservancy	May 13, 2021
O14	Renee Lawler	Riverpark Coalition	May 13, 2021
O15	Jessica Prieto	East Yard Communities for Environmental Justice	May 12, 2021
O16	Shivaun Cooney	Forest Lawn Memorial-Park Association	May 13, 2021
O17	Michelle Black, Amy Minter	Los Angeles Waterkeeper	May 13, 2021

No.	Name	Agency/Organization	Date
O18	Katherine Pease	Heal the Bay	May 13, 2021
O19	Angela Mooney D'Arcy	Sacred Places Institute	May 13, 2021
O20	Clark Stevens, Rosi Dagit	Resource Conservation District of the Santa Monica Mountains	May 13, 2021
O21	J. P. Rose	Center for Biological Diversity	March 1, 2021
O22	J. P. Rose, Elizabeth Reid-Wainscoat	Center for Biological Diversity	May 13, 2021
Elected Officials			
EO1	Representative Lucille Roybal-Allard	U.S. Representative, 40 th District, California	May 13, 2021
Individuals			
I1	Paul Rabinov	N/A	February 1, 2021
I2	Connie Elliot	N/A	February 1, 2021
I3	Julia Borovay	N/A	February 2, 2021
I4	David Swanson	N/A	February 3, 2021
I5	Alina Zehnali	N/A	February 3, 2021
I6	Margaret Daret-Quiroz	N/A	February 3, 2021
I7	Naomi Turner	N/A	February 4, 2021
I8	Peter Cardenas	N/A	February 4, 2021
I9	Carrie Sutkin	N/A	February 4, 2021
I10	Kevin Greutert	N/A	February 4, 2021
I11	Brent Fischer	N/A	February 4, 2021
I12	Allen Escobedo	N/A	February 4, 2021
I13	Dean Scalia	N/A	February 8, 2021
I14	Veta Gashgai	N/A	February 9, 2021
I15	Armando Simental	N/A	February 9, 2021
I16	Dr. Ricardo Morelli	N/A	February 16, 2021
I17	Jacqueline Teeter	N/A	February 17, 2021
I18	Flor Burrola	N/A	February 17, 2021
I19	gloriarevive (no name provided)	N/A	February 20, 2021
I20	Donna Thomas	N/A	February 6, 2021
I21	Vasken Hagopian	N/A	February 5, 2021
I22	Bruce Boyer	N/A	February 12, 2021
I23	Robert Fox	N/A	March 2, 2021
I24	Brent Fischer	N/A	March 2, 2021
I25	Sheryl Avery	N/A	March 2, 2021
I26	Tilly Hinton	N/A	March 3, 2021
I27	Sheryl Avery	N/A	March 3, 2021
I28	Greg Linton	N/A	March 3, 2021
I29	Jessie Cowley	N/A	March 3, 2021
I30	Keshav Boddula	N/A	March 3, 2021

No.	Name	Agency/Organization	Date
I31	Ryan Conroy	N/A	March 4, 2021
I32	Sallie Neubauer	N/A	March 4, 2021
I33	Richard Niederberg	N/A	March 4, 2021
I34	John Samore	N/A	March 4, 2021
I35	Patricia Frias	N/A	March 7, 2021
I36	Eloise Hess	N/A	March 7, 2021
I37	Lorna Paisley	N/A	March 8, 2021
I38	Tilly Hinton	N/A	March 10, 2021
I39	Stephen F. Jones	N/A	March 11, 2021
I40	George Rubio	N/A	March 11, 2021
I41	Avital Oehler	N/A	March 11, 2021
I42	Glenn Claycomb	N/A	March 12, 2021
I43	Schuyler Johnson	N/A	March 13, 2021
I44	Monica Wyatt	N/A	March 18, 2021
I45	Elizabeth L.	N/A	March 26, 2021
I46	Shirley Otis-Green	N/A	March 30, 2021
I47	Ashley Kramer	N/A	March 31, 2021
I48	Jon Gerfen	N/A	April 2, 2021
I49	Antonio Juan Gomez	N/A	March 9, 2021
I50	Veronica Ann Villegas	N/A	April 30, 2021
I51	Albert Alfasso	N/A	May 4, 2021
I52	Theresa (Les) Hew	N/A	May 4, 2021
I53	Rosemary Leibowitz	N/A	May 4, 2021
I54	Elizabeth L.	N/A	May 6, 2021
I55	Leslie Klein	N/A	May 6, 2021
I56	Merryl Edelstein	N/A	May 7, 2021
I57	Ron Cyger	N/A	May 7, 2021
I58	Andy Birch	N/A	May 7, 2021
I59	Ari Martinez	N/A	May 7, 2021
I60	Sara Boscoe	N/A	May 8, 2021
I61	Nancy Salem	N/A	May 8, 2021
I62	Amy Wolfberg	N/A	May 8, 2021
I63	Erica Silverman	N/A	May 8, 2021
I64	Richard Barth	N/A	May 8, 2021
I65	Gregory Hachigian	N/A	May 8, 2021
I66	Susan Gilliland	N/A	May 8, 2021
I67	Frank D. Gilliland	N/A	May 8, 2021
I68	Bella Liu	N/A	May 8, 2021
I69	Donald White & Lisa Chang	N/A	May 8, 2021
I70	Pollito Gnoche	N/A	May 8, 2021
I71	Jeffrey Boyd	N/A	May 9, 2021

No.	Name	Agency/Organization	Date
I72	Grace Wong	N/A	May 10, 2021
I73	Rob Bender	N/A	May 10, 2021
I74	Ken Unger	N/A	May 10, 2021
I75	Ron Hirst	N/A	May 11, 2021
I76	Sarah De Santiago	N/A	May 11, 2021
I77	Miles Griffis	N/A	May 11, 2021
I78	Robert Karn	N/A	May 12, 2021
I79	Marianne Vogel Bender	N/A	May 12, 2021
I80	Deloris Jones	N/A	May 12, 2021
I81	Michael Connor	N/A	May 12, 2021
I82	Lisa Petrus	N/A	May 12, 2021
I83	Molly Hill	N/A	May 13, 2021
I84	David Joyce	N/A	May 13, 2021
I85	Ann Cantrell	N/A	May 13, 2021
I86	Allison McSurely	N/A	May 13, 2021
I87	Tilly Hinton	N/A	May 9, 2021
I88	Erica Roach	N/A	May 13, 2021
I89	Allen Arslanian	N/A	May 13, 2021
I90	Jesse Ross	N/A	May 13, 2021
I91	Robert Leyland	N/A	May 13, 2021
I92	Jeffrey Sapin	N/A	May 13, 2021
I93	Jon Fisher	N/A	May 13, 2021
I94	Calvin Bonn	N/A	May 13, 2021
I95	Cesar Estrada	N/A	May 13, 2021
I96	Christine Rowe	N/A	May 13, 2021
I97	Steve Appleton	N/A	May 13, 2021
I98	Aida Ashouri	N/A	May 13, 2021
I99	Elena Tucci	N/A	May 18, 2021
I100	Joyce Dillard	N/A	May 20, 2021
I101	Katherine Kato	N/A	April 8, 2021
I102	Anonymous	N/A	June 15, 2021
I103	Erin Judge	N/A	May 13, 2021
Oral Comments			
OC1	Anthea Raymond	N/A	March 3, 2021
OC2	Teresa Austin	N/A	March 3, 2021
OC3	Andrew Lewis	N/A	March 3, 2021
OC4	Adele Slaughter	N/A	March 3, 2021
OC5	Jessica Prieto	N/A	March 3, 2021
OC6	Jessica Prieto	N/A	March 3, 2021
OC7	Laurie Hoffman	N/A	March 3, 2021
OC8	Brandon Contreras	N/A	March 3, 2021

No.	Name	Agency/Organization	Date
OC9	Cindy Donis	N/A	March 3, 2021
OC10	Ms. Daret-Quiroz	N/A	March 3, 2021
OC11	Ellen Dixon	N/A	March 3, 2021
OC12	Zihua Zhao	N/A	March 3, 2021
OC13	Mary Gonnelli	N/A	March 3, 2021
OC14	Marcus Fox	N/A	March 3, 2021
OC15	Serena Steers	N/A	March 3, 2021
OC16	Tilly Hinton	N/A	March 3, 2021
OC17	Michael Cowley	N/A	March 3, 2021
OC18	T. Sanchez	N/A	March 3, 2021
OC19	Luke Ginger	N/A	March 3, 2021
OC20	Nina Beckhardt	N/A	March 3, 2021
OC21	Brian Bastien	N/A	March 3, 2021
OC22	Jamila Cervantes	N/A	March 3, 2021
OC23	Laurie Angel	N/A	March 3, 2021
OC24	Naomi Zamazal	N/A	March 3, 2021
OC25	Gabriela Tovat	N/A	March 3, 2021
OC26	Corliss Lee	N/A	March 3, 2021
OC27	Renee Lawler	N/A	March 3, 2021
OC28	Connie Elliot	N/A	March 3, 2021
OC29	Ann Cantrell	N/A	March 3, 2021
OC30	Wendy Zimmerman	N/A	March 3, 2021
OC31	Karen Barnett	N/A	March 3, 2021
OC32	Jasmine Gonzalez	N/A	March 3, 2021
OC33	Seymour Liao	N/A	March 3, 2021
OC34	Erica Rich	N/A	March 3, 2021
OC35	Lena	N/A	March 3, 2021
OC36	Veronica Soto	N/A	March 3, 2021
OC37	Michael Berg	N/A	March 3, 2021
OC38	Marianne Bender	N/A	March 3, 2021
OC39	Scott Edwards	N/A	March 3, 2021
OC40	Aida Ashouri	N/A	March 3, 2021
OC41	Christine Rowe	N/A	March 3, 2021
OC42	Felicia Bander	N/A	March 3, 2021
OC43	Unidentified Speaker 1	N/A	March 3, 2021
OC44	Ramona Ballhaus	N/A	March 3, 2021
OC45	Mr. Keshav	N/A	March 3, 2021
OC46	Mr. Captain Obvious	N/A	March 3, 2021
OC47	Unidentified Speaker 2	N/A	March 3, 2021
OC48	Unidentified Speaker 3	N/A	March 3, 2021
OC49	Unidentified Speaker 4	N/A	March 3, 2021

No.	Name	Agency/Organization	Date
OC50	Mr. Reki	N/A	March 3, 2021
OC51	Mr. Captain Obvious	N/A	March 3, 2021
OC52	Christine Rowe	N/A	March 3, 2021
OC53	Mr. Captain Obvious	N/A	March 3, 2021
OC54	Jessica Prieto	N/A	March 3, 2021
OC55	Tilly Hinton	N/A	March 3, 2021
OC56	Ms. Ayvazian	N/A	March 3, 2021
OC57	Renee Lawler	N/A	March 3, 2021

2.3 Comments and Response to Comments

2.3.1 Master Responses

2.3.1.1 Master Response MR-1 (Homelessness along the LA River)

As discussed in Section 3.13, *Population and Housing*, of the Draft PEIR, it is expected that implementation of projects under the *2020 LA River Master Plan* could result in the displacement of homeless encampments and affect the density and distribution of homeless encampments throughout the 51-mile-long and 2-mile-wide study area. The complex issue of homeless encampments in the LA River area requires the involvement and coordination of multiple local agencies, including the County, as well as the affected cities. Since June 2019, there have been a total of 11 motions passed by the Los Angeles County Board of Supervisors directing various County departments to work together on initiatives and policies to address affordable housing, anti-displacement, and persons experiencing homelessness in Los Angeles County. Numerous efforts are currently underway to mitigate the effects of displacement in communities along the river, including existing programs such as the relocation of transient populations to safer, more sanitary shelters or more permanent residences. The removal of unpermitted structures, debris, or other materials from the river would reduce human hazards and eliminate trash and other sources of waste in and around the area. The potential for relocation of people experiencing homeless, removal and/or displacement of homeless encampments, and cleanup of remaining refuse would be coordinated and conducted among the County and/or cities prior to any subsequent project implementation activities.

One of the nine objectives of the *2020 LA River Master Plan* is to address potential adverse impacts on housing affordability and people experiencing homelessness, the aim of which is to maintain strategies for ensuring continuing housing affordability in LA River-adjacent communities. Like each of the other objectives, this objective is an active priority for the future of the river and was developed based on an extensive community engagement and geographic information system (GIS)-based needs analysis, with input from the community, the steering committee, and technical experts. As detailed in the *2020 LA River Master Plan*, there are eight actions in the *2020 LA River Master Plan*, each with a range of methods, that are identified to help address housing affordability and people experiencing homelessness. Action 6.8: "Integrate best practices for working with persons experiencing homelessness utilizing the river corridor," contains a methodology for creating a

centralized set of guidelines for the management and clearing of encampments based on compassionate practices. This—in coordination with the regulations, goals, and policies in other jurisdictions in the LA River study area—aims to make the river corridor a space where all people feel safe, have access to basic needs, and are treated with dignity. For details on goals, actions, and methods specific to the objective to address potential adverse impacts on housing affordability and people experiencing homelessness, refer to the Draft *2020 LA River Master Plan* found on the Public Works website: <https://www.larivermasterplan.org/>.

2.3.1.2 Master Response MR-2 (Program-Level Analysis in the PEIR)

As described in Chapter 1, *Introduction*, the *2020 LA River Master Plan* is an advance planning document, and no specific projects will be approved at the time the *2020 LA River Master Plan* is adopted. Similarly, the Draft PEIR analyzes the impacts of the *2020 LA River Master Plan* on a program level. Once certified, this PEIR would provide the County, the 17 cities through which the proposed Project extends, and other potential implementing parties with a base reference of facts and analyses that would avoid unnecessary repetition for future CEQA compliance by agencies on individual projects and would allow for a comprehensive approach to the consideration of regional and cumulative impacts.

The proposed Project analyzed in the Draft PEIR is the *2020 LA River Master Plan*, which includes up to 107 potential projects ranging in size from extra-small (less than 1 acre) to extra-large (150+ acres/10+ miles) that would be implemented over the 25-year horizon period to meet the *2020 LA River Master Plan's* nine objectives. These would include the two Typical Projects (Common Elements Typical Project and Multi-Use Trails and Access Gateways Typical Project) that would be constructed at a specified cadence, or spacing, along the river to ensure equitable distribution of facilities throughout the 51-mile-long corridor and help improve access and safety; and additional subsequent projects from the six kit of parts (KOP) categories' multi-benefit design components. These elements together compose the entirety of the *2020 LA River Master Plan*. As identified in Chapter 1, *Introduction*, of the Draft PEIR, the *2020 LA River Master Plan* is at a conceptual level and the specific locations of the 107 potential projects have not been determined. Therefore, the environmental impact analysis is presented at a programmatic level and does not include project-specific or site-specific analysis. Also, project-level approvals are not part of the *2020 LA River Master Plan* approval. For subsequent project activities, site-specific CEQA compliance would be the responsibility of the implementing agency prior to proposed project implementation.

As described in Section 2.5.1.3 of the Draft PEIR, several other agencies have planned proposed projects in other LA River plans (such as the 2007 LA River Revitalization Master Plan, the LA River Ecosystem Restoration Integrated Feasibility Report and its Recommended Plan – ARBOR Study, and the 2017 Lower LA River Revitalization Plan) in addition to the 107 potential projects identified in the *2020 LA River Master Plan*. The *2020 LA River Master Plan* included an opportunities and constraints analysis at sites along the corridor, taking into account the LA River right-of-way, adjacent land assets, and underlying geophysical conditions. However, implementation of these potential 107 subsequent projects would depend on many factors, including, but not limited to, the location, agency oversight, and jurisdiction; the proponent of subsequent projects; the implementing party; local community needs; policy decisions; timing of implementation; and availability of funding. Because of these factors, the Draft PEIR did not include site-specific or project-specific analysis and instead presented a program-level analysis of the *2020 LA River Master Plan*.

2.3.1.3 Master Response MR-3 (Public Outreach for the Draft PEIR)

The County, in accordance with CEQA, prepared a Notice of Preparation (NOP), which was released to the public and filed with the State Clearinghouse (SCH No. 2020070128) in the Office of Planning and Research on July 7, 2020. The NOP provided notice to the public and public agencies that a PEIR would be prepared, described the proposed Project that would be evaluated in detail in the Draft PEIR, listed the probable environmental effects of the Project, and identified the date, time, and location for an online scoping meeting, which was held on July 29, 2020. The NOP, which was also provided in Spanish, was distributed to involved public agencies and interested parties for a 30-day public review period, which began on July 7, 2020, and ended on August 6, 2020. Comments provided by the public and public agencies in response to the NOP were considered during preparation of the Draft PEIR.

Notification of the availability of the Draft PEIR was sent to the public and interested or affected agencies for review. Release of the Draft PEIR to the public began a 45-day comment period extending from February 1, 2021, to March 18, 2021. During that timeframe, members of the public and public agencies had the opportunity to review the Draft PEIR and provide comments on the document, including adequacy of the impact analyses. On March 4, 2021, in response to comments initially received, the review period was extended to April 2, 2021, for a total of 60 days. The review period was extended a second time to May 13, 2021, to provide additional review time to all interested parties. In total, the review period extended from February 1, 2021, to May 13, 2021, for a total of 101 days.

Section 15087 of the State CEQA Guidelines outlines the notice of availability of a draft EIR. Accordingly, notification of the availability of the Draft PEIR was published in newspapers of general circulation in the area affected by the proposed Project, posted at libraries open to the public, directly mailed to owners and occupants of properties contiguous to the parcel or parcels on which the proposed Project is located, emailed to interested parties, and posted on social media through Twitter and Facebook. Public notice of the availability of the Draft PEIR as well as review period extension notifications were provided in email and the following publications:

- *Glendale Independent*
- *Grunion Gazette*
- *L.A. Watts Times*
- *Long Beach Press Telegram*
- *Paramount Journal*
- *Los Angeles Times*
- *Excelsior LA*
- *The Canyon News*
- *Monterey Park Press*
- *The Downey Patriot*
- *The Signal Tribune*
- *South Bay Daily Breeze*

- *La Opinion*
- *Los Angeles Times en Español (Hoy Los Angeles)*
- *Los Angeles Daily News*

Due to COVID-19 precautions, the County, City of Los Angeles, and City of Long Beach libraries were closed starting in March 2020 and remained closed when the Draft PEIR was released on February 1, 2021. A flyer with information about the availability of the document on Public Works' website (pw.lacounty.gov/go/larmpceqa), and the March 3, 2021, community meeting was posted in a visible spot at the following library locations:

- Billie Jean King Main Library, Long Beach
- Long Beach Public Library – Bret Harte Neighborhood Library, Long Beach
- Michelle Obama Neighborhood Library, Long Beach
- East Rancho Dominguez Library, East Rancho Dominguez
- Paramount Library, Paramount
- Hollydale Library, South Gate
- Lynwood Library, Lynwood
- Cudahy Library, Cudahy
- Bell Gardens Library, Bell Gardens
- Bell Library, Bell
- Maywood Cesar Chavez Library, Maywood
- Huntington Park Library, Huntington Park
- Glendale Central Library, Glendale
- Burbank Public Library, Burbank
- Los Angeles Public Library, Los Angeles

On April 19, 2020, the County announced that select libraries would be re-opened for in-person services. As part of the phased re-opening, a hard copy of the Draft PEIR was made available from April 22, 2021, through the remainder of the 101-day review period at the following library locations:

- Leland R. Weaver Library, South Gate
- Huntington Park Library, Huntington Park
- Glendale Central Library, Glendale

The County provided English and Spanish translation during the *2020 LA River Master Plan* Draft PEIR scoping meeting and Draft PEIR public meeting, and through hyperlocal outreach. Notices for the Draft PEIR, including the Notice of Availability and flyers announcing the Draft PEIR public meeting held on March 3, 2021, were provided in Spanish and published in the three Spanish newspapers (listed above) in Los Angeles County serving the project area.

In addition to solicitation for public comments, a public meeting on the Draft PEIR was held on March 3, 2021, from 6 p.m. to 8 p.m. This public meeting was intended to inform interested parties about the Draft PEIR's analysis of the Project and to gather input from interested persons and agencies on the content of the Draft PEIR. The meeting was hosted online through Zoom video teleconference due to COVID-19 social distancing orders. A telephone call-in number was also provided as an option for attendees. A total of 519 people attended the public meeting through the Zoom video teleconference, 34 people called in to the meeting, and 57 attendees provided oral comments. These oral comments and responses are included in Section 2.3.2.4.3 of the Final PEIR. Spanish translation was available during the scoping meeting on July 29, 2020, and Draft PEIR public meeting on March 3, 2021. Spanish translations of the PowerPoint presentations for both meeting presentations were also made available online prior to the meeting at pw.lacounty.gov/go/larmpeqa and are still available to the public. All of the above noticing was in compliance with State CEQA Guidelines Section 15087, Public Review of Draft EIR, which requires the lead agency to provide public notice of the availability of a draft EIR at the same time as it sends a notice of completion to the Office of Planning and Research.

2.3.1.4 Master Response MR-4 (Adherence to Local Jurisdictions' Requirements)

As noted in Chapter 1 of the Draft PEIR, the County is currently proposing adoption of the *2020 LA River Master Plan*. Implementing parties for later activities under the PEIR would need to meet requirements of all applicable Federal, State, and local regulations.

Because this is a PEIR and project-level approvals are not part of the *2020 LA River Master Plan* approval, no other permits or approvals (and hence, no responsible agency actions) are anticipated for the *2020 LA River Master Plan*. If the Final PEIR is certified and the *2020 LA River Master Plan* is adopted, more detailed project-level review can proceed along the project study area by the County, the 17 other local jurisdictions, or other parties interested in implementing a specific project identified in the *2020 LA River Master Plan*. The PEIR will serve as a first-tier CEQA analysis for later project-level and site decisions by implementing agencies and other agencies with jurisdiction along the river corridor—including, but not limited to, the Los Angeles County Flood Control District and U.S. Army Corps of Engineers in regard to activities affecting their respective jurisdictions. Any jurisdiction intending to tier from the PEIR would need to consider project type, location, funding, permit requirements, and other agency jurisdiction in light of the findings identified for the PEIR.

Implementing agencies and others tiering from the PEIR will be subject to the subsequent CEQA compliance requirements of State CEQA Guidelines Section 15162. Agencies that do not choose to tier from the PEIR will need to conduct and comply with CEQA review separate from the PEIR. It is also possible that subsequent National Environmental Policy Act review may need to be performed where a Federal agency (e.g., the U.S. Army Corps of Engineers) has jurisdiction over a subsequent activity.

2.3.1.5 Master Response MR-5 (Naturalization of the LA River)

As described in Chapter 5, *Alternatives*, of the Draft PEIR, naturalizing the LA River through removal of concrete along the entire length of the river and restoring the channel to a naturalized substrate while maintaining the current channel alignment was an alternative that was considered but eliminated from further evaluation. (See Section 5.3.3, *Naturalize the LA River Alternative*, of the

Draft PEIR.) As discussed in Section 5.3.3 of the Draft PEIR, naturalizing the channel would significantly reduce the floodwater conveyance capacity of the river channel and significantly increase the chances of channel erosion and sedimentation, exacerbating flood risk. It would significantly impede the channel's ability to efficiently convey flood flows, which would significantly increase the risk of flooding along the 51 miles of the river. This standalone alternative would also not meet some of the project objectives such as reduced flood risk or improved resiliency; provision of equitable, inclusive, and safe parks, open space, and trails; increased opportunities for equitable access to the river corridor; arts and culture; housing affordability strategies; and improvements to water quality. While this alternative would avoid construction and operation impacts associated with improvements outside the channel (i.e., beyond top of levee), it could cause more severe in-channel downstream impacts, including at the Los Angeles and Long Beach ports and harbors. Therefore, this alternative was removed from further consideration.

Even though naturalization of the entire river is not feasible, the *2020 LA River Master Plan's* objectives include support of healthy connected ecosystems; promotion of healthy, safe, clean water; and improvement of local water supply reliability, while reducing flood risk and maintaining resiliency. In addition, as described in Section 2.5.1.2 of the Draft PEIR, design components under KOP Category 5, Floodplain Reclamation, include wetlands, naturalized banks, braided channels, fields, storage, and side channels, which can be considered as options to naturalize the river on a more localized scale. Reclaiming the floodplain in certain areas would reconnect the hydrologic relationship between the river and its floodplain, which has the potential to enhance ecological function, create park space, and improve water quality, among other benefits. Examples of ecological uses include a naturalized bank and a wider channel for decreased flood risk to support habitat communities. Any floodplain modification will require hydraulic analysis to ensure flood risk is not increased.

2.3.1.6 Master Response MR-6 (Gentrification and Housing Affordability)

Pursuant to Section 15131 of the State CEQA Guidelines, the PEIR focuses only on impacts related to adverse impacts on the physical environment and does not identify or disclose impacts related to socioeconomics, including gentrification and housing affordability. However, the *2020 LA River Master Plan* identifies that Los Angeles County is facing an ongoing housing crisis characterized by widespread displacement risk and gentrification. The *2020 LA River Master Plan* indicates that there is potential to negatively affect housing affordability associated with the *2020 LA River Master Plan's* goal of increasing parks and open space.

Housing affordability and availability is a concern in many Los Angeles County communities. Research for the *2020 LA River Master Plan* demonstrates that investment in parks, infrastructure, and community development can cause increased rent and property values, which, if not addressed, can cause displacement if residents are no longer able to afford homes or rent. Reducing displacement as a result of infrastructure investment and park improvement is critical, and efforts are already underway in Los Angeles County and several municipalities to limit or reduce displacement impacts. The *2020 LA River Master Plan* is focused on strategies to help current residents thrive in place and offers measures to reduce the effects of displacement through a series of actions outlined in Objective 6 of the *2020 LA River Master Plan*. The County is heavily invested in anti-displacement measures. In addition to the actions included in the *2020 LA River Master Plan*, the County has already passed several motions working toward equity for communities. Additional

efforts are continually needed across Los Angeles County and in local municipalities to improve housing affordability and the availability and preservation of affordable housing.

2.3.1.7 Master Response MR-7 (Master Plan Area/PEIR Study Area and Addressing the LA River in a Comprehensive Manner)

A watershed approach to the research was used during preparation of the *2020 LA River Master Plan*. All of the hydrology studies, social/demographic, and environmental research conducted covered the entire LA River watershed. *2020 LA River Master Plan* Objectives 8 and 9 in particular, but many of the others as well, operate at the scale of the watershed, which is noted in the *2020 LA River Master Plan*'s implementation matrix. A watershed-wide database of all the planned projects across the watershed was developed and the *2020 LA River Master Plan* team coordinated with other regional planning efforts to incorporate their project databases (e.g., the Upper Los Angeles River and Tributaries effort). There was no need to duplicate the effort of identifying opportunity sites around the entire watershed because other planning efforts already do this.

When it comes to the study area for the PEIR, the decision was made to consider current conditions and potential opportunities in a more focused study area along the river centerline. A 1-mile radius on either side of the LA River corridor was selected to capture potential sites that provide access to nearby points of interest within a reasonable walking distance. The 1-mile buffer was selected because it is a frequent timescale used for pedestrian movement (for example, the Los Angeles County Metropolitan Transportation Authority does the first mile/last mile program, and many walk score and park access studies are based on either 0.5-mile or 1-mile distances). The *2020 LA River Master Plan* team felt that it was important to recognize that improving access to the river for pedestrians and active transportation would require a deeper study of this 1-mile radius. Therefore, for the purposes of CEQA and consistency with the *2020 LA River Master Plan*, the study area is defined as a 2-mile-wide corridor—1 mile on each side of the river—that follows the centerline of the LA River for its entire 51 miles. This is consistent with the study area identified for the *2020 LA River Master Plan*, which does not include any tributaries of the LA River but instead focuses only on the main river stem. Furthermore, the sites identified in the *2020 LA River Master Plan* focus on an equitable cadence of opportunity locations at various scales depending on community needs.

2.3.2 Responses to Specific Comments

This section responds to those comments received that specifically pertain to the scope and content of the Draft PEIR. The written comment letters received by the County are included at the beginning of each response.

Where comments have prompted changes to text in the Draft PEIR, these changes have been compiled in Chapter 3, *Clarifications and Modifications to the Draft PEIR*. Where stated in the responses that implementation of mitigation measures would reduce potentially significant impacts to less-than-significant levels, it is assumed that the agencies implementing the projects will employ the mitigation as well. As noted in the Draft PEIR on page 1-4, "Each implementing agency would determine the significance after mitigation for potential impacts of their proposed projects."

2.3.2.1 Comment Letter A1: Santa Monica Mountains Conservancy, February 5, 2021

Comment#	Comment Text	Response
A1-1	<p>With the timing of the PEIR’s release and the comments due 3/18, we would need to also prepare our comments for the February SMMC meeting, which isn’t much time! We haven’t yet had the chance to dig into the PEIR as we are focused on the Master Plan, but I am writing to ask if the 45-day deadline could be pushed back to 60-days so that staff would have time to review the document and provide comments at the March SMMC meeting planned to occur on 3/22.</p>	<p>The County appreciates the Santa Monica Mountains Conservancy for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR). In response to this comment and others initially received, on March 4, 2021, the review period was extended to April 2, 2021 (60 days). The review period was then extended a second time to May 13, 2021, to provide additional review time to all interested parties. In total, the review period was open from February 1, 2021, to May 13, 2021, for 101 days, which is more than twice the 45-day minimum required by CEQA (State CEQA Guidelines Section 15105).</p>
A1-2	<p>Any consideration and direction you can provide on this request would be greatly appreciated, as we are coordinating our resources to provide feedback and need to know how to best focus.</p>	<p>This comment is acknowledged. Please see the response to comment A1-1 regarding the decision to extend the public review period for a total of 101 days.</p>

2.3.2.2 Comment Letter A2: City of Burbank, February 16, 2021

Comment #	Comment Text	Response
A2-1	Multiple departments in the City of Burbank are reviewing the DEIR for the L.A River Master Plan. I am emailing to request two additional weeks to review the DEIR.	<p>The County appreciates the City of Burbank for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i>.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR). In response to this comment and others initially received, on March 4, 2021, the review period was extended to April 2, 2021 (60 days). The review period was then extended a second time to May 13, 2021, to provide additional review time to all interested parties. In total, the review period was open from February 1, 2021, to May 13, 2021, for a total of 101 days, which is more than twice the 45-day minimum required by CEQA (State CEQA Guidelines Section 15105).</p>

2.3.2.3 Comment Letter A3: City of Burbank, February 18, 2021

Comment#	Comment Text	Response
A3-1	<p>I've included you both because I'm not sure who the Storm Water Quality Division is currently under. I've been asked to see if there is a possibility to get an extension of time to review and prepare a response document on the subject EIR. LACDPW has only provided a 45-day public review period to review an almost 2,000 page document. Burbank typically has responses to documents such as this, reviewed and signed by our City Council and Mayor. Our Council dates do not occur every week and our current staffing levels are limited at this time. Is there anyway to have this review period extended to at least 60 days so that agencies such as Burbank have sufficient time to review the extremely large document, prepare a reasonably detailed response letter, and have it presented to our City Council.</p> <p>The County Staff person in Storm Water Quality who is championing this document review is Grace Komjakraphan-Tek. Please let me know if you or Grace would be amenable to this request and thank you for your time.</p>	<p>The County appreciates the City of Burbank for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR). In response to this comment and others initially received, on March 4, 2021, the review period was extended to April 2, 2021 (60 days). The review period was then extended a second time to May 13, 2021, to provide additional review time to all interested parties. In total the review period was open from February 1, 2021, to May 13, 2021, for a total of 101 days, which is more than twice the 45-day minimum required by CEQA (State CEQA Guidelines Section 15105).</p>

2.3.2.4 Comment Letter A4: California Department of Transportation, February 25, 2021

Comment#	Comment Text	Response
A4-1	After reviewing the DEIR, Caltrans has the following comments: Caltrans concurs with Mitigation Measure TR-1a, which specifies that Vehicle Miles Travelled (VMT) impacts will be evaluated on a per project basis as well as the two-step screening process that will be used. This allows VMT impacts to be analyzed on a project level basis with more detail than can be provided in a Master Plan. Caltrans looks forward to reviewing these projects as part of the CEQA process.	The County appreciates the California Department of Transportation (Caltrans) for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> . This comment is acknowledged.
A4-2	Caltrans also concurs with Mitigation Measure TR-1b, which outlines the transportation demand management (TDM) strategies that will be used to offset or prevent the generation of excess VMT. It is especially noteworthy that one of the principal measures given is to price and/or limit car parking, as research indicates that car parking prioritizes driving above all other travel modes and undermines a community's ability to choose public transit and active modes of transportation.	This comment is acknowledged.
A4-3	It is especially noteworthy that one of the principal measures given is to price and/or limit car parking, as research indicates that car parking prioritizes driving above all other travel modes and undermines a community's ability to choose public transit and active modes of transportation.	This comment is acknowledged.
A4-4	Finally, for all locations where active transportation improvements are impacted by Caltrans right of way, our planners and engineers are available to partner on implementing design elements that improve safety and mobility for people walking or riding bikes throughout the Plan area. Some examples include protected Class IV bikeways, wider sidewalks, curb extensions, pedestrian refuge islands, landscaping, street furniture, reduced crossing distances, roadway narrowing, pedestrian and bicycle signage, flashing beacons, and refreshed or new crosswalks. These elements can	This comment is acknowledged. The County appreciates Caltrans' willingness to work with the County on future projects. The County will engage with Caltrans on applicable projects and will work with Caltrans to help the State meet its greenhouse gas (GHG) emissions reduction goals.

Comment#	Comment Text	Response
	<p>help the LA River Master Plan meet its objectives as well as Caltrans' targets of tripling trips made by bicycle, doubling trips made by walking and public transit, and a 15% reduction in statewide VMT. By removing barriers to walking, biking, and taking transit, this Plan can make transportation mode shift easier for Californians and help the State meet its policy goals to reduce the number of trips made by driving, Greenhouse Gas (GHG) emissions, and encourage alternative modes of travel.</p>	

2.3.2.5 Comment Letter A5: California Coastal Commission, February 25, 2021

Comment#	Comment Text	Response
A5-1	<p>Coastal Commission staff appreciates the opportunity to review and provide comment on the Draft Environmental Impact Report and Notice of Preparation for the 2020 LA River Master Plan (Plan). We also would like to acknowledge the significant collaboration that has taken place to date between interested stakeholders, and federal and state agency representatives, in the development of this significant restoration project. Given the complexity of this riparian and estuarine ecosystem, floodwater infrastructure, public access and recreation amenities, and coastal resources, additional and more thorough project review will be required as a part of necessary future coastal development permits (CDPs) for the proposed project.</p>	<p>The County appreciates the California Coastal Commission for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i>.</p>
A5-2	<p>The following comments address, in a preliminary manner, the issue of the Plan’s consistency with the policies of the California Coastal Act of 1976 (specifically Chapters 3 and 8). Based on the project description, portions the LA River in Frame 1 of the Plan are within a range of coastal jurisdictions and are therefore governed by various laws and regulations, including but not limited to, the Local Coastal Program (LCP) for the City of Long Beach, the Port Master Plan (PMP) of Long Beach, and other relevant policies derived from the California Coastal Act of 1976. This letter is an overview of the main issues Commission staff has identified at this time based on the information that has been presented, and it is not an exhaustive analysis. The comments contained herein are preliminary in nature, and those of Coastal Commission staff only, and should not be construed as representing the official opinion of the Coastal Commissioners.</p>	<p>The County understands that California Coastal Commission jurisdiction would be limited to subsequent projects in the designated coastal zone (i.e., the lower portion of Frame 1 of the LA River).</p> <p>The County acknowledges that the comments contained within this letter are preliminary in nature and from Coastal Commission staff, rather than from the Coastal Commissioners.</p>
A5-3	<p>The PEIR is conceptual in nature, stating on Pages 1-1 and 2-15 that it “presents a program-level analysis of the 2020 LA River Master Plan and its components that does not include any site-specific or project-specific analysis.” While there are over 107 potential projects identified throughout, there is no concrete or</p>	<p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR), regarding the programmatic analysis in the Draft PEIR.</p> <p>The County recognizes that future projects under the <i>2020 LA River Master Plan</i> that are within the Coastal Zone will require</p>

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	<p>detailed description of what each project would entail. The Plan consistently alludes to the 2017 Lower LA River Revitalization Plan and other preceding documents for more specific implementation plans; indeed, the PEIR uses information from these previous reports to make certain determinations and produce relevant maps, such as in Figure 3.10-2. Based on the way the PEIR is structured, the Commission staff's comments will therefore concern two main aspects: 1) as they pertain to the overall framework, and 2) as they pertain to specific potential projects planned for the Coastal Zone</p>	<p>review and approval of the California Coastal Commission or local government, as applicable.</p> <p>Consistent with CEQA, the Draft PEIR discusses any inconsistencies of the proposed Project and applicable general plans, specific plans, and regional plans, including the 2017 <i>Lower LA River Revitalization Plan</i>. Additionally, Figure 3.10-2 was mapped using Los Angeles County Assessor's parcel data. As the lead agency, the County used its own geographic information system layers.</p>
<p>A5-4</p>	<p>Regarding the coastal jurisdictions represented, Planning Frame 1, as shown, described, and analyzed in the PEIR, is partially within the Coastal Zone, and includes areas within the City of Long Beach, the Port of Long Beach (incl. Federal territory), and retained Coastal Commission jurisdiction. While the jurisdictional boundaries are generally as depicted in the Coastal Zone of Frame 1, they are more specifically as follows:</p> <p>The western flank of the Los Angeles County Flood Control Channel to the south and west of Anaheim St, and all subsequent Port areas to the south and west, shall be subject to the Port Master Plan (PMP) of Long Beach (refer to map on p. I-3 of 1990 PMP).</p> <p>The eastern flank of the Los Angeles County Flood Control Channel to the south and east of Ocean Blvd, and all subsequent City areas to the south and east, shall be subject to the City of Long Beach's Local Coastal Program (LCP [refer to Attachment A for PD-6 in LCP]). Appealable areas and areas of retained jurisdiction area may include all subareas below Seaside Wy.</p> <p>Along the Los Angeles River itself, between the two channelization banks, areas immediately south and including Ocean Blvd ROW shall be subject to the PMP, as they are located within Queensway Bay Harbor District 7 (PD-21). The eastern boundary of this jurisdiction crosses the River near mile marker 0 (PEIR Fig. 3.10-2), briefly touches the western bank of the River at the Queensway Bridge, and then turns east to roughly</p>	<p>The County agrees that the California Coastal Commission is responsible for processing coastal development permits for development projects within the identified area of the project study area and that development could be potentially restricted by Coastal Act policies, as noted in the comment.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). As this is a program-level EIR, the analysis presented is conservative in nature. Under State CEQA Guidelines Section 15168, where the later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the <i>2020 LA River Master Plan</i> PEIR. The <i>2020 LA River Master Plan</i> is a conceptual plan. All future specific projects would be subject to subsequent environmental compliance under State CEQA Guidelines Section 15168.</p> <p>The Draft PEIR identifies significant and unavoidable impacts in many environmental categories, but because the design information for the proposed <i>2020 LA River Master Plan</i> is at a conceptual level, and specific locations of potential projects are not proposed, the environmental impact analysis is presented at a programmatic level and does not include project-specific or site-specific analysis.</p>

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	<p>bisect Queensway Bay until the mouth of River. All areas to the north of the aforementioned boundary, and south of Seaside Wy in the City of Long Beach, thereby encompassing more than half of Queensway Bay, shall be subject to retained original Commission permit jurisdiction. Thus, the Coastal Commission is responsible for processing coastal development permits (CDPs) for development projects within this area of the Coastal Zone, as well as for making determinations of the consistency of such projects with the policies of the Coastal Act of 1976.</p> <p>In addition to the jurisdictional boundaries laid out above, it is important to note that the City of Long Beach has certified LCP language that offers guidance under the 1995 Queensway Bay Development Plan and subsequent LCP amendments, which will play a role in the Commission’s review of development within its retained jurisdiction. Also, the 1990 PMP is currently undergoing an update, to be reviewed by the Coastal Commission in 2021, which will prioritize future projects adjacent to the river. Staff appreciates that the PEIR explicitly recognizes the authority of public agencies in the LA River project, including the role of the California Coastal Commission. Should any projects in the Plan be developed, a coastal development permit will be required from each agency with jurisdiction in the coastal zone.</p> <p>The proposed project involves development in an area of the Commission’s retained coastal development permit jurisdiction, and development in areas of a certified Local Coastal Program and Port Master Plan. The Coastal Act was amended by Senate Bill 1843 in 2006 to add Section 30601.3, effective January 1, 2007. Section 30601.3 authorizes the Commission to process a consolidated coastal development permit application when requested by the local government and applicant, and is then approved by the Executive Director, for projects that would otherwise require coastal development permits from both the Commission and from a local government with a certified LCP, or several certified LCP or PMP areas. The policies of the Coastal Act provide the legal standard of review for a consolidated coastal development permit application submitted pursuant to</p>	<p>Because the Draft PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance. The State CEQA Guidelines Section 15168(c) states, “Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase.”</p> <p>The Draft PEIR has been revised to include the City of Long Beach’s Local Coastal Program (LCP) and the Port Master Plan (PMP) in the identified regulatory setting of Section 3.10, <i>Land Use</i>. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>As specific projects move forward under the <i>2020 LA River Master Plan</i>, the County anticipates that future project proposals, where applicable, would adhere to the PMP and the LCP. Please refer to Master Response MR-4 (Adherence to Local Jurisdictions’ Requirements) for additional information.</p>

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	<p>Section 30601.3. The local government’s certified LCP or PMP may be used as guidance.</p> <p>In short, the stated purpose of the master plan is to “improve 51 miles of connected open space along the LA River to improve health, equity, access, mobility, and economic opportunity for the diverse communities of the County while still providing flood risk management” (p. 1-4). The PEIR then lays out nine separate thematic goals in order to achieve this mission. While developing and implementing conceptual objectives and frameworks of the Plan, it is crucial to be aware that many impacts to coastal resources are restricted by Coastal Act policies. For example, except for certain specific instances, fill of a wetland or other coastal waters is prohibited (Section 30233), and the marine resources (Section 30230), water quality (Section 30231), and environmentally sensitive habitat areas (Section 30240) associated with coastal resources are also protected. In addition, public views of scenic coastal resources (Section 30251), public access and recreation (Section 30210), and the public’s ability to access the coast and coastal resources for water-oriented recreational activities (Section 30220) are also protected by the Coastal Act. To implement projects within the Coastal Zone, a Coastal Development Permit from the Commission or local government must be found to protect and enhance coastal resources, and consistent with policies of the Coastal Act and of the various LCPs and PMPs.</p>	
A5-5	<p>1.) Executive Summary and Introduction</p> <ul style="list-style-type: none"> • In the overview of the project, and in later summaries, the focus is on environmental impacts and subsequent mitigation measures proposed. In the context of restoration and development, it is indeed very helpful to evaluate the overall project framework by environmental impact category, and to qualitatively measure the difference between County-led and non-County mitigation. However, given the breadth in geography and jurisdiction of the Plan, it would be additionally informative to have a summary of federal, state, local, and other public 	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements).</p> <p>The <i>2020 LA River Master Plan</i> will guide all County departments in decision-making for LA River projects and facilities owned, operated, funded, permitted, and/or maintained by the County. All future specific projects would be subject to subsequent environmental compliance under State CEQA Guidelines Section 15168. Because the PEIR does not examine specific projects at</p>

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	<p>agencies involved in the project, to be detailed in Section 1.4. As such, regulatory bodies would be more adept at providing feedback, understanding their jurisdictional authority, and offering technical support to the County in the future development of this project</p>	<p>this time, the County anticipates that future specific projects would require subsequent CEQA compliance.</p> <p>Other agencies and municipalities are encouraged to implement the <i>2020 LA River Master Plan</i> as it applies to their jurisdictions in making the reimagined river a reality. Other agencies that might be involved in later activities are identified in the regulatory setting sections of each resource, but that County approval of the <i>2020 LA River Master Plan</i> itself does not require approvals from other agencies at this time.</p> <p>No changes to the Draft PEIR are needed.</p>
<p>A5-6</p>	<ul style="list-style-type: none"> • Copy Figure 19 of Appendix B (p. 36-37) and attach it to this section, as it helps decipher any redundant terminology within the context of the LA River. • Add links to the standalone document of each environmental impact category in chapter 3 of the PEIR. In addition, link each mitigation measure listed in Table ES-1 to its relevant section in the PEIR. • Add links to the section of the PEIR listed in the Front Matter. 	<p>The County appreciates the request for additional organizational components for the Draft PEIR. The Executive Summary is written in accordance with State CEQA Guidelines Section 15123 and presents the analyses in the order identified in the Draft PEIR and consistent with the CEQA Guidelines Appendix G Initial Study checklist. In addition, the table of contents presents the organization of the Executive Summary and the Draft PEIR, including Chapter 3, <i>CEQA Environmental Impact Assessment</i>, of the Draft PEIR. A list of acronyms used throughout the Draft PEIR is included directly after the Table of Contents.</p> <p>No changes to the Draft PEIR are needed.</p>
<p>A5-7</p>	<p>2.) Project Description</p> <ul style="list-style-type: none"> • Page 2-11 generally describes the different tiered pavilions under the Common Elements Typical Project. First, the regular interval with which these pavilions are projected to recur do not match the overall count shown in Table 2-2. Also, there are limits in all coastal jurisdictions for siting such projects in environmentally sensitive habitat areas (ESHAs) and/or wetlands; it is important these caveats and exceptions are noted in this section. 	<p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those</p>

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		<p>projects lies with the jurisdictions along the LA River. Please see Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>Because the Draft PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. Other agencies may use the Draft PEIR as the basis on which to tier future project environmental analyses under CEQA. State CEQA Guidelines Section 15168(c) states, "Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase."</p> <p>Table 2-2 in the Draft PEIR estimates the proposed projects that could be implemented over the 25-year horizon period to meet the <i>2020 LA River Master Plan's</i> nine objectives. As stated in Section 2.5.1.1, <i>Typical Projects</i>, in Chapter 2, <i>Project Description</i>, of the Draft PEIR, the need for common elements would be determined by spacing at set intervals along the LA River and would be implemented as needed.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern identified by the commenter: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-3a, Conduct Preconstruction Nesting Bird Surveys; BIO-3b, Conduct Preconstruction Raptor Nest Surveys; BIO-3c, Active Eagle Nest Avoidance Measures; BIO-3d(i), Conduct Burrowing Owl Preconstruction Surveys; BIO-3e, Conduct Preconstruction Special-Status Bat Surveys; BIO-3f, Implement Bat Avoidance and Relocation Measures; BIO-3g, Conduct Preconstruction Surveys for American Badger; BIO-</p>

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		<p>4, Identify Work Areas and Environmentally Sensitive Areas; BIO-5, Prepare and Implement Weed Abatement Plan; BIO-6, Conduct Biological Monitoring During Construction; BIO-7, No Intentional Collection and/or Killing of Plants or Wildlife; BIO-8, Work Stoppage; BIO-9, Prepare and Implement Construction Best Management Practices and Operations Recreation Plan; BIO-10, Prevent Entrapment in Construction Materials and Excavations; BIO-11, Restrict Monofilament Materials; BIO-12, Implement Best Practices for Night Lighting; BIO-13, Avoid Bird and Bat Entrapment in Poles; and BIO-14, Minimize Noise Disturbance of Wildlife. Any environmentally sensitive areas (ESAs), such as wetlands, habitat for special-status species, wildlife movement corridors, and/or nest sites, will be delineated, and no access will be allowed into these areas. Delineation of ESAs will include fencing, flagging, and other methods of demarcation sufficient to prevent entry into the ESA. No grading or fill activity of any type will be permitted within ESAs.</p> <p>In addition to the measures included in the Draft PEIR, Mitigation Measures BIO-3d(ii), Implement Burrowing Owl Avoidance and Relocation Measures; BIO-3d(iii), Implement Burrowing Owl Mitigation Management Plan; and BIO-20b, Protect Against Tree Diseases, Pests, and Pathogens, were added in the Final PEIR in response to comments from CDFW. No additional changes to the Draft PEIR are needed nor does the inclusion of these mitigation measure change conclusions in the Draft PEIR.</p>
A5-8	<ul style="list-style-type: none"> • In Table 2-6, the pavilion components are set to be at elevation above the 1% storm event. The project must consider sea-level rise (SLR). Please follow the Ocean Protection Council’s (OPC) State of California Sea-Level Rise Guidance, 2018 Update for sea-level rise predictions, as additional areas within and outside of Frame 1 may be inundated depending on emissions scenarios and other factors. Most importantly, under this schema, the 1% event probability constitutes a high-risk aversion decision, and 	<p>The California Supreme Court decided in <i>California Building Industry Assoc. v. Bay Area Air Quality Management District</i> (2015) 62 Cal-4th 369 that impacts of the environment on the proposed Project, such as sea level rise, are not subject to CEQA review. However, future projects under the <i>2020 LA River Master Plan</i> will consider the effects of sea level rise in their design,</p>

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	<p>combined with future sea level rise under the high risk aversion scenario, it would likely coincide with at least 1.5+ ft baseline inundation by 2050, in areas within the flood control channel near the tidal mouth (especially areas of the Port).</p>	<p>consistent with state and local concerns, including the Coastal Act and LCPs, where applicable.</p>
<p>A5-9</p>	<ul style="list-style-type: none"> Page 2-11 and Figure 2-19 include an equestrian trail under the Multi-Use Trails and Access Gateways Typical Project. Is an equestrian trail planned for the entirety of the LA River? Such a project would require an amendment to the Long Beach LCP or PMP in order to secure a permit, depending on which side of the River it is planned for, since only bicycle and pedestrian routes are currently allowed within either jurisdiction. 	<p>The <i>2020 LA River Master Plan</i> intends to connect trails and paths along the length of the river to create a mobility network across Los Angeles County for cyclists, pedestrians, and equestrians and accommodate as many user types as safely as possible. Implementation of all <i>2020 LA River Master Plan</i> Design Guidelines (Design Guidelines) must be consistent with prevailing building codes and relevant regulations and permits.</p> <p>Please refer to Mitigation Measure LU-4, Site Selection Process, which states that for subsequent projects the implementing agency will coordinate with and obtain all necessary land use entitlements, permits, and approvals from all agencies with jurisdiction, including the California Coastal Commission and the City of Long Beach, as applicable.</p>
<p>A5-10</p>	<ul style="list-style-type: none"> For equestrian trails, there are also wildlife considerations, especially near salt marshes, mudflats, and existing marine biological reserves. Horses, if they get graze near ESHAs, may perturb several endangered and noncommon species, particularly birds such as the light-footed Ridgway’s rail and California least tern (Levin et al. 2002). Changes in avian biodiversity and shifts in biological resources may further affect fish populations by increasing predation or otherwise disturbing the local estuarine ecosystem. 	<p>The construction of Multi-Use Trails and Access Gateways Typical Projects would include a continuous path for multiple uses, bike trails, equestrian trails, vegetated buffers, and pedestrian trails, with gateways for access to the river. Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which discusses how direct impacts on special-status birds, raptors, and migratory birds as a result of construction or operation of Multi-Use Trails and Access Gateways Typical Projects would be reduced to less-than-significant levels with Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-3a, Conduct Preconstruction Nesting Bird Surveys; BIO-3b, Conduct Preconstruction Raptor Nest Surveys; BIO-3c, Active Eagle Nest Avoidance Measures; BIO-3d(i), Conduct Burrowing Owl Preconstruction Surveys; BIO-3e, Conduct Preconstruction Special-Status Bat Surveys; BIO-3f,</p>

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		<p>Implement Bat Avoidance and Relocation Measures; BIO-3g, Conduct Preconstruction Surveys for American Badger; BIO-4, Identify Work Areas and Environmentally Sensitive Areas; BIO-5, Prepare and Implement Weed Abatement Plan; BIO-6, Conduct Biological Monitoring During Construction; BIO-7, No Intentional Collection and/or Killing of Plants or Wildlife; BIO-8, Work Stoppage; BIO-9, Prepare and Implement Construction Best Management Practices and Operations Recreation Plan; BIO-10, Prevent Entrapment in Construction Materials and Excavations; BIO-11, Restrict Monofilament Materials; BIO-12, Implement Best Practices for Night Lighting; BIO-13, Avoid Bird and Bat Entrapment in Poles; and BIO-14, Minimize Noise Disturbance of Wildlife.</p> <p>In addition to the measures included in the Draft PEIR, Mitigation Measures BIO-3d(ii), Implement Burrowing Owl Avoidance and Relocation Measures; BIO-3d(iii), Implement Burrowing Owl Mitigation Management Plan; and BIO-20b, Protect Against Tree Diseases, Pests, and Pathogens, were added in the Final PEIR in response to comments from CDFW.</p> <p>Section 3.3, <i>Biological Resources</i>, of the Draft PEIR also identifies additional indirect recreational impacts on special-status birds, raptors, and migratory birds, which may include human disturbance of nesting, foraging, mating, and resting through human activities such as hiking, bird watching, walking, biking, and use of the river. Indirect effects would be reduced to less-than-significant levels with incorporation of the mitigation measures identified above.</p>
A5-11	<ul style="list-style-type: none"> • Please specify in Table 2-5 and in Section 2.5.1.1 that vegetated buffers within the Multi-Use Trails and Access Gateways Typical Project should follow plant species suggested in Section 3.3.1 and Appendix B, and that they must be in accordance with the estuarine nature of the LA River below where appropriate. Such plant species should occupy ecological niches that were 	<p>Table 2-5, Ecology, Habitat, and Planting Design Guidelines: Key Features, highlights the key features in the <i>Ecology, Habitat, and Planting</i> chapter of the Design Guidelines, including the key drawing and specification technical requirements that are relevant to the analysis in the Draft PEIR. Please refer to Appendix B.2, <i>Design Guidelines</i>, for a detailed description of all Ecology, Habitat, and Planting Design Guidelines and the full</p>

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	historically prevalent, assimilating any existing geobiological gradients and ecotones.	<p>drawing and specification technical requirements and maintenance program checklists.</p> <p>As described in the Design Guidelines, planting would adhere to the Los Angeles County Flood Control District and Public Works Permitting checklist and follow the most recent U.S. Army Corps of Engineers Guidelines. Planting in Frame 1 would be in accordance with the estuarine nature of the LA River.</p>
A5-12	<ul style="list-style-type: none"> • If channel modifications, as per KOP 2, are to follow “estuary channel” specifications as exhibited in Figure 2-2, they will likely need a consistency determination and permit approval, given that not all areas of the project proposed within the Coastal Zone are currently configured accordingly. 	<p>This comment is acknowledged. Development within Frame 1 potentially would need a coastal development permit and/or other approval by either the California Coastal Commission or a local government.</p> <p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including BMPs to reduce environmental impacts. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements).</p> <p>Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance, including the California Coastal Commission and the City of Long Beach, as applicable. State CEQA Guidelines Section 15168(c) states, “Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase.”</p> <p>Additionally, please refer to Mitigation Measure LU-4, Site Selection Process, which states that for subsequent projects the implementing agency will coordinate with and obtain all necessary land use entitlements, permits, and approvals from all</p>

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		<p>agencies with jurisdiction, including the California Coastal Commission and the City of Long Beach, as applicable.</p> <p>No changes to the Draft PEIR are needed.</p>
A5-13	<ul style="list-style-type: none"> • A figure after Figure 2-25 showing an overlaid diagram of all KOP proposals would be very useful for understanding the interplay among each kit-of-parts. The Commission assumes that various segments of the River would have multiple KOPs combined. 	<p>This comment is acknowledged. In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including BMPs to reduce environmental impacts. Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, “Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase.”</p> <p>Additionally, as described in Chapter 2, <i>Project Description</i>, of the Draft PEIR, each KOP category is independent and includes a recommended collection of design components and can be implemented individually or in any combination as subsequent projects, as driven by the local jurisdiction’s needs, funding, and policy decisions.</p> <p>No changes to the Draft PEIR are needed.</p>
A5-14	<ul style="list-style-type: none"> • It is important to note on Page 2-13 that KOP 3 might not be fully implementable if KOP 1 is not first applied, which is contingent on amending the PMP for intended projects within the Coastal Zone. As shown in Figure 3.11-4 and discussed in Table 2-3, bridges, and other modes of connectivity between 	<p>This comment regarding the concern that KOP Category 3 could not be implemented without implementation of KOP Category 1 is acknowledged.</p> <p>In the <i>2020 LA River Master Plan</i>, projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>.</p>

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	<p>both sides of the River, may not be feasible at times, especially where there are ongoing mining and petrological operations (i.e., oil pumping) right next to the channel. If abutting industrial zones are to be converted to recreational areas, An LCP Amendment or Port Master Plan Amendment will be required.</p>	<p>There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including BMPs to reduce environmental impacts. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements).</p> <p>Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance, including the California Coastal Commission and the City of Long Beach, as applicable. State CEQA Guidelines Section 15168(c) states, “Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase.”</p> <p>Please refer to Mitigation Measure LU-4, Site Selection Process, which states that for subsequent projects the implementing agency will coordinate with and obtain all necessary land use entitlements permits and approvals from all agencies with jurisdiction, including the California Coastal Commission and the City of Long Beach, as applicable.</p> <p>Additionally, as described in Chapter 2, <i>Project Description</i>, of the Draft PEIR, each KOP category is independent and includes a recommended collection of design components and can be implemented individually or in any combination as subsequent projects, as driven by the local jurisdiction’s needs, funding, and policy decisions.</p> <p>Please also refer to Section 3.11, <i>Mineral Resources</i>, of the Draft PEIR, which discusses how compliance with local general plans and the Los Angeles County General Plan would ensure that impacts on mineral resources would be less than significant. Jurisdictions that do not have policies regarding mineral resources in their adopted general plan have determined these</p>

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		<p>land areas are fully built out (i.e., land is fully developed, with no potential for extraction), and therefore do not provide for extraction.</p> <p>The Draft PEIR has been revised include the City of Long Beach’s LCP and the PMP in the identified regulatory setting of Section 3.10, <i>Land Use</i>. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
A5-15	<ul style="list-style-type: none"> • A study showing the hydrologic/hydraulic outcomes depending on paving materials used in KOP 1, 2, and 3. This is important because additional paved sites of development of the River might augment outflow to the Coastal Zone, and it might affect things such as water quality and salinity, hydrologic cycle, and ecosystem of the estuarine and marine environment downstream 	<p>Please see the response to comment A5-12 and A5-14.</p> <p>The Draft PEIR addresses the potential for increased flows. Please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, which discusses how impacts regarding drainage alteration resulting in erosion, flooding, runoff, or altered flood flows would be reduced to less-than-significant levels with Mitigation Measures HYDRO-1a, Require Site-Specific Drainage Studies to Address Stormwater Management, and HYDRO-1b, Require Stormwater Control Measures. Mitigation Measure HYDRO-1a requires site-specific drainage studies to address stormwater management. Additionally, construction would be required to comply with the Long Beach Municipal Separate Storm Sewer System (MS4) Permit (for work within Frame 1) and the County MS4 Permit requirements and their associated provisions, local jurisdictions’ stormwater management programs, and the National Pollutant Discharge Elimination System Construction General Permit.</p>
A5-16	<ul style="list-style-type: none"> • There is mention on Page 2-14 that, “Any modification to the LA River channel or its water flow requires hydraulic analysis is not increased and to consider the downstream impacts of altering the flow rate on other uses of the water, such as ecosystem function.” There is no reference to such an analysis or study, however. Please include one if possible, for the effects of KOP 4-6. 	<p>Please see the response to comments A5-12 and A5-14.</p> <p>Please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, which addresses potential downstream impacts. Subsequent projects would be required to implement Mitigation Measure HYDRO-1a, Require Site-Specific Drainage Studies to Address Stormwater Management, which requires site-specific drainage studies to address stormwater management.</p>

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A5-17	<p>3.) Impact Assessment</p> <p>a.) Utilities/Service Systems</p> <ul style="list-style-type: none"> • In accordance with the hydraulic analysis of channel modifications, it would be informative to also study altered flow rates due to utility consumption, specifically water, for various project sites. 	<p>Please see the response to comment A5-12.</p> <p>Please refer to Section 3.18, <i>Utilities/Service Systems</i>, of the Draft PEIR, which discusses how most of the KOP categories would require additional utility connections, utility relocations, and expansion of existing infrastructure, depending on location and size of the subsequent projects under the KOP categories. The extent of trenching or repaving to accommodate utility relocation or the extent of aboveground utility relocations is unknown for the subsequent projects under the KOP categories. However, as described in Section 3.18, <i>Utilities/Service Systems</i>, of the Draft PEIR, it is not anticipated that these activities would be extensive or result in substantial environmental effects. Based on the types of potential subsequent projects, it is expected that impacts on flow rates due to utility consumptions would be less than significant.</p> <p>However, if a subsequent project requires relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, or other utilities, the implementing agency would implement Mitigation Measure UTIL-1, Prepare and Implement Utilities Plan.</p> <p>As described in Mitigation Measure UTIL-1, as part of the utilities plan, the implementing agency will prepare a utilities report that compares the expected operational demand and generation for the various utility resources against existing supply and infrastructure to determine whether sufficient capacity exists to accommodate the proposed Project; if any insufficiency is identified, the implementing agency will modify the proposed Project to avoid the impact in consultation with the affected utility provider(s).</p>
A5-18	<ul style="list-style-type: none"> • On Pages 3.18-10 and 3.18-19, it is unclear if Long Beach Water Department (LBWD) would be increasing water recycling and greywater treatment capacity in an effort to create a closed, self-sufficient water utility system. That could be a mitigation measure for environmental impact, despite the PEIR’s 	<p>This comment is acknowledged. Information included in Section 3.18.2.1, <i>Utilities/Service Systems</i>, of the Draft PEIR, is a summary of the City of Long Beach’s current water supply system. Information included on page Section 3.18.2.3, <i>Utilities/Service Systems</i>, of the Draft PEIR is a summary of the sewer and</p>

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	assessment that wastewater from Common Elements Typical Projects would be of minimal impact.	wastewater treatment systems in the City of Long Beach. This information is provided as a geographic and regulatory setting. Recommendation for increased recycling and graywater treatment capacity in the City of Long Beach is directed more appropriately toward the City of Long Beach and does not generally apply the <i>2020 LA River Master Plan</i> . As stated in the comment, it is correct that wastewater from implementation from the Common Elements Typical Projects would result in a less-than-significant impact. Therefore, mitigation would not be required.
A5-19	b.) Recreation • Be aware that there are currently restrictions on types of recreation in the LA River subject to both PMP and LCP (generally passive recreation including walking and cycling), which could be amended with the emergence of new potential projects.	Please see the response to comment A5-12.
A5-20	• Currently, placement of gateways and trails would be limited to eastern bank/levee of LA River, except in PD-7 of the PMP due to relevant stipulation. This roughly limits public access and recreation on the western bank of the river to east of Harbor Scenic Drive. This could be changed with a Port Master Plan Amendment and would require collaboration with the Port to ensure that recreational use of the western bank of the river could be provided safely and without disrupting essential Port operations.	Please see the response to comment A5-12.
A5-21	• Table 3.15-30 should include elements from the LCP, which is part of the Long Beach General Plan.	This comment regarding adding relevant elements from the LCP is acknowledged. The Draft PEIR has been revised include the City of Long Beach’s LCP in the identified regulatory setting of Section 3.15, <i>Recreation</i> . See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i> . These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.

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A5-22	<ul style="list-style-type: none"> • There should be a separate section to discuss the Port of Long Beach, since it is within Frame 1, and it contains Harry Bridges Memorial Park and the RMS Queen Mary. 	<p>The geographic and regulatory portions of each section are organized by frame and jurisdiction, where relevant. This organization is consistent throughout the entire Draft PEIR. The Port of Long Beach would not be broken out separately. Harry Bridges Memorial Park and the RMS Queen Mary are identified in Table 3.15-4, Parks and Recreational Resources, within Frame 1.</p>
A5-23	<p>c.) Transportation</p> <ul style="list-style-type: none"> • On Page 3.16-13. The PEIR should mention the importance of integrating transportation infrastructure, consistent with the goals and policies of the LB LCP and PMP, especially the bike path system for PD-6 in Shoreline Downtown. 	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements).</p> <p>Because the Draft PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, “Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase.”</p> <p>As specific projects move forward under the <i>2020 LA River Master Plan</i>, the County anticipates that future project proposals, where applicable, would adhere to the PMP and the LCP. Please refer to Master Response MR-4 (Adherence to Local Jurisdictions’ Requirements) for additional information.</p> <p>Additionally, relevant policies from the Mobility Element of the <i>City of Long Beach General Plan</i>, which incorporates Long Beach’s LCP, Safe Streets Long Beach Vision Zero Action Plan, and the City’s Bicycle Master Plan 2040, are included in the Section 3.16, <i>Transportation</i>, discussion.</p>
A5-24	<ul style="list-style-type: none"> • Any development plans in the Queensway Bay area should increase mobility and public access between the Queensway Bay Harbor District and the City of Long Beach. 	<p>This comment is acknowledged. The <i>2020 LA River Master Plan</i> intends to connect trails and paths along the length of the river to create a mobility network across Los Angeles County for cyclists, pedestrians, and equestrians and accommodate as many user types as safely as possible. Additionally, please refer to</p>

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		<p>Section 3.16, <i>Transportation</i>, of the Draft PEIR, which discusses how the <i>2020 LA River Master Plan</i> intends to complete the LA River Trail so that there is a continuous route along the entire river and encourages future routes on both sides of the river, where feasible. This would include the Queensway Bay area transportation discussion for improved mobility.</p>
<p>A5-25</p>	<ul style="list-style-type: none"> •Coastal Act Chapter 3 policies require development projects to minimally increase vehicle miles travelled or vehicular traffic, to the extent possible. 	<p>This comment is acknowledged. Please refer to Section 3.16, <i>Transportation</i>, of the Draft PEIR, which discusses how implementation of the <i>2020 LA River Master Plan</i> was determined to have the potential to generate a significant vehicle miles traveled (VMT) impact. Mitigation Measures TRA-1a, Determine VMT Based on Type of Subsequent Project, and TRA-1b, Implement TDM Strategies and/or Enhancements to Reduce VMT, would be implemented to reduce this impact to a less-than-significant level.</p>
<p>A5-26</p>	<p>d.) Tribal Cultural Resources</p> <ul style="list-style-type: none"> •The Coastal Act has tribal consultation and environmental justice provisions that would perhaps differ than the tribal cultural resources impact analysis performed here. Therefore, in projects located within the Coastal Zone, there should be a tribal consultation and environmental justice study/process that is consistent with Commission policies and regulations. Please reference those policies at the following: www.coastal.ca.gov/env-justice/tribal-consultation/. 	<p>The Draft PEIR complies will the requirements of Assembly Bill 52 with regard to consultation with California Native American tribes. CEQA contains no requirement for analysis of environmental justice.</p> <p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River. Please see Master Response MR-2 (Program-Level Analysis in the PEIR).</p>

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		<p>Because the Draft PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance.</p> <p>Additionally, please see the response to comment A5-12.</p>
A5-27	<ul style="list-style-type: none"> •Mitigation measures listed on Page 3.17-13 are crucial for compliance with Coastal Act Chapter 3 policies. Archaeological and paleontological study of each project site must be first undertaken before any construction below grade 	<p>This comment is acknowledged.</p>
A5-28	<ul style="list-style-type: none"> •There must be some framework included (complementary to the California Native American Graves Protection and Repatriation Act of 2001, as described on Page3.17-7), in which there is a balanced selection process for archaeological and paleontological artefacts and findings to be exhibited at the art and community centers proposed under Common Elements Typical Project KOP 3. 	<p>The County has not included this specific recommendation because it may not be acceptable to all Native American tribes.</p>
A5-29	<ul style="list-style-type: none"> •Sections 4.1.3.2 and 4.1.3.3 in Chapter 4 (Other CEQA Considerations) are more detailed in explaining the impacts of construction and operation of Typical Projects on archaeological resources (and human remains). A figure in Chapter 3 specifying excavation methods is necessary, especially for human remains, for areas inside and outside the littoral zone. 	<p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River. Please see Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>Because the Draft PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, “Later activities in the program must be examined in the light of the program EIR to determine whether</p>

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		<p>an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase.” Where subsequent CEQA documents are required, this will include consultation with Native American tribes, as applicable.</p> <p>The Draft PEIR does not provide greater specificity for excavation methods because methods can vary depending on the cultural resource, its sensitivity, and the concerns of the affected Native American tribes. This will provide flexibility for culturally acceptable site-specific methods to be employed for future projects.</p>
A5-30	<p>e.) Population and Housing</p> <ul style="list-style-type: none"> •The Commission is aware that in the immediate vicinity of the LA River within the Coastal Zone, there are limited areas zoned for residential housing. Nevertheless, Frame 1 encompasses other parts of the Coastal Zone, especially in the City of Long Beach, that have dense housing. As such, changes in housing density or design that are motivated by the Plan may have significant impact within the Coastal Zone. As such, it is important to refer to Coastal Act Chapter 3 and LCP policies regarding environmental justice (EJ) for further nuance on the subject. 	<p>Environmental justice is not a CEQA requirement, and there currently are no formal procedures to evaluate potential environmental justice impacts under CEQA.</p> <p>However, as discussed in <i>the 2020 LA River Master Plan</i>, the <i>2020 LA River Master Plan</i> contains objectives intended to support affordable housing and people experiencing homelessness, i.e., Goal 6: Address Potential Adverse Impacts to Housing Affordability and People Experiencing Homelessness. As noted in prior responses, future projects within the Coastal Zone will comply with the Coastal Act, California Coastal Commission regulations, and the provisions of certified LCPs.</p> <p>Additionally, please see the response to comment A5-12.</p>
A5-31	<ul style="list-style-type: none"> •The EIR should include additional discussion and findings surrounding EJ to address potential project impacts to housing, human and environmental health, and the environment. 	<p>As discussed above, environmental justice is not a CEQA requirement. Additionally, the State CEQA Guidelines state that social and economic effects will not be treated as significant effects on the environment (State CEQA Guidelines Section 15131).</p> <p>However, human and environmental health, as well as effects on population and housing, are analyzed in the Draft PEIR. Topics analyzed in the Draft PEIR include aesthetics, air quality, biological resources, cultural resources, energy, geology, soils, and paleontology resources, greenhouse gas emissions, hazards</p>

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		and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities/service systems, and wildfire.
A5-32	<p>•Additionally, Planning Frame maps with geographical breakdown of current zoning and zoning ordinances would help identify areas where housing is predicted to change dramatically near the LA River. These Frame maps could be overlaid with known environmental risks, such as industrial hazards (especially near the Port), sea-level rise, poor air and water quality, and unstable geology, in order to increase breadth of environmental justice discussion.</p>	<p>As discussed above, environmental justice is not a CEQA requirement. Please refer to Section 3.13, <i>Population and Housing</i>, of the Draft PEIR, which addresses the physical effects of the proposed Project on housing.</p> <p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River. Please see Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>Because the Draft PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, "Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase."</p> <p>No changes to the Draft PEIR are needed.</p>
A5-33	<p>f.) Land Use and Planning</p> <p>•Figure 3.10-2 would be a useful map for stakeholders within the Coastal Zone, but the boundaries for Plan Project Sites are</p>	<p>The proposed Project is a conceptual master plan. The current level of detail in Figure 3.10-2 in Section 3.10, <i>Land Use and Planning</i>, of the Draft PEIR reflects the scale of the proposed</p>

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	vague. Commission staff cross-referenced this map with 2017 LLARRP project site descriptions and was able to identify some potential project sites in the coastal zone.	Project and its conceptual (as opposed to site-specific) nature. No change to Figure 3.10-2 is needed.
A5-34	<ul style="list-style-type: none"> Based on this section, there are several anticipated projects in the PMP that would take precedence over, or conflict with, several Plan Project Sites. Based on the 1990 Long Beach Port Master Plan, there are plans for rail, berth, and pier expansions in the Harbor District. For example, as later discussed in the staff's comments, project sites such as the Shoemaker Bridge Realignment and Harbor District River Edge Greening would be of lesser urgency according to the PMP. Therefore, PMP amendments would be necessary to structurally change the permitting and review priorities for large portions of Frame 1. 	<p>To the extent that future projects come under the jurisdiction of other agencies, such as where LCPs are required, the implementing agency will work with the affected agencies to obtain approvals. This will include complying with the permit requirements of those agencies in project design and implementation.</p> <p>Please see the response to comment A5-12.</p> <p>Additionally, please refer to Master Response MR-4 (Adherence to Local Jurisdictions' Requirements).</p>
A5-35	<ul style="list-style-type: none"> Grading and construction phases must also conform to the LCP, PMP, and then Coastal Act. In particular, any operational use or construction activity that disturbs wetlands, creates significant landform alteration near coastal resources, or affects stream flow, requires a coastal development permit. 	Please see the response to comment A5-12.
A5-36	<p>g.) Hydrology and Water Quality</p> <ul style="list-style-type: none"> No development should occur in the wetland portion of the estuary, except for maintenance of the wetland function and removal of contaminants. 	Please see the response to comment A5-12.
A5-37	<ul style="list-style-type: none"> The PEIR should include sea-level rise and storm flood risk data from the State's OPC Sea-Level Rise Guidance 2018 Update, in addition to FEMA data and scenarios, especially within the Coastal Zone. 	Please see the responses to comments A5-8 and A5-12.
A5-38	<ul style="list-style-type: none"> A Stormwater Quality Management Plan (SQMP) or Stormwater Pollution Prevention Plan (SWPPP), including proposals for project dewatering within coastal watersheds and for waste discharge, will be required prior to any action on a project by the 	Please see the response to comment A5-12.

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	Commission. It must be compliant with Section 30254.5 of the Coastal Act.	
A5-39	<ul style="list-style-type: none"> •Infrastructure projects that affect and alter the hydrologic balance of the LA River system, such as described for KOP 6 (p. 3.9-47), must also submit to the review and permitting process by the Commission. 	Please see the response to comment A5-12.
A5-40	<ul style="list-style-type: none"> •Placement of pavilions (“Typical Project” Tier I-III) in interval distance might go against Section 30233d of Coastal Act if water flow within the flood channel is significantly altered, especially in areas where there is currently soft bottom habitat which has less capacity to adapt to stormflow. 	Please see the response to comment A5-12.
A5-41	<p>h.) Geology, Soils, and Paleontological Resources</p> <ul style="list-style-type: none"> •Geological and biological study of impact of terracing levees and riverbanks, both in soft-bottom and concrete-bottom sections, should be analyzed for the potential to improve water quality and habitat potential, consistent with Section 30253 of the Coastal Act. 	Please see the response to comment A5-12.
A5-42	<ul style="list-style-type: none"> •Dredging specifications near mouth of river and in Queensway Bay should be provided, and the PEIR should note that on-site or off-site mitigation may be required. The Plan should also identify potential uses for the dredged soils. 	Please see the response to comment A5-12.
A5-43	<ul style="list-style-type: none"> •Projects with the potential to cause or contribute to erosion, liquefaction, and surface rupture within the Coastal Zone must follow guidance in LCP, PMP, and Coastal Act. 	Please see the response to comment A5-12.
A5-44	<ul style="list-style-type: none"> •Staff suggests coming up with a Climate Action Plan (CAP) for the Coastal Zone of the project, perhaps incorporating elements of the City of Long Beach Climate Action and Adaptation Plan. Staff asks that this CAP have intersectional analyses linking GHG emissions to ocean acidification, storm flood risk, poor air quality, ecological degradation, etc. The CAP should also address 	Although a Climate Action Plan has not been developed as part of the <i>2020 LA River Master Plan</i> , Action 1.4 of the <i>2020 LA River Master Plan</i> calls for inclusion of climate change research in the planning process for new projects along the LA River. Method 1.4.1 calls for preparation of an interinstitutional study on climate change impacts in the Los Angeles Basin, and Method

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	<p>the adaptive capacity of the river and planned projects to withstand the effects of climate change and reduce risks to surrounding areas.</p>	<p>1.4.2 calls for application of the latest accepted climate change prediction models. These methods address the commenter’s recommendation that analysis be undertaken to “address the adaptive capacity of the river and planned projects to withstand the effects of climate change.” Furthermore, in addition to climate change research being led by the Los Angeles County Department of Public Works in coordination with academic institutions, the Los Angeles County Sustainability Plan, <i>Our County</i>, will be working to develop vulnerability data for Los Angeles County. The plans call for the work of the <i>2020 LA River Master Plan</i> and <i>Our County</i> to continue to be coordinated as both plans are implemented. Lastly, there is no regulatory requirement to develop a Climate Action Plan as part of the <i>2020 LA River Master Plan</i> development process.</p>
<p>A5-45</p>	<p>i.) Hazards and Hazardous Materials</p> <ul style="list-style-type: none"> •The Plan should provide further explanation of mitigation measures against hazards, especially within Harbor Districts 1, 4, and 6. Hazards in Frame 1 are mostly industrial in nature; air quality, water quality, and flood risk assessments are needed for this portion of the River, which is rather unique in this respect (see Section 3.11). 	<p>Please refer to Section 3.8, <i>Hazards and Hazardous Materials</i>, of the Draft PEIR, which focuses on potentially contaminated sites within and immediately adjacent to the project footprint. The analysis also includes potential impacts associated with routine handling of hazardous materials during project construction and operations and near schools, potential aviation impacts, potential impacts on emergency response, and potential effects of wildland fires. Mitigation measures in the section intend to address potential significant impacts and include Mitigation Measures HAZ-1, Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures; WF-2, Prepare a Construction Fire Protection Plan; and WF-3, Prepare a Fire Protection Plan. As such, air quality, water quality, and flood risk impacts typically are not within the scope of the hazards and hazardous materials analysis. In addition, please see Master Response MR-2 (Program-Level Analysis in the PEIR) for additional details about how the analysis was conducted.</p>

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A5-46	<ul style="list-style-type: none"> Section 3.11 (specifically Figure 3.11-4) illustrates the high hazard risk for recreational activities in Harbor District 7 on the western side of the LA River. Most of the oil extraction within Frame 1 is along the western bank of the channel, interjected between the I-710 Freeway (offramp) and levee. 	The comment is acknowledged.
A5-47	<ul style="list-style-type: none"> The PEIR should identify regulatory mechanisms to induce projects with significant environmental benefit and harm reduction, and incentives to reduce mineral extraction within and adjacent to the Plan area. 	Reducing mineral extraction is outside the scope of the <i>2020 LA River Master Plan</i> , and therefore outside the scope of the Draft PEIR.
A5-48	<ul style="list-style-type: none"> The section should include a discussion or study of the impact of plastic debris. Plastic debris has downstream implications, for biological resources, visual resources, recreational opportunities, and economic activity, especially in the estuarine and marine areas of the LA River. Mitigation measures and general analysis should be described, with respect to KOPs, Typical Projects, and construction and operations frameworks. 	The impact of plastic debris is outside the scope of the <i>2020 LA River Master Plan</i> . It is a conceptual plan, not a regulatory document, and has limited ability to regulate plastic debris. Therefore, this specific topic is outside the scope of the Draft PEIR. Please also refer to Master Response MR-2 (Program-Level Analysis in the PEIR).
A5-49	<p>j.) Cultural Resources</p> <ul style="list-style-type: none"> The Coastal Act prioritizes public access, recreation, and environmental justice over the preservation, restoration, rehabilitation, and reconstruction of cultural or historic landmarks. Natural features of the Coastal Zone, of course, should be prioritized. 	The comment is acknowledged. Please see the response to comment A5-12.
A5-50	<p>k.) Biological Resources</p> <ul style="list-style-type: none"> The PEIR should provide and ecological study of current wildlife ecotones and gradients between Anaheim St and Mouth of LA River. There is a shift from riparian to estuarine. Terrestrial, avian, and marine life should be highlighted in Appendix D. Restoration vs. habitat creation frameworks/metrics should also be included, especially since a replica pre-channelization restoration might not be viable in the face of climate change and sea-level rise. 	Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The environmental impact analysis and applicable significance conclusions in the Draft PEIR are not contingent on the detailed and extensive study that the commenters suggest.

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A5-51	<p>4.) Other CEQA Considerations</p> <ul style="list-style-type: none"> •In this section, it might be useful to holistically assess the environmental benefits of this project, as well. CEQA Guidelines ask for very specific considerations, but an additional summary of environmental benefits would be useful in creating a necessary cost-benefit analysis for such an extensive project. It would also be an important prequel to Chapter 5 (Alternatives), too, in that stakeholders could more easily contemplate the significance and consequence of each proposed project alternative. 	<p>CEQA and the State CEQA Guidelines do not require an EIR to highlight the environmental benefits of a project, but to focus on the potentially substantial, <i>adverse</i> changes in any of the physical conditions (State CEQA Guidelines Section 15382).</p> <p>Chapter 4, <i>Other CEQA Considerations</i>, discusses significant effects of the proposed Project that cannot be avoided if the proposed Project is implemented, addresses significant irreversible changes to the environment that would result from implementation of the <i>2020 LA River Master Plan</i>, discusses the environmental effects of the <i>2020 LA River Master Plan</i> that were determined not to be significant, and discusses the potential for growth-inducing impacts of the <i>2020 LA River Master Plan</i>, which pertains to ways in which the <i>2020 LA River Master Plan</i> could promote either direct or indirect growth.</p> <p>Implementation of the proposed Project is expected to provide benefits such as increased acres of publicly accessible open space, reduction in flood risk, increased vegetation and canopy cover, promotion of biodiversity, support for persons experiencing homelessness, increased opportunities for alternatives modes of transportation, improved water quality, and many more benefits. A full list of benefits is provided in the Statement of Overriding Considerations. Some of these benefits include, but are not limited to: providing hundreds of acres of publicly accessible open space in some of the County’s most park-poor communities; reducing flood risk, while also reducing the impacts of flooding, thereby reducing the need for flood insurance; providing additional jobs and training for local communities; providing support to people experiencing homelessness; increasing affordable housing and housing stability; incentivizing and prioritizing investment along the LA River; increasing vegetation and tree canopy along the LA River; improving water quality and securing additional water supplies; and providing equitable access to the LA River.</p>

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A5-52	<ul style="list-style-type: none"> • One other aspect that should be considered would be construction and operations for KOP 2, channel modifications, within the context of the Coastal Zone. Rather than modifying the concrete banks of the River, the project might require dredging near the mouth of the River at Queensway Bay. This Chapter is a good place to analyze potential environmental impacts of dredging as part of KOP 2. 	<p>KOP Category 2 design components could include terraced banks, check dams and deployable barriers, levees, armored channels/vertical walls, daylighted storm drains, removed/added concrete, bridge pier modifications, channel texturing/grooving/smoothing, and installation of access ramps. The Draft PEIR and <i>2020 LA River Master Plan</i> do not anticipate dredging. However, please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, which states that the proposed Project would comply with the Clean Water Act, River and Harbors Appropriation Act (Section 10), and State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004).</p>
A5-53	<p>The following comments regard potential project sites laid out in the 2017 Lower LA River Revitalization Plan and Figure 3.10-2 of the Plan. There were no descriptions of any specific land-use or implementation plans, and as such, the comments made forth are only to illustrate the existent confines and limitations for any future Plan project site located within the Coastal Zone.</p> <ul style="list-style-type: none"> • Park on Golden Avenue <p>If a park is to be modified, dedicated, expanded, or otherwise altered in any within the Golden Shore Master Plan area, as delineated in Long Beach’s LCP Amendment No. 1-10, then the current plans for this subarea must be amended or appealed, and the project must be reviewed by the Coastal Commission through an amendment to the Long Beach LCP.</p> <ul style="list-style-type: none"> • City of Long Beach Queensway Bay Plan <p>The Queensway Bay is under retained Commission jurisdiction, and as such as under the permit review process pursuant to policies in Chapters 3 and 8 of the California Coastal Act of 1976. Additionally, there is significant guidance in LCP Amendment No. 1-95, and such, this document should be consulted for any future changes to the Queensway Bay area.</p> <ul style="list-style-type: none"> • Golden Shore Biological Reserve 	<p>Please see the response to comment A5-12.</p> <p>No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
	<p>This marine reserve is part of the Tideland Trust Land originally dedicated by the Long Beach LCP in 1980. Since then, LCP Amendment No. 1-95 has added specifications to this parcel, and any changes proposed here must be approved by the Commission, since the area is located within the Commission’s retained jurisdiction.</p> <ul style="list-style-type: none"> • Shoemaker Bridge/Chavez Park Realignment <p>The western terminus of the Shoemaker Bridge falls within Port of Long Beach jurisdiction, and as such as is governed by the PMP. Awaiting an update, the latest PMP from 1990 prioritizes an industrial rail alignment project known as Pico Corridor Interchange over other projects. A PMP Amendment may be required if the project conflicts with planned Port uses.</p> <ul style="list-style-type: none"> • 6th & 7th St Pedestrian Improvements <p>This project will require review by the Port of Long Beach for consistency with the PMP and Port objectives.</p> <ul style="list-style-type: none"> • Harbor District River Edge Greening <p>A greening of the River edge may be compatible with the 1990 PMP Goal 4 of District 7 (p. VI-26). However, in other Harbor Districts, such as 1, 4, and 6, such a project might not be currently permissible unless the PMP is amended or updated. The Commission supports the goal to increase environmental benefits within this jurisdiction, so long as they are compatible with the Port’s operations and the Coastal Act’s Chapters 3 and 8 policies.</p> <ul style="list-style-type: none"> •Waterfront Bike Path <p>The Waterfront Bike Path is a recent improvement which the Plan suggests would be later expanded into a multi-use trail under KOP 1. to the facility should be integrated it into the existing cycling network laid out in the LCP for Planning District 6 (Downtown Shoreline).On the Port side, Harbor District 7 supports increased public access and recreational opportunities, including cycling, whereas other riverfront Harbor Districts do</p>	

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	<p>not. In such Harbor Districts (1, 4, and 6), other anticipated projects may be of higher priority, though it is subject to change as the PMP is updated and amended. In any case, existing paths and cycling facilities should in integrated with planned projects in a network approach.</p> <ul style="list-style-type: none"> •Ocean Boulevard Greening <p>There are already park dedication provisions for the southern ROW on Ocean Blvd, such as Victory Park and Santa Cruz Park. There are also certain landscaping stipulations(usually described as “lush vegetation”) for these areas. Much of this language, at least for PD-6, can be found in LCP Amendment No. 1-10.</p> <ul style="list-style-type: none"> •Terminal Island Freeway Tree Buffer <p>Unlike at the River edge, where vegetation efforts are encouraged south of Ocean Blvd under the Goal 4 of the 1990 PMP for District 7 (p. VI-26), a freeway tree buffer may be incompatible within an intensively industrial zone of the Port. The buffer should be designed and sited in order to be compatible with Port berths and piers, which might also change usage or location in the future. Therefore, a tree buffer might not be an appropriate or reasonable addition to this specific site.</p> <ul style="list-style-type: none"> •Los Angeles River Greenway <p>It is assumed that the County will seamlessly connect areas abutting the banks of the LA River both inside and outside the Coastal Zone. LCP, PMP, and Coastal Act policies dictate the viability of an LA River Greenway, yet it is highly encouraged that this project is realized concurrently alongside parallel additions such as the Ocean Blvd Greening, Harbor District River Edge Greening, and Waterfront Bike Path.</p>	
A5-54	<ul style="list-style-type: none"> •Screened Public Parcels <p>The 2017 Lower LA River Revitalization Plan states that, “Low impact development to treat the onsite 85th percentile runoff volume was proposed on all screened, publicly owned parcels</p>	<p>Please see the response to comment A5-12.</p> <p>Please also refer to the dredging discussion in the response to comment A5-50.</p>

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	<p>throughout the Watershed Management Program area.” Due to the industrial and environmental benefit of treating and recycling storm runoff, the Plan should continue this goal of utilizing excess parcels adjacent to the river for stormwater management.</p> <p>•Add: Estuarine Dredging</p> <p>The Long Beach LCP offers guidance to continuously dredge Queensway Bay and the mouth of the Los Angeles River after heavy winter rains, in order assure the continuation of boating operations of Catalina Landing and the Downtown Marina, as well as those of the Port from RMS Queen Mary towards Pier J. The Coastal Act includes dredging policies applicable to the mouth of the LA River and Queensway Bay that are not covered by the LCP guidance, and/or those that are within the Commission’s original retained permit jurisdiction. If the dredging is done in a manner similar to the consistency determination CD-005-97, then the County would be fulfilling a crucial public works assignment in the most ideal manner. Otherwise, the County would have to submit the project for review and permitting with the Commission.</p>	<p>Additionally, the Draft PEIR and <i>2020 LA River Master Plan</i> do not anticipate dredging. As identified in Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, the proposed Project would comply with the Clean Water Act, River and Harbors Appropriation Act (Section 10), and State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004).</p> <p>No changes to the Draft PEIR are needed.</p>
A5-55	<p>Please note that the comments provided herein are preliminary in nature. More specific comments may be appropriate as the project develops and site-specific plans are assigned. Coastal Commission staff requests notification of any future activity associated with this project or related projects. Additionally, the comments contained herein are those of Coastal Commission staff only and should not be construed as representing the opinion of the Coastal Commission itself. Thank you again for the opportunity to comment on the Draft PEIR. We look forward to future collaboration on preservation of coastal resources within the South Coast region. If you have any questions or concerns, please do not hesitate to contact us at the Coastal Commission’s Long Beach office.</p>	<p>This is a concluding statement from the commenter. Although this comment seems to state that further comments are forthcoming, no further responses have been received from the California Coastal Commission to date. No further response is necessary.</p>

2.3.2.6 Comment Letter A6: California Department of Fish and Wildlife, April 28, 2021

Comment#	Comment Text	Response
A6-1	<p>CDFW’s Role</p> <p>CDFW is California’s Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.</p> <p>CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in “take”, as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.</p>	<p>The County appreciates the California Department of Fish and Wildlife (CDFW) for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This is an introductory comment that summarizes the role and authority of the CDFW under CEQA that precedes specific comments. No further response is required.</p>
A6-2	<p>Project Description and Summary</p> <p>Background: In the 1930s, the U.S. Army Corps of Engineers and Los Angeles County Flood Control District channelized the Los Angeles River (LA River) and replaced the shifting floodplain to protect lives and property from flooding. As a result, the LA</p>	<p>This is an introductory comment that summarizes information about the <i>2020 LA River Master Plan</i> that precedes specific comments. No further response is required. No changes to the Draft PEIR are needed.</p>

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	<p>River evolved from an uncontrolled and meandering river to a major flood management system. The historic floodplain of the LA River is almost entirely developed. Most of the LA River within the channel (bank to bank) is concrete lined along its sides and bottom. However, the LA River is “soft-bottom” (earthen channel) at the Estuary, Sepulveda Basin, and Glendale Narrows. Other areas of the LA River have concrete walls forming a rectangular channel, often called a box channel, or a trapezoidal channel formed by levees.</p> <p>Objective: The proposed Project is along a 51-mile-long, approximately 2-mile-wide corridor (1 mile on each side) of the LA River. The LA River right-of-way is confined to its channel, top of levee, and immediately adjacent “landside” areas. The Project’s nine objectives are to:</p> <ol style="list-style-type: none"> 1) Reduce flood risk and improve resiliency; 2) Provide equitable, inclusive, and safe parks, open space, and trails; 3) Support healthy connected ecosystems; 4) Enhance opportunities for equitable access to the river corridor; 5) Embrace and enhance opportunities for arts and culture; 6) Address potential adverse impacts on housing affordability and people experiencing homelessness; 7) Foster opportunities for continued community engagement, development, and education; 8) Improve local water supply reliability; and, 9) Promote healthy, safe, clean water. <p>To meet Project objectives, the Project includes up to 107 potential projects ranging in size from extra-small (less than 1 acre) to extra-large (150+ acres/10+ miles) that would be implemented over the next 25 years. The Project is intended to be a visionary and practical document for 18 local jurisdictions</p>	

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	<p>within the Project area. The Project allows for a consistent approach to achieve the nine objectives through implementation of six improvement categories, or kit of parts (KOP) categories. The six KOP categories include:</p> <p>1) KOP Category 1: Trails and Access Gateways. The following design components could be constructed: pedestrian/bike/equestrian trails; equestrian facilities; light towers; water towers; lookouts; boardwalks; channel access points; vehicular access for maintenance and operations; underpasses and overpasses; vegetated buffer; and habitat corridor.</p> <p>2) KOP Category 2: Channel Modifications. The following design components could be constructed: terraced bank; check dams and deployable barriers; levees; armored channels/vertical walls; daylighted storm drains; removed/added concrete; sediment removal; bridge pier modifications; channel texturing/grooving/smoothing; reshape low flow; and installation of access ramps.</p> <p>3) KOP Category 3: Crossings and Platforms. The following design components could be constructed: bridges (pedestrian, bike, equestrian, habitat/wildlife, and multi-use); cantilevers; and platforms.</p> <p>4) KOP Category 4: Diversions. The following design components could be constructed: pumps, diversion pipe/tunnel/channel, overflow weirs, underground gallery, side channel, storm drain interceptors, and wetlands.</p> <p>5) KOP Category 5: Floodplain Reclamation. Floodplain reclamation in the LA River include wetlands, naturalized banks, braided channels, fields, storage, and side channels.</p> <p>6) KOP Category 6: Off-Channel Land Assets. Off-channel land assets include affordable housing; cultural centers; urban agriculture/composting; water storage; water treatment facilities; dry wells; spreading grounds; purple pipe connections; storm drain daylighting; injection wells; solar panels; fields; and</p>	

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	<p>parks. These design elements would occur outside of the LA River right-of-way.</p> <p>Each of these six KOP categories includes a recommended collection of design components and can be implemented individually or in any combination as subsequent projects, as driven by the local jurisdiction’s needs, funding, and policy decisions.</p> <p>After the Project is approved, individual subsequent projects would be designed and implemented over time by any one of the 18 jurisdictions or others. Individual subsequent projects would tier from the PEIR.</p> <p>Location: The LA River encompasses an 834 square-mile watershed. The LA River flows from its headwaters in the Santa Susana Mountains eastward to the northern area of Griffith Park. Then, the LA River turns southward through the Glendale Narrows before it flows across the coastal plain and into San Pedro Bay near Long Beach where the LA River drains into the Pacific Ocean. The Project spans through 18 jurisdictions (17 cities and unincorporated Los Angeles County areas). Nine distinct geographical sections, or planning frames, related to jurisdictional, hydraulic, and ecological zones have been identified along the LA River and are included in the Project.</p> <p>Comments and Recommendations</p> <p>CDFW offers the comments and recommendations below to assist LACPW in adequately identifying, avoiding, and/or mitigating the Project’s significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project’s CEQA mitigation, monitoring, and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).</p>	

Comment#	Comment Text	Response
A6-3	<p>Comment #1: Impacts of Recreation on Wildlife</p> <p>Issue: The Project may impact biological resources because of increased visitor uses and recreation.</p> <p>Specific impacts: The Project may cause local extirpation of wildlife from otherwise suitable habitat. Direct impacts on wildlife may include energetic costs to the animal, nest abandonment, reduced reproductive success, and reduced fitness.</p> <p>Why impacts would occur: The Project proposes to create recreational opportunities along the LA River where opportunities do not currently exist. These opportunities include pedestrian/bike/equestrian trails, equestrian facilities, lookouts, boardwalks, channel access points, platform parks, and pavilions. Increased visitor uses and recreation along the LA River has potential to impact wildlife and habitat through a variety of ways, including:</p> <ul style="list-style-type: none"> * Increased numbers of people and dogs; * Increased area of influence; * Increased noise levels; * Increased trash or pet waste; * Introduction of unnatural food sources via trash and trash receptacles; * Loss of habitat due to erosion from non-official footpaths; and, * Loss of habitat due to introduction or spread of invasive plant species. <p>Evidence impacts would be significant: Recreation and increased human activities can have the following effects on wildlife:</p> <ul style="list-style-type: none"> * Non-consumptive recreation can lead to detrimental changes in animal behavior, reproduction, growth, and immune system function (Lucas 2020). 	<p>Regarding CDFW’s Mitigation Measure #1, the Draft PEIR’s Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys, already includes the requirement that a regulatory assessment be conducted for individual subsequent projects. This would include a construction and operation impact analysis and the identification and implementation of appropriate avoidance and minimization measures based on the presence of biological resources. Impact analysis includes appropriate assessment of project-specific disturbances (e.g., recreational effects, night lighting, noise). This means that all subsequent projects would be evaluated individually for impacts and would implement appropriate avoidance and minimization measures for the individual project. Because this mitigation measure already begins the process of making a determination of whether the proposed individual subsequent project would have a significant environmental impact on biological resources and provides the steps necessary to make that determination, no change to Draft PEIR Mitigation Measure BIO-1 is needed from this comment. However, other clarifications to the measure have been added regarding literature review and the determination of presence/absence for identification of rare plants. See Chapter 3 of this Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed</p> <p>Regarding CDFW Mitigation Measure #2, individual subsequent projects would include a regulatory assessment, impact analysis, appropriate avoidance and minimization measures, and required lead agency approvals.</p> <p>If, during implementation of Draft PEIR Mitigation Measure BIO-1, it is determined that known breeding and nursery sites for sensitive or special-status species occur within the project area, then project-specific avoidance and minimization measures would be implemented as included in other Draft PEIR mitigation measures (i.e., Mitigation Measures BIO-3a, Conduct Preconstruction Nesting Bird Surveys, and BIO-9,</p>

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	<p>* Human presence can instill strong fear in wild animals, which may adjust their activity to avoid contact with humans. Such risk avoidance can have important nonlethal effects on animal physiology and fitness. This shift may have negative and far-reaching ecological consequences (Gaynor et al. 2018; Mitrovich et al. 2020).</p> <p>* Human activities that result in escape or avoidance behaviors may increase the probability of a bird being detected by a predator, increase intraspecific aggression in colonial species, expose bird chicks and eggs to adverse environmental conditions that can cause embryo death, and divert energy from feeding or reproduction to defensive behaviors (Hillman et al. 2015).</p> <p>* Blue tit (<i>Cyanistes caeruleus</i>) nestlings near recreation facilities develop slower and fledge with low body mass and poor body condition (Remacha et al. 2016).</p> <p>* Belding’s savannah sparrow (<i>Passerculus sandwichensis beldingi</i>) is sensitive to pedestrian and vehicle traffic. An approaching distance of 3 meters and 2.8 meters during the pre-nesting and nesting season, respectively, alert Belding’s savannah sparrows to take flight (Fernandez-Juricic et al. 2009).</p> <p>* Being approached by a person may trigger a change in the behavior or physiological processes in a bird (e.g., flight responses or increased heart rate). Although these responses tend to be short in duration, they can have longer term effects as is the case of breeding birds being flushed from nests leaving eggs or chicks vulnerable to predation (Steven et al. 2011).</p> <p>* Relatively ‘low’ impact activities such as walking or hiking can still have negative effects on birds (Steven et al. 2011).</p> <p>* Increased noise may alter or mask the auditory signals required for information exchange in birds (Hillman et al. 2015).</p>	<p>Prepare and Implement Construction Best Management Practices and Operations Recreation Plan).</p> <p>The Draft PEIR has been revised to include trail avoidance and minimization measures, including the modification of trails, spatial arrangement of trails, trail dimensions, access points, and recreational structures under Draft PEIR Mitigation Measure BIO-9. The Draft PEIR has also been revised to include avoidance and minimization measures to reduce impacts on sensitive wildlife and habitat features through the incorporation of setbacks and restrictions, as appropriate, to avoid significant and unavoidable impacts for subsequent projects under Mitigation Measure BIO-9. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>In addition to seasonal closures during sensitive periods and seasonal restrictions on certain recreational uses to mitigate for the proposed Project’s potential to displace or extirpate wildlife, PEIR Mitigation Measure BIO-9 also requires other construction BMPs for construction and maintenance activities. If it is determined that there is the potential for special-status wildlife that could become entrapped in construction materials or excavations, then PEIR Mitigation Measure BIO-10, Prevent Entrapment in Construction Materials and Excavations, and other mitigation measures will be required to be implemented without timing or reasonable restrictions.</p> <p>Regarding CDFW Mitigation Measure #3, as stated previously, individual subsequent projects would include a regulatory assessment, impact analysis, appropriate avoidance and minimization measures, and required lead agency approvals. Setbacks or restrictions for recreation projects where avoidance is not feasible would be incorporated into project design, as required by CEQA.</p> <p>Text has been added to Mitigation Measure BIO-9 to include avoidance and minimization measures to reduce impacts on</p>

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	<p>* Some species of birds are sensitive to off-trail activities, particularly dog walking (greater area of influence) (Miller et al. 2001).</p> <p>* Patterns of wildlife habitat use can be disrupted by disturbances occurring outside of regular human activity, such as large recreation events, off-trail visitor behavior, or the proliferation of new social trails, even in areas that traditionally see high levels of visitor use (Mitrovich et al. 2020).</p> <p>The Project has proposed to Mitigation Measure BIO-9: Prepare and Implement Construction Best Management Practices and Operations Recreation Plan, to mitigate for potential impacts of recreation on biological resources. Mitigation Measure BIO-9 proposes seasonal closures during sensitive periods and seasonal restrictions on certain recreational uses. Seasonal closures would only mitigate for potential impacts on wildlife during certain times of the year (e.g., bird nesting season). However, wildlife could use or occupy habitat year-round. Wildlife could become displaced or extirpated from otherwise functional habitat where recreational activities are created or increased. Seasonal closures alone may be insufficient to mitigate for the Project’s potential to displace or extirpate wildlife. Accordingly, inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species by CDFW and/or U.S. Fish and Wildlife Service (USFWS).</p> <p>Recommended Potentially Feasible Mitigation Measure(s)</p> <p>Mitigation Measure #1: CDFW recommends LACPW include measures under Mitigation Measure BIO-1 or BIO-9 (or where appropriate) whereby individual subsequent projects analyze impacts of recreational activities on biological resources. At a minimum, an analysis should include:</p>	<p>sensitive wildlife and habitat features through the incorporation of setbacks and restrictions, as appropriate, to avoid significant and unavoidable impacts for subsequent projects. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>.</p> <p>The revisions to the mitigation measure clarify the mitigation in the Draft PEIR and do not result in a change in the Draft PEIR’s conclusions. Because the Draft PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements).</p>

Comment#	Comment Text	Response
	<p>1) potential direct and indirect impacts on wildlife as a function of each type of recreational activity proposed and associated increases in human activity, noise, and lighting; and,</p> <p>2) potential for wildlife to be entangled in furnishings (e.g., perimeter fencing or netting around basketball courts) associated with each recreational activity.</p> <p>Mitigation Measure #2: CDFW recommends LACPW provide a mitigation measure whereby recreational activities proposed by individual subsequent projects avoid known breeding and nursery sites for sensitive and special status species (e.g., least Bell’s vireo). At a minimum, a project should restrict or modify trails, trail dimensions, number of trails, spatial arrangement of trails, access points, and all recreation-related structures to avoid sensitive areas.</p> <p>Mitigation Measure #3: CDFW recommends LACPW provide a mitigation measure whereby recreational activities proposed by individual subsequent projects incorporate appropriate setbacks or restrictions if avoidance is not feasible. An appropriate setback should consider the species (e.g., alert and flight initiation distances) and type and intensity of recreational use proposed (e.g., trail, pavilion, lookout). A project should restrict activities that are likely to have greater impacts such as dog walking and horseback riding near sensitive and special status species habitat. A project should restrict the size of gathering areas such as pavilions to limit the number of users to a smaller group.</p>	
A6-4	<p>Comment #2: California Fully Protected Bird Species</p> <p>Issue: The Project may impact California Fully Protected bird species.</p> <p>Specific impacts: According to Table 3.3-3 in Chapter 3.3, Biological Resources, the following California Fully Protected bird species have a potential to occur along the LA River: American peregrine falcon (<i>Falco peregrinus</i>); bald eagle (<i>Haliaeetus leucocephalus</i>); California brown pelican (<i>Pelecanus</i></p>	<p>Regarding CDFW Mitigation Measure #1, the Draft PEIR was revised to add a minimum 0.5-mile no-disturbance buffer around nests of California fully protected bird species to Mitigation Measures BIO-3a, Conduct Preconstruction Nesting Bird Surveys; BIO-3b, Conduct Preconstruction Raptor Nest Surveys; and BIO-3c, Active Eagle Nest Avoidance Measures. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are</p>

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	<p>occidentalis californicus); and California least tern (<i>Sterna albifrons browni</i>). Project construction and activities, directly or through habitat modification, may result in injury or mortality, reduced reproductive capacity, population declines, or local extirpation of these California Fully Protected bird species. Temporal or permanent loss of foraging, breeding, nesting, or nursery habitat may occur.</p> <p>Why impacts would occur: Impacts to these species may occur as a result of ground disturbing (e.g., staging, mobilization, demolition, and grading) activities, vegetation removal, increased human activity, noise disturbances, light, and dust. The Project proposes mitigation for nesting birds and raptors by implementing a buffer of up to 500 feet for a raptor nest and an appropriate distance for a non-raptor nest as determined by a biologist. Buffers for birds and raptors may not be large enough to avoid impacts on nests of California Fully Protected birds.</p> <p>Moreover, the Project’s proposed buffers only mitigates for impacts on nests, eggs, and nestlings during the bird/raptor breeding season. California Fully Protected species may not be taken at any time. Accordingly, an adequate mitigation plan would need to also avoid impacts on a California Fully Protected species during all life stages.</p> <p>Evidence impact would be significant: The Project may result in adverse effects, either directly or through habitat modifications, on a California Fully Protected species. Take of any species designated as California Fully Protected under the Fish and Game Code is prohibited. CDFW cannot authorize the take of any California Fully Protected species as defined by State law. California Fully Protected species may not be taken or possessed at any time. No licenses or permits may be issued for take, except for collecting those species for necessary scientific research and relocation of the bird species for protection of livestock (Fish & G. Code, § 3511).</p> <p>Recommended Potentially Feasible Mitigation Measure(s)</p>	<p>clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>Individual subsequent projects would include robust avoidance, buffer, and demarcation plans specifically for California fully protected bird species, depending on project-level specifics (e.g., project area, species, life stages, scope of work). Draft PEIR Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys, requires that a regulatory assessment, impact analysis, appropriate avoidance and minimization measures, and required lead agency approvals be conducted. Because this mitigation measure already begins the process of making a determination of whether the proposed individual subsequent project would have a significant environmental impact on biological resources and provides the steps necessary to make that determination, no change to Draft PEIR Mitigation Measure BIO-1 is needed. However, the Draft PEIR has been revised to include other clarifications to the measure regarding literature review and the determination of presence/absence for identification of rare plants. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>Regarding CDFW Mitigation Measure #2, the Draft PEIR has been revised to require consultation with CDFW if a bald eagle nest is detected in the project area under Mitigation Measure BIO-3c, Active Eagle Nest Avoidance Measures. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR is a programmatic document and does not include project-specific or site-specific analysis. All future specific projects would be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168. Because the PEIR does not examine specific projects at this time, the</p>

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	<p>Mitigation Measure #1: CDFW recommends LACPW provide a mitigation measure whereby individual subsequent projects avoid impacts on California Fully Protected birds by implementing a minimum 0.5-mile no-disturbance buffer around each nest of a California Fully Protected bird. Additionally, a qualified biologist should develop a robust avoidance, buffer, and demarcation plan specifically for California Fully Protected birds depending on project-level specifics [e.g., project area, species, life stage(s), scope of work].</p> <p>Mitigation Measure #2: CDFW recommends Mitigation Measure BIO-3c, Active Eagle Nest Avoidance Measures, be modified to state that a lead agency will also notify and consult with CDFW (in addition to USFWS) if a bald eagle nest is detected within a project area.</p>	<p>County anticipates that future specific projects would require subsequent CEQA compliance.</p>
<p>A6-5</p>	<p>Comment #3: Lake and Streambed Alteration Agreement Issue: The Project may impact streams.</p> <p>Specific impacts: The Project may result in temporary or permanent modifications to a stream. Why impacts would occur: The Project may modify the LA River by modifying the channel (KOP Category 2), creating platform parks on a land bridge across the channel, and installing diversion structures (KOP Category 4). Diversion structures may obstruct water flow and change the bed and channel of a stream (confinement). Water diversion may adversely affect the existing stream pattern, potentially resulting in substantial erosion or siltation within the project area and downstream.</p> <p>Evidence impacts would be significant: Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:</p> <ul style="list-style-type: none"> * Divert or obstruct the natural flow of any river, stream, or lake; * Change the bed, channel, or bank of any river, stream, or lake; 	<p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River. Please see Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>Because the PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. Other agencies may use the PEIR as the basis on which to tier future project environmental analyses under CEQA.</p> <p>No changes to the Draft PEIR are needed.</p>

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	<p>* Use material from any river, stream, or lake; or, * Deposit or dispose of material into any river, stream, or lake.</p> <p>The construction of diversion devices such as deployable barriers and inflatable dams, and conveyance of water structures within a stream is subject to notification under Fish and Game Code section 1602. The ongoing operations and maintenance of instream storm flow diversion devices and conveyance of water structures is also subject to notification under Fish and Game Code section 1602 once the devices are constructed. Also, the diversion of stormwater and/or dry weather runoff that flows within streams or that have overflowed the banks of streams, is subject to notification under Fish and Game Code section 1602.</p> <p>Recommended Potentially Feasible Mitigation Measure(s)</p> <p>Mitigation Measure: CDFW recommends LACPW modify Mitigation Measure BIO-21c, Obtain Wetland Permits, to include the underlined language:</p> <p>“If wetlands or jurisdictional aquatic resources are identified within the project footprint and would be affected by construction of the project, the appropriate permits will be obtained from the USACE, SWRCB or RWQCB, CDFW, and/or the CCC, as required. CDFW shall be notified pursuant to Fish and Game Code, section 1600 et seq. Based on this notification and other information, CDFW will determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting proposed activities. An LSA Notification shall include the following: 1) an analysis to demonstrate that concrete-lined or soft-bottom channels would not be impaired (e.g., aggraded, incised, increased suspended sediment), 2) a hydrological evaluation of the 200, 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions, 3) whether dewatering/diversion of water may be necessary, and (if applicable) 4), an analysis of whether diversion structures would impact stormwater and dry season water flow, and the extent of those impacts, during the wet season (November through</p>	<p>Additionally, Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys, in the Draft PEIR includes the requirement that a regulatory assessment be conducted for individual subsequent projects. This would include a construction and operation impact analysis and the identification and implementation of appropriate measures based on the presence of biological resources. Impact analysis includes appropriate assessment of project-specific disturbances. This means that all projects would be evaluated individually for impacts and would implement appropriate mitigation measures for the individual project. In this case, a review of the individual subsequent project would be conducted for all of the mentioned issues related to potential impacts on streams, and appropriate mitigation measures would be implemented. Because this mitigation measure already begins the process of making a determination of whether the proposed individual subsequent project would have a significant environmental impact on biological resources and provides the steps necessary to make that determination, no change to Draft PEIR Mitigation Measure BIO-1 is needed. However, the Draft PEIR has been revised to include other clarifications to the measure regarding literature review and the determination of presence/absence for identification of rare plants. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the Draft PEIR are needed.</p> <p>Regarding potential new language proposed for PEIR Mitigation Measure BIO-21c, Obtain Wetland Permits, please refer to Section 3.3.2.2, <i>Regulatory</i>, of the Draft PEIR (specifically the Lake or Streambed Alteration [California Fish and Game Code Section 1602] discussion) to find the requirements and process for agency consultation provided in the comment.</p>

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	<p>March), dry season (April through October), and both above-average and below-average water year.</p> <p>Recommendation: CDFW’s issuance of an LSA Agreement for project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from a lead agency for a project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 et seq. and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.</p> <p>To compensate for any on- and off-site impacts to riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures, avoidance of resources, protective measures for downstream resources, on- and/or off-site habitat creation, enhancement or restoration, and/or protection, and management of mitigation lands in perpetuity.</p>	
A6-6	<p>Comment #4: Water Diversion and Impacts on Beneficial Uses</p> <p>Issue: The Project may divert surface stormwater and dry season flow from the LA River.</p> <p>Specific impact: Diverting stormwater and dry season flow into stormwater catchment basins or infiltration galleries may reduce the availability and extent of water flow. There could be changes to the hydrologic regime both within the immediate area and downstream. Changes to the hydrologic regime could affect abiotic and biotic variables that support plants, fish, wildlife, and macroinvertebrates. Significant impacts to biological resources could occur, especially during a dry season proceeding after a below-average water year.</p> <p>Why impacts would occur: The PEIR does not provide sufficient analysis as to whether the Project, specifically diversion devices proposed under KOP Category 2 and KOP Category 4, would</p>	<p>Please see the responses to comments A6-3 through A6-5.</p> <p>Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys, of the Draft PEIR includes the requirement that a regulatory assessment be conducted for individual subsequent projects, including water diversion projects. This would include a construction and operation impact analysis and the identification and implementation of appropriate measures based on the presence of biological resources. Impact analysis includes appropriate assessment of project-specific disturbances. This means that all projects would be evaluated individually for impacts and would implement appropriate mitigation measures for the individual project. In this case, a review of the individual subsequent project would be conducted for all of the mentioned issues related to water diversions and appropriate mitigation measures implemented. Also, PEIR Mitigation Measures BIO-21a,</p>

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	<p>impact biological resources both within a project area and downstream.</p> <p>Biological Resources: Both the concrete-lined and soft-bottom portions of the LA River support biological resources. Where the LA River overtops the concrete-lined channel, the resulting sheet flows allow phytoplankton (algae and cyanobacteria), microorganisms, and herbaceous vegetation to establish. The algae provide habitat and a food source for benthic invertebrates, a vital food source for wading birds. The LA River provides habitat for 140 species of birds (USACE 2015). The least Bell’s vireo (<i>Vireo bellii pusillus</i>), an Endangered Species Act and CESA-listed endangered species, has been documented at Glendale Narrows. Least Bell’s vireo depends on willow (<i>Salix</i> genus) riparian habitat. The LA River supports woody vegetation such as black willow (<i>Salix gooddingii</i>), Fremont cottonwood (<i>Populus fremontii</i>), and arroyo willow (<i>Salix laevigata</i>) (USACE 2015). The upper LA Basin watershed supports Santa Ana sucker (<i>Catostomus santaanae</i>) and arroyo chub (<i>Gila orcutti</i>) (USACE 2015). The LA River could potentially support southern California steelhead (<i>Oncorhynchus mykiss</i>) Distinct Population Segment, Pacific lamprey (<i>Entosphenus tridentatus</i>), speckled dace (<i>Rhinichthys osculus</i>), and California killifish (<i>Fundulus parvipinnis</i>).</p> <p>Flow reductions, especially dry season flow, could impact beneficial uses directly or indirectly through habitat modifications. Diverting water during the dry season could reduce the availability and extent of shallow water sheet flow. This could potentially impact algae and benthic invertebrates, and eventually birds. Willow riparian habitat may be impacted if flow reductions lead to receding shoreline or lower water depth. Loss of suitable habitat may impact sensitive species such as least Bell’s vireo. Fish have specific habitat requirements including water depth, velocity, and vegetation.</p> <p>Seasonality: The PEIR does not analyze the potential significance of water diversion depending on the season. During the dry season, typically April through September in southern California,</p>	<p>Conduct a Jurisdictional Delineation, and BIO-21c, Obtain Wetland Permits, include the requirements for projects to prepare a formal jurisdictional delineation to identify and map wetlands and jurisdictional aquatic resources and obtain appropriate permits for any impacts, including permits from CDFW and the Lake and Streambed Alteration (LSA) Notification. As such, any additional mitigation measures specific to water diversion projects are not required for the programmatic analysis provided in the Draft PEIR.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR for an analysis regarding biological resources.</p> <p>Please also refer to Section 3.9, <i>Hydrology and Water Quality</i>, and Section 3.7, <i>Greenhouse Gas Emissions</i>, of the Draft PEIR for analyses regarding flow reductions, seasonality, drought, and changes to hydrology and hydraulics. According to the <i>2020 LA River Master Plan</i>, the LA River presents an opportunity to develop and diversify local water resources through capture of wet- and dry-weather flows and recharging local groundwater basins for extraction at a future time.</p> <p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River. Please see Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>Because the PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. Other agencies may use the PEIR</p>

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	<p>the LA River is largely maintained by urban runoff and discharge from wastewater reclamation plants. Diverting water could be significant during the dry season and could either significantly reduce water flow or result in complete loss of water flow.</p> <p>Drought: The PEIR does not analyze the potential significance of water diversion during a below-normal water year. Since 2000, the longest duration of drought in California lasted between 2011 and 2019 (USGS 2021) and in southern California, between 2012 through 2016 (Los Angeles Almanac 2021). The 2017-2018 rainfall season was below normal and the driest for Los Angeles since 2006-2007 (Los Angeles Almanac 2021). Diverting water during a below normal rainfall year may significantly reduce water flow or result in complete loss of water flow.</p> <p>Cumulative Flow Reductions: The PEIR does not analyze whether the Project would result in significant impacts when considered with other existing or proposed water diversion projects in the LA River watershed. The cities of Burbank, Glendale, and Los Angeles plan to recycle more wastewater and reduce their discharges to the LA River for this purpose (SCCWRP 2021).</p> <p>Evidence impacts would be significant: Changes to hydrology and channel morphology, both within a project area and downstream, are reasonable potential direct and indirect physical changes in the environment. Said changes and their potential impacts on biological resources should be analyzed and disclosed in an environmental document. Adequate disclosure is necessary for CDFW to assist a lead agency in adequately identifying, avoiding, and/or mitigating a project’s significant, or potentially significant, direct, and indirect impacts on biological resources. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in a project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate,</p>	<p>as the basis on which to tier future project environmental analyses under CEQA.</p> <p>Therefore, the CDFW mitigation measures are not applicable, and no changes to the Draft PEIR are needed.</p> <p>No change to the Draft PEIR is required.</p>

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	<p>sensitive, or special-status species by CDFW, USFWS, and/or National Marine Fisheries Service (NMFS).</p> <p>Recommended Potentially Feasible Mitigation Measure(s)</p> <p>Mitigation Measure: CDFW recommends LACPW include a mitigation measure whereby individual subsequent projects analyze potential impacts on biological resources resulting from proposed water diversion. At a minimum, an analysis and should include:</p> <p>Study Reach 1) A study reach that includes an additional length of channel downstream from a project site. The additional study reach should extend a minimum of 1 mile downstream, or to the extent of the LA River downstream that could be expected to be affected similarly by a proposed project (hydraulic and ecological zones), or an appropriate distance determined by both a qualified biologist and hydrologist, whichever is greater.</p> <p>Changes to Hydrology and Hydraulics</p> <p>1) Under pre-project (i.e., baseline) conditions, the volume of water flow from both the project area and study reach during a) the wet (November through March); b) the dry season (April through October); and c) above-average and below-average water year (i.e., wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year). The analysis should clearly define above-average or below-average rainfall year.</p> <p>2) Under proposed project conditions, the percent reduction in flow from both the project area and study reach for a wet season/above-average water year, wet season/below average water year, dry season/above-average water year, and dry season/below average water year.</p> <p>3) A quantitative analysis comparing the flow from the project area and other tributaries into the study reach, and their relative contribution to the hydrograph of the study reach.</p>	

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	<p>4) An analysis of potential project-related changes to river hydraulics in both concrete-lined and soft-bottom reaches. This includes water depth (percent change), wetted perimeter (acres gained/lost), and velocity (percent change).</p> <p>Biological Resources Impact Assessment</p> <p>1) A map of plant communities and important bird foraging and nesting habitat occurring in the study reach. Plant communities should be mapped at the alliance/association level using the Manual of California Vegetation, second edition (Sawyer et al. 2009). Also, CDFW recommends an updated and thorough floristic-based assessment of plant communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018).</p> <p>2) A comprehensive list of sensitive and special status plant and wildlife species, and sensitive plant communities, occurring in the study reach. For each biological resource, provide:</p> <ul style="list-style-type: none"> a. A summary of species-specific habitat requirements; b. A discussion as to how the species or plant community may be significantly impacted directly or indirectly through habitat modification, as result of changes to hydrology (reduced flow) and hydraulics (water depth, wetted perimeter, velocity); and, c. A quantitative analysis and/or adequate discussion to evaluate whether the project would result in those significant impacts. <p>3) A discussion of whether construction, operations, and maintenance of diversion devices such as rubber dams, pipes, and tunnels, would have direct and/or indirect, permanent or temporal impact on biological resources.</p> <p>4) An adequate discussion to address how the project may potentially affect on-going habitat recovery and restoration efforts.</p>	

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	<p>5) An adequate discussion of project-related impacts on biological resources in relation to cumulative flow reductions.</p> <p>Mitigation Measure #2: For projects proposing to divert water, CDFW recommends LACPW include a mitigation measure whereby individual subsequent projects develop an Adaptive Management Plan that would reduce or suspend water diversion if at any point the project may impact biological resources downstream exceeding a defined threshold/trigger.</p> <p>Mitigation Measure #3: CDFW recommends project-level lead agencies/applicants provide a copy of the basis of water right (water right permit) by State Water Resources Control Board that authorizes the beneficial use of stormwater or dry weather flows diverted from streams. This information along with the LSA Notification would assist CDFW in assessing the need for an LSA Agreement. CDFW recommends including documentation of water rights in a project level CEQA document to ensure project budgets and timelines consider CDFW's regulatory process in the implementation of projects under the 2020 LA River Master Plan.</p>	
A6-7	<p>Comment #5: Anadromous Fish Habitat and Passage</p> <p>Issue: The Project may impact anadromous fish habitat and passage.</p> <p>Specific impacts: The Project may create impassable artificial barriers to the passage of anadromous fish such as the southern California steelhead Distinct Population Segment, an endangered species under the Endangered Species Act. Accordingly, the Project may further degrade habitat that could support southern California steelhead that may pass through the LA River or migrate upstream from the estuary in the absence of threats or stressors. Additionally, the Project may result in construction, activities, and design elements that could impede any future recovery efforts for southern California steelhead in the LA River watershed.</p>	<p>Regarding CDFW’s recommended Mitigation Measures #1, #2, and #3, included within Draft PEIR Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys, is the requirement that a regulatory assessment be conducted for individual subsequent projects. This would include a construction and operation impact analysis and the identification and implementation of appropriate avoidance and minimization measures based on the presence of biological resources. Impact analysis includes appropriate assessment of project-specific disturbances (e.g., fish passage). This means that all projects would be evaluated individually for impacts and would implement appropriate avoidance and minimization measures for the individual project(s). Because this mitigation measure already begins the process of making a determination of whether the proposed individual subsequent project would have a significant environmental impact on biological resources,</p>

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	<p>Why impacts would occur: The Project may include modifications to the channel, creation of platform parks on a land bridge across the channel, or installation of diversion structures. KOP Category 2 includes check dams, deployable barriers, levees, armored channels/vertical walls, remove/add concrete, channel texturing/grooving/smoothing, reshape low flow, and installation of access ramps. KOP 4 includes diversion structures such as pumps, pipes/tunnels/channels, overflow weirs, and side channels. These structures could be barriers to anadromous fish passage.</p> <p>Evidence impacts would be significant: In southern California, at the southern limit of the range for southern California steelhead, it is estimated that annual runs have declined dramatically from 32,000-46,000 returning adults historically, to currently less than 500 returning adults (NMFS 2012). The LA River historically supported southern California steelhead, but the species has been extirpated from the LA River watershed (USACE 2015). Southern California steelhead has been extirpated for reasons including the channelization of the LA River, urbanization of the floodplain, barrier structures such as dams, and surface water diversions.</p> <p>These impacts have eliminated the ability of fish to move freely upstream-to-downstream and to find adequate locations for refuge and proliferation (USACE 2015). The LA River has a highly altered flow regime and functions more as a drainage channel than a river ecosystem. Input of gravels and cobbles are prevented, water temperatures are higher, channel morphology is simplified, and the episodic succession-setting flood regime necessary to sustain target riparian communities and native fish habitats has been altered (USACE 2015).</p> <p>The Project may result in structures that are considered very high threats or stressors to southern California steelhead and their habitat. This includes dams, surface water diversion structures, levees, and channelization (NMFS 2012). Per CEQA Guidelines section 15065(a), a project may have a significant effect on biological resources if the project has the potential to</p>	<p>including impacts on anadromous fish habitat and passage, and provides the steps necessary to make that determination, no change to the PEIR Mitigation Measure BIO-1 is needed.</p> <p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River. Please see Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>Because the Draft PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, "Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase."</p> <p>No changes to the conclusions in the Draft PEIR are needed.</p>

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	<p>substantially reduce the habitat of a fish species or substantially reduce the number or restrict the range of a special status species. Per Fish and Game Code section 5901, it is unlawful to construct or maintain in any stream any device or contrivance that prevents, impedes, or tends to prevent or impeded, the passing of fish up and downstream. Per Fish and Game Code section 5937, the owner of any dam shall allow sufficient water at all times to pass through a fishway, or to keep in good condition any fish that may be planted or exists below the dam.</p> <p>Recommended Potentially Feasible Mitigation Measure(s)</p> <p>Mitigation Measure #1: CDFW recommends LACPW include measures under Mitigation Measure BIO-1 or BIO-23 (or where appropriate) whereby individual subsequent projects analyze impacts on southern California steelhead. At a minimum, an analysis should include:</p> <ol style="list-style-type: none"> 1) potential direct and impacts on southern California steelhead population, habitat, and passage; 2) whether the project area supports existing structures that create barriers to southern California steelhead passage; and, 3) whether the project may affect ongoing or future native fish recovery projects throughout the LA River watershed per federal, State, county, city, or other agencies. <p>Mitigation Measure #2: CDFW recommends LACPW provide a mitigation measure whereby individual subsequent projects modify design components to the maximum extent feasible (e.g., size or location of structures) so they are not barriers, threats, or stressors to fish passage. If feasible, a project should remove existing fish passage barriers and provide fish passage around dams, diversions, and other barriers that may not be feasible to remove.</p> <p>Mitigation Measure #3: CDFW recommends LACPW provide a mitigation measure whereby individual subsequent projects allow sufficient water at all times to pass through in order to allow fish passage and sustain any fish existing within the</p>	

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	<p>project area or downstream. This should be for both during and for the life of the project. Effort should be made to incorporate fish passage</p> <p>standards for velocity and depth as outlined in the Southern California Steelhead Recovery Plan (NMFS 2012) and the California Salmonid Stream Habitat Restoration Manual, 4th edition, Volume I and II (CDFW 2004). Also, a project should avoid creating any temporal barriers that would alter water velocity or depth meeting fish passage standards.</p> <p>Recommendation #1: CDFW recommends that individual subsequent projects make a concerted effort to create habitat and design a channel that could support multiple life stages and life history strategies exhibited by southern California steelhead. Essential habitat components should be provided, including refugia to allow fish to withstand high flows, softbottom spawning areas to bury eggs, and restoration of riffle/pool complexes. A project should consider waters and substrate necessary to southern California steelhead for spawning, breeding, feeding, or growth to maturity. Floodplain connectivity is also important for restoration of critical spawning and rearing habitats.</p> <p>Recommendation #2: CDFW recommends LACPW include a section in Appendix B that would provide general design guidelines for creating habitat suitable for southern California steelhead. CDFW recommends the following sources for guidance in finalizing the PEIR and preparation of project-level CEQA documents with respect to creating fish habitat and passage: Los Angeles River Ecosystem Restoration Integrated Feasibility Report (USACE 2015), Southern California Steelhead Recovery Plan (NMFS 2012), Los Angeles River Environmental Flows Project (SCCWRP 2021), The Los Angeles River Fish Passage & Habitat Structures Design Project</p> <p>(CWH 2018); the State Wildlife Action Plan 2015, Chapters 5.5 and 6 (CDFW 2015), and the California Salmonid Stream Habitat Restoration Manual, 4th edition, Volume I and II (CDFW 2004).</p>	

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A6-8	<p>Comment #6: Impacts on Riparian Habitat</p> <p>Issue: The Project may impact riparian habitat.</p> <p>Specific impacts: The Project may result in temporary or permanent loss of riparian resources. Why impacts would occur: According to Chapter 3.3, Biological Resources, the LA River contains riparian vegetation communities. This includes Fremont cottonwood Forest Alliance, black willow Woodland Alliance, and mulefat thickets (<i>Baccharis salicifolia</i>) Shrubland Alliance. These vegetation communities could be impacted during project construction and activities. This could result in temporary or permanent loss of riparian habitat. Vegetation communities may also be impacted through changes to hydrology (e.g., amount of flow) and hydraulics (e.g., creates a platform parks on a land bridge across the channel, or installs diversion structures. Willow riparian habitat may be impacted if reduced flow leads to lower water depth or receding shoreline. Preliminary work of the Los Angeles River Flows Project shows that black willow seedling mortality increases as water depth decreases (SCCWRP 2019). Increased sediment deposition can bury seedlings and saplings of riparian trees, resulting in increased mortality of new recruits (Kui and Stella 2016).</p> <p>Evidence impacts would be significant: Only relic and fragmented riparian habitat remain along the significantly channelized, engineered, and urbanized LA River and floodplain. Over 90 percent of southern California’s coastal riparian habitat have been lost (USACE 2015). The remaining fragments of LA River riparian habitat contribute significantly to the integrity of regional hydrologic connectivity, biodiversity, and habitat connectivity and wildlife movement between significant ecological areas, including the Santa Monica Mountains, the Verdugo Hills, and nationally significant San Gabriel Mountains National Monument (USACE 2015). Therefore, loss of remaining riparian habitat could affect regional hydrologic, habitat, and wildlife connectivity, and increase threats/stressors on regional biodiversity. Per CEQA Guidelines section 15065(a), a project</p>	<p>Included within Draft PEIR Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys, is the requirement that a regulatory assessment be conducted for individual subsequent projects. This would include a construction and operation impact analysis and the identification and implementation of appropriate avoidance and minimization measures based on the presence of biological resources. Impact analysis includes appropriate assessment of project-specific disturbances (e.g., impacts on riparian vegetation communities). This means that all projects would be evaluated individually for impacts and would implement appropriate avoidance and minimization measures for the individual project(s). Additionally, PEIR Mitigation Measures BIO-21a, Conduct a Jurisdictional Delineation, and BIO-21c, Obtain Wetland Permits, include the requirements for projects to prepare a formal jurisdictional delineation to identify and map wetlands and jurisdictional aquatic resources and obtain appropriate permits for any impacts, including permits from CDFW for any impacts on riparian habitat. As such, any additional mitigation measures specific to permanent loss of jurisdictional aquatic resources are not required for the programmatic analysis provided in the PEIR.</p> <p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River. Please see Master Response MR-2 (Program-Level Analysis in the PEIR).</p>

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	<p>may have a significant effect on biological resources if the project substantially reduces the habitat of a fish or wildlife species; threatens to eliminate a plant community; or has the potential to restrict the range of an endangered, rare, or threatened species.</p> <p>Recommended Potentially Feasible Mitigation Measure(s)</p> <p>Mitigation Measure: CDFW recommends that LACPW modify Mitigation Measure BIO-21e to include the underlined language:</p> <p>“Impacts that result in a permanent loss of jurisdictional aquatic resources within an earthen channel, bank, or associated riparian will be mitigated at a minimum 2:1 ratio, or as specified in the aquatic resource permits. There shall be no net loss of riparian habitat within the LA River.</p> <p>Mitigation for impacts to riparian habitat shall be provided within the project area and/or along the LA River. Compensatory mitigation shall increase if a project would result in permanent loss of riparian habitat within a contiguous riparian corridor or loss of an isolated, remnant habitat patch. Mitigation shall increase if a project would impact a riparian vegetation community considered rare in the State (i.e., S1, S2, or S3). Mitigation shall further increase if the riparian habitat is considered very threatened or threatened (i.e., 0.1, 0.2). Mitigation shall further increase if the riparian habitat impacted supports special status species, specifically obligate riparian breeders (e.g., least Bell’s vireo). Mitigation shall replace the same vegetation association/alliance that was impacted.”</p>	<p>Because the PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, “Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase.”</p> <p>No changes to the conclusions in the Draft PEIR are needed.</p>
A6-9	<p>Comment #7: California Species of Special Concern</p> <p>Issue: The Project may impact California Species of Special Concern (SSC).</p> <p>Specific impacts: According to Table 3.3-3 in Chapter 3.3, Biological Resources, the LA River has the potential to support SSC, which includes 10 species of birds, one fish, four amphibians, six reptiles, and 12 mammals. Project construction</p>	<p>The Draft PEIR has been revised to include revisions as described below for expanded mitigation. Because Mitigation Measure BIO-4, Identify Work Areas and Environmentally Sensitive Areas, identifies work areas and environmentally sensitive areas prior to ground-disturbing activities, revisions to this mitigation measure clarify items considered prohibited materials and the requirement to stop work if wildlife becomes entangled in construction fencing. See Chapter 3 of the Final</p>

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	<p>and activities, directly or through habitat modification, may result in direct injury or mortality (trampling, crushing), reduced reproductive capacity, population declines, or local extirpation of an SSC. Temporal or permanent loss of foraging, breeding, nesting, or nursery habitat for an SSC may occur.</p> <p>Why impacts would occur: Impacts to an SSC could result from ground-disturbing (e.g., staging, mobilization, demolition, and grading) activities, vegetation removal, increased noise disturbances, light, human activity, and dust. Evidence impact would be significant: A California Species of Special Concern is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:</p> <ul style="list-style-type: none"> * is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role; * is listed as ESA-, but not CESA-, threatened, or endangered; meets the State definition of threatened or endangered but has not formally been listed; * is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and/or, * has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA threatened or endangered status (CDFW 2021a) CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). <p>Therefore, take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065). Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either</p>	<p>PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>Regarding CDFW Mitigation Measures #1 and 2, included within Draft PEIR Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys, is the requirement that a regulatory assessment be conducted for individual subsequent projects. This would include a construction and operation impact analysis and the identification and implementation of appropriate avoidance and minimization measures based on the presence of biological resources. Impact analysis includes appropriate assessment of project-specific disturbances (e.g., California Special Species of Concern [SSC] avoidance, handling protocol, and relocation plans). This means that all projects would be evaluated individually for impacts and would implement appropriate avoidance and minimization measures for the individual project. The Draft PEIR has been revised to include language regarding the avoidance and handling of California SSCs under Mitigation Measure BIO-6, Conduct Biological Monitoring During Construction. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>Regarding CDFW Mitigation Measure #3, compensatory mitigation for the temporary and/or permanent loss of any habitat supporting California SSCs for individual subsequent projects would be addressed through Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys, and BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements. The Draft PEIR has been revised to include language that states that where impacts on special-status wildlife are unavoidable, the biological monitor will protect special-status wildlife following several steps under this mitigation measure. The Draft PEIR has also</p>

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	<p>directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species by CDFW.</p> <p>Recommended Potentially Feasible Mitigation Measure(s)</p> <p>Mitigation Measure #1: If impacts are unavoidable, wildlife should be protected, allowed to move away on its own (noninvasive, passive relocation), or relocated to adjacent appropriate habitat on site or to suitable habitat adjacent to the project area. SSC should be captured only by a qualified biologist with proper handling permits. The qualified biologist should prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. A relocation plan should be prepared prior to implementing any Project-related ground-disturbing activities and vegetation removal.</p> <p>While relocation is an option for mitigating impacts, it may not fully account for impacts to an SSC, such as loss of individuals, loss of habitat, or loss of natal dens/middens/burrows.</p> <p>Capturing, handling, or relocation are acts that may have multiple unintended negative consequences, including increased stress and mortality of relocated animals, negative impacts on resident animals at release sites, increased conflicts with human interests, and the spread of diseases. Attempts to avoid impacts to SSC should be the first option. Seeking a Scientific Collection Permits (see Mitigation Measure #2 below) in order to trap and relocate individuals should only be done if impacts cannot be avoided.</p> <p>Mitigation Measure #2: Handling and relocation of wildlife, including SSC, may be required. If so, Pursuant to the California Code of Regulations, title 14, section 650, the lead agency/qualified biologist should obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. Please visit CDFW’s Scientific Collection Permits webpage for information (CDFW 2021b). An LSA Agreement</p>	<p>been revised to include other clarifications to the measure regarding literature review for identification of anadromous fish. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River. Please see Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>Because the Draft PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. Other agencies may use the PEIR as the basis on which to tier future project environmental analyses under CEQA.</p> <p>No changes to the Draft PEIR are needed.</p>

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	<p>may provide similar take or possession of species as described in the conditions of the Agreement.</p> <p>CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650).</p> <p>Mitigation Measure #3: CDFW recommends providing compensatory mitigation for temporary and/or permanent loss of any habitat supporting SSC. There should be no net loss of habitat supporting SSC along the LA River. Compensatory mitigation for should be provided within the project area and/or along the LA River. Compensatory mitigation should be provided at no less than 2:1. Mitigation should provide upland and/or aquatic habitat (depending on the species), refugia, and habitat structures that supports that species (e.g., woody material, rocks, brush piles, pools, burrows). Any proposed mitigation area/plan should include a discussion on the territory size; nesting, breeding, foraging, and refuge, locations, invasive, non-native plant and wildlife species present, food availability, and how all life cycle functions will be mitigated. Mitigation for impacts to an SSC should adhere to CDFW and/or USFWS established protocol/guidelines if available.</p>	
A6-10	<p>Comment #8: Impacts of Fencing on Wildlife and Wildlife Dispersal</p> <p>Issue: The Project’s proposed temporary and permanent fencing, gates, and guardrails could impact wildlife, particularly birds and raptors, as well as create barriers to wildlife dispersal.</p>	<p>The Draft PEIR has been revised to include revisions to Mitigation Measure BIO-4, Identify Work Areas and Environmentally Sensitive Areas, as described in this comment for expanded mitigation. Because Mitigation Measure BIO-4 identifies work areas and environmentally sensitive areas prior to ground-disturbing activities, revisions to this mitigation measure clarify items considered prohibited materials and the</p>

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	<p>Specific impacts: Project fencing during the construction phase and for the life of the Project may directly impact wildlife. Fencing could result in the mortality of mammals, birds, and raptors. Additionally, permanent fencing, gates, and guardrails along the LA River where adjacent to natural areas could create barriers to wildlife dispersal.</p> <p>Why impacts would occur: Project-related fencing, gates, and guardrails could impact wildlife both during and for the life of the Project. The LA River supports habitat for hundreds of bird species including special status bird species. According to the Project’s Mitigation Measure BIO- 4, Identify Work Areas and Environmentally Sensitive Areas, environmental sensitive areas would be delineated using “fencing, flagging, and other methods of demarcation.” As such, the Project may use fencing that could trap or entangle mammals, birds, and raptors. Birds can collide with fences, breaking wings, impaling themselves on barbs, and tangling in wires. Large, low-flying birds such as ducks, geese, cranes, grouse, hawks, and owls are especially vulnerable. Waterfowl fly into fences that run near or across waterways, and low-flying hawks and owls may careen into fences when swooping in on prey.</p> <p>Temporary construction fencing may also impact wildlife by creating a barrier to dispersal. Impermeable fencing such as chain link may make it more difficult for wildlife to move between locations. More permanent fixtures, such as the fences, guardrails, and gates proposed in Appendix B Volume 1 Design Guidelines could create permanent barriers to wildlife dispersal across the broader landscape, potentially impacting both transitory and permanent wildlife populations.</p> <p>Evidence impacts would be significant: The Project may cause wildlife injury or mortality and/or local extirpation of wildlife. The Project site and surroundings is highly urbanized and developed, which has led to habitat loss, modification, or fragmentation. It is possible that the Project could increase pressures on wildlife dispersal without appropriate mitigation. Mammals occurring naturally in California are considered non-</p>	<p>requirement to stop work if wildlife becomes entangled in construction fencing. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>This comment regarding the recommendation to expand the <i>2020 LA River Master Plan</i> Design Guidelines to include specific guidelines for wildlife fencing is acknowledged. This comment was shared with the <i>2020 LA River Master Plan</i> team. However, the recommended changes are beyond the scope of the proposed Project. The Draft PEIR has been revised to include additional text under Mitigation Measure BIO-23, Maintain Connectivity in Subsequent Project Design, Construction, and Operation, that would require future projects to include fencing requirements. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River. Please see Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>Because the Draft PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. Other agencies may use the PEIR</p>

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	<p>game mammals and are afforded protection by state law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species by CDFW and/or USFWS.</p> <p>Recommended Potentially Feasible Mitigation Measure(s)</p> <p>Mitigation Measure: Construction Fencing – CDFW recommends that all Project-related fencing be constructed with materials that are not harmful to wildlife. CDFW recommends LACPW amend Mitigation Measure BIO-4 to include the following underlined language to reduce potential wildlife injury or mortality:</p> <p>“[...] Delineation of [Environmentally Sensitive Areas] will include fencing, flagging, and other methods of demarcation sufficient to prevent entry into the [Environmentally Sensitive Area].</p> <p>Prohibited materials shall include, but are not limited to, spikes, glass, razor, or barbed wire. Use of chain link and steel stake fence shall be avoided or minimized. Fences shall not have any slack that may cause wildlife entanglement. No grading or fill activity of any type will be permitted within Environmentally Sensitive Areas [...]. Environmentally Sensitive Area fencing and exclusion fencing will remain in place and be maintained until project construction is completed. If, during the project phase, wildlife becomes entangled in construction fencing, work must immediately stop, a qualified biologist notified, and dead or injured wildlife documented immediately. If injury or mortality involves a special status species, the qualified biologist shall notify CDFW and/or USFWS within three calendar days of the incident or finding. Work in the immediate area may only resume once the proper notifications have been made and/or additional mitigation measures have been identified to prevent additional injury or mortality.</p>	<p>as the basis on which to tier future project environmental analyses under CEQA.</p> <p>No changes to the Draft PEIR are needed.</p>

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	<p>Recommendation: Permanent Fencing, Gates, and Guardrails – CDFW recommends that LACPW include a section in Appendix B that would provide design guidelines for wildlife friendly and permeable fencing [see A Landowner’s Guide to Wildlife Friendly Fences for additional information (MFWP 2012)]. CDFW also recommends that LACPW amend the Project’s Mitigation Measure BIO-23, Maintain Connectivity in Subsequent Project Design, Construction, and Operation, to reference those design guidelines.</p>	
<p>A6-11</p>	<p>Comment #9: Tree Diseases, Pests, and Pathogens</p> <p>Issue: The Project may remove trees and spread material infected with invasive tree diseases, pests, and pathogens.</p> <p>Specific impacts: The Project may spread of tree insect pests and diseases into areas not currently exposed to these stressors. This could result in expediting the loss of native trees and plant communities. Loss of trees may result in loss of foraging and perching habitat for small mammals, birds, and raptors.</p> <p>Why impacts would occur: The Project may remove trees that could host diseases and pests. One such pathogen is sudden oak death. Sudden oak death has become the most common cause of mortality of oak (<i>Quercus</i> genus) and other native trees (Phytosphere 2015). Mortality rates of oak trees are greater than 50 percent in some areas impacted by sudden oak death (Phytosphere 2012). Tree dieback can have cascading impacts on the habitat and ecosystem, particularly avian distribution and abundance (Monahan and Koenig 2006). One such pest is the polyphagous shot hole borer, which hosts on many native trees species that include box elder (<i>Acer negundo</i>), California sycamore (<i>Platanus racemosa</i>), willows (<i>Salix</i> genus), oaks, cottonwoods (<i>Populus</i> genus), and alders (<i>Alnus</i> genus) (Calinvasives 2021).</p> <p>Diseases such as sudden oak death can spread via equipment and transport of infected material. These fragments can be spread to new locations if equipment and tools are not</p>	<p>Mitigation Measure BIO-24, Implement Avoidance, Transplantation, and Compensatory Mitigation Measures for Protected Trees, states that all applicable local policies and ordinances, including tree preservation policies, will be followed, and protected trees will be avoided where possible. The Draft PEIR has been revised to incorporate the commenter’s suggestions for expanded mitigation under the new Draft PEIR Mitigation Measure BIO-20b, Protect Against Tree Disease, Pests, and Pathogens. As the measure states, to protect sensitive natural communities and native trees, when deemed necessary by a qualified biologist or arborist, prior to any tree removal (both native and nonnative species), a certified arborist will evaluate trees for infectious tree diseases. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>

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	<p>disinfected or cleaned before moving to the next work location. Infected material that is transported off site for disposal may expose trees and plant communities to pest and disease.</p> <p>This could result in expediting the loss of southern California black walnut (<i>Juglans californica</i>), oak trees, and other native trees and plant communities within and adjacent to a project area.</p> <p>Evidence impacts would be significant: The Project may have a substantial adverse effect on any sensitive natural communities identified in local or regional plans, policies, and regulations or by the CDFW. The Project may result in a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW that are dependent on woodlands susceptible to insect and disease pathogens.</p> <p>Recommended Potentially Feasible Mitigation Measure(s)</p> <p>Mitigation Measure: CDFW recommends that LACPW include a measure to mitigate the spread of invasive pests and diseases by implementing the following:</p> <p>1) Prior to tree removal, a certified arborist should evaluate trees for infectious tree diseases including but not limited to: sudden oak death (<i>Phytophthora ramorum</i>), thousand canker fungus (<i>Geosmithia morbida</i>), polyphagous shot hole borer (<i>Euwallacea</i> spp.), and goldspotted oak borer (<i>Agrilus auroguttatus</i>) (TCD 2021; UCANR 2021; Phytosphere Research 2012; UCIPM 2013).</p> <p>2) If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist should prepare an Infectious Tree Disease Management Plan or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list should provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees should not be transported</p>	

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	<p>from a project area without first being treated using best available management practices described Infectious Tree Disease Management Plan or list of preventative measures.</p> <p>3) If possible, all tree material, especially infected tree material, should be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.</p>	
A6-12	<p>Rare Plant Surveys. The Project’s proposed Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys, as it is currently proposed, may result in missed detections of rare plants not previously known to occur at a project site. This may result in population declines or local extirpation of a rare plant species. CDFW recommends LACPW amend Mitigation Measure BIO-1 to include the underlined language:</p> <p>“[...] will be assessed for candidate, sensitive, or special-status plants and/or wildlife, aquatic resources, sensitive natural communities, wildlife corridors or nurseries, biological resources protected by local ordinances policies, such as protected trees or other regulated biological resources, while identifying and mapping all vegetation communities and land-cover types (initial study). To determine presence/absence or accurately identifying rare plants, a qualified botanist shall conduct multiple rare plant surveys throughout the growing season for any given year. Surveys shall occur during the time of year when rare plants are more likely to be visually detectable. Rare plant surveys proceeding after a low water year shall be supplemented with one or two additional rare plant surveys over a number of years depending on the rare plant species, annual weather patterns, and whether the project area was recently disturbed e.g., fire).</p>	<p>Please see the responses to comments A16-2 though A16-5.</p> <p>Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys, in the Draft PEIR includes the requirement that a regulatory assessment be conducted for individual subsequent projects. Impact analysis includes appropriate assessment of project-specific disturbances. This means that all projects would be evaluated individually for impacts and would implement appropriate mitigation measures for the individual project. In this case, a review of the individual subsequent project would be conducted for all of the mentioned issues related to potential impacts on plants and wildlife, and appropriate mitigation measures would be implemented. Because this mitigation measure already begins the process of making a determination of whether the proposed individual subsequent project would have a significant environmental impact on biological resources and provides the steps necessary to make that determination, no change to Draft PEIR Mitigation Measure BIO-1 is needed. The Draft PEIR has been revised to include other clarifications to the measure regarding literature review and the determination of presence/absence for identification of rare plants and wildlife. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>The Draft PEIR has been revised to incorporate the commenter’s suggestions for expanded mitigation, as related to the County’s</p>

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		actions, as well as actions of all the individual jurisdictions that lie along the LA River. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i> . These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.
A6-13	Rodenticides. CDFW recommends LACPW include second-generation anticoagulant rodenticides as a prohibited poison under Mitigation Measure BIO-17, Prepare and Implement Pest Management Plan.	All rodenticides are prohibited, as stated in Mitigation Measure BIO-17, Prepare and Implement Pest Management Plan , and the prohibition of second-generation anticoagulation rodenticides is included in that prohibition. No changes to the Draft PEIR are needed.
A6-14	State Wildlife Action Plan (SWAP) 2015. The SWAP 2015 describes the key conservation factors crucial to the sustainability of California ecosystems, and for each geographic province, provides specific conservation strategies that will either reduce or ameliorate negative impacts to ecological systems or enhance the qualities vital to the natural landscapes of California (CDFW 2015). Prior to finalizing the PEIR, CDFW recommends LACPW review the SWAP and consider whether the Project could incorporate KOPs, modify mitigation measures, and/or include design components that are consistent with the SWAP. CDFW recommends LACPW consider Chapters 5.5 South Coast Province and Chapter 6 Anadromous Fish. Also, CDFW recommends the final PEIR refer to the SWAP 2015 so project-level planning is consistent with the objectives and recommendations in the SWAP 2015.	Reviewing the State Wildlife Action Plan (SWAP) 2015 would be most appropriate for project-level planning, and it has been referenced in PEIR Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys . This mitigation measure begins the process of making a determination of whether the proposed individual subsequent project would have a significant environmental impact on biological resources and provides the steps necessary to make that determination. The Draft PEIR has been revised to include clarifications to the measure regarding literature review, including a review of the SWAP and the determination of presence/absence for identification of rare plants. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i> . These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed. In the <i>2020 LA River Master Plan</i> , these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i> . There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. The responsibility for identifying, approving, and

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		<p>implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River. Please see Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, “Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase.” Other agencies may use the PEIR as the basis on which to tier future project environmental analyses under CEQA.</p> <p>No changes to the Draft PEIR are needed.</p>
A6-15	<p>Los Angeles Biodiversity Project. In 2015, the City of Los Angeles (City) set a goal of “no net loss” of biodiversity by 2035. In 2017, the City Council passed a Biodiversity Motion which directs the development of a biodiversity index for Los Angeles, focused on conservation and access to nature and biodiversity in urban areas. The City’s biodiversity work is being led by the Los Angeles Sanitation and Environment, which recently publish a Draft 2020 Biodiversity Report (LASAN 2020). “Native Species Protection and Enhancement” is a theme in the City’s biodiversity index. Prior to finalizing the PEIR, CDFW recommends LACPW review the Draft 2020 Biodiversity Report and consider whether the Project could incorporate KOPs, modify mitigation measures, and/or include design components that are consistent with the City’s biodiversity work. Also, CDFW recommends the final PEIR refer to the Biodiversity Report so project-level planning is consistent with the objectives and recommendations in the Biodiversity Report.</p>	<p>This is an informational comment. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Note that supporting biodiversity and connecting to habitat corridors are major objectives of the <i>2020 LA River Master Plan</i>. A reference to the <i>City of Los Angeles Biodiversity Report</i> was added to Section 3.3, <i>Biological Resources</i>. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>Please see the response to comment A6-14.</p>

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		<p>Reviewing the SWAP 2015 would be most appropriate for project-level planning, and it has been referenced in Draft PEIR Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys. This mitigation measure begins the process of making a determination of whether the proposed individual subsequent project would have a significant environmental impact on biological resources and provides the steps necessary to make that determination. The Draft PEIR has been revised to include clarifications regarding literature review, including a review of the SWAP and the determination of presence/absence for identification of rare plants. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River. Please see Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>Because the PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. Other agencies may use the PEIR as the basis on which to tier future project environmental analyses under CEQA.</p> <p>No changes to the Draft PEIR are needed.</p>

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A6-16	<p>Funding. CDFW grant programs fund projects that sustain, restore, and enhance California's fish, wildlife, plants, and their habitats. Please visit CDFW Grant Opportunities for more information (CDFW 2021c).</p>	<p>This is an informational comment. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. No response is necessary. No changes to the Draft PEIR are needed.</p>
A6-17	<p>Data. CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., California Natural Diversity Database (CNDDDB)] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, CDFW recommends that the PEIR include measures where lead agencies of individual projects tiering from the PEIR report any special status species detected during preparation of project-level environmental impact analyses/environmental documents. Special status species information should be submitted to the CNDDDB by completing the Online Field Survey Form (CDFW 2021d). The lead agency should ensure all pertinent data has been properly submitted, with all applicable data fields filled out, prior to finalizing/adopting an environmental document. The lead agency should provide CDFW with confirmation of data submittal.</p>	<p>Draft PEIR Mitigation Measure BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements, requires the implementing agencies to consult with the resource agencies to avoid, reduce, or minimize impacts on biological resources, with activities that include may include California Natural Diversity Database (CNDDDB) observations and reporting of any CNDDDB species.</p> <p>The Draft PEIR has been revised to incorporate the commenter’s suggestions for expanded mitigation, as related to the County’s actions, as well as actions of all the individual jurisdictions that lie along the LA River. Please see the response to comments A6-2 through A6-17 for changes to mitigation, as noted previously. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>Although the County would commit to the mitigation proposed in the PEIR, if approved as recommended, and the County believes that other entities that propose projects under the <i>2020 LA River Master Plan</i> and Draft PEIR similarly can and should adopt the proposed mitigation. However, the County cannot enforce or guarantee that the mitigation measures in the Draft PEIR will be implemented by other agencies, which is why the County provided two separate impact conclusions: County and non-County. Such changes or alterations to a project are within the responsibility and jurisdiction of other public agencies and not the agency making the finding. However, if the mitigation measures identified in the Draft PEIR are adopted by another agency for impacts that are considered less than significant after</p>

Comment#	Comment Text	Response
		<p>the mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for projects not carried out by the County, for the same reasons as discussed for later activities carried out by the County. Please refer to Chapter 1, <i>Introduction</i>, Section 1.3.1.1, <i>Enforceability of Mitigation Measures</i>, Section 1.3.1.2, <i>PEIR and Later Activities</i>, and Section 1.4.2, <i>Later Activities</i>.</p>
<p>A6-18</p>	<p>Mitigation and Monitoring Reporting Plan. CDFW recommends LACPW update the Project’s proposed Biological Resources Mitigation Measures and condition the environmental document to include mitigation measures recommended in this letter. CDFW provides comments to assist LACPW in developing mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). LACPW is welcome to coordinate with CDFW to further review and refine the Project’s mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided LACPW with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A).</p>	<p>This comment is acknowledged. The County developed and updated its own Mitigation and Monitoring Reporting Plan, but will consider and implement several of the CDFW suggestions to mitigation measures. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
<p>A6-19</p>	<p>Filing Fees</p> <p>The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by Los Angeles County Public Works and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).</p>	<p>The County will pay the required filing fees at the time the Notice of Determination (NOD) is filed, as mandated by law and regulation. No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
A6-20	<p>Conclusion</p> <p>We appreciate the opportunity to comment on the Project to assist Los Angeles County Public Works in adequately analyzing and minimizing/mitigating impacts to biological resources CDFW requests an opportunity to review and comment on any response that Los Angeles County Public Works has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Ruby Kwan-Davis, Senior Environmental Scientist (Specialist), at Ruby.Kwan-Davis@wildlife.ca.gov</p>	<p>This is a concluding statement. No response is necessary. No changes to the Draft PEIR are needed.</p>

2.3.2.7 Comment Letter A7: City of Burbank, April 13, 2021

Comment#	Comment Text	Response
A7-1	<p>The City of Burbank wants to thank you for the opportunity to provide comments on the Draft Program Environmental Impact Report (PEIR) for the Los Angeles County Department of Public Works' (LACDPW's or County's) proposed 2020 LA River Master Plan. As the LA River lies along/adjacent to the City of Burbank's southern boundary, we are committed to ensuring that the management and improvement of the river corridor maintains essential flood control functions; enhances multi-modal transportation opportunities; provides equitable access for pedestrians, cyclists, and equestrians; improves recreational facilities/opportunities; provides ecological and environmental benefits; protects Burbank's residents and businesses from undue environmental and social impacts; and dovetails with the City's plans and objectives, particularly those related to land use, transportation, recreation, drainage, water quality, and water supply.</p> <p>Overall, the City of Burbank appreciates the County's efforts to plan for improvement of the LA River corridor and generally supports the types of improvements conceptualized in the 2020 LA River Master Plan-so long as implementing projects are properly sited, contextually designed, and do not conflict with or adversely impact nearby uses. Given the general nature of the proposed Master Plan and the absence of any specific projects or specific locations of potential improvements, the City of Burbank can only offer general comments at this time. The City respectfully requests the opportunity to comment on any specific projects implementing the Master Plan and their potential impacts prior to such projects are approved or undertaken.</p>	<p>The County appreciates the City of Burbank for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i>.</p> <p>The County will consult with affected entities, when applicable, when it proposes specific projects under the <i>2020 LA River Master Plan</i> (see, for example, Mitigation Measures LU-2, Consultation, and LU-4, Site Selection Process, in the Draft PEIR). Future specific projects would be subject to the requirements of State CEQA Guidelines Section 15182 and would include consultation with affected entities, if appropriate for the specific project, including the City of Burbank, over the subsequent tiering.</p> <p>Because the PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance.</p> <p>Other agencies, like City of Burbank, may use the PEIR as the basis upon which to tier their future project environmental analyses under CEQA. In those situations, as provided in State CEQA Guidelines Section 15168(c), the other agencies could rely upon and implement the mitigation measures identified in the PEIR. However, the County cannot require other agencies to implement the mitigation identified in the PEIR. In addition, please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements). No changes to the Draft PEIR are needed.</p>
A7-2	<p>While the City of Burbank is generally supportive of the types of improvements identified in the draft Master Plan, the City is also generally concerned with potential adverse impacts on adjacent uses in Burbank, including sensitive residential areas. Impacts of</p>	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements).</p>

Comment#	Comment Text	Response
	<p>concern include noise, lighting, parking, and similar neighborhood disruptions that could result from components of the "Common Element Typical Project," which include pavilions, cafes, hygiene facilities, and restrooms. It is unclear whether such facilities could host events, which could cause unique and potentially intense impacts on surrounding uses.</p>	<p>Because this is a program-level EIR, the analysis presented is conservative in nature. Future specific projects would be subject to subsequent environmental compliance.</p> <p>The Draft PEIR identifies significant and unavoidable impacts in many environmental categories because the design information for the proposed <i>2020 LA River Master Plan</i> is at a conceptual level. Because the specific locations of potential projects have not been determined, the environmental impact analysis is presented at a programmatic level and does not include project-specific or site-specific analysis.</p> <p>Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, "Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase."</p>
A7-3	<p>The City of Burbank Water and Power (BWP) Department maintains potable and recycled water systems that are present in the Project area and have the potential to be impacted. Project elements that require water services for construction and/or operation should use recycled water when feasible. In addition, the Burbank Water Reclamation Plant (BWRP) discharges tertiary treated wastewater into the Burbank Western Channel which confluences with the Project. In the future, the City intends to reduce its wastewater discharges to the Burbank Western Channel to zero and recycle all its wastewater. Please also see the BWP Water Division's specific comments on the Draft PEIR, which are included as an enclosure to this letter.</p>	<p>Please refer to Section 3.18.2.1, <i>Water</i>, of the Draft PEIR (under the <i>City of Burbank</i> heading) for a discussion of the City of Burbank recycled/reclaimed water program and supplies.</p> <p>Mitigation Measure GHG-1a, Implement Sector-Specific Operations GHG Emissions Reductions Strategies, in the Draft PEIR requires the County to use recycled water when feasible during design, construction, and operation. Mitigation Measure UTIL-1, Prepare and Implement Utilities Plan, also requires—for specific projects that move forward under the <i>2020 LA River Master Plan</i>—the County to undertake subsequent CEQA review and consider the activities of the Burbank Water and Power Department and the state of discharges to the Burbank Western Channel as they pertain to LA River flows. No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
A7-4	<p>The City of Burbank Transportation Division implements the transportation vision outlined in the Mobility Element of the City's General Plan, while also overseeing the design, funding, and implementation of transportation improvements throughout the City, such as bike and pedestrian paths and bridges. Generally, the Draft PEIR does not include sufficient information regarding possible proposed improvements in the study area within the City of Burbank, including specific projects identified in the Master Plan itself, to ensure that these improvements align with the Burbank Bicycle Master Plan and Complete Streets Plan and to determine if these improvements require encroachment on private property and other areas that are not publicly accessible. Please also see the Transportation Division's specific comments on the Master Plan, which are included as an enclosure to this letter.</p>	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements).</p> <p>All future specific projects would be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168. Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance.</p> <p>As specific project proposals move forward under the <i>2020 LA River Master Plan</i>, the County anticipates that future project proposals would take into consideration the Burbank Bicycle Master Plan and Complete Streets Plan in order to integrate the future projects with the City of Burbank's transportation network, as applicable. No changes to the Draft PEIR are needed.</p>
A7-5	<p>The Burbank Fire Department provides a variety of services to the community, including a portion of the LA River Master Plan Area, with services including fire suppression, emergency medical services, fire prevention, hazardous materials response, emergency preparedness, and public education. Please see the Fire Departments specific comments on the Master Plan, which are included as an enclosure to this letter.</p>	<p>The referenced enclosure in this comment included comments from the Burbank Fire Department on the <i>2020 LA River Master Plan</i>. The enclosure stated that there are no significant fire code requirements for the proposed Project, but the owner and the owner's architect and/or contractor are responsible for ensuring compliance with all applicable provisions of fire life/safety codes. Please see the response to comment A7-104 regarding fire department comments.</p> <p>With the exception of referencing the City of Burbank Fire Department comment letter, provided as an enclosure, which is addressed in response to comment A7-104, this comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
A7-6	<p>Section 1.3.1.2 of the Draft PEIR describes the intended use of the LA River Master Plan Program EIR with later activities. This section states, “If an agency determines that a later activity is covered in the scope of the [Program] EIR and new or substantially more severe significant impacts would not occur, no further environmental documentation would be required.” Given the very high-level of analysis provided in this PEIR, the City of Burbank would expect, and requests, that most projects under the LA River Master Plan would require project-level environmental documentation. Since the PEIR has identified significant and unavoidable impacts in many environmental categories, there may be a desire to use addenda to this PEIR for later activities with the claim that project-level impacts are not more severe than those identified in the PEIR. However, in almost all cases, the project-level impacts of later activities would constitute new information that requires further environmental documentation due to the lack of baseline information and the generalized nature of the impact analyses in this PEIR.</p>	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). In addition, because this is a program-level EIR, the analysis presented is conservative in nature. Under State CEQA Guidelines Section 15168, where the later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the PEIR. The <i>2020 LA River Master Plan</i> is a conceptual plan. All future specific projects would be subject to subsequent environmental compliance.</p> <p>The Draft PEIR identifies significant and unavoidable impacts in many environmental categories because the design information for the proposed <i>2020 LA River Master Plan</i> is at a conceptual level and the specific locations of potential projects are not proposed; therefore, the environmental impact analysis is presented at a programmatic level and does not include project-specific or site-specific analysis.</p> <p>Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, “Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase.”</p>
A7-7	<p>The Draft PEIR provides detailed conceptual plans for two typical types of projects: (1) Common Element Typical Project and (2) Multi-Use Trails and Access Gateways Typical Project. However, the Master Plan identifies multiple other types of improvements. The proposed "kit of parts" (KOP) includes six categories of projects: (1) trails and access gateways, (2) channel modifications, (3) crossings and platforms, (4) diversions, (5) floodplain reclamation, and (6) off-channel land assets. Only one</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements).</p> <p>All future specific projects would be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168. Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require</p>

Comment#	Comment Text	Response
	<p>such category, trails and access gateways, appears to be represented by the conceptual plans. Given the lack of specificity on most of the potential improvements called for by the Master Plan, the City reserves the right to comment on the potential impacts of such improvements at the time they are proposed for implementation.</p>	<p>subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, “Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase.”</p> <p>No change to the Draft PEIR is needed.</p>
<p>A7-8</p>	<p>While the City is generally supportive of the types of improvements identified in the draft Master Plan (so long as they do not cause adverse impacts on nearby uses), no information is provided regarding the long-term maintenance of such facilities. The draft Master Plan itself notes the importance of a robust operations and maintenance plan, stating on p. 117 that, “[a]ll projects proposed by the Draft LA River Master Plan Update should be planned with clear long-term O&M strategies to ensure the physical feasibility and future success of projects along the river.” If any improvements or facilities are expected to be dedicated to and/or maintained by the City of Burbank, funding mechanisms for operations and maintenance will need to be identified.</p>	<p>All future specific projects would be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168. Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance, including the City of Burbank. In accordance, the implementing agency will consult with the City of Burbank during the process of developing site-specific plans within the city’s jurisdiction, including specific operation and maintenance provisions, and during the subsequent CEQA process (see Mitigation Measures LU-2, Consultation, and LU-4, Site Selection Process), when applicable. This would be the case for any improvements or facilities that would need dedication or maintenance by the City of Burbank. However, the County cannot anticipate what any particular project proposed under the <i>2020 LA River Master Plan</i> environmental documentation under CEQA would be. Other agencies may use the PEIR as the basis upon which to tier future project environmental analyses under CEQA.</p> <p>State CEQA Guidelines Section 15168(c) states, “Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase.” The precise timing for later activities (i.e., subsequent proposed projects) over this timeframe is not known because they are dependent on several factors, such as funding, the implementing party, community needs, and detailed design considerations. No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
A7-9	The Draft PEIR states that the City of Burbank lies within Frames 6 (Narrows) and Frame 7 (East Valley). However, based on review of Draft PEIR Figures 2-10 and 2-11, Frame 6 appears to be just outside (east) of the City.	The Draft PEIR has been revised to correct this description. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i> . These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.
A7-10	The draft 2020 LA River Master Plan appendix (p. 135) identifies "Headworks Connector" as a newly proposed project in the City of Burbank at river mile 32.8. However, no information is provided in the Master Plan about this proposed project, and the project is not referenced in the Draft PEIR. Please provide additional details (e.g., type, scale, purpose, etc.) about this proposed project to allow the City of Burbank to consider its potential impacts.	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>In the <i>2020 LA River Master Plan</i>, projects, including the Headworks Connector project, were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. These examples are potential projects reflected in various planning documents in the region and are in various stages of planning; however, they are not projects that will be approved for implementation as part of the <i>2020 LA River Master Plan</i>. If these projects were to be proposed for approval, they would still be required to comply with CEQA at a site-specific level. Other considerations for project approval could include community input, funding, engineering design, and other factors before they could be approved for construction. The <i>2020 LA River Master Plan</i> is intended to guide how future projects will be planned and define key design elements, including best management practices. Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>Because the PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. Other agencies, like the City of Burbank, may use the PEIR as the basis upon which to tier their future project environmental analyses under CEQA.</p> <p>No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
A7-11	<p>The draft 2020 LA River Master Plan appendix (p. 160) identifies "Olive Ave North" at river mile 34.50. However, no information is provided in the Master Plan about this project, and this project is not referenced in the Draft PEIR. Please provide additional details (e.g., type, scale, purpose, etc.) about this proposed project to allow the City of Burbank to consider its potential impacts. The Draft PEIR should consider connectivity between the Burbank Western Channel and Olive Avenue North (to Verdugo mountains) via proposed bridge improvements on Magnolia Boulevard, Third Street protected bike lanes, and Olive Avenue North Greening Project included in the City's Complete Streets Plan.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the responses to comments A7-6 and A7-10. In addition, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The PEIR is a programmatic document because the <i>2020 LA River Master Plan</i> does not include project-specific or site-specific approvals.</p> <p>No changes to the Draft PEIR are needed.</p>
A7-12	<p>The draft 2020 LA River Master Plan appendix (p. 160) identifies "Warner Brothers Studio" at river mile 34.12. However, no information is provided in the Master Plan about this project, and this project is not referenced in the Draft PEIR. Please provide additional details (e.g., type, scale, purpose, etc.) about this proposed project to allow the City of Burbank to consider its potential impacts. The Draft PEIR should consider this project's consistency with the planned extension of the LA River Bikeway proposed by the NBC Universal Evolution Plan, as well as the City of Los Angeles.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the responses to comments A7-6 and A7-10. In addition, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The PEIR is a programmatic document because the <i>2020 LA River Master Plan</i> does not include project-specific or site-specific approvals.</p> <p>No changes to the Draft PEIR are needed.</p>
A7-13	<p>The draft 2020 LA River Master Plan appendix (p. 160) identifies "Valleyheart Drive" as a newly proposed project in the City of Burbank at river mile 33.29. However, no information is provided in the Master Plan about this proposed project, and the project is not referenced in the Draft PEIR. Please provide additional details (e.g., type, scale, purpose, etc.) about this proposed project to allow the City of Burbank to consider its potential impacts. River-adjacent public areas near Valleyheart Drive include important equestrian accessibility between the Rancho neighborhood and Griffith Park. Park areas also abut sensitive single-family neighborhoods. The Draft PEIR does not</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the responses to comments A7-6 and A7-10. In addition, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The PEIR is a programmatic document because the <i>2020 LA River Master Plan</i> does not include project-specific or site-specific approvals.</p>

Comment#	Comment Text	Response
	disclose potential impacts of a new park on this equestrian access and adjacent neighborhoods.	No changes to the Draft PEIR are needed.
A7-14	The draft 2020 LA River Master Plan appendix (p. 161) identifies "Bob Hope Drive Non-Motorized Bridge" in the cities of Los Angeles and Burbank at river mile 33.71. However, no information is provided in the Master Plan about this proposed project, and the project is not referenced in the Draft PEIR. Please provide additional details (e.g., type, scale, purpose, etc.) about this proposed project to allow the City of Burbank to consider its potential impacts. The Draft PEIR should consider the Master Plan's potential impacts to this project, which is included in the City's Bike Master Plan, Complete Streets Plan, and Mobility Element.	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the responses to comments A7-6 and A7-10. In addition, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The PEIR is a programmatic document because the <i>2020 LA River Master Plan</i> does not include project-specific or site-specific approvals.</p> <p>No changes to the Draft PEIR are needed.</p>
A7-15	The draft 2020 LA River Master Plan appendix (p. 161) identifies "Forest Lawn Cemetery" as a newly proposed project in the City of Los Angeles at river mile 33.94. However, no information is provided in the Master Plan about this proposed project, and the project is not referenced in the Draft PEIR. Please provide additional details (e.g., type, scale, purpose, etc.) about this proposed project to allow the City of Burbank to consider its potential impacts.	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the responses to comments A7-6 and A7-10. In addition, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The PEIR is a programmatic document because the <i>2020 LA River Master Plan</i> does not include project-specific or site-specific approvals.</p> <p>No changes to the Draft PEIR are needed.</p>
A7-16	The draft 2020 LA River Master Plan appendix (p. 161) identifies "134 Freeway Underpass/Overpass at Spreading" in the Cities of Los Angeles at Burbank at river mile 32.86. However, no information is provided in the Master Plan about this proposed project, and the project is not referenced in the Draft PEIR. Please provide additional details (e.g., type, scale, purpose, etc.) about this proposed project to determine this project's feasibility or consistency with similar proposed projects,	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the responses to comments A7-6 and A7-10. In addition, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The PEIR is a programmatic document</p>

Comment#	Comment Text	Response
	including the LA River Bikeway proposed by the NBC Universal Evolution Plan, as well as the City of Los Angeles.	because the <i>2020 LA River Master Plan</i> does not include project-specific or site-specific approvals. No changes to the Draft PEIR are needed.
A7-17	The draft 2020 LA River Master Plan appendix (p. 161) identifies "South Mariposa Street Pocket Park" in the City of Burbank at river mile 32.71. However, no information is provided in the Master Plan about this proposed project, and the project is not referenced in the Draft PEIR. Please provide additional details (e.g., size, scale, access, etc.) about this proposed project to determine this project's feasibility or consistency with the City's Complete Streets Plan, which proposes an equestrian bridle path along Mariposa Street between the Mariposa Bridge and Riverside Drive.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. Please see the responses to comments A7-6 and A7-10. In addition, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The PEIR is a programmatic document because the <i>2020 LA River Master Plan</i> does not include project-specific or site-specific approvals. No changes to the Draft PEIR are needed.
A7-18	The draft 2020 LA River Master Plan appendix (p. 161) identifies "Burbank Equestrian Center" in the City of Los Angeles at river mile 32.38, as well as the following projects in the City of Los Angeles: "Griffith Park River Park Buffer" at river mile 32.06, "Burbank Western Channel Non-Motorized Bridge" at river mile 31.97, and "Riverside Drive North" at river mile 31.64. However, no information is provided in the Master Plan about these project, and these projects are not referenced in the Draft PEIR. Please provide additional details (e.g., size, type, scale, access, purpose etc.) about these projects to determine their feasibility.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. Please see the responses to comments A7-6 and A7-10. In addition, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The PEIR is a programmatic document because the <i>2020 LA River Master Plan</i> does not include project-specific or site-specific approvals. No changes to the Draft PEIR are needed.
A7-19	The draft 2020 LA River Master Plan identifies a potential "bypass tunnel" to divert water at river mile 33 (in the City of Burbank) and return it to the river at river mile 22. The Draft PEIR does not mention this potential project, which the Master Plan describes as a concrete tunnel that would be approximately 40 feet in diameter and nine miles long. Given the tunnel's proposed inlet in the City of Burbank, this improvement would	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.

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	<p>cause adverse impacts on Burbank’s residents and businesses during both construction and operation/maintenance. Of particular concern is the collection and hauling of bored and/or excavated material and the air pollution, noise and vibration, and traffic that would be caused by the necessary haul trucks and on-site construction equipment.</p>	<p>Please see the responses to comments A7-6 and A7-10. In addition, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The PEIR is a programmatic document because the <i>2020 LA River Master Plan</i> does not include project-specific or site-specific approvals.</p> <p>No changes to the Draft PEIR are needed.</p>
<p>A7-20</p>	<p>Los Angeles River Revitalization Master Plan Project 113, Pollywog Park Renovation, is not mentioned in the proposed LA River Master Plan as a previously identified project in the City of Burbank. Is this project still planned? Despite, the mention of this project in the Revitalization Master Plan, no details regarding the type, scale, or purpose of this project has been provided to the City of Burbank. If this project is being considered for inclusion in the proposed Master Plan, please provide additional details to allow the City of Burbank to consider its potential impacts.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Projects identified in the Los Angeles River Revitalization Plan from 2019 were folded into the <i>2020 LA River Master Plan</i> under potential opportunity sites for future projects.</p> <p>Please see the responses to comments A7-6 and A7-10. In addition, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The PEIR is a programmatic document because the <i>2020 LA River Master Plan</i> does not include project-specific or site-specific approvals.</p> <p>No changes to the Draft PEIR are needed.</p>
<p>A7-21</p>	<p>The Draft PEIR should describe how the proposed bikeway would follow the LA River under SR-134 or if it would be routed along Zoo Drive. Similarly, the Draft PEIR should identify any effects on existing equestrian access between the City of Burbank and Griffith Park’s equestrian trails.</p>	<p>Please see the responses to comments A7-6 and A7-10. In addition, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The PEIR is a programmatic document because the <i>2020 LA River Master Plan</i> does not include project-specific or site-specific approvals.</p> <p>No changes to the Draft PEIR are needed.</p>

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A7-22	The Draft PEIR should describe how anticipated creek naturalization and park design would integrate with the LA River path and the Burbank-proposed and -funded Bob Hope Drive Bike/Pedestrian Bridge project.	<p>Please see the responses to comments A7-6 and A7-10. In addition, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The PEIR is a programmatic document because the <i>2020 LA River Master Plan</i> does not include project-specific or site-specific approvals.</p> <p>No changes to the Draft PEIR are needed.</p>
A7-23	The Draft PEIR does not include the Burbank Channel Bikeway Project along the Burbank Western Channel between Olive Avenue and Victory Boulevard. This project opened in February 2021 and has been in the planning and design stage since 2014.	<p>Please see the responses to comments A7-6 and A7-10. In addition, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The PEIR is a programmatic document because the <i>2020 LA River Master Plan</i> does not include project-specific or site-specific approvals.</p> <p>No changes to the Draft PEIR are needed.</p>
A7-24	For numerous impact analyses the Draft PEIR concludes that impacts would be significant when entities other than the County carry out a project, because the County cannot guarantee that other entities would implement the mitigation measures in the PEIR. Why is it reasonable to conclude that other entities would not provide sufficient mitigation for the impacts identified in the PEIR? Wouldn't any other approval entity be required to comply with CEQA and examine localized impacts starting with tiering from this PEIR and provide the same, equivalent or possibly other/additional measures to reduce impacts?	<p>Please refer to Section 1.3.1.1, <i>Enforceability of Mitigation Measures</i>; Section 1.3.1.2, <i>PEIR and Later Activities</i>; and Section 1.4.2, <i>Later Activities</i>. The County would commit to the mitigation proposed in the PEIR, if approved as recommended; the County believes that other entities that propose projects under the master plan and PEIR can and should adopt the proposed mitigation. However, the County cannot enforce the mitigation measures in the PEIR or guarantee implementation by the other agencies, which is why the County provided two separate impact conclusions: County and non-County. Such changes or alterations to a project are the responsibility of other public agencies and within their jurisdictions, not that of the agency making the finding. However, if the mitigation measures identified in the Draft PEIR are adopted by another agency for impacts that are considered less than significant after the mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for projects not carried out by the County for the same reasons as discussed for later activities carried out by the County.</p> <p>Other agencies, like the City of Burbank, may use the PEIR as the basis upon which to tier their future project environmental</p>

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		<p>analyses under CEQA. In those situations, as provided in State CEQA Guidelines Section 15168(c), the other agencies could rely upon and implement the mitigation measures identified in the PEIR. However, the County cannot require other agencies to implement the mitigation identified in the PEIR.</p> <p>No changes to the Draft PEIR are needed.</p>
A7-25	<p>The City of Burbank recommends that the County explore all possible enforcement mechanisms to ensure that the mitigation measures in the PEIR are implemented. If no enforcement mechanisms or only partial enforcement mechanisms are available, the County should provide documentation of the analysis that resulted in that conclusion. Beyond exploring enforcement mechanisms, the City recommends that the County make a good-faith effort to secure commitments from other agencies and entities that might undertake implementation projects that such agencies/entities will abide by the mitigation measures in the PEIR.</p>	<p>Please refer to Section 1.3.1.1, <i>Enforceability of Mitigation Measures</i>; Section 1.3.1.2, <i>PEIR and Later Activities</i>; and Section 1.4.2, <i>Later Activities</i>. The County would commit to the mitigation proposed in the PEIR, if approved as recommended; the County believes that other entities that propose projects under the master plan and PEIR can and should adopt the proposed mitigation. However, the County cannot enforce the mitigation measures in the PEIR or guarantee implementation by the other agencies, which is why the County provided two separate impact conclusions: County and non-County. Such changes or alterations to a project are the responsibility of other public agencies and within their jurisdictions, not that of the agency making the finding. However, if the mitigation measures identified in the Draft PEIR are adopted by another agency for impacts that are considered less than significant after the mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for projects not carried out by the County for the same reasons as discussed for later activities carried out by the County.</p> <p>Other agencies may use the PEIR as the basis upon which to tier future project environmental analyses under CEQA. In those situations, as provided in State CEQA Guidelines Section 15168(c), the other agencies could rely upon and implement the mitigation measures identified in the PEIR. However, the County cannot require other agencies to implement the mitigation identified in the PEIR.</p> <p>No changes to the Draft PEIR are needed.</p>

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A7-26	<p>The term "Cumulative Condition" is used repeatedly in the cumulative impact analysis portions of each impact topic assessment. This is an unusual term and is not defined; it is not apparent what that represents as a way of assessing the significance of cumulative impacts. Is this supposed to represent a cumulative baseline condition upon which the River Master Plan and other likely growth would occur and add to such conditions? The PEIR should be revised to provide a definition of this term and explain how this is applied to analyze cumulative impacts.</p>	<p>Please refer to Section 3.0.2, <i>Cumulative Impacts</i>, on pages 3-3 through 3-10 of the Draft PEIR for a detailed description of how the cumulative impacts were developed for the PEIR. Section 3.0.2 also identifies the specific sections of the State CEQA Guidelines that were used in defining the terms (e.g., Section 15130(b)). Section 3.0.2 is referenced in the discussion of cumulative impacts for each resource topic analyzed in Chapter 3, <i>CEQA Environmental Impact Assessment</i>, of the Draft PEIR. Much like general use of the term "existing conditions" in the individual impact analysis for baseline existing conditions, the term "cumulative condition" is the baseline upon which the cumulative impact analysis is conducted. The term "cumulative condition" is used in the discussion of each resource topic's cumulative impact.</p> <p>The Draft PEIR has been revised to clarify the description of the cumulative condition. The cumulative condition has been revised to say, "baseline cumulative condition." See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
A7-27	<p>A more useful way of representing potential "typical" projects would be to describe a "worst case" (most impactful) concept for both small and large projects, rather than the simplified trail and pavilion scenarios, which are less impactful than many other potential projects. This flaw is addressed, to some extent, by the examination of the KOP options in the various impact chapters, but that is done in an inconsistent manner and sometimes leaves out potential development scenarios that could be more impactful than what is discussed.</p>	<p>CEQA does not require the consideration of a worst-case scenario in environmental analysis. Such a scenario is speculative and therefore not informative. (<i>Napa Citizens for Honest Government v. Napa County Bd. of Supervisors</i> [2001] 91 Cal.App.4th 342).</p> <p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may</p>

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		<p>tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River. Please see Master Response MR-2 (Program-Level Analysis in the PEIR).</p>
<p>A7-28</p>	<p>What is the point of analyzing the overall Master Plan implementation scenario? It doesn't need a construction impact analysis since there is no possibility that all elements would be constructed in the same time period. It is more of a long-term, cumulative impact scenario representing the fully built MP across the entire river course. It is also extremely vague, since there is no current definition of location and scope of any particular project, so there is no way to analyze implications of an ultimate buildout scenario. If there is some analytic value with this scenario, that could assist the City of Burbank or other affected jurisdictions in responding to this Program EIR, it is not evident. Please provide further information to allow the City to provide specific and constructive comments regarding this ultimate buildout scenario.</p>	<p>The County is required to analyze “the whole of the action,” including direct and reasonably foreseeable indirect project effects, pursuant to Public Resources Code Section 21065 and State CEQA Guidelines Section 15378, which defines “project” for CEQA purposes. In order to do that, the County has chosen to describe “overall 2020 LA River Master Plan implementation” to the extent that the general characteristics of future projects can be presented without speculation. This includes describing and examining “typical” projects within various future project types.</p> <p>There is no definition of specific future projects because the 2020 LA River Master Plan is a conceptual plan and project-level approvals are not part of the 2020 LA River Master Plan approval. The 2020 LA River Master Plan is intended to guide how future projects will be planned and define key design elements, including best management practices, to reduce environmental impacts. Please see the response to comment A7-6. No changes to the Draft PEIR are needed.</p>
<p>A7-29</p>	<p>With regard to the study area setting and Frames 6 and 7, the PEIR seems to be confusing the City of Glendale with the City of Burbank. River mile 27.8 (as referenced on page 3.1-12 of the Draft PEIR) mentions Griffith Park within the City of Los Angeles and City of Burbank begins on the west bank, extending into Frame 7. Griffith Park is entirely within the City of Los Angeles, and the City of Burbank starts closer to river mile 32 farther upriver. Frame 7'sTs 7's discussion of scenic corridors in the City of Burbank refers to the discussion for Frame 6, which only mentions that scenic vistas within Burbank near the LA River include views of the eastern Santa Monica Mountains to the south (pages 3.1-12 and 3.1-13).</p>	<p>The Draft PEIR has been revised to include only the City of Los Angeles regarding Griffith Park. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>

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A7-30	Photo 3 in Figure 3.1-7 (Typical Views of the LA River in Frame 7) looks like it has been misplaced. US-101 is in Frame 8 where it crosses the LA River, as indicated in the caption.	The Draft PEIR has been revised accordingly. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i> . These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.
A7-31	Page 3.1-14, last paragraph: Please explain or describe why there would be elevated view of the LA River when it is depressed compared to the surrounding uses.	The sentence in the Draft PEIR is: “Griffith Park includes an extensive trail system, much of which affords panoramic views of the LA River and the Los Angeles basin from elevated vantage points.” This means that views from Griffith Park would be elevated compared to the depressed LA River. No changes to the Draft PEIR are needed.
A7-32	Pages 3.1-14 and 3.1-15: The east bank is north of the LA River in Frame 7. Please explain why Griffith Park is identified on the east bank with Burbank when they are across the river from each other. Similarly, Warner Bros Studios and Lakeside Golf Club are located on the east bank, not the west bank.	The Draft PEIR has been revised to correct these descriptions. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i> . These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.
A7-33	Page 3.1-58: 1-110 does not cross over the LA River near Griffith Park (also mentioned on page 3.1-67). Also, in the last paragraph, please explain what is being depicted as coastal areas (possibly limited to Frame 1 but not noted) and undeveloped hillsides.	<p>The Draft PEIR has been revised to correct the description of the Interstate 110 crossing over the LA River near Elysian Park. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>The description of coastal areas and undeveloped hillsides is a general description, and no changes will be made for this topic.</p>
A7-34	Please explain why impacts to scenic vistas during construction of the two types of typical projects and KOP categories are determined to be less than significant with mitigation or significant and unavoidable but not during operation (except KOP Category 6). If scenic views within the LA River are limited in nature, please explain why the impact determination would not be the same (i.e., less than significant) for both construction and operation, particularly when construction impacts are short-term and temporary.	The conclusion is based on the timing of the change in scenery. During construction, the scenic vistas would be changed by construction of the facilities. This change would be temporary in nature. However, operational impacts would be permanent, meaning that, once construction is completed, the implemented changes would become part of the environment. The main impacts that would require mitigation are the construction impacts because construction equipment and staging could block scenic views. Furthermore, their presence would not be aesthetically pleasing. Although the views of construction

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		<p>activities would be temporary, the location, design details, and specific construction phasing of the Common Elements Typical Project have not been determined; therefore, it is possible that construction activities, particularly those associated with larger-scale amenities, such as the Tier III pavilions, which could include a café, indoor showers, lockers, a public safety station, multi-purpose rooms, community kitchens, and management offices, could obstruct views of scenic resources.</p> <p>Once constructed, the Common Elements Typical Project would include distinct structures that would affect only a small portion of the viewshed and would not result in substantial adverse effects on scenic vistas. In addition, once constructed, the Common Elements Typical Project would most likely contribute to enhanced viewing opportunities (e.g., shade pavilions, cafés, benches) for users.</p> <p>The County would commit to the mitigation proposed in the PEIR, if approved as recommended; the County believes that other entities that propose projects under the master plan and PEIR can and should adopt the proposed mitigation. However, the County cannot enforce the mitigation measures in the PEIR or guarantee implementation by other agencies, which is why the County provided two separate impact conclusions: County and non-County. Such changes or alterations to a project are the responsibility of other public agencies and within their jurisdictions, not that of the agency making the finding. However, if the mitigation measures identified in the Draft PEIR are adopted by another agency for impacts that are considered less than significant after mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for projects not carried out by the County, for the same reasons as discussed for later activities carried out by the County. No changes to the Draft PEIR are needed.</p>

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A7-35	<p>Significant and unavoidable impacts related to scenic vistas during project operation seem to be limited to KOP Category 6; however, based on the previous comment, please explain why impacts under all KOP Categories are determined significant when scenic views within the LA River are limited in nature. The significant and unavoidable determination should be specifically limited to KOP Category 6.</p>	<p>Because this is a program-level EIR, the analysis presented is conservative in nature. Please see the response to comment A7-24 regarding the potential for other agencies to approve projects without implementing the PEIR’s mitigation measures.</p> <p>To be conservative in its analysis, the Draft PEIR considers the LA River to be a scenic resource. Improvements visible from the river would have a significant and unavoidable impact. No changes to the Draft PEIR are needed.</p>
A7-36	<p>Construction impacts related to conflict with applicable zoning and other regulations governing scenic quality are determined to be less than significant when a project is carried out by the County but significant and unavoidable when not carried out by the County. The conclusion stems from the introduction of new visual elements in the form of construction equipment, staging areas, and other visual elements that could be incompatible with the surrounding visual environment. The substantiation does not seem to respond to the actual threshold of conflicting with applicable zoning and other regulations that govern scenic quality. The discussion should address which regulations that govern scenic quality relate to the protection of existing residential neighborhoods from encroachment of incompatible uses, which also need to be identified or defined. If it is related to zone change or impacts to a scenic corridor or scenic highway, those impacts need to be generally identified. Similarly, please explain why construction impacts, which are temporary, are significant and unavoidable, but impacts related to operations are less than significant.</p>	<p>Because the specific locations of future project components have not been determined, it is possible that construction activities could be visible and could conflict with zoning or other design standards governing scenic quality. The <i>2020 LA River Master Plan</i> Design Guidelines would help visually integrate the new use with existing adjacent uses. However, temporary construction of <i>2020 LA River Master Plan</i> projects could introduce new visual elements in the forms of construction equipment, staging areas, and other visual elements that could be incompatible with the surrounding visual environment. Therefore, impacts would be potentially significant.</p> <p>The following mitigation measures would reduce impacts to less-than-significant levels when projects are implemented by the County: Mitigation Measures AES-1, Install Construction Fencing for Screening and Security for Construction Lasting Longer than 30 Days; LU-1, Construction Management Plan; and REC-1, Minimize Disruption of Recreational Uses during Construction.</p> <p>Please refer to Section 3.1, <i>Aesthetics</i>, of the Draft PEIR, which discusses how the <i>2020 LA River Master Plan</i> would improve visual quality across and along the river by providing gateways, amenities, new structures, artwork, and additional recreational uses and trails. These projects would result in increased scenic quality and are not anticipated to conflict with zoning or design regulations governing scenic quality. Many subsequent projects would follow the Design Guidelines, which identify connective</p>

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		<p>elements such as trail dimensions, path materiality, lighting, artwork, and signage. The Design Guidelines also include standards for visual quality and safety, architectural design, signage, and landscaping. Therefore, operational impacts would be less than significant.</p> <p>Although the County would commit to the mitigation proposed in the PEIR, if approved as recommended, the County believes that other entities that propose projects under the master plan and PEIR can and should adopt the proposed mitigation. However, the County cannot enforce the mitigation measures or guarantee implementation by other agencies, which is why there are two separate impact determinations: County and non-County. For non-County actions, such changes or alterations are the responsibility of other public agencies and within their jurisdictions, not that of the agency making the finding. However, if the mitigation measures identified are adopted by another agency for impacts that are considered less than significant after mitigation is implemented for County-led projects, then the impact would be reduced to less than significant, for the same reasons as discussed for later activities carried out by the County. In addition, please refer to Master Response MR-4 (Adherence to Local Jurisdictions' Requirements). No changes to the Draft PEIR are needed.</p>
A7-37	<p>If construction impacts and lighting impacts during operation are determined to be significant and unavoidable when a project is not carried out by the County, please explain why these impacts were not identified in the cumulative impacts discussion. Projects that are determined to have significant and unavoidable impacts tend to contribute to cumulative impacts that are significant, especially when the number and location of the projects under the Master Plan, as well as those projects within the region, are unknown.</p>	<p>Please refer to Section 3.0.1.4, <i>County and Non-County Impact Determinations</i>, of the Draft PEIR. Specifically, where the PEIR concludes that a less-than-significant impact with mitigation would occur during later activities carried out by the County, the impact would be significant and unavoidable when such activities are not carried out by the County. This applies to both direct and cumulative impacts.</p> <p>The Draft PEIR—specifically, the discussion of cumulative construction impacts on lighting and glare—has been revised to indicate that the County cannot enforce mitigation measures when they are the responsibility of another public agency or within that agency's jurisdiction. See Chapter 3 of the Final PEIR,</p>

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		<p><i>Clarifications and Modifications to the Draft PEIR.</i> These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>The County would commit to the mitigation proposed in the PEIR, if approved as recommended; the County believes that other entities that propose projects under the master plan and PEIR can and should adopt the proposed mitigation. However, the County cannot enforce the mitigation measures in the PEIR or guarantee implementation by the other agencies, which is why the County provided two separate impact conclusions: County and non-County. Such changes or alterations to a project are the responsibility of other public agencies and within their jurisdictions, not that of the agency making the finding. However, if the mitigation measures identified in the Draft PEIR are adopted by another agency for impacts that are considered less than significant after the mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for projects not carried out by the County, for the same reasons as discussed for later activities carried out by the County. Therefore, the proposed Project would not make a cumulatively considerable contribution to a cumulative impact with regard to light and glare when carried out by the County. Cumulative aesthetics impacts on light and glare would be significant and unavoidable for later activities that would not be carried out by the County.</p> <p>The County agrees with the comment regarding cumulative impact determinations being significant and unavoidable when the direct impact is found to be significant and unavoidable. Where the Draft PEIR identifies significant unavoidable direct impacts for projects carried out by the County, the Draft PEIR also concludes significant unavoidable cumulative impacts. (e.g., Air Quality, Cultural Resources, Greenhouse Gas Emissions, Public Services, Tribal Cultural Resources, Utilities, and Wildfire).</p>

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A7-38	Ambient Air Quality Data in Table 3.2-1 of the Draft PEIR should be updated to reflect the last three years of available data (2017 to 2019).	The Draft PEIR has been revised to update this information. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i> . These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.
A7-39	The Localized Significance Threshold (LST) analysis in the Draft PEIR utilizes the LST screening criteria for sensitive receptors at a distance of 25 meters from a typical project. However, as acknowledged in the Draft PEIR, there are sensitive receptors, including residences and recreational uses, that are within 10 meters of the river ROW (particularly the top of the levee). While the South Coast Air Quality Management District's (SCAQMD's) LST Methodology allows for use of the 25-meter screening criteria for receptors closer than 25 meters, given the fact that PM10 emissions approach the LST screening criteria (Table 3.2-8 estimates PM10 emissions to be 2.3 pounds per day, just under the screening threshold of 3 pounds per day), please consider whether sensitive receptors closer than 25 meters to the project site would experience significant concentrations of air pollution. This is a concern for the City of Burbank because, as an example, there are residences on W. Valley Heart Drive within 10 meters of the LA River and Buena Vista Park immediately adjacent to the LA River.	<p>As the commenter notes, the impact analysis properly follows the South Coast Air Quality Management District's (SCAQMD's) localized significance threshold (LST) impact methodology guidance, which states, "The closest receptor distance on the mass rate LST look-up tables is 25 meters. It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters." Per Table 3.2-8 in Section 3.2, <i>Air Quality</i>, in the Draft PEIR, localized emissions from the Common Elements Typical Project's daily operations would amount to 2.3 pounds of particulate matter 10 microns or less in diameter (PM10) per day, which is below the 3-pound threshold selected for the analysis. There are several highly conservative assumptions built into the analysis methodology worth highlighting.</p> <ul style="list-style-type: none"> • The City of Burbank is in source receptor area zone 7, which has a PM10 threshold of 4 pounds per day. The analysis conservatively used 3 pounds a day to account for the lowest threshold available for any of the cities and communities in the study area (i.e., Los Angeles in source receptor area zone 2). • The majority (98 percent) of the operational emissions of the Common Elements Typical Project would be from fugitive dust associated with mobile sources. It was assumed that 10 percent of the vehicle activity associated with the Common Elements would occur on the project site. This is conservative, considering actual vehicle trip patterns. More specifically, the Common Elements project area is 3 acres, which translates to a distance of approximately 362 feet (assuming square acres), or 0.06 mile. Per CalEEMod (see Appendix C of the Draft PEIR), the average trip distance is 8.2 miles. That means that vehicle

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		<p>trips across the entire distance of the project site account for only approximately 0.7 percent of the vehicle activity. Therefore, use of the 10 percent assumption is highly conservative and an overestimation of local mobile emissions.</p> <ul style="list-style-type: none"> • The Common Elements include Tier I, Tier II, and Tier III pavilions. Tier III pavilions have the most operational activity and were therefore modeled to represent all Common Elements as a worst-case scenario. Per Section 2.5.1.1, <i>Typical Projects</i>, Tier III pavilions may include a café. Because CalEEMod does not specify a land use for cafés, this building was conservatively modeled as a fast-food restaurant, which has a maximum daily trip rate of 5,728, or 240 trips per hour. This is incredibly conservative, considering the on-the-ground characteristics of the pavilions as riverside cafés, and much different from fast-food restaurant characteristics on highly accessible main thoroughfares. Therefore, the trip rates used overestimate expected vehicle activity, and vehicle emissions are conservatively overestimated. <p>All future specific projects would be subject to subsequent CEQA compliance. Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance.</p> <p>Lastly, because it cannot be concluded what the result of the project-level evaluation will be without speculation, it is possible that mitigation for future project health risks may be inadequate with respect to reducing construction-related and/or operational impacts. No changes to the Draft PEIR are needed.</p>
A7-40	Please include the assumptions (number of trips, type of use, size of use, etc.) used for estimating the daily operational regional mass emissions presented in Table 3.2-7 and Table 3.2-11.	Please refer to Appendix C of the Draft PEIR for CalEEMod inputs related to project characteristic inputs (i.e., number of trips, type of use, size of use) for the Multi-Use Trails and Access Gateways Typical Project. No changes to the Draft PEIR are needed.

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A7-41	<p>Please explain why operational impacts related to the KOP Categories were determined to be significant and unavoidable. Please identify what types of uses under each of the KOP Categories would result in operational emissions that exceed thresholds for regional and localized pollutant emissions. It seems that the potential for a significant and unavoidable impact would be limited to KOP Category 6 only.</p>	<p>As discussed in the Draft PEIR, the wide-ranging functions, characteristics, and complexities of the KOP categories and their respective design components make it particularly challenging to make informed assumptions about reasonable operational scenarios for elements of the <i>2020 LA River Master Plan</i>. The specific locations (in-channel/off-channel, frame, etc.), configurations, and design details for subsequent projects depend on numerous factors, including the proponent of subsequent projects, the implementing agency, community needs, policy decisions, and availability of funding. Accordingly, the six KOP categories were qualitatively analyzed at a high level for Impact 3.2(b).</p> <p>Operation of the KOP categories would generate air pollutant emissions, which would be associated with motor vehicle trips, onsite consumption of natural gas for space and water heating, onsite use of solvents and consumer products, landscaping, and other sources. Emissions could exceed operational thresholds for regional and localized pollutant emissions, depending on project details. This qualitative determination of a significant and unavoidable impact was conservatively made, given the lack of detailed design information, which is needed to model project emissions and compare them against SCAQMD’s regional and localized thresholds and make a quantitative determination of the impact. Similarly, the analysis for Impact 3.2(c) in the Draft PEIR states that “In the event that KOP Categories 1 through 5 operations activities result in emissions that exceed regional or localized standards at the time plans for the development are further developed, a potentially significant impact would occur. In addition, without specific details on the locations of building footprints, it is conservatively assumed that there may be instances where diesel particulate matter (DPM) emissions could result in cancer or non-cancer health risks that exceed SCAQMD’s thresholds.” The reason KOP Category 6 is discussed separately from KOP Categories 1 through 5 is that Mitigation Measure AQ-4, Require Subsequent Projects with Sensitive Receptors within 1,000 Feet of Existing Toxic Air</p>

Comment#	Comment Text	Response
		<p>Contaminant Hazards to Perform a Health Risk Assessment, might be required. This is because KOP Category 6 could involve the placement of sensitive receptors (e.g., affordable housing) within 1,000 feet of existing toxic air contaminant hazards.</p> <p>This comment does not apply to Impact 3.2(a) or Impact 3.2(d). No changes to the Draft PEIR are needed.</p>
A7-42	<p>Please identify what type of existing structures would result in asbestos dispersion during demolition under all KOP Categories unless it is limited to KOP Category 6 only. Even if the emissions would be controlled according to SCAQMD and US Environmental Protection Agency (EPA) regulations, examples of sources should be identified to inform the affected jurisdictions, including the City of Burbank, of the sources and potential impacts.</p>	<p>Impact 3.2(c) in the Draft PEIR provides a generic analysis of what types of structures could contain asbestos under the Common Elements Typical Project, saying that asbestos-containing materials (ACMs) “were commonly used as fireproofing and insulating agents prior to the 1970s. The U.S. Consumer Product Safety Commission banned use of most ACMs in 1977 due to their its link to mesothelioma. Structures constructed prior to 1977 that would be demolished by the development supported by the Common Elements Typical Project may have used [ACMs] and could expose receptors to asbestos, which may become airborne with other particulates during demolition.” As mentioned in the Section 3.2, <i>Air Quality</i>, of the Draft PEIR, this analysis generally applies to the Multi-Use Trails and Access Gateways Typical Project and KOP Categories 1 through 6. There is no KOP-specific analysis. In addition, all demolition activities during construction would be required to comply with SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities), which specifies work practices to limit asbestos emissions from building demolition and renovation activities to protect surrounding uses from exposure to asbestos emissions. Furthermore, all demolition activities would be subject to the U.S. Environmental Protection Agency’s National Emission Standards for Hazardous Air Pollutants (NESHAP) if asbestos is present at existing facilities. The asbestos NESHAP regulations protect the public by minimizing the release of asbestos fibers during activities involving the processing, handling, and disposal of ACMs. No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
A7-43	<p>Construction impacts related to exposure of sensitive receptors within 1,000 feet of projects have been identified as significant and unavoidable, which seems to be contradictory with the determination that the LSTs would not be exceeded and impacts would be less than significant under Impact 3.2(b).</p>	<p>Impact 3.2(b) in the Draft PEIR evaluates criteria pollutant emissions and compares them against air quality standards. Per the SCAQMD 2008 <i>Final Localized Significance Threshold Methodology</i>, “LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard.” As discussed in the impact determination for the Common Elements Typical Project (Impact 3.2[c]), based on the analysis in Table 3.2-5 and Table 3.2-7 of the Draft PEIR, construction would not exceed any of SCAQMD’s localized significance thresholds for criteria pollutants; therefore, criteria pollutant emissions would not expose receptors to substantial pollutant concentrations or risks. However, depending on the proximity of an individual development to the Common Elements Typical Project, there may be instances where DPM emissions (i.e., a toxic air contaminants) could result in cancer or non-cancer health risks that would exceed SCAQMD thresholds. Therefore, impacts could be significant. No changes to the Draft PEIR are needed.</p>
A7-44	<p>Similar to the comment under Impact 3.2(b), please explain whether sensitive receptors within 25 meters of a project site would be exposed to significant concentrations of PM10.</p>	<p>Please see the response to comment A7-39. In addition, because this is a program-level EIR, the analysis presented is conservative in nature. Under State CEQA Guidelines Section 15168, where later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activities to determine whether the environmental effects of the operation are within the scope of the PEIR. The <i>2020 LA River Master Plan</i> is a conceptual plan. All future specific projects would be subject to subsequent CEQA compliance.</p> <p>Lastly, because it cannot be concluded what the result of the project-level evaluation will be without speculation, it is possible that mitigation for future project health risks may be inadequate with respect to reducing construction-related and/or operational impacts to levels below SCAQMD’s threshold level.</p>

Comment#	Comment Text	Response
		Appropriate project-specific mitigation should be identified. No changes to the Draft PEIR are needed.
A7-45	While specific location and design details for implanting projects are not currently known, it is reasonable to assume that no project under the Master Plan would generate a daily traffic volume of 100,000 vehicles, which seems to be the general threshold for a CO hot spot to occur. The statement that "it is not possible to analyze the effect of project-generated traffic on LOS for unknown intersections or daily traffic volume for unknown roadways in the project area" seems inaccurate. The analysis continues to misstate that "it is unlikely that 1-hour or 8-hour CO concentrations generated along project vicinity roadways would not exceed CAAQS for CO."	<p>This sentence in the Draft PEIR has been revised to avoid confusion: "However, it is unlikely that 1-hour or 8-hour CO concentrations generated along project vicinity roadways would not exceed CAAQS for CO." See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>.</p> <p>These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
A7-46	Even without specific details, please identify what types of projects (common element, multiuse trails/access gateways, or any of the KOP Categories) would generate DPM emissions from operation that could result in cancer or non-cancer health risks that exceed SCAQMD's thresholds. The discussion should provide examples of conceptual projects that could be assumed to result in the significant and unavoidable impact that is being disclosed.	Please see the response to comment A7-41 for similar information. In addition, the analysis in the Draft PEIR for the Common Elements Typical Project (Impact 3.2[c]) states that operation of the Typical Project is not anticipated to "generate a substantial amount of onsite DPM emissions from diesel-powered maintenance equipment or diesel-powered trucks that could expose adjacent receptors to significant health risks. Furthermore, no diesel-powered stationary sources (e.g., generators, boilers) are anticipated to be constructed. Because the <i>2020 LA River Master Plan</i> is a conceptual plan, a quantitative evaluation of potential health risk impacts is not possible. Depending on the proximity of an individual development of the Common Elements Typical Project, there may be instances where DPM emissions from operations could result in cancer or non-cancer health risks that exceed SCAQMD's thresholds." Without specific details regarding the building footprints, a quantitative evaluation of potential health risk impacts by type of project (e.g., Common Element, Multi-Use Trails/Access Gateways, KOP categories) is not possible. No changes to the Draft PEIR are needed.

Comment#	Comment Text	Response
A7-47	<p>Please explain how the analysis of KOP Category 6 is different from KOP Categories 1 through 5. It seems the level of analysis is the same, and the only difference is the identification of a sample project in KOP Category 6, but the analysis still remains qualitative and generic while identifying a significant unavoidable impact without providing any assumptions or examples as to the impact determination.</p>	<p>Please refer to Section 3.2, <i>Air Quality</i>, of the Draft PEIR, which discusses how emissions associated with the six KOP categories and related design components—as well as the <i>2020 LA River Master Plan</i> in its entirety—are analyzed qualitatively at a programmatic level. The Common Elements Typical Project and the Multi-Use Trails and Access Gateways Typical Project are analyzed in greater detail compared with the other elements because information regarding the design components was available for the County to make reasonable and informed construction-related and operational assumptions. In addition, in Section 3.2, <i>Air Quality</i>, of the Draft PEIR, the environmental analysis describes the impact analysis related to air quality for the two Typical Projects, six KOP categories, and overall <i>2020 LA River Master Plan</i> implementation. It describes the methods used to determine the impacts of the proposed Project and lists the thresholds used to conclude whether an impact would be significant. Where two Typical Projects or six KOP categories have similar impacts related to a specific criterion, the discussion is combined.</p> <p>KOP 6 was acknowledged separately in the impact statement because the design components under KOP 6 are slightly different, although potential impacts would be similar. Under KOP 6, the design components include affordable housing, cultural centers, urban agriculture/composting, water storage, water treatment facilities, dry wells, spreading grounds, purple pipe connections, storm drain daylighting, injection wells, solar panels, fields, and parks. The level of analysis presented for all KOP categories is sufficient. No changes to the Draft PEIR are needed.</p>
A7-48	<p>Please explain why a typical project under the two types would be found less than significant for odors, but KOP Category 1, which is similar to the Multi-Use Trail/Access Gateways Typical Project, would be found significant and unavoidable if not carried out by the County.</p>	<p>Please see the response to comment A7-24 regarding significant and unavoidable impacts when projects are not undertaken by the County.</p>

Comment#	Comment Text	Response
A7-49	<p>The discussion of the KOP Categories under the analysis of odors is confusing. The first sentence under construction and operation of KOP Categories 2 through 6 refers to projects that are typically associated with odor complaints according to the SCAQMD, but the next sentence continues to state that KOP Categories 2 and 3 would have no land uses associated with odor complaints but that KOP Categories 4 and 6 would. The third sentence then identifies KOP Categories 4, 5, and 6 as having design components associated with odor complaints. These statements need to be reconciled to show consistent information (not contradictory to each other). It seems that KOP Category 6 is the only one with a component that may potentially result in odor impacts. Please identify what types of odor sources could be generated by projects under the other KOP Categories.</p>	<p>The Draft PEIR has been revised to reconcile the discussion of KOP Categories 2 through 6 and show consistent information regarding the land uses associated with odor complaints, per the commenter’s recommendations. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
A7-50	<p>The discussion of impacts related to the typical projects and KOP Categories needs to be consistent with the overall discussion of impacts presented under the "Overall 2020 LA River Master Plan Implementation," as well as how the different conceptual projects are described in Chapter 2, Project Description, of the Draft PEIR.</p>	<p>This comment is acknowledged. Please see the response to comment A7-47.</p>
A7-51	<p>The discussion of impacts under Impact 3.2(b) indicates that air quality impacts are less than significant based on both construction and operational emissions remaining below the regional and localized screening thresholds. However, the discussion of impacts under Impact 3.2(c) indicates that air quality impacts to sensitive receptors may be significant and unavoidable as emissions may exceed SCAQMD's LSTs. Please explain why these impacts were not identified in the cumulative impacts discussion. Projects that are determined to have significant and unavoidable impacts tend to contribute to cumulative impacts that are significant, especially when the number and location of the projects under the Master Plan, as well as those projects within the region, are unknown.</p>	<p>The comment states that “the discussion of impacts under Impact 3.2(c) indicates that air quality impacts to sensitive receptors may be significant and unavoidable as emissions may exceed SCAQMD's LSTs.” However, this is not the reason air quality impacts on sensitive receptors were deemed significant; multiple criteria were considered to determine the significance of Impact 3.2(c), including criteria pollutants, asbestos, carbon monoxide hot spots, and toxic air contaminants. As discussed in the impact determination for the Common Elements Typical Project (Impact 3.2[c]), based on the analysis for Table 3.2-5 through Table 3.2-8, construction and operational emissions would not exceed any of SCAQMD's regional or localized significance thresholds for criteria pollutants. Therefore, criteria pollutant emissions would not expose receptors to substantial pollutant concentrations or risks. However, depending on the</p>

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		<p>proximity of an individual to development of the Common Elements Typical Project, there may be instances where DPM emissions (i.e., toxic air contaminants) could result in cancer or non-cancer health risks that would exceed SCAQMD thresholds. Therefore, the Draft PEIR concludes that impacts would be potentially significant.</p> <p>The impact conclusion related to sensitive receptors is mirrored in the cumulative impacts discussion—specifically, under <i>Contribution of the Project to Cumulative Impacts</i>. The Draft PEIR states in the cumulative discussion that health risks would not be reduced to a level that would be below SCAQMD thresholds. Despite implementation of mitigation, the proposed Project would make a cumulatively considerable contribution to cumulative effects with respect to the generation of emissions that would be above established thresholds and expose sensitive receptors to substantial pollutant concentrations.</p> <p>“Cumulative condition” has been revised in the Draft PEIR to “baseline cumulative condition” (see Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>). This is a clarifying change; no changes to the conclusions in the Draft PEIR are needed.</p>
A7-52	<p>According to page 3.3-8 of the Draft PEIR, a database search and literature review were conducted to identify any habitat conservation plans (HCPs), natural communities conservation plans (NCCPs), or other approved local, regional, or State HCPs/NCCPs are applicable to the study area. Please explain if any plans are applicable to the study area.</p>	<p>Please refer to the discussion under Impact 3.3.(f) in Section 3.3, <i>Biological Resources</i>, of the Draft PEIR for the results of this analysis. No HCPs, NCCPs, or other approved local, regional, or state HCPs are located within the project study area. No changes to the Draft PEIR are needed.</p>
A7-53	<p>Figure 3.3-11 of the Draft PEIR identifies a small patch of southern cottonwood willow riparian forest, a CNDDDB special-status vegetation community, along the southern boundary of the study area within the City of Burbank; this area seems to correspond to Johnny Carson Park. Please explain why this vegetation community is not included in Tables 3.3-5 and 3.3-8, which list vegetation community and land cover types, acreages,</p>	<p>The depiction of vegetation mapped in Figure 3.3-11 is based on data provided by the CDFW’s CNDDDB. It is not intended to be a thorough or accurate inventory of all rare species or communities in California. Field verification regarding the presence or absence of sensitive species and communities is always required. However, because impacts on sensitive vegetation communities are considered significant, as part of the</p>

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	<p>sensitivities, and locations within the study area and Frames 6 to 8, respectively. Table 3.3-10 identifies the southern cottonwood willow riparian forest as no longer present; information should be consolidated and made consistent to avoid any discrepancy in what is being presented in the PEIR.</p>	<p>CEQA compliance process, all mapped sensitive vegetation communities from the CNDDDB are reviewed. In this case, through a review of Google Earth imaging, it could be determined that the southern cottonwood willow riparian forest mapped by CDFW is no longer present. The LA River has been channelized, and the vegetation has been replaced by nonnative grasses and some urban woodlands. Figure 3.3-11 should not be removed or altered. It is required to document that a search of the CNDDDB for sensitive vegetation communities was conducted. Southern cottonwood willow riparian forest was not included in Tables 3.3-5 and 3.3-8 because this community is not present, per the CNDDDB. This information is consistent throughout the Draft PEIR, and no changes are needed.</p>
<p>A7-54</p>	<p>According to page 3.3-97 of the Draft PEIR, a database search and literature review were conducted to determine if any project under the Master Plan would conflict with any HCPs, NCCPs, or other approved local, regional, or State HCPs. Per the comment above, it is not clear if any plans have been identified to determine if such impact would occur.</p>	<p>Please refer to the discussion under Impact 3.3(f) in Section 3.3, <i>Biological Resources</i>, of the Draft PEIR for the results of this analysis. No HCPs, NCCPs, or other approved local, regional, or state HCPs are located within the project study area. No changes to the Draft PEIR are needed.</p>
<p>A7-55</p>	<p>The Draft PEIR identifies a potential significant unavoidable impact to sensitive and special status species to result from any project implemented under the Master Plan and includes 19 mitigation measures to address impacts related to these biological resources. There should be a discussion regarding the effectiveness of the mitigation measures identified, particularly when a project is not carried out by the County.</p>	<p>The Draft PEIR has been revised to discuss the effectiveness of mitigation measures. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
<p>A7-56</p>	<p>There does not seem to be any sensitive riparian habitat in the study area within the City of Burbank. However, the Draft PEIR identifies a potential significant unavoidable impact to result from any project implemented under the Master Plan and includes several of the 19 mitigation measures identified for Impact 3.3(a) and Mitigation Measures BIO-20a and BIO-20b to address impacts related to riparian habitats. There should be a discussion regarding the effectiveness of the mitigation</p>	<p>Please refer to Chapter 1, <i>Introduction</i>, including Section 1.3.1.1, <i>Enforceability of Mitigation Measures</i>; Section 1.3.1.2, <i>PEIR and Later Activities</i>; and Section 1.4.2, <i>Later Activities</i>, of the Draft PEIR. Although the County would commit to the mitigation proposed in the PEIR, if approved as recommended, the County believes that other entities that propose projects under the master plan and PEIR can and should adopt the proposed mitigation. However, the County cannot enforce the mitigation</p>

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	<p>measures identified, particularly when a project is not carried out by the County.</p>	<p>measures in the PEIR or guarantee implementation by the other agencies, which is why the County provided two separate impact conclusions: County and non-County. Such changes or alterations to a project are the responsibility of other public agencies and within their jurisdictions, not that of the agency making the finding. However, if the mitigation measures identified in the Draft PEIR are adopted by another agency for impacts that are considered less than significant after the mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for projects not carried out by the County, for the same reasons discussed for later activities carried out by the County.</p> <p>The Draft PEIR has been revised to discuss the effectiveness of mitigation measures. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
<p>A7-57</p>	<p>There does not seem to be any wetland habitat in the study area within the City of Burbank, with the exception of a freshwater pond to the north of the eastern portion of the Lakeside Golf Club. However, the Draft PEIR identifies a potential significant unavoidable impact to result from any project implemented under the Master Plan and includes Mitigation Measures BIO-21a through BIO-21e, as well as Mitigation Measure BIO-1 (from Impact 3.3(a)), to address construction impacts, and Mitigation Measures BIO-22a and BIO-22b, as well as Mitigation Measure BIO-9 (from Impact 3.3(a)), to address operational impacts related to wetland habitats. There should be a discussion regarding the effectiveness of the mitigation measures identified, particularly when a project is not carried out by the County.</p>	<p>The Draft PEIR has been revised to discuss the effectiveness of mitigation measures. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Other agencies, like the City of Burbank, may use the PEIR as the basis upon which to tier their future project environmental analyses under CEQA. In those situations, as provided in State CEQA Guidelines Section 15168(c), the other agencies could rely upon and implement the mitigation measures identified in the PEIR. However, the County cannot require other agencies to implement the mitigation identified in the PEIR.</p> <p>No changes to the Draft PEIR are needed.</p>
<p>A7-58</p>	<p>There does not seem to be any wildlife corridor or nursery sites in the study area within the City of Burbank. However, the Draft PEIR identifies a potential significant unavoidable impact to</p>	<p>The Draft PEIR has been revised to discuss the effectiveness of mitigation measures. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are</p>

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	<p>result from any project implemented under the Master Plan and includes Mitigation Measure BIO-23, as well as Mitigation Measures BIO-9 through BIO19 (from Impact 3.3(a)), to address construction and operational impacts to wildlife corridors and native wildlife nursery sites. There should be a discussion regarding the effectiveness of the mitigation measures identified, particularly when a project is not carried out by the County.</p>	<p>clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Other agencies, like the City of Burbank, may use the PEIR as the basis upon which to tier their future project environmental analyses under CEQA. In those situations, as provided in State CEQA Guidelines Section 15168(c), the other agencies could rely upon and implement the mitigation measures identified in the PEIR. However, the County cannot require other agencies to implement the mitigation identified in the PEIR.</p> <p>Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance.</p> <p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements).</p>
<p>A7-59</p>	<p>The Draft PEIR identifies a potential significant unavoidable impact related to a project implemented under the Master Plan to conflict with local policies or ordinances protecting biological resources, specifically for projects not carried out by the County. The Draft PEIR identifies Mitigation Measure BIO-24 as sufficient mitigation to reduce impacts from projects carried out by the County to a less-than-significant level. There should be a discussion regarding the effectiveness of the mitigation measures identified, particularly when a project is not carried out by the County.</p>	<p>The Draft PEIR has been revised to discuss the effectiveness of mitigation measures. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>Other agencies, like the City of Burbank, may use the PEIR as the basis upon which to tier their future project environmental analyses under CEQA. In those situations, as provided in State CEQA Guidelines Section 15168(c), the other agencies could rely upon and implement the mitigation measures identified in the PEIR. However, the County cannot require other agencies to implement the mitigation identified in the PEIR.</p> <p>Because the PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements).</p>

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A7-60	The acknowledgement that no HCPs, NCCPs, or other approved local, regional, or state HCPs first appears in the discussion of Impact 3.3(f). This should have been identified in the setting discussion. See comment under "Methods."	Because there are no HCPs or state or local conservation plans in the project study area, they are not identified in the <i>Setting</i> section of the Draft PEIR. Please refer to the discussion of Impact 3.3(f) in Section 3.3, <i>Biological Resources</i> , of the Draft PEIR. They are also not included in the <i>Methods</i> section. No changes are needed to the Draft PEIR.
A7-61	The discussion of cumulative impacts states that the "proposed Project would not reduce habitat, but rather would increase it. Implementation of the 2020 LA River Master Plan would potentially have beneficial permanent direct effects on wildlife connectivity and nursery sites with creation and restoration of native upland and wetland habitats, enhancements to wildlife connectivity, and features supporting nursery sites. This does not seem to be consistent with the potential significant and unavoidable determination in Impact 3.3(d). Please explain this discrepancy.	The Draft PEIR has been revised to add clarification to the cumulative discussion of biological resources. It includes that impacts were potentially significant prior to the implementation of mitigation but less than significant with mitigation. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i> . These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.
A7-62	In the Setting section under Resources within the Project Study Area, the first sentence under Burbank (Frame 7) on page 3.4-52 should be corrected to refer to the City of Burbank and not the City of Glendale. Glendale does not appear in Frame 7 according to Figure 2-11 in Chapter 2, Project Description of the Draft PEIR.	The Draft PEIR has been revised to correct these descriptions. See Chapter 3 of this Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i> . These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.
A7-63	The methodology discussion on page 3.4-53 is for aesthetics, including scenic vistas, visual quality, and light and glare. Please revise to address cultural resources specifically.	The Draft PEIR has been revised to address cultural resources more specifically. See Chapter 3 of this Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i> . These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.
A7-64	Construction impacts to historical resources are very generalized. Impacts to historic resources should be identified by frame since the discussion of resources within the study area indicates that 10 of the 18 local jurisdictions do not have historic resources in the study area. In addition, since archaeological	This analysis applied a cultural sensitivity approach to the identification of historical resources in the study area. Although 10 of the 18 jurisdictions do not have historical resources in the study area, based on this methodology, this analysis assumes that historical resources could be located anywhere in the study

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	resources are addressed under a separate threshold question, this impacts discussion should be focused on the built environment, and ground disturbance should not have been the primary factor for determining impacts to historic resources to be significant and unavoidable.	area. Because the proposed Project is conceptual, the construction impacts analysis identified likely activities that could occur in any location, with an acknowledgement that historical resources could be located there, based on the sensitivity of the built environment. Ground disturbance in this example could include movement that undermines foundations, such as vibration. Previously recorded and/or unrecorded/unknown archaeological resources could be encountered during construction as well. These resources may be eligible as historical resources or historic properties. Therefore, construction activities could destroy, remove, disturb, or alter surface-exposed or buried archaeological resources. No changes to the Draft PEIR are needed.
A7-65	The Draft PEIR concludes that activities related to the operation of the Common Elements and Multi-Use Trails and Access Gateways Typical Projects have the potential to cause significant impacts on historical resources due to the potential for damage to historical resources from water and/or waste leakages from hygiene facilities, restrooms, and/or water features, and from potential increased foot traffic affecting the integrity of materials of existing historic resources. Given the unknown location of potential future improvements and the purely hypothetical potential for future facilities to leak water and/or waste, this impact seems like a remote potential and too speculative to meaningfully evaluate/consider	The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements). Because the <i>2020 LA River Master Plan</i> is conceptual, the PEIR is a programmatic document and does not include project-specific or site-specific analysis. Project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. Because this is a program-level EIR, the analysis presented is conservative in nature. Although impacts from foot traffic and/or water or waste leakage seem unlikely, the potential exists for impacts on sensitive historical resources within the study area to result from such activities/events. Subject-matter experts considered the importance of quiet settings, which could be disturbed by heavy foot traffic, or hazardous conditions for visitors caused by water damage. No changes to the Draft PEIR are needed.
A7-66	Mitigation Measures: Mitigation Measure CR-1a should have been completed as part of the Draft PEIR to inform the public and the decisionmakers in the different affected local jurisdictions of the location of cultural resources within the study area. It seems some of the required information sources	The <i>2020 LA River Master Plan</i> is a conceptual plan. Detailed cultural resources surveys would be based on speculative locations and characteristics. CEQA does not require speculation because it would not provide useful information to the public and decision-makers. Also note that archaeological resources can be and often are historical resources. It is unethical to reveal

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	<p>have been reviewed and consulted to identify the resources within the study area as part of the setting discussion.</p>	<p>the location of known archaeological resources to the public because it increases the potential for sites to be looted, destroyed, or degraded. In addition, as specific projects and their locations are identified, formal record searches need to be redone. Search results are typically used for only 3 years because the records are constantly being updated. For example, a records search result from a few years back may indicate that there are no historical resources or historic properties within the project footprint, while a recent study or construction in the area may reveal such resources.</p> <p>The Draft PEIR has been revised to discuss the effectiveness of mitigation measures. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
<p>A7-67</p>	<p>Please explain why impacts to historic resources are determined to be significant and unavoidable. There should be a discussion regarding the effectiveness of the mitigation measures identified.</p>	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements).</p> <p>Because this is a program-level EIR, a conservative approach to analyzing impacts was taken. Impacts were analyzed at a program level, as evidenced in Impact 3.4(a) in Section 3.4, <i>Cultural Resources</i>, of the Draft PEIR. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects will be planned and define their key design elements, including best management practices to reduce environmental impacts. Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>Because the PEIR does not examine specific projects, the County anticipates that future specific projects will require subsequent CEQA compliance, including additional historical resource surveys and eligibility determinations, if required. It is entirely possible, given the specific project type, that a project could</p>

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		<p>avoid or minimize impacts on historical resources through project design or by following the mitigation measures in the section or developing project-specific mitigation. In addition, there may not be any resources within the project footprint. The mitigation measures proposed are broadly designed to address a multitude of potential issues, depending on the types of historical resources at the project location and the types of impacts.</p> <p>No changes to the Draft PEIR are needed.</p>
A7-68	<p>Please explain why there is a mitigation measure for the preparation of a noise and vibration plan for operation when the impacts discussion did not identify impacts related to noise and vibration. Please identify what types of noise- and vibration-generating uses could be developed as a result of the Master Plan implementation.</p>	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements).</p> <p>Because this is a program-level EIR, a conservative approach to analyzing impacts was taken; impacts were analyzed qualitatively at a program level. Preconstruction noise surveys will establish base levels for noise if a quiet setting is a character-defining feature of the historic setting. Both construction-period and post-construction noise measurements must be taken to determine if ambient or specific noise occurrences are present. Thresholds will be determined on a case-by-case basis. If impacts due to noise and vibration are discovered, then a strategy for repair, in accordance with the standards, will be required. The mitigation measure related to noise and vibration was included to address significant impacts on historical resources in the study area of an individual project. No changes to the Draft PEIR are needed.</p>
A7-69	<p>Please explain why impacts under all the KOP Categories are determined to have a potentially significant impact to historic resources and identify what types of projects could be developed as a result of the Master Plan implementation that would result in this potentially significant impact. An example was provided for KOP Category 6, but an example under the other KOP Categories or of any of the 107 projects should be identified as well. Similar to the comment above, there should be a discussion</p>	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements).</p> <p>Because this is a program-level EIR, a conservative approach to analyzing impacts was taken; impacts were analyzed at a program level. KOP Categories 1 through 6 would be similar and involve a variety of tasks and features, ranging from trail modifications to development of facilities, habitat corridors,</p>

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	<p>regarding the effectiveness of the mitigation measures identified to substantiate the significant and unavoidable determination.</p>	<p>flood-management infrastructure, channel access ramps, affordable housing, and solar fields anywhere in the project study area. As individual projects are designed, additional historical resource surveys and eligibility determinations will be performed as applicable, leading to project-specific impacts analyses. The mitigation measures proposed are broadly designed to address a multitude of potential concerns, depending on the types of historical resources at the project location and types of impacts. No changes to the Draft PEIR are needed.</p>
<p>A7-70</p>	<p>Please explain why construction impacts to archaeological resources and human remains are determined to be significant and unavoidable when considering the typical projects, KOP Categories, any of the 107 projects, and the overall implementation of the Master plan. There should be a discussion regarding the effectiveness of the mitigation measures identified.</p>	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements).</p> <p>Because this is a program-level EIR, the analysis presented is conservative in nature. Under State CEQA Guidelines Section 15168, where later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the PEIR. All future specific projects would be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168.</p> <p>The Draft PEIR identifies significant and unavoidable impacts in many environmental categories because the design information for the proposed <i>2020 LA River Master Plan</i> is at a conceptual level. The specific locations of potential projects have not been determined; therefore, the environmental impact analysis is presented at a programmatic level and does not include project-specific or site-specific analysis.</p> <p>Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance.</p> <p>No changes to the Draft PEIR are needed.</p>

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A7-71	<p>Under operational activities, please explain how development of a Common Elements or a Multi-Use Trails and Access Gateways Typical Project, the KOP Categories, any of the 107 projects, and the overall implementation of the Master Plan would have a substantial adverse change in the significance of an archaeological resource and disturb human remains (beyond the effects of project construction). Please also explain why impacts to archaeological resources and human remains are determined to be significant and unavoidable during project operation. There should be a discussion regarding the effectiveness of the mitigation measures identified.</p>	<p>The section describes the potential effects of erosion, increased foot traffic, and the looting of archaeological materials as a result of operation of the various facilities, trail alignments, and recreational areas proposed as part of the overall <i>2020 LA River Master Plan</i>. Please see the response to comment A7-70, which states that, because the <i>2020 LA River Master Plan</i> is conceptual, impacts were considered at a program level. A conservative approach was taken in considering future impacts on as-yet undefined/unknown potential archaeological resources. Individual project-specific refinements/additions to mitigation measures would address specific impacts on archaeological resources or human remains (if any are found to exist). No changes to the Draft PEIR are needed.</p>
A7-72	<p>The Draft PEIR includes a figure presenting the earthquake hazard zones for Frame 7 that identifies the entire study area within the City of Burbank as being in a liquefaction zone; no areas in Burbank are identified within a landslide zone. Accordingly, please correct the analysis on page 3.6-42 for Frame 5 through Frame 9 to exclude the City of Burbank from the landslide zone.</p>	<p>Please refer to Section 3.6, <i>Geology, Soils, and Paleontological Resources</i>, of the Draft PEIR, which states that “portions of Frames 5 through 9 are also in areas designated as landslide hazard areas (these are areas with variation in topography adjacent to the Santa Monica Mountains). According to the Department of Conservation, these zones identify where the stability of hillslopes must be evaluated and countermeasures undertaken in the design and construction.” Frames 5 through 9 include the Cities of Los Angeles, Glendale, and Burbank. Portions of the City of Los Angeles (included within Frame 7, along with Burbank) are within a landslide zone, making the statement above true. Portions of the project site (including within Frame 7) not within a landslide zone would not require special considerations associated with that specific geologic hazard. No change to the Draft PEIR is needed.</p>
A7-73	<p>Construction and operational impacts related to seismic hazards and unstable soils, including liquefaction, as well as expansive soils, are typically less than significant as a result of applicable strict building codes and regulations, particularly in California, with which projects are required to comply. There should be a discussion regarding the effectiveness of the mitigation measure identified and an explanation as to why the impact</p>	<p>The Draft PEIR has been revised to discuss the effectiveness of mitigation measures. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed. Please see the response to comment A7-24.</p>

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	determination is significant and unavoidable, particularly when a project is not carried out by the County. Regardless of who implements a project, regulatory compliance remains mandatory.	
A7-74	Please explain why construction impacts to paleontological resources or unique geologic feature are determined to be significant and unavoidable when considering the typical projects, KOP Categories, any of the 107 projects, and the overall implementation of the Master plan. There should be a discussion regarding the effectiveness of the mitigation measures identified.	<p>The Draft PEIR has been revised to discuss the effectiveness of mitigation measures. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>Please refer to Chapter 1, <i>Introduction</i>, including Section 1.3.1.1, <i>Enforceability of Mitigation Measures</i>; Section 1.3.1.2, <i>PEIR and Later Activities</i>; and Section 1.4.2, <i>Later Activities</i>, of the Draft PEIR. Although the County would commit to the mitigation proposed in the PEIR, if approved as recommended, the County believes that other entities that propose projects under the master plan and PEIR can and should adopt the proposed mitigation. However, the County cannot enforce the mitigation measures in the PEIR or guarantee implementation by the other agencies, which is why the County provided two separate impact conclusions: County and non-County. Such changes or alterations to a project are the responsibility of other public agencies and within their jurisdictions, not that of the agency making the finding. However, if the mitigation measures identified in the Draft PEIR are adopted by another agency for impacts that are considered less than significant after the mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for projects not carried out by the County, for the same reasons as discussed for later activities carried out by the County. In addition, please see the response to comment A7-24.</p>
A7-75	Under operational activities, please explain how development of a Common Elements or a Multi-Use Trails and Access Gateways Typical Project, the KOP Categories, any of the 107 projects, and the overall implementation of the Master Plan would destroy paleontological resources or unique geologic features (beyond	Please see the responses to comments A7-74 and A7-24.

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	<p>the effects of project construction). Please also explain why impacts to paleontological resources and unique geologic features are determined to be significant and unavoidable during project operation. There should be a discussion regarding the effectiveness of the mitigation measures identified.</p>	
<p>A7-76</p>	<p>Please explain what it means to have "a cumulative condition with respect to geology, soils, and paleontological resources" and whether that statement is equivalent to identifying a significant cumulative impact. Similar to previous comments, any project in California, regardless of type and size, is required to comply with strict building codes and regulations, including those that address seismic hazards. The cumulative analysis states that construction activities associated with the Project would not be expected to cause significant geologic events or create a geologic hazard by causing or accelerating instability related to erosion and that adherence to Construction General Permit requirements would reduce potential impacts during construction to less-than-significant levels and that impacts related to geology and soils would not be cumulative considerable. This is contradictory to the analysis under Impacts 3.6(a), 3.6(c), and 3.6(d) which determine that impacts would be significant and unavoidable.</p>	<p>Please see the responses to comments A7-24 and A7-26.</p> <p>As identified in Section 3.6, <i>Geology, Soils, and Paleontological Resources</i>, of the Draft PEIR, Impacts 3.6(a), 3.6(c), and 3.6(d) would be less than significant for later activities carried out by the County and significant and unavoidable for later activities not carried out by the County.</p> <p>The analysis in the Draft PEIR includes impact determinations under CEQA for the <i>2020 LA River Master Plan</i> that are applicable to all 18 jurisdictions in the study area, including County and non-County jurisdictions (17 cities). Except for significant and unavoidable impacts, all identified significant environmental effects of the proposed <i>2020 LA River Master Plan</i> can be avoided or reduced to a less-than-significant level if the mitigation measures identified in this PEIR are implemented. These mitigation measures will be implemented for subsequent projects that are carried out by the County (i.e., the County is directly undertaking the project). Because some later activities under the <i>2020 LA River Master Plan</i> would not be carried out by the County, the County cannot enforce the mitigation measures or guarantee incorporation. Therefore, when this PEIR concludes that a less-than-significant impact would occur with later activities carried out by the County, the impact would be significant and unavoidable when these activities are not carried out by the County.</p> <p>The Draft PEIR is not contradictory because the significant unavoidable impact conclusions are for when mitigation is not carried out by the County.</p>

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A7-77	<p>Similarly, the cumulative analysis on page 3.6-64 of the Draft PEIR states that the "proposed Project would require notification and inventory of paleontological resources and implementation of an unanticipated discovery plan to mitigate potentially significant impacts (Mitigation Measures GEO-2, GEO-3, and GEO-4). Therefore, the 2020 LA River Master Plan would not make a cumulatively considerable contribution to impacts on paleontological resources." This is contradictory to the analysis under Impact 3.6(f), which determines that impact to paleontological resources and unique geologic features would be significant and unavoidable.</p>	<p>Much like general use of the term "existing conditions" in the individual impact analysis for baseline existing conditions, the term "cumulative condition" is the baseline upon which the cumulative impact analysis is conducted. It is the geographic and temporal scope of impact considered for a particular resource, which can vary for each resource topic as well as the baseline used for the direct impacts analysis. It comprises past, present, and reasonably probable future activities that contribute to each impact area. The term is used to differentiate the cumulative impact analysis from the individual impact analyses discussed elsewhere in the PEIR. Therefore, the conclusion of significant and unavoidable under Impact 3.6(f) is separate from the cumulative impact determination. In addition, as described in Section 3.6, <i>Geology, Soils, and Paleontological Resources</i>, of the Draft PEIR, impacts under Impact 3.6(f) would be less than significant with mitigation when carried out by the County and significant an unavoidable when not carried out by the County. No changes to the Draft PEIR are needed.</p>
A7-78	<p>The Draft PEIR discusses the City of Burbank's 2013 Greenhouse Gas Reduction Plan. Please note that the City is currently in the process of updated the Greenhouse Gas Reduction Plan.</p>	<p>This comment is acknowledged.</p>
A7-79	<p>The Draft PEIR's quantification of GHG emissions is limited to the two typical types of projects described in the Draft PEIR: (1) Common Element Typical Project and (2) Multi-Use Trails and Access Gateways Typical Project. While those types of projects may be the most well defined, they do not appear to be the most intense. For example, the extra-large projects noted in the proposed Master Plan, such as the bypass tunnel, would be anticipated to generate more emissions. Moreover, the Draft PEIR notes that up to 107 implementation projects could be implemented over the Master Plan's 25-year horizon; however, the Draft PEIR does not attempt to estimate the total GHG emissions from such projects.</p>	<p>As discussed under Impact 3.7(a) of the Draft PEIR, the wide-ranging functions, characteristics, and complexities of the KOP categories and their respective design components—along with the lack of detailed site or design information—make it particularly challenging to make informed assumptions about reasonable construction and operational scenarios for elements of the <i>2020 LA River Master Plan</i>. The specific locations (in-channel/off-channel, frame, etc.) and design details for subsequent projects depend on numerous factors, including the proponent of subsequent projects, the implementing agency, community needs, policy decisions, and availability of funding. Accordingly, the six KOP categories are qualitatively analyzed at a high level for this impact. The significance determination for this impact is based on a sector-by-sector consistency analysis</p>

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		<p>that relied on 2017 Scoping Plan strategies as well as supporting regulations and guidance. Emissions associated with the Common Elements Typical Project and the Multi-Use Trails and Access Gateways Typical Project were quantified, based on the design components and Common Elements Typical Project, for which Public Works could make reasonable and informed assumptions regarding construction and operations. No changes to the Draft PEIR are needed.</p>
A7-80	<p>The Draft PEIR analysis of Impact 3.8(a) relies on compliance with a construction NPDES General Permit for Stormwater Discharges to conclude that impacts regarding transport, use, and disposal of hazardous materials during construction would be less than significant. However, while the construction NPDES General Permit would be mandatory for projects greater than 1 acre, projects under 1 acre, such as the category of extra-small (less than 1 acre) projects, as identified in Draft PEIR Section 2.5.1.3 and in the Draft 2020 LA River Master Plan, may not be subjected to a construction NPDES General Permit. Please include provisions to address construction hazardous waste management for the smaller projects.</p>	<p>Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR states that all construction activities must comply with the County or the Long Beach Municipal Separate Storm Sewer System (MS4) permit or the MS4 permit and its associated provisions, hazardous materials management requirements, and general plan provisions and ordinances for the local jurisdiction, including standards to ensure that water quality is not degraded. This includes stormwater discharges and the disposal of hazardous materials, regardless of the size of the project.</p> <p>The Draft PEIR was revised to include a reference to the MS4 permit and Section 3.8, <i>Hazards and Hazardous Materials</i>. See Chapter 3 of this Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
A7-81	<p>Mitigation Measure HAZ-1 provides hazardous materials assessment and management practices for project sites that have been listed in hazardous materials-related databases. However, this mitigation measure does not address sites that have not been previously listed on a database but may have potential contamination. Given the history of development in the City, there is a potential for hazardous materials contamination from prior uses. The Draft PEIR should include measures to prepare a Phase I Environmental Site Assessment in accordance with ASTM standards to evaluate project sites, regardless of any database listing, for the potential contamination, and in the event that recognized environmental conditions (RECs), controlled recognized environmental conditions (CRECs),</p>	<p>A Phase I Environmental Site Assessment (Phase I ESA) relies on established historical site information to make determine if there is any <i>likelihood</i> to encounter contaminated media. Therefore, a Phase I ESA does not fully characterize the extent of contaminants, if they exist, on a particular site. A Phase I ESA includes a review of environmental database information, similar to that included in Mitigation Measure HAZ-1, Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures, to make its determinations. Given the number of sites that are part of the proposed Project, the assessment of project-level hazardous materials sites proposed under Mitigation Measure HAZ-1 is a</p>

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	<p>and/or historical recognized environmental conditions (HRECs) are identified, provide appropriate measures to characterize, remediate, and manage prior contamination.</p>	<p>practical first-step measure that provides construction personnel, the public, and the environment protection from contaminated media. The Draft PEIR has been revised, under Mitigation Measure HAZ-1, to include guidance regarding what to do if previously undocumented contaminated media is encountered during construction. See Chapter 3 of this Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR is needed.</p>
<p>A7-82</p>	<p>Mitigation Measure HAZ-1 identifies implementation of a soil management plan to "provide administrative, procedural, and analytical guidance to expedite and clarify decisions and actions if contaminated soils are encountered." (DEIR page 3.8-48) Given the wide range of previous and current uses in the study area, including industrial, commercial, and military operations, there is the potential for a similarly wide range of resulting potential contaminants in the study area. While the Soil Management Plan is described as containing procedures for handling, stockpiling, screening, and disposing of excavated soil, it is not clear whether other remediation practices would be considered that may be more appropriate to address and remediate various types of pollutants. The EIR should include mitigation to remediate and manage hazardous materials in the manner that is feasible and appropriate for the contaminant and the proposed use, with DTSC and local CUPA coordination.</p>	<p>The Draft PEIR has been revised to include coordination with oversight agencies, as applicable, including the Department of Toxic Substances Control (DTSC), as appropriate under Mitigation Measure HAZ-1, Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
<p>A7-83</p>	<p>Table 3.9-1 of the Draft PEIR identifies the waterbodies with potential to be affected by the implementation of the Master Plan. Please identify how the LA River reaches correspond to the frames addressed in each of the environmental topics. Please confirm that LA River Reach 4 incorporates Frame 7, which includes the City of Burbank.</p>	<p>The Draft PEIR has been revised to correct Table 3.9-1, which now identifies LA River reaches and the corresponding project frames. As shown in the revised table, LA River Reach 4 incorporates Frame 7. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>

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A7-84	<p>Page 3.9-20 of the Draft PEIR discusses that the County MS4 Permit allows permittees the flexibility to develop Watershed Management Programs or Enhanced Watershed Programs to implement the requirements of the permit on a watershed scale through customized strategies, control measures, and BMPs. Please include a discussion of the Enhanced Watershed Management Program Plan for the Upper Los Angeles River Watershed Management Group, which includes Burbank, Glendale, the County, and LACFCD.</p>	<p>The Draft PEIR has been revised to include a discussion of the Upper Los Angeles River Management Group’s Enhanced Watershed Management Program. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
A7-85	<p>As discussed under "Construction-Frames 5 through 9" on page 3.9-60 of the Draft PEIR, "several reaches in the LA River in Frames 5 through 9 do not meet existing design standards for flood conveyance capacity As a result, baseline conditions of the system capacity are exceeded in large storm events." Since areas with a 100-year floodplain have been mapped, more specificity by frame should have been included in the analysis. In particular, since Burbank is primarily located outside the 500-year flood zone, only those areas that do not meet existing design standards should have been specifically identified.</p>	<p>As noted in the Draft PEIR discussion, the design capacity throughout the channel varies with respect to the level of flood risk reduction. Several reaches of the channel in Frames 5 through 9 have been identified, areas where conveyance capacity for the 1 percent (100-year) flood event is not currently met (i.e., 1 percent annual chance of exceedance). All areas upstream of downtown Los Angeles, including Burbank, have less than a 1-percent (100-year) flood-event capacity. Specific areas of particular concern—such as the Glendale Narrows and the LA River above the Sepulveda Flood Control Basin—have been identified in the analysis. Further details are provided in the <i>2020 LA River Master Plan</i>, Appendix Volume II. No changes to the Draft PEIR are needed.</p>
A7-86	<p>Please explain why construction impacts to flooding are determined to be significant and unavoidable when considering the typical projects, KOP Categories, any of the 107 projects, and the overall implementation of the Master plan. There should be a discussion regarding the effectiveness of the mitigation measures identified, particularly when a project is not carried out by the County. Required compliance with the NPDES Construction General Permit and implementation of Mitigation Measures HYDRO-1a and HYDRO-1 b should not be limited to the County for compliance and implementation. Regardless of who implements a project, regulatory compliance remains</p>	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). In addition, because this is a program-level EIR, the analysis presented is conservative in nature. Under State CEQA Guidelines Section 15168, where later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the PEIR. The <i>2020 LA River Master Plan</i> is a conceptual plan.</p>

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	<p>mandatory, and the identified mitigation measures should be extended to any project proponent.</p>	<p>Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, “Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase.”</p> <p>Furthermore, please see the response to comment A7-24.</p> <p>No changes to the Draft PEIR are needed.</p>
<p>A7-87</p>	<p>As discussed under "Operations-Frames 5 through 9" on page 3.9-63 of the Draft PEIR, "[t]here are several regions within Frame 6 and Frame 7 along the river that are hydraulically unstable, which may result in large and unstable surface waves River reaches throughout Frame 5 through Frame 9 also have capacity constraints for the 1 percent storm event (100- year) flood, and could exceed the capacity of the channel in a large storm event. ... As a result, during operation, the Common Elements Typical Project could create or contribute surface water runoff in Frames 5 through 9 that could exceed the capacity of existing stormwater drainage systems." Please identify the portions of the study area in Burbank that are affected. Similarly, there should be a discussion regarding the effectiveness of the mitigation measures identified, particularly when a project is not carried out by the County.</p>	<p>Please see the response to comment A-86.</p> <p>All areas upstream of downtown Los Angeles, including Burbank, have worse than a 1 percent (100-year) flood-event capacity. Implementing agencies for later activities under the PEIR would need to meet requirements of all applicable federal, state, and local flood-related regulations.</p> <p>No changes to the Draft PEIR are needed.</p>
<p>A7-88</p>	<p>Please explain what it means to have "a cumulative condition related to hydrology and water quality" and whether that statement is equivalent to identifying a significant cumulative impact. The cumulative analysis states that "[e]ven with compliance with water quality, drainage, and flood safety regulations and policies, impacts on hydrology and water quality would be cumulatively significant. Please explain the basis of that conclusion. Similar to other comments provided above, there should be a discussion regarding the effectiveness of the</p>	<p>Please see the response to comment A7-26. The term “cumulative condition” is equivalent to identifying the existence of a significant cumulative impact relative to hydrology and water quality. As required under State CEQA Guidelines Section 15130, the cumulative impact analysis considers the severity of the significant cumulative impact when determining whether the proposed Project’s incremental contribution is “cumulatively considerable” (described here as “cumulatively significant”).</p>

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	<p>mitigation measures identified, particularly when a project is not carried out by the County. The only area where significant and unavoidable impacts are identified relates to the alteration of existing drainage patterns, which would typically be addressed by compliance with applicable regulations, including, but not limited to, NPDES permitting requirements, the County's MS4 Permit requirements, and the County's and local municipalities' Low Impact Development (LID) standards.</p>	<p>The Draft PEIR has been revised to add clarification to the hydrology and water quality cumulative discussion. It includes a statement that notes that findings were potentially significant prior to implementation of mitigation but less than significant with the mitigation. Cumulative impacts include the implementation of mitigation measures. Text has been added to the cumulative section of the Draft PEIR to clarify (see Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>). These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed. In addition, the Draft PEIR has been revised to clarify the description of the cumulative condition, which has been revised to say, "baseline cumulative condition" (see Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>). These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>Further urbanization in the region in combination with other projects in Greater Los Angeles, including transportation improvements and land use strategies, would result in a continuing increase in stormwater runoff, water quality degradation, and floodplain hazards. Cumulative growth and development would generate additional pollutants from residential, commercial, industrial, and transportation facilities. The increase in impervious surface areas would increase urban runoff, resulting in the transport of greater quantities of contaminants to receiving waters. This would also decrease groundwater recharge, resulting in increased runoff rates and/or volumes. However, the proposed Project would not affect the County's ability to implement or enforce its goals or policies. The proposed Project would also be consistent with regulatory requirements related to the minimization of water quality impacts.</p> <p>Implementation of the proposed Project would not deplete the groundwater supply or interfere with groundwater recharge. Please refer to the cumulative impacts discussion in Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, which discusses</p>

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		<p>how implementation of Mitigation Measures HYDRO-1a, Require Site-Specific Drainage Studies to Address Stormwater Management; and HYDRO-1b, Require Stormwater Control Measures, as required as part of site design for all new developments, would reduce potential project impacts related to erosion, runoff, and potential flooding to less-than-significant levels. As a result, the proposed Project would not make a cumulatively considerable contribution to a cumulative impact on hydrology and water quality.</p>
<p>A7-89</p>	<p>Draft PEIR p. 3.10-31 states, "Off-channel land asset design components would likely entail greater levels of construction than the other five KOP categories and would occur outside the ROW. KOP Category 6 design components would be anticipated to be considerably larger than the other KOP categories' design components, resulting in more extensive environmental effects during construction. This KOP category could occur within established neighborhoods and could result in temporary road closures and obstructions to community facilities, which could divide an established community. Site-specific and project-specific design details of subsequent projects would determine their construction schedules and would ultimately be driven by the County's needs or the needs of any other jurisdictions implementing these subsequent projects under the 2020 LA River Master Plan. For these larger KOP Category 6 design components, a potentially significant impact could occur as a result of physical division of an established community. [Bold added.]</p> <p>With regard to the bolded text, the Draft PEIR does not explain how these temporary construction impacts could divide an established community. What might that entail in the adjacent Burbank neighborhoods? Examples of specific circumstances in which there could be a physical division of an established neighborhood or other coherent physically linked community are requested to examine the scope and magnitude of such</p>	<p>The projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>Because the PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. Other agencies may use the PEIR as the basis upon which to tier future project environmental analyses under CEQA.</p> <p>Impact 3.10(a) in Section 3.10, <i>Land Use and Planning</i>, of the Draft PEIR discusses temporary impacts that could divide an established community. As concluded in that section: "Construction of the Common Elements Typical Project would occur off-channel (outside of the bank) between the top of the levee and the fenceline and would not provide long-term physical barriers to the community (construction would last no more than 10 months). Although construction of the Common Elements Typical Project could require temporary closure of some roadway lanes, all lanes would not be closed at the same time. Staging areas for construction equipment would be located</p>

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	<p>potential effects and to help determine the efficacy of proposed mitigation measures.</p>	<p>within the fenceline and on the ROW. As part of the demolition/ construction permitting process, the project proponent would coordinate road closures or detours with the local fire and police departments to ensure that access would not be restricted. Construction workers would be required to park in designated areas so as not to block access in the community. Therefore, there would be a less-than-significant impact with regard to physical division of an established community during construction of the Common Elements Typical Project.”</p> <p>Please refer to Section 3.10, <i>Land Use and Planning</i>, of the Draft PEIR, which discusses how larger projects involving off-channel land assets, such as affordable housing projects and museums, would entail greater levels of construction compared with KOP Categories 1 through 5. As this is a program-level EIR, the analysis presented is conservative in nature.</p> <p>No changes to the Draft PEIR are needed.</p>
A7-90	<p>The KOP-6-Operational Impact Analysis indicates there could be a permanent physical division of an established community resulting from design of a KOP-6 element, such as road closure, walls, "or other project features that would disrupt community connectivity." The Draft PEIR then concludes, without explanation, that implementation of MM LU-3, requiring alternative design to avoid a physical division or to provide suitable alternatives to maintain connectivity would not be sufficient to avoid a significant impact, if activities were carried out by entities other than the County.</p> <p>Examples of specific circumstances in which there could be a physical division of an established neighborhood or some other 'coherent' physically linked community are requested to examine the scope and magnitude of such potential effects and to help determine the efficacy of proposed mitigation measures. What kinds of significant impacts might occur in Burbank?</p>	<p>The projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. Please refer to Master Response MR-2 (Program-Level Analysis in the PIR). The Draft PEIR analyzes two Typical Projects and six KOP categories.</p> <p>The Draft PEIR identifies significant and unavoidable impacts in many environmental categories because the design information for the proposed <i>2020 LA River Master Plan</i> is at a conceptual level and the specific locations of potential projects are not proposed; therefore, the environmental impact analysis is presented at a programmatic level and does not include project-specific or site-specific analysis.</p>

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		<p>Because no specific future projects are proposed with the <i>2020 LA River Master Plan</i>, the specific significant impacts in Burbank are not known at this time. Attempting to identify the significance of impacts absent site-specific characteristics and the application of Mitigation Measure LU-3, Alternative Connectivity, to those characteristics would be purely speculative. This level of specificity is consistent with State CEQA Guidelines Section 15146, which states that the EIR for a plan “need not be as detailed as an EIR on the specific construction projects that follow.” No changes to the Draft PEIR are needed.</p>
A7-91	<p>The analysis of the Master Plan Kit of Parts Categories 1 and 2 - Operations Impacts with regard to potential conflicts with land use policies, plans, and programs concludes impacts would be significant and unavoidable, even with MM LU-4, which requires consultation with affected agencies along the river to review proposed plans to identify and avoid land use planning conflicts. This conclusion is not explained or evident from the context of the discussion. What kinds of significant conflicts with Burbank land use plans/policies could occur from development of KOPs 1 and 2?</p>	<p>Please see the response to comment A7-90. Because no specific future projects are proposed with the <i>2020 LA River Master Plan</i>, the specific significant impacts in Burbank are not known at this time. Please refer to Section 3.10, <i>Land Use and Planning</i>, of the Draft PEIR, which discusses how projects under KOP Categories 1 and 2 were identified as having potential incompatibilities with local land use/recreation policies. Mitigation Measure LU-4, Site Selection Process, would help projects avoid potential inconsistencies. However, because no specific future projects are proposed and therefore the site-specific characteristics of future projects are not known, the impact remains significant and unavoidable with respect to operations.</p> <p>No changes to the Draft PEIR are needed.</p>
A7-92	<p>The analysis of the Master Plan Kit of Parts Category 6 - Construction Impacts with regard to potential conflicts with land use policies, plans, and programs concludes impacts would be significant and unavoidable, even with MM LU-1 and LU-2, which requires a construction management plan and consultation with affected local agencies. Why is this considered significant and unavoidable if temporary? What kinds of construction impacts could be so severe that it would represent a conflict with Burbank’s land use plans and policies to avoid or mitigate environmental impacts?</p>	<p>Please refer to Section 3.10, <i>Land Use and Planning</i>, of the Draft PEIR, which discusses how larger projects involving off-channel land assets, such as affordable housing projects and museums, would entail greater levels of construction compared with KOP Categories 1 through 5. As this is a program-level EIR, the analysis presented is conservative in nature. No changes to the Draft PEIR are needed.</p>

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A7-93	<p>The analysis of the Master Plan Kit of Parts Categories 1, 2, and 3- Operations Impacts with regard to potential conflicts with land use policies, plans, and programs concludes that projects in KOP Categories 1, 2, and 3 could be out of scale with adjacent development and thus impacts would be significant and unavoidable. This conclusion is not explained or evident from the context of the discussion. What kinds of Master Plan implementation projects could be out of scale with land uses in Burbank?</p>	<p>Please refer to Section 3.10, <i>Land Use and Planning</i>, of the Draft PEIR, which discusses how subsequent projects under KOP Categories 1 and 2 could consist of multi-use trails, a recreational use, or a range of flood-management, recreational, and ecological functions. KOP Categories 1 and 2 would not be expected to result in inconsistencies with the goals, but the potential remains for a significant impact to occur because it cannot be stated with certainty whether there would be inconsistencies with applicable land use plans, policies, or regulations.</p> <p>The recreational uses under KOP Category 3 would be compatible with adjacent land uses, including those associated with residential neighborhoods. There would be no incompatibilities with adjacent land uses or out-of-scale development. Furthermore, there would be no conflicts with goals and policies aimed at ensuring a diversity of land uses and avoiding intrusions into residential neighborhoods. Subsequent projects under KOP Category 3 would not be within residential neighborhoods. Operation of projects under KOP Category 3 would have less-than-significant impacts. No changes to the Draft PEIR are needed.</p>
A7-94	<p>Regulatory Framework: The Draft PEIR identifies that the primary noise source during operations of the Common Elements Typical Project is visitors speaking. However, it is also possible that visitors may use audio devices during hiking and recreational activities. Please observe that the City of Burbank Municipal Code also includes additional restrictions on noise uses in proximity to parks or on a right of way adjacent to a park use in Burbank Municipal Code Section 9-3-213.5, Radios, Television Sets and Similar Devices in and Adjacent to Park Facilities, which states the following:</p> <p>A. Disturbing Residents: No person in a park (including public parking lots) or on a right of way adjacent to a park shall use or operate any radio receiving set, musical instrument, phonograph, television set or other machine or device for the</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>The proposed Project does not include the use of “audio devices during hiking and recreational activities.” These are activities that may or may not occur, based on personal preference. The City’s Code Enforcement office would be the responsible agency for enforcing City of Burbank Municipal Code Section 9-3-213.5. Please also refer to Master Response MR-4 (Adherence to Local Jurisdictions’ Requirements). No changes to the Draft PEIR are needed.</p>

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	<p>producing or reproducing of sound or other sound amplification systems in such manner as to disturb the peace, quiet, and comfort of neighboring residents or any reasonable person of normal sensitiveness residing in the area.</p> <p>B. Prima Facie Violation: Any person who operates or permits the operation of an outdoor sound amplification device which can be heard seventy five feet (75') or more away: 1) from the closest boundary of the park, when the source of the noise is within the boundaries of a park; or 2) from the actual source of the noise, when the source is of noise is located in the right of way adjacent to a park; shall be deemed to be prim a facie evidence of a violation of this section.</p> <p>C. Exceptions: This prohibition shall not apply to a park permit or other City approval that expressly authorizes the use of outdoor sound amplification devices. [Added by Ord. No. 3642, eff. 7/24/04.]</p>	
A7-95	<p>The Draft PEIR identifies Mitigation Measure NOI-7: Locate Project 200 Feet or More from Occupied Structures or Prepare Vibration Study and Implement Findings (Draft PEIR page 3.12-136) under the Common Elements Typical Project and Mitigation Measure NOI-8: Locate Project 400 feet or More from Occupied Structures or Prepare Vibration Study and Implement Findings (Draft PEIR page 3.12-139) under the Multi-Use Trails and Access Gateways Typical Project scenarios in Frames 1 through 9. With regard to this impact:</p> <ul style="list-style-type: none"> o Without more specificity on the potential project locations, it is unclear as to which structures may be affected. 	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements). Because the <i>2020 LA River Master Plan</i> is conceptual, the PEIR is a programmatic document and does not include project-specific or site-specific analysis. Project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. Because the location and scope of specific construction-related activities—specifically, activities involving vibration-intensive construction equipment—that may result as part of this Project are not proposed, Mitigation Measures NOI-7, Locate Project 200 feet or More from Occupied Structures or Prepare Vibration Study and Implement Findings; and NOI-8, Locate Project 400 feet or More from Occupied Structures or Prepare Vibration Study and Implement Findings, would be implemented to address potential impacts. The mitigation measures require “focused vibration analysis” for development associated with the Common Elements and Multi-Use Trails and Access Gateways Typical Projects within 200 or 400 feet,</p>

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		<p>respectively, of vibration-sensitive land uses. The vibration analysis will identify vibration-sensitive land uses within the respective distances where impacts could occur. Therefore, the mitigation measures as described will identify any structures (during final design) that may be affected.</p> <p>Please refer to Chapter 1, <i>Introduction</i>, including Section 1.3.1.1, <i>Enforceability of Mitigation Measures</i>; Section 1.3.1.2, <i>PEIR and Later Activities</i>; and Section 1.4.2, <i>Later Activities</i>, of the Draft PEIR. The County would commit to the mitigation proposed in the PEIR, if approved as recommended; the County believes that other entities that propose projects under the master plan and PEIR can and should adopt the proposed mitigation. However, the County cannot enforce the mitigation measures in the PEIR or guarantee implementation by the other agencies, which is why the County provided two separate impact conclusions: County and non-County. Such changes or alterations to a project are the responsibility of other public agencies and within their jurisdictions, not that of the agency making the finding. However, if the mitigation measures identified in the Draft PEIR are adopted by another agency for impacts that are considered less than significant after the mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for projects not carried out by the County, for the same reasons as discussed for later activities carried out by the County.</p> <p>No changes to the Draft PEIR are needed.</p>
A7-96	<p>o In the case of the nearest residences along Bob Hope Drive and Valleyheart Drive that are adjacent to the river ROW, residence structures are located approximately 20 feet from the river ROW. As a result, projects along the north side of the river may not be feasibly located 200 feet or more from the residences.</p>	<p>Please see the response to comment A7-95.</p>

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A7-97	<p>o The remaining conditions in Mitigation Measure NOI-7 identify measures that could be included, but are not limited to: using less vibration-intensive construction equipment; timing construction so that structures would not be occupied when high levels of vibration are expected; and informing residents of the timing of construction and that vibration may be noticeable during these times. The mitigation measure requires more information that demonstrates that less vibration-intensive construction equipment would be a feasible option. The latter two provisions to time construction so that structures would not be occupied and inform residents of construction timing may not be sufficient or practicable for residents to avoid exposure to high vibrations.</p>	<p>Mitigation Measure NOI-7, Locate Project 200 feet or More from Occupied Structures or Prepare Vibration Study and Implement Findings, includes a menu of effective vibration-reducing approaches that would provide flexibility during the design and construction of future specific projects. Construction can be timed so as to reduce impacts by limiting noise-generating activities to times when residents are less likely to be home or when expectations of quiet (e.g., non-evening hours) are lower. Informing residents of construction timing would reduce the impact by eliminating the element of surprise and allow residents to take action, such as closing windows or minimizing outdoor activities during the periods of construction. No changes to the Draft PEIR are needed.</p>
A7-98	<p>The Draft PEIR identifies a significant and unavoidable noise impact on sensitive receptors in the City of Burbank during project operation when implementing projects are undertaken by entities other than the County. Please provide additional description/characterization of this significant noise impact, including how it could affect sensitive receptors in Burbank. What will the level of disruption be for neighboring properties? Are there effects other than annoyance that could occur, such as disruption of normal daily activities, sleep disturbances, or adverse health effects?</p>	<p>Impacts related to noise exposure under the Common Elements Typical Project are discussed on page 3.12-108 of the Draft PEIR. Impacts under the Multi-Use Trails and Access Gateways Typical Project are discussed on page 3.12-120 of the Draft PEIR. This discussion identifies the potential noise exposure for noise-sensitive receptors within the City of Burbank. Mitigation measures are identified to reduce impacts. These include preparing a focused noise study that considers heating, ventilating, and air conditioning (HVAC) units. This would ensure that noise from developments with HVAC units would meet the City of Burbank’s noise criteria. As such, the effects and characterization of HVAC noise were discussed and mitigated. In addition, please see Master Response MR-2 (Program-Level Analysis in the PEIR). Identifying individual sensitive receptors is not possible at this point because the <i>2020 LA River Master Plan</i> does not include site-specific information. Absent this information, any identification of specific receptors and noise intensity would be speculative.</p> <p>Please see the response to comment A7-24 regarding the conservative approach to determining significance.</p> <p>Other agencies may use the PEIR as the basis upon which to tier future project environmental analyses under CEQA. In those</p>

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		<p>situations, as provided in State CEQA Guidelines Section 15168(c), the other agencies could rely upon and implement the mitigation measures identified in the PEIR. However, the County cannot require other agencies to implement the mitigation identified in the PEIR. No changes to the Draft PEIR are needed.</p>
A7-99	<p>Given the lack of specificity on the location and scope of implementing projects, it is the City of Burbank's expectation that the County and/or other entities undertaking projects within or in the vicinity of Burbank will coordinate with the City to develop and implement noise minimization techniques for both construction and operation noise sources. In particular, due to the close proximity of the nearby residences, the City requests coordination and notification of construction activities in the future to ensure compliance with the City's ordinance for projects located within 500 feet of residential areas.</p>	<p>The County will coordinate and consult with the City of Burbank during the design of future projects (see Mitigation Measures LU-2, Consultation, and LU-4, Site Selection Process) as applicable. This would occur during project design work and, if a subsequent CEQA document is necessary, during the subsequent CEQA process. No changes to the Draft PEIR are needed.</p>
A7-100	<p>While the Draft PEIR provides an estimate that more than 7,500 people experiencing homelessness live in communities along the LA River, the source of this estimate is not cited, and the DEIR also states that "no count of the population within the fence line were identified ... " In order for the EIR analysis to identify the extent of the homeless population that would be impacted and the extent that shelter, housing, and other services would be affected, the number of homeless individuals and families requires an accurate estimate.</p>	<p>This comment is acknowledged. The 7,500 number was pulled from Los Angeles Homeless Services Authority's "2018 Greater Los Angeles Homeless Count." In addition, the data were synthesized in the "Demographics, Health, and Social Equity" progress memorandum prepared by Geosyntec and Olin for the <i>2020 LA River Master Plan</i>.</p> <p>The <i>2020 LA River Master Plan</i> updated the number of people experiencing homelessness in neighborhoods adjacent to the LA River to 8,500. The Draft PEIR has been revised to reflect this number (see Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>). These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
A7-101	<p>Without identification of the status of the referenced programs to assist the homeless or the capacity and resources of available shelters, the Draft PEIR does not disclose whether existing programs and shelters can accommodate the homeless population that would be relocated from the river prior to construction. In the event that existing programs and shelters do</p>	<p>Please refer to Master Response MR-1 (Homelessness along the LA River). Also, please refer to Section 3.13, <i>Population and Housing</i>, of the Draft PEIR, which includes an extensive discussion about homeless populations in the study area and the programs of agencies within the region to address the problem of homelessness. The Draft PEIR concludes that project impacts</p>

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	<p>not have sufficient capacity to provide services to the homeless, additional construction of expanded or new shelters or housing may be required, for which the impacts should be identified and disclosed in the EIR.</p>	<p>resulting from the relocation of homeless populations would be less than significant in light of the extensive programs that are currently in place. No mitigation is required when an impact is less than significant.</p> <p>The complex issue regarding homeless encampments in areas adjacent to the LA River requires the involvement and coordination of multiple local agencies, including the County, as well as the affected cities. The County and cities currently implement programs involving the relocation of transient populations to safer, more sanitary shelters or permanent residences. These include solutions for people who choose not to stay in homeless shelters for various reasons (e.g., drug dependency or pets, which are not allowed in some shelters). The removal of unpermitted structures, debris, and materials associated with the homeless encampments would be environmentally beneficial for the LA River and would reduce both human hazards and trash. The relocation of transient individuals, removal of homeless encampments, and cleanup of any remaining refuse would be coordinated by and conducted among the County and/or cities prior to construction. For example, the County provides outreach programs and resources, with the overall goal of reducing homelessness by providing an array of housing options and programs, based on community needs, as described in Section 3.13.2.2, <i>Regulatory</i>, of the Draft PEIR. Given that local jurisdictions would relocate individuals and families experiencing homelessness and that encampments would be removed prior to construction activities, construction and operation of the Common Element Typical Project would not displace a substantial number of existing people or housing, thereby necessitating the construction of replacement housing elsewhere.</p> <p>Homeless populations vary over time. The development of specific projects would occur individually at undetermined times in the future. Homeless populations can reasonably be expected to change between now and when individual projects are initiated. In addition, existing programs for the homeless can</p>

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		<p>reasonably be expected to change as additional resources are applied to this complex problem. Therefore, attempting to assess whether additional programs and shelters would be needed is speculative. Similarly, identifying locations where new or expanded shelters might be needed is not possible, given the uncertainty over the extent of the homeless populations that may exist at future individual project sites when the projects are initiated. Absent information on the extent of demand, future program and shelter capacity, and the potential for expanded or new shelters to be needed, the analysis requested by the commenter cannot be undertaken without engaging in speculation. No changes to the Draft PEIR are needed.</p>
A7-102	<p>The PEIR should identify a means or mitigation measure(s) to address the relocation of the homeless population and the provision of resources and shelter or housing.</p>	<p>Please refer to Master Response MR-1 (Homelessness along the LA River) and the response to comment A7-101.</p> <p>Please refer to Section 3.13, <i>Population and Housing</i>, of the Draft PEIR, which notes that the County has numerous programs to address homelessness. The same is true of many of the cities along the length of the proposed Project. Establishing additional programs is beyond the scope of this proposed Project, particularly given that the impact has been determined to be less than significant. Thus, a mitigation measure is not applicable at this time. No changes to the Draft PEIR are needed.</p>
A7-103	<p>Impact analyses indicate that construction activities could increase demand for police and fire protection services but doesn't explain why/how. What activities could increase demand for response from Burbank Police and Fire Depts?</p>	<p>Please refer to Section 3.14, <i>Public Services</i>, of the Draft PEIR, which notes that the six KOP categories include a variety of construction activities, ranging from trail modifications to the development of facilities, habitat corridors, and channel access ramps; channel modifications; off-channel land development; floodplain reclamation; and recreational amenities such as amphitheaters, crossings, and platforms. Because details regarding the construction scenarios for subsequent projects under the six KOP categories are not yet known, including duration, number of construction workers, and phasing, along with the specific size, extent, and locations of the KOP categories, localized road closures and detours in the City of Burbank may</p>

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		<p>be necessary and could increase response times for emergency services. No changes to the Draft PEIR are needed.</p>
<p>A7-104</p>	<p>The analyses indicate a significant and unavoidable impact for Police and Fire, despite routine mitigation to coordinate with each local agency during design, construction and implementation of every project. This determination of a significant and unavoidable impact is not explained and is not apparent from the context of the discussion. What ramifications would this have on Burbank's Police and Fire Departments' service performance standards and could it result in a need for more staffing, resources, and facilities than would otherwise occur due to growth?</p>	<p>CEQA requires the disclosure of physical changes in the environment. In the context of police and fire services, the emphasis is on whether new or expanded facilities would be needed to maintain current service levels. Levels of police or fire protection service are not a concern of CEQA, other than how they may affect the need for new or expanded facilities (<i>City of Hayward v. Trustees of California State University</i> (2015) 242 Cal.App.4th 833).</p> <p>Physical restrictions on access could occur during overall 2020 <i>LA River Master Plan</i> construction, as discussed in Impact 3.14(a). Implementation of Mitigation Measure LU-1, Construction Management Plan, would reduce this impact but not to a less-than-significant level. The Draft PEIR concludes that impacts would be significant and unavoidable for operations under KOP Categories 1–6, despite implementation of Mitigation Measure PS-1, Ensure Police and Fire Service Providers Have Adequate Resources. These are conservative conclusions, based on the potential need for facilities, such as fire hydrants and police sub-stations, that may result from new park or recreational facilities.</p> <p>Information on service-level exceedances is not required by CEQA but is provided for informational purposes. No changes to the Draft PEIR are needed.</p>
<p>A7-105</p>	<p>The cumulative impact analysis has unsubstantiated conclusion of "result in permanent population increase, there would be localized visitor population increases that would increase the demand for public services, which would result in a cumulatively considerable contribution." If the overall Master Plan implementation would have a "cumulatively considerable contribution" to impacts on public services, that implies a significant impact that requires mitigation. Yet there is no statement of impact significance and no mitigation offered for</p>	<p>The sentence being referred to in Section 3.14, <i>Public Services</i>, of the Draft PEIR is this: "While operation of the Project would not result in permanent population increase, there would be localized visitor population increases that would increase the demand for public services, which would result in a cumulatively considerable contribution." The discussion of cumulative impacts does not require the identification of additional mitigation measures. In the prior discussion of impacts in Section 3.14, <i>Public Services</i>, of the Draft PEIR, Mitigation</p>

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	<p>this alleged significant contribution. How could this "cumulatively considerable contribution" impact Burbank public services? Would some form of programmatic mitigation be required to reduce potentially significant impacts to less than significant levels?</p>	<p>Measure PS-1, Ensure Police and Fire Service Providers Have Adequate Resources, is identified, which requires, during subsequent project design and development, the implementing agency to regularly notify and coordinate with police and fire service providers that have jurisdiction over subsequent project sites regarding project construction designs, activities, and scheduling, including any street or lane closures related to subsequent projects, to ensure that police and fire service providers have adequate resources to continue to serve the project area within their respective required levels of service and response times once the subsequent project is constructed.</p>
<p>A7-106</p>	<p>For Category 6, which could include off-channel "affordable housing projects". First, what is the definition of "affordable housing projects"? Second, there is no impact analysis associated with new housing, which would create a larger local population and add to the demand and level of use of existing parks and recreational resources and facilities.</p>	<p>According to the U.S. Department of Housing and Urban Development, affordable housing is generally defined as housing where the occupant pays no more than 30 percent of his or her gross income for associated costs, including utilities. Please refer to Section 3.13, <i>Population and Housing</i>, of the Draft PEIR, which describes how the development of affordable housing units under KOP Category 6 could induce resident populations but accommodate growth that has already been projected in local and regional plans. It would also serve the existing low-income population and facilitate the development of supportive housing for people experiencing homelessness. Development of affordable housing under KOP Category 6 would encourage a mix of supportive housing, affordable rental units, and affordable ownership units in both new and preservation buildings. This approach is designed to increase affordable housing in the area rather than create new housing for people outside the County. Please refer to Section 3.15, <i>Recreation</i>, of the Draft PEIR, which analyzes affordable housing under KOP Category 6. Operation of KOP Category 6 would not be expected to result in an increase in the use of adjacent or nearby recreational facilities such that substantial deterioration of those facilities would occur. No changes to the Draft PEIR are needed.</p>

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A7-107	<p>There is little or no discussion of potential indirect impacts related to new recreational fields or other recreational areas built within (over) the channels, such as more vehicle traffic, on-street parking, noise, trash, etc. from occasional or frequent large group events in those areas. Would any of the recreational fields be used for organized sports, for example, which could attract significant populations of both users and audiences? Does the Master Plan contain any provisions to indicate there could not be such organized activities at these larger recreational areas?</p>	<p>The facilities the commenter refers to are considered part of the analyses of KOP Category 3 impacts. Because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval, they have been considered conceptually and generally throughout the analyses. A more detailed consideration is not possible because it would require extensive speculation about the size, function, and location of facilities that have not been planned. This approach is consistent with State CEQA Guidelines Section 15146, which states that an EIR for a plan “need not be as detailed as an EIR on the specific construction projects that may follow.” No changes to the Draft PEIR are needed.</p>
A7-108	<p>Page 3.15-84 of the Draft PEIR states, "Enforcement of existing parkland dedication requirements would serve to reduce the potential for deterioration of facilities by allowing for adequate funding for the provision and maintenance of recreational facilities. While existing regulations, general plan update policies, and implementation programs address in part the need for parkland acquisition and maintenance, considering the deficit of parkland compared to the County goal, a cumulative condition with respect to recreation exists in the County." However, existing parkland dedication requirements are not intended (and potentially not legally available) to providing funding for any maintenance of recreation facilities. Rather, such funds are only for acquisition of additional parkland or perhaps some other method of expanding existing parks and recreation areas/facilities. How does this mistaken estimate of how parkland dedication funding relates to maintenance costs affect the Master Plan assumptions and expectations for funding to cover increased costs of maintenance for new recreation facilities developed under the Master Plan?</p>	<p>The Draft PEIR has been revised to reflect that park fees do not pay for maintenance or operations (see Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>). These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
A7-109	<p>What does the statement that "a cumulative condition with respect to recreation exists in the County" mean?</p>	<p>Please see the responses to comments A7-24 and A7-26.</p> <p>The Draft PEIR has been revised to clarify the description of the “cumulative condition,” which has been changed to “baseline cumulative condition” (see Chapter 3 of the Final PEIR,</p>

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		<p><i>Clarifications and Modifications to the Draft PEIR</i>). These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
<p>A7-110</p>	<p>The impact analysis fails to address cumulative impacts involving the first threshold regarding increasing use of existing parks and recreational resources to an extent that physical deterioration could occur. While it appears unlikely that cumulative impacts would be any different or more severe than impacts associated with implementation of the Master Plan only, some analysis of this should be provided. Would the project-level mitigation measures adequately address potential cumulative impacts?</p>	<p>The <i>2020 LA River Master Plan</i> would provide additional park and recreational resources to the communities along its reach. This would, to some extent, relieve existing resources. There is nothing to suggest that the additional park and recreational resources constructed as a result of the <i>2020 LA River Master Plan</i> would result in the deterioration of existing park and recreational facilities. In fact, the proposed Project would result in a beneficial contribution to recreational opportunities within Los Angeles County. Therefore, no further analysis is provided in the Draft PEIR, and no changes to the Draft PEIR are needed.</p>
<p>A7-111</p>	<p>The Draft PEIR includes several policies and projects that are inconsistent with the City's Complete Streets Plan, Bicycle Master Plan, and General Plan. The Draft PEIR does not reference the City's Complete Streets Plan as a supporting or source document or disclose potential land use and transportation impacts to City of Burbank plans and policies.</p>	<p>The projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>Because the PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. Other agencies may use the PEIR as the basis upon which to tier future project environmental analyses under CEQA.</p> <p>Please refer to Section 3.16, <i>Transportation</i>, of the Draft PEIR, in which relevant policies of the City of Burbank Bicycle Master Plan are discussed, along with relevant policies from the <i>Burbank2035 General Plan</i> (Mobility Element).</p> <p>The Draft PEIR has been revised to reference the City of Burbank's Complete Streets Plan (see Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>). These</p>

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		are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.
A7-112	<p>P. 3.16-26 of the Draft PEIR states, "Implementation of the 2020 LA River Master Plan will allow for an increased share of trips to be completed via active transportation instead of by private vehicle. Of importance in a county without many long-distance Class I bicycle trails in developed areas, the 2020 LA River Master Plan will allow for cross-county commuting via active transportation. Increasing the active transportation mode share and the ability to replace long-distance vehicle commute trips with an active transportation trip will reduce VMT, consistent with State and regional policy initiatives, including SB 743 and SCAG's RTP. It is also consistent with RTP Goal 6, which seeks to protect the environment and the health of SCAG region residents by improving air quality and encouraging active transportation. [Bold added.]</p> <p>The bolded text makes an unsubstantiated claim that the Class I riverside bike trails will somehow replace long distance vehicle commute trips with "an active transportation trip" that will reduce VMT. Since the riverside trails would not provide access to any employment centers, it is unlikely that there would be a substantial number of commute trips currently taken by automobile that would transition to a bicycle, scooter or walking/running mode of travel. It is much more likely that the vast majority of "trips" along the river bike trail would be recreational in nature, not commuting in nature. The claim (or implied claim) that this river bike trail is going to result in substantial reduction of VMT associated with commuting is not supported by any facts or analysis. Is there something in the Master Plan that would somehow facilitate connections by bike trail users from the trail to an employment area? If so, that has not been identified. There is no evident benefit to Burbank residents in terms of being able to travel over the river bike trail to get to/from work instead of using their private automobiles or some form of automotive transportation that burns gas or diesel in the propulsion system. Perhaps the Master Plan could</p>	<p>Please refer to Section 3.16, <i>Transportation</i>, of the Draft PEIR, which discusses how implementation of the proposed Project would create a continuous 51-mile trail, providing a comfortable off-road backbone facility through Los Angeles County that would be free of conflicts with vehicles and available for long-distance commuting with use of active transportation modes that include bicycles or scooters, along with walking and running. Access points would be provided every half mile along the path, increasing neighborhood connectivity to the trails and open spaces developed within the LA River corridor. The proposed Project would also create new neighborhood parks and reduce or eliminate the need to travel extended distances by private vehicle to reach a neighborhood park for the tens of thousands of people who live adjacent to the LA River. Pedestrians, bicyclists, and other micro-mobility mode users and equestrians would find space for travel and recreation along the LA River corridor on the multi-use trails that would be designed to accommodate them equally. The <i>2020 LA River Master Plan</i> would allow cross-county commuting, which is important in a county with few long-distance Class I bicycle trails in developed areas.</p> <p>This is a general discussion of consistency with the Southern California Association of Governments' (SCAG's) Regional Transportation Plan (RTP). By providing additional recreational facilities close to urban development, the <i>2020 LA River Master Plan</i> may have a small effect on vehicle trips for recreation by reducing the distance between recreationists and recreational opportunities. This is consistent with SCAG's RTP, which encourages active transportation. No changes to the Draft PEIR are needed.</p>

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	<p>be amended to add provisions to facilitate trail to employment center linkages for bicyclists, walkers, and people on non-motorized scooters. Or is the proposed Master Plan assuming that the river trails could be used by motorized scooters? If so, that could create a variety of conflicts with pedestrians and bicyclists that are not discussed in this section. Could that include scooters powered by internal combustion engines as well as electric battery power? Also, why is travel by scooters considered to be "active" transportation in this section, if the scooters could be motorized?</p>	
<p>A7-113</p>	<p>With regard to VMT impacts, the Draft PEIR a concludes potential for significant impacts during construction but does not explain why/how. It is not clear how there could be a potential for a short-term but significant effect involving increased VMT from projects originating/ending in Burbank. Why would the construction activities required to build Typical Projects somehow result in longer than typical construction related commuting trips? The PEIR should be revised to provide such an explanation so that the City has an opportunity to provide a comment on some type of specific adverse impact that might occur.</p>	<p>Development of subsequent projects under the <i>2020 LA River Master Plan</i> may result in short-term increases in vehicle miles traveled (VMT). This is a conservative analysis. Depending on the timing of buildout of subsequent projects, there could be an increase in VMT. In addition, it is unclear where the commenter is seeing that construction activities under the Typical Projects would result in a longer-than-usual construction-related commute. Construction of the Common Elements Typical Project may result in short-term increases in VMT. To account for potential impacts on traffic circulation, transportation impacts related to construction activities under the Common Elements Typical Project would be considered potentially significant. No changes to the Draft PEIR are needed.</p>
<p>A7-114</p>	<p>Draft PEIR p. 3.16-33 indicates a potential for significant impacts associated with vehicle trips generated by a Tier II Pavilion or an Art/Performance space. No explanation for this conclusion is provided. It is not evident why these special purpose facilities could result in different/longer VMT metrics than such facilities located elsewhere, outside of the project study area. Does the MP propose some additional vehicle parking areas to accommodate people who want to drive to the river trail to access it for recreational travel? The PEIR should provide such an explanation, so the City can determine whether some VMT-related adverse impacts could occur in Burbank or affect Burbank VMT characteristics.</p>	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements). Because this is a program-level EIR, the analysis presented is conservative in nature. The Draft PEIR assumed that activities that would draw participants would result in new vehicle trips or longer trips. Vehicle parking would be provided for facilities, in compliance with applicable codes, as noted in Table 2-6 of the Draft PEIR. No changes to the Draft PEIR are needed.</p>

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A7-115	<p>With regard to Draft PEIR Table 3.16-2 Typical Projects - VMT Impact Evaluation Matrix, how could the various trail projects listed below Common Elements have a potential to generate VMT? Is that for people who drive to access the river trails and transport their bicycles or horses with them? If this is what is contemplated, does this represent new vehicle trips generated by the river trail improvements? Same questions with respect to the Multi-Use Trails and Access Gateways in the last row.</p>	<p>The potential impacts on VMT associated with implementation of the <i>2020 LA River Master Plan</i> are assessed in the context of State CEQA Guidelines Section 15064.3 and CEQA Appendix G, as implemented in the County’s Transportation Impact Analysis Guidelines. As described in Appendix H to the Draft PEIR, a screening checklist from the County guidelines—developed by the County and aligned with the California Governor’s Office of Planning and Research <i>Technical Advisory on Evaluating Transportation Impacts</i> (December 2018)—was reviewed to help evaluate whether the <i>2020 LA River Master Plan</i> would conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b)(1), by causing substantial increases in VMT.</p> <p>Tier III pavilions are anticipated to accommodate up to 500 visitors per day. Maximum visitation is based on a conservative assumption that each visitor would drive to the site alone, which would result in 1,000 daily vehicle trips, exceeding the screening criterion of 110 net daily trips. In reality, many pavilion visitors would arrive at the site on foot or by bicycle. Many would be pass-by visitors who would stop while on the LA River Trail. Once specific sites have been determined, an appropriate mode split can be identified to determine what percentage of visitors would arrive by vehicle, bicycle, on foot, or with use of transit. Local transportation characteristic databases, as well as other databases, can be used to determine the appropriate average vehicle occupancy to refine estimates regarding the number of daily vehicle trips to the site.</p> <p>The Common Elements Typical Project is assumed to be inclusive of all 17 Common Elements. Therefore, because two land use elements of the Common Elements Typical Project (pavilions and art/performance spaces) have the potential to result in a significant VMT impact, the Common Elements Typical Project also has the potential to result in a significant VMT impact. For any future project configuration, including one involving the above project elements, quantitative VMT analysis</p>

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		would be required once a specific project location has been identified. No changes to the Draft PEIR are needed.
A7-116	The Draft PEIR concludes that a large/regional serving equestrian facility (KOP-1) would result in a significant/unavoidable VMT impact. This is not explained or evident from the context of the discussion. Is this because it would be a new facility that would generate a significant amount of daily trips that would not otherwise occur? Would such trips be longer than existing trips to an equestrian facility? Could this result in Burbank residents with horses somehow driving a longer distance for access to the river equestrian trail?	Please refer to the Transportation Impact Assessment in Appendix H of the Draft PEIR, which discusses how details regarding programming and facility size would be required to determine the potential for significant VMT impacts. For example, a small equestrian facility that serves neighborhood residents and/or equestrians who are already on the trail would generate fewer trips than a top regional facility. Not only would a local-serving facility attract fewer equestrians, but many may walk to a facility within their own neighborhood as opposed to driving to one farther away. Conservatively, KOP Category 1 would result in significant unavoidable impacts because, as shown in Table 3.16-3, the equestrian facility design component would have the potential to generate a significant VMT impact, although details regarding programming and facility size would be required to determine the full potential for significant VMT impacts. No changes to the Draft PEIR are needed.
A7-117	The Draft PEIR concludes that terraced channel improvements (KOP-2) could result in significant VMT impacts. The explanation of this (p. 3.16-46) is that such improvements could be used for amphitheaters for public performances or parks. Is this suggesting that such occasional, seasonal, special purpose activities within the channel area could have a permanent effect on subregional VMT patterns and volumes? If so, this requires further explanation so that the City of Burbank and others can comment more meaningfully on such potential effects.	Please refer to the Transportation Impact Assessment in Appendix H of the Draft PEIR, which discusses how terraced banks could be used to develop amphitheaters for public performances or parks. Site-specific details regarding site programming and acreage would be required to determine the potential for these public-serving uses to be eligible for screening or result in a VMT impact. Conservatively, KOP Category 2 would result in significant unavoidable impacts because if amphitheaters for public performances or parks with special events are provided, then it stands to reason that these time-specific attractions would increase VMT as well as the public presence at these venues during specific timeframes. Because this is a program-level EIR, the analysis presented is conservative in nature; the scenario with the greatest VMT in KOP Category 2, with amphitheaters and parks constructed, is conservatively analyzed. No changes to the Draft PEIR are needed.

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A7-118	<p>The Draft PEIR concludes that large platform projects (KOP-3) that support public recreational uses could result in significant VMT impacts. No explanation of this is provided and it is not evident from the context of the discussion. This requires further explanation so that the City of Burbank and others can comment more meaningfully on such potential effects.</p>	<p>Please refer to the Transportation Impact Assessment in Appendix H of the Draft PEIR, which discusses how crossings typically transport pedestrians, bicyclists, and equestrians across a river. Platforms are envisioned as wider facilities, providing space for parks, recreation, and wildlife habitats. Platforms could host a range of habitat typologies and allow for wildlife migration. For the public-serving uses, including parks and recreational spaces, site-specific details regarding site programming and acreage would be required to determine the potential for these uses to be eligible for screening or result in a VMT impact. Conservatively, KOP Category 3 could result in significant unavoidable impacts because it stands to reason that time-specific public events would increase the number of trips to and from the proposed venue. No changes to the Draft PEIR are needed.</p>
A7-119	<p>The Draft PEIR concludes that potential educational programming for side channel improvements (KOP-4) result in a significant VMT impact. No explanation of this is provided and it is not evident from the context of the discussion. This requires further explanation so that the City of Burbank and others can comment more meaningfully on such potential effects.</p>	<p>Please refer to the Transportation Impact Assessment in Appendix H of the Draft PEIR, which discusses how diversions are primarily flood-control measures and intended to address high-water flows from storm events by creating a side channel for additional flows. During the dry season, when flows are reduced, side channels may also provide the setting for educational programs (e.g., programs that focus on ecosystem function). Programming and location specifics for the educational uses would need to be provided to determine screening eligibility or the level of significance regarding potential impacts. Conservatively, KOP Category 4 could result in significant unavoidable impacts because it stands to reason that time-specific public events would increase the number of trips to and from the proposed facility. No changes to the Draft PEIR are needed.</p>
A7-120	<p>With regard to Threshold (c), the conclusion in the Draft PEIR that construction activities conducted by entities other than the County would cause a significant and unavoidable impact related to traffic hazards because the County cannot guarantee that such other entities would not impose the same or similar mitigation</p>	<p>Please see the response to comment A7-24 regarding the potential for other agencies to approve projects without implementing the PEIR’s mitigation measures.</p>

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	<p>measures to avoid such hazards is not plausible. Any entity who proposes a project authorized by the Master Plan would be obligated to prevent temporary traffic hazards through appropriate construction management plans. It is virtually inconceivable that some public entity would design a project and move ahead with construction that could result in a significant traffic hazard. The PEIR does not explain why or how such dangerous conditions could occur and if this is a real concern, such explanation is necessary to allow the City of Burbank or others to provide meaningful comments on such potentially significant impacts.</p>	
<p>A7-121</p>	<p>With regard to cumulative transportation impacts, the Draft PEIR does not address Thresholds (a) or (c); therefore, it is not possible to determine if there could be significant cumulative impacts involving those thresholds and how such impacts might affect the Burbank area. The PEIR should be revised to provide such an assessment.</p>	<p>Impact 3.16(a) of the Draft PEIR is not related to cumulative impacts. Most projects are private development projects and required to be consistent with the plans and programs of the local governments that grant approval. As a result, plan or program inconsistency is generally rare. There is no significant cumulative impact from such an inconsistency.</p> <p>Impact 3.16(c) is not related to cumulative impacts. Individual hazards are localized in nature and do not combine for a cumulative impact. No changes to the Draft PEIR are needed.</p>
<p>A7-122</p>	<p>Please explain why construction and operational impacts to tribal cultural resources are determined to be significant and unavoidable when considering the typical projects, KOP Categories, any of the 107 projects, and the overall implementation of the Master plan. There should be a discussion regarding the effectiveness of the mitigation measures identified (from Impacts 3.4(a) and 3.4(b)), as well as Mitigation Measure TCR-1 for construction and Mitigation Measures TCR-2 and TCR-3 for operation. Typically, implementation of mitigation measures, particularly Native American monitoring, is sufficient to reduce impacts to tribal cultural resources to a less-than-significant level.</p>	<p>Please refer to Section 3.17, <i>Tribal Cultural Resources</i>, of the Draft PEIR, which describes the effectiveness of the mitigation measures identified for Impacts 3.4(a) and 3.4(b).</p> <p>There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. Although implementation of the mitigation measures would help reduce the impacts, the PEIR does not examine specific projects at this time. As a result, the Typical Projects' effects on TCRs are not known at this time. Therefore, because there is currently no substantial evidence to prove otherwise, it is possible that impacts, based on the specific resource, could remain significant. Native American monitoring can help to identify important TCRs that were not known at the time the</p>

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		<p>PEIR was prepared (or identified during tribal consultation), but it cannot avoid damage to the affected TCRs.</p> <p>Because the PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. After the <i>2020 LA River Master Plan</i> is adopted and later activities are proposed, including project design, location, and other site-specific information, the impact could be determined to be less than significant. No changes to the Draft PEIR are needed.</p>
A7-123	<p>Please explain what it means to have "a cumulative condition" related to tribal cultural resources and whether that statement is equivalent to identifying a significant cumulative impact. The cumulative analysis states that "[a]lthough implementation of the mitigation measures (Mitigation Measures CR-1 a-b, CR-4a-d, CR-5, TCR-1, TCR-2, and TCR-3) would help reduce the impacts, considering the existing significant cumulative impacts for TCRs in the greater Los Angeles region, it would be reasonable to infer that the Project could result in localized significant impacts on TCRs. Therefore, the Project's contribution to cumulative tribal cultural resources impacts would be considerable." Please explain the basis of that conclusion. Similar to other comments provided above, there should be a discussion regarding the effectiveness of the mitigation measures identified.</p>	<p>Please see the response to comment A7-26. Much like general use of the term "existing conditions" in the individual impact analysis for baseline existing conditions, the term "cumulative condition" is the baseline upon which the cumulative impact analysis is conducted. It consists of the geographic and temporal conditions considered for a particular resource, which can vary for each resource topic and be different from the baseline used for the direct impacts analysis. It comprises the past, present, and reasonably probable future activities that contribute to each impact area. The term is used to differentiate the cumulative impact analysis from the individual impact analyses discussed elsewhere in the PEIR. No changes to the Draft PEIR are needed.</p> <p>The Draft PEIR has been revised to clarify the description of the "cumulative condition," which has been changed to "baseline cumulative condition" (see Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>). These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
A7-124	<p>KOP 1-6: The analysis for these 6 KOP categories indicates there would not be a significant impact involving expansion of existing infrastructure or construction of new infrastructure. Nonetheless, the discussion ends with a determination that there could be localized utility deficiencies and mitigations are identified to require preparation of project specific Utilities Plans to determine the need for infrastructure improvements</p>	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements). In addition, because this is a program-level EIR, the analysis presented is conservative in nature. Under State CEQA Guidelines Section 15168, where later activities involve site-specific operations, an agency should use a written checklist or</p>

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	<p>and provide such improvements or ways to reduce impacts, as appropriate. A final conclusion is then presented that impacts could be significant and unavoidable, which contradicts the earlier analysis that indicates there should not be a need for infrastructure improvements that could result in significant impacts. This inconsistency should be resolved in revisions to the PEIR.</p>	<p>similar device to document evaluation of the site and the activity and determine whether the environmental effects of the operation are within the scope of the PEIR.</p> <p>The Draft PEIR identifies significant and unavoidable impacts in many environmental categories because the design information for the proposed <i>2020 LA River Master Plan</i> is at a conceptual level. The specific locations of potential projects have not been determined; therefore, the environmental impact analysis is presented at a programmatic level and does not include project-specific or site-specific analysis.</p> <p>Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance State CEQA Guidelines Section 15168(c) states, "Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase."</p> <p>Please see the response to comment A7-24 regarding the potential for other agencies to approve projects without implementing the PEIR's mitigation measures.</p>
<p>A7-125</p>	<p>Further, it is not clear that there would not be a need to expand or construct new infrastructure connections to the City of Burbank utility network for a major project within Frame 7, such as the Headworks Connector project, or possibly for off-channel projects such as affordable housing or wastewater treatment facilities. More analysis is requested to explain why no infrastructure improvements associated with Burbank's utility networks would be required for any KOP elements, especially the larger ones that could occur under KOP's 5 and 6.</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements). The PEIR is a programmatic document and does not include project-specific or site-specific analysis.</p> <p>Other agencies may use the PEIR as the basis upon which to tier future project environmental analyses under CEQA. In those situations, as provided in State CEQA Guidelines Section 15168(c), the other agencies could rely upon and implement the mitigation measures identified in the PEIR. However, the County cannot require other agencies to implement the mitigation identified in the PEIR.</p> <p>No changes to the Draft PEIR are needed.</p>

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A7-126	<p>KOP 6: The analysis notes that it is not possible at this stage to prepare a water supply assessment for overall potential water demand for this category of projects, and even with a mitigation measure to require preparation of a WSA for subsequent projects that would trigger that effort due to the volume of water demand, there could be significant and unavoidable impacts to water supplies. That conclusion is not explained and represents a serious consideration for adopting statement of overriding considerations in order to approve the proposed River Master Plan. That may prove to be very challenging, since accepting such a significant impact, despite the direct conflict with project objectives and the serious nature of such an impact, requires an extraordinary demonstration of why this is both accurate and appropriate. It is suggested, therefore, that this analysis be re-drafted to provide better examination of potential effects and perhaps identification of ways in which significant impacts on water supplies would be avoided.</p>	<p>The County has chosen to take a conservative approach to disclosure of the overall impacts of the conceptual plan. Because of the severity of water shortages within the jurisdictions in the study area as well as the increase in demand resulting from potential uses associated with buildout of the <i>2020 LA River Master Plan</i>, it is likely that the projects in combination would result in a cumulatively considerable contribution to water demand. However, because the specific characteristics of the subsequent projects anticipated by the <i>2020 LA River Master Plan</i> have not been determined, undertaking a specific water supply assessment is not feasible. Future projects undertaken by the County would be subject to subsequent CEQA compliance, which would include consideration of water demand. No change to the Draft PEIR is needed.</p>
A7-127	<p>KOP 6: The conclusion of a significant and unavoidable impact on the wastewater treatment systems is both highly conservative and unnecessary. It could also be argued that preparation/implementation of Utilities Plan would result in sufficient means of providing whatever additional wastewater conveyance and/or treatment infrastructure might be needed for some major project that could exceed existing capacity in the conveyance and treatment facilities. It is recommended that the PEIR be revised to address this more carefully and provide sufficient explanation to support a finding of less than significant impacts after mitigation.</p>	<p>Please see response to comment A7-24. The County has chosen to take a conservative approach to disclosure of the overall impacts of the conceptual plan. Other agencies may use the PEIR as the basis upon which to tier future project environmental analyses under CEQA. In those situations, as provided in State CEQA Guidelines Section 15168(c), the other agencies could rely upon and implement the mitigation measures identified in the PEIR. However, the County cannot require other agencies to implement the mitigation identified in the PEIR.</p> <p>Please refer to Chapter 1, <i>Introduction</i>, including Section 1.3.1.1, <i>Enforceability of Mitigation Measures</i>; Section 1.3.1.2, <i>PEIR and Later Activities</i>; and Section 1.4.2, <i>Later Activities</i>, of the Draft PEIR. The County would commit to the mitigation proposed in the PEIR, if approved as recommended; the County believes that other entities that propose projects under the master plan and PEIR can and should adopt the proposed mitigation. However, the County cannot enforce the mitigation measures in the PEIR or guarantee implementation by the other agencies, which is</p>

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		<p>why the County provided two separate impact conclusions: County and non-County. Such changes or alterations to a project are the responsibility of other public agencies and within their jurisdictions, not that of the agency making the finding. However, if the mitigation measures identified in the Draft PEIR are adopted by another agency for impacts that are considered less than significant after the mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for projects not carried out by the County, for the same reasons as discussed for later activities carried out by the County.</p> <p>Because project-specific or site-specific analysis is not available, it cannot be said for certain if there would be utility deficiencies. For subsequent project activities, site-specific CEQA compliance would be the responsibility of the implementing agency prior to implementation of the proposed Project. No change to the Draft PEIR is needed.</p>
A7-128	<p>KOP 6: The conclusion of potentially significant impacts on landfill capacity and then ultimately significant and unavoidable impacts for projects undertaken by entities other than the County, even with the mitigation to recycle and reuse construction wastes is both highly conservative and unnecessary. It is recommended that the PEIR be revised to address this more carefully and provide sufficient explanation to support a finding of less than significant impact after mitigation for all projects, including those undertaken by non-County entities.</p>	<p>Please see the response to comment A7-127.</p>
A7-129	<p>On p. 3.19-4, in the description of wild land fire hazards within Frame 7, it is noted that there is a Very High Fire Hazard Severity Zone in the southernmost part of Burbank, south of the Ventura Freeway, adjacent to Griffith Park, and that this area includes studio buildings and a residential area. This is consistent with Figure S-1, Fire Zones, of the Safety Element of the Burbank 2035: General Plan, which shows this area to be a "Mountain Fire Zone." However, given that parts of this area are</p>	<p>In 1992, Government Code Sections 51175–51189 established the classification for Very High Fire Hazard Severity Zones (FHSZs), based on fuel loading, terrain, weather, and other relevant factors identified by the California Department of Forestry and Fire Protection (CAL FIRE) as major causes of wildfire spread as well as the severity of fire hazard expected in those areas.</p>

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	<p>developed with studio buildings and residential uses, please provide context for this VHFHSZ classification, and explain why it is designated as such given the developed condition of the land.</p>	<p>CAL FIRE has mapped areas with significant fire hazards in the state through its Fire and Resource Assessment Program. The maps designate areas of the state as FHSZs, based on various factors, including vegetation, topography, weather, crown fire production, and ember production and movement (CAL FIRE 2007). CAL FIRE uses FHSZs to classify anticipated fire-related hazards for the entire state and includes classifications for Federal Responsibility Areas, State Responsibility Areas, and Local Responsibility Areas.</p> <p>Although parts of this area are developed with studio buildings and residential uses, CAL FIRE has still determined that the area is in a Very High FHSZ. No changes to the Draft PEIR are needed.</p>
<p>A7-130</p>	<p>Construction/Common Elements, Multi-use Trails and Access Gateways, KOPs 1-6, and Overall LA River Master Plan Implementation: The analysis indicates a potential for a significant impact due to possible temporary road closures or other impediments to vehicle travel, including emergency vehicles and fire trucks. It is not explained why this could "substantially impair" an adopted emergency response plan or emergency evacuation plan and the PEIR should explain that, because these types of common construction impacts are not typically regarded as a substantial impairment to an adopted emergency response plan or emergency evacuation plan that cover broad areas of concern. A suitable mitigation measure is identified, requiring coordination with emergency and fire services to ensure there is adequate avenues for emergency response and possibly evacuation during construction activities. Then, the final conclusion is that this would be sufficient to reduce impacts to less than significant for projects carried out by the County, but not for projects carried out by other entities. This is an unnecessarily conservative conclusion, not explained and not reasonable. Why would any party that carries out an implementing project approve a plan that would interfere with emergency response or evacuation during construction activities? This should be analyzed more carefully, and an effort made to demonstrate that appropriate measures would be taken</p>	<p>Because this is a program-level EIR, the analysis presented is conservative in nature. Please see the response to comment A7-24 regarding the potential for other agencies to approve projects without implementing the PEIR's mitigation measures. No changes to the Draft PEIR are needed.</p>

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	<p>by any party that carries out an implementing project to maintain adequate emergency response and evacuation if needed during construction.</p>	
<p>A7-131</p>	<p>Construction/Common Elements, Multi-use Trails and Access Gateways, KOPs 1-6, and Overall LA River Master Plan Implementation: The analysis indicates a potential for a significant impact due to the potential for construction related ignition sources to cause a wildfire in VHFHSZs where there are steep slopes that may not be adequately prevented or suppressed through compliance with a host of existing regulatory requirements. A suitable mitigation measure is identified, requiring preparation and implementation of a Construction Fire Protection Plan. While it is not actually stated, it is presumed that such a Plan would be developed in coordination with emergency and fire services to ensure there are adequate measures in place. Then, the final conclusion is that this would be sufficient to reduce impacts to less than significant for projects carried out by the County, but not for projects carried out by other entities. This is an unnecessarily conservative conclusion, not explained and not reasonable. Why would any other party that carries out an implementing project approve a project in a VHFHSZ that doesn't include a Construction Fire Protection Plan to prevent wildland fires? This should be analyzed more carefully, and an effort made to demonstrate that appropriate measures would be taken by any party that carries out an implementing project to adequately prevent wildland fires during construction.</p>	<p>Because this is a program-level EIR, the analysis presented is conservative in nature. Please see the response to comment A7-24 regarding the potential for other agencies to approve projects without implementing the PEIR's mitigation measures. In addition, the commenter is correct about a Construction Fire Protection Plan being developed in coordination with emergency and fire services. No changes to the Draft PEIR are needed.</p>
<p>A7-132</p>	<p>Operations/Common Elements, Multi-use Trails and Access Gateways, KOPs 1-6, and Overall LA River Master Plan Implementation: This analysis indicates that despite application of all pertinent regulatory standards and preparation/implementation of a Fire Protection Plan, there would still be significant and unavoidable wildland fire impacts for projects constructed in or adjacent to a VHFHSZ. This conclusion applies to any project, whether carried out by the</p>	<p>Because this is a program-level EIR, the analysis presented is conservative in nature. Please see the response to comment A7-24 regarding the potential for other agencies to approve projects without implementing the PEIR's mitigation measures. No changes to the Draft PEIR are needed.</p>

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	<p>County or another party. This conclusion is not explained and does not seem reasonable. It is also not reasonable to approve a project that would result in such a significant and unavoidable impact. It is recommended, therefore, that further, more careful analysis be conducted to support a determination that with existing regulatory compliance and a Fire Protection Plan, impacts would be reduced to a less than significant level.</p>	
<p>A7-133</p>	<p>Construction/Common Elements, Multi-use Trails and Access Gateways, KOPs 1-6, and Overall LA River Master Plan Implementation: The analysis indicates a potential for a significant impact due to the potential for construction related ignition sources to cause a wildfire for projects located in a VHFHSZ. A suitable mitigation measure is identified, requiring preparation and implementation of a Construction Fire Protection Plan. While it is not actually stated, it is presumed that such a Plan would be developed in coordination with emergency and fire services to ensure there are adequate measures in place. Then, the final conclusion is that this would be sufficient to reduce impacts to less than significant for projects carried out by the County, but not for projects carried out by other entities. This is an unnecessarily conservative conclusion, not explained and not reasonable. Why would any other party that carries out an implementing project approve a project in a VHFHSZ that doesn't include a Construction Fire Protection Plan to prevent wildland fires? This should be analyzed more carefully, and an effort made to demonstrate that appropriate measures would be taken by any party that carries out an implementing project to adequately prevent wildland fires during construction.</p>	<p>Because this is a program-level EIR, the analysis presented is conservative in nature. Please see the response to comment A7-24 regarding the potential for other agencies to approve projects without implementing the PEIR's mitigation measures. No changes to the Draft PEIR are needed.</p>
<p>A7-134</p>	<p>Operations/Common Elements, Multi-use Trails and Access Gateways, KOPs 1-6, and Overall LA River Master Plan Implementation: This analysis indicates that despite application of all pertinent regulatory standards and preparation/implementation of a Fire Protection Plan, there would still be significant and unavoidable wildland fire impacts</p>	<p>Because this is a program-level EIR, the analysis presented is conservative in nature. As described in Section 3.19, <i>Wildfire</i>, of the Draft PEIR, all KOP categories would be required to operate in compliance with the California Fire Code, California Building Standards Code, and standards regarding a state-mandated 100-foot defensible space (Public Resources Code Section 4291).</p>

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	<p>for projects constructed in or adjacent to a VHFHSZ. This conclusion applies to any project, whether carried out by the County or another party. This conclusion is not explained and does not seem reasonable. It is also not reasonable to approve a project that would result in such a significant and unavoidable impact. It is recommended, therefore, that further, more careful analysis be conducted to support a determination that with existing regulatory compliance and a Fire Protection Plan, impacts would be reduced to a less than significant level for any implementing project.</p>	<p>However, because the exact locations of project sites have not been determined but could be within or immediately adjacent to a Very High FHSZ, it cannot be guaranteed that operation of any KOP category would not exacerbate wildfire risk.</p> <p>No changes to the Draft PEIR are needed.</p>
<p>A7-135</p>	<p>Construction/Common Elements, Multi-use Trails and Access Gateways, KOPs 1-6, and Overall LA River Master Plan Implementation: The analysis indicates a potential for a significant impact due to the potential for projects located in a VHFHSZ to be severely impacted by post-wildfire events that could result in flooding or landslides that could subject people or structures to significant risks, even with implementation of all existing regulatory compliance requirements. Several suitable mitigation measures are identified, requiring preparation of drainage studies, geotechnical reports to provide adequate stabilization of construction sites and a Post-Fire Risk Reduction Plan. Then, the final conclusion is that this would be sufficient to reduce impacts to less than significant for projects carried out by the County, but not for projects carried out by other entities. This is an unnecessarily conservative conclusion, not explained and not reasonable. Why would any other party that carries out an implementing project approve a project in a VHFHSZ that doesn't include these same kinds of mitigation measures to prevent significant post fire impacts? This should be analyzed more carefully, and an effort made to demonstrate that appropriate measures would be taken by any party that carries out an implementing project to adequately prevent significant impacts during construction. Absent that, how can this River MP be approved?</p>	<p>Because this is a program-level EIR, the analysis presented is conservative in nature. Please see the response to comment A7-24 regarding the potential for other agencies to approve projects without implementing the PEIR's mitigation measures. No changes to the Draft PEIR are needed.</p>

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A7-136	<p>Operation/Common Elements, Multi-use Trails and Access Gateways, KOPs 1-6, and Overall LA River Master Plan Implementation: The analysis concludes that by merely placing new structures and people within a VHFHSZ, that would exacerbate existing wildland fire hazard risks. There is no explanation of how these circumstances would worsen existing physical conditions involving slopes, landslides, and potential for significant post-fire impacts due to such conditions. Then, suitable mitigations are identified including preparation of drainage plans, geotechnical analysis, and a Post-Fire Risk Reduction Plan, that would adequately reduce impacts for projects carried out by the County, but not for projects carried out by other parties. This is an unnecessarily conservative conclusion, not explained and not reasonable. Why would any other party that carries out an implementing project approve a project in a VHFHSZ that doesn't include these same kinds of mitigation measures to prevent significant post fire impacts? This should be analyzed more carefully, and an effort made to demonstrate that appropriate measures would be taken by any party that carries out an implementing project to adequately prevent significant impacts during construction.</p>	<p>Because this is a program-level EIR, the analysis presented is conservative in nature. Please see the response to comment A7-24 regarding the potential for other agencies to approve projects without implementing the PEIR's mitigation measures. No changes to the Draft PEIR are needed.</p>
A7-137	<p>Cumulative Impacts/Geographic context: This is identified as the entire six-county area that comprises the SCAG region. This is a grossly overestimated geographic area of concern, as the LA River corridor occurs only within Los Angeles County and activities conducted along this corridor could not influence or be influenced by projects undertaken in the other counties, or even in other parts of Los Angeles County that are separated from the river corridor by a substantial distance, particularly areas that are heavily urbanized. The PEIR should be revised to establish a much narrower geographic context that extends along the project corridor area as the overly broad definition proposed results in an artificial basis for examining cumulative impacts and thus an overstating of potential cumulative impacts.</p>	<p>The County disagrees. The geographic context for an analysis of cumulative impacts related to wildfire is the six-county SCAG region because counties in this region are adjacent to Los Angeles County and projects in this region could contribute to cumulative wildfire impacts. Please refer to Chapter 3, <i>CEQA Environmental Impact Analysis</i>, of the Draft PEIR, which discusses how the cumulative impacts analysis for each resource area considers the impacts related to general growth projected for the area as well as the policies and programs that are in place (i.e., adopted) to protect and conserve environmental resources (e.g., biological resources) and minimize resulting impacts on human health. Generally, with respect to geographic scope, the cumulative impacts analysis considers the study area and areas beyond to be relevant, with consideration of whether the proposed Project would cause a new significant cumulative</p>

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		<p>impact or result in a cumulatively considerable contribution to a previously identified significant cumulative impact included in an adopted local, regional, or statewide plan. No changes to the Draft PEIR are needed.</p>
<p>A7-138</p>	<p>Contribution of the Project to Cumulative Impacts: This discussion indicates that despite implementation of all existing regulatory standards for construction within VHFHSZs and the mitigation measures set forth in this chapter, the project would still have a "cumulatively considerable contribution" to wildfire impacts. This conclusion is forced by the overly conservative determinations made with respect to project-level impacts, as noted in the earlier comments. If the PEIR is revised to explain how the project would not result in significant and unavoidable impacts through regulatory compliance and implementation of the mitigation measures identified in this chapter, the conclusion regarding cumulative impacts could also change to less than significant.</p>	<p>CEQA case law has held that even a small incremental addition to a significant cumulative impact that is particularly severe can be cumulatively considerable (<i>Kings County Farm Bureau v. City of Hanford</i> (1990) 221 Cal.App.3rd 692). The County has chosen to be conservative in its approach to this environmental concern, given the extensive wildfire history in Southern California and the lengthening wildfire season.</p> <p>Please see the response to comment A7-24 regarding the potential for other agencies to approve projects without implementing the PEIR's mitigation measures. No changes to the Draft PEIR are needed.</p>
<p>A7-139</p>	<p>Essentially all of the technical analysis sections (Sections 3.1 through 3.19) identified significant and unavoidable impacts. Please explain why only certain resource areas are identified in Section 4.1.</p>	<p>Please refer to Chapter 4, <i>Other CEQA Considerations</i>, of the Draft PEIR, which organizes all thresholds and impacts according to their respective impact determinations. Also, please refer to Section 4.1, <i>Significant Unavoidable Adverse Environmental Impacts</i> of the Draft PEIR, which outlines the impacts that were determined to be significant and unavoidable, regardless of whether later activities are carried out by the County or not carried out by the County. Please also refer to Section 4.2, <i>Impacts Found to Be Less than Significant with Mitigation for Later Activities Carried Out by the County and Significant Unavoidable When Not Carried Out by the County</i>, and Section 4.3, <i>Impacts Found to Be Less than Significant</i> of the Draft PEIR.</p> <p>Please refer to Chapter 4, <i>Other CEQA Considerations</i>, of the Draft PEIR, which notes that, except for significant and unavoidable impacts, all identified significant environmental effects of the proposed <i>2020 LA River Master Plan</i> can be avoided or reduced</p>

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		<p>to a less-than-significant level if the mitigation measures identified in the Draft PEIR are implemented.</p> <p>The County would commit to the mitigation proposed in the PEIR, if approved as recommended; the County believes that other entities that propose projects under the master plan and PEIR can and should adopt the proposed mitigation. However, the County cannot enforce the mitigation measures in the PEIR or guarantee implementation by the other agencies, which is why the County provided two separate impact conclusions: County and non-County. Such changes or alterations to a project are the responsibility of other public agencies and within their jurisdictions, not that of the agency making the finding. However, if the mitigation measures identified in the Draft PEIR are adopted by another agency for impacts that are considered less than significant after the mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for projects not carried out by the County, for the same reasons as discussed for later activities carried out by the County.</p>
A7-140	<p>The identification of impacts found to be less than significant does not match the impacts identified in Sections 3.1 through 3.19. Many of the impacts identified in the Draft PEIR are identified as significant and unavoidable, particularly those projects not carried out by the County. Please explain the discrepancy.</p>	<p>Except for significant and unavoidable impacts, all identified significant environmental effects of the proposed <i>2020 LA River Master Plan</i> can be avoided or reduced to a less-than-significant level if the mitigation measures identified in this PEIR are implemented.</p> <p>The County would commit to the mitigation proposed in the PEIR, if approved as recommended; the County believes that other entities that propose projects under the master plan and PEIR can and should adopt the proposed mitigation. However, the County cannot enforce the mitigation measures in the PEIR or guarantee implementation by the other agencies, which is why the County provided two separate impact conclusions: County and non-County. Such changes or alterations to a project are the responsibility of other public agencies and within their jurisdictions, not that of the agency making the finding. However, if the mitigation measures identified in the Draft PEIR</p>

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		<p>are adopted by another agency for impacts that are considered less than significant after the mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for projects not carried out by the County, for the same reasons as discussed for later activities carried out by the County.</p>
A7-141	<p>Pursuant to CEQA Guidelines Section 15126.2(c), where there are significant unavoidable impacts, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.</p>	<p>State CEQA Guidelines Section 15126.2(c) requires an EIR to describe significant environmental impacts that cannot be avoided as well as impacts that can be mitigated but not reduced to a level of insignificance. Please refer to Chapter 4, <i>Other CEQA Considerations</i>, of the Draft PEIR, which organizes all thresholds and impacts according to their respective impact determinations. Also, please refer to Section 4.1, <i>Significant Unavoidable Adverse Environmental Impacts</i> of the Draft PEIR, which outlines the impacts that were determined to be significant and unavoidable, regardless of whether later activities are carried out by the County or not carried out by the County. Please also refer to Section 4.2, <i>Impacts Found to Be Less than Significant with Mitigation for Later Activities Carried Out by the County and Significant Unavoidable When Not Carried Out by the County</i>, and Section 4.3, <i>Impacts Found to Be Less than Significant</i> of the Draft PEIR.</p> <p>No changes to the Draft PEIR are needed.</p>
A7-142	<p>A rationale for Alternative 2 - No In-Channel Improvements is not provided. There is no explanation offered as to which of the project's significant environmental effects would be avoided or reduced, as well as any other attributes that are considered to be an improvement of some sort, compared to the proposed Master Plan, as a statement of the intent of this alternative. A rationale should also indicate which of the project objectives would be met and any that would not. The PEIR should be revised to state this rationale, to enable any reader to comprehend the intent and environmental benefits of this alternative, without having to</p>	<p>There is no "Alternative 2." Assuming that the commenter is referring to Alternative B, Channel Avoidance Alternative, channel modifications associated with the <i>2020 LA River Master Plan</i> would not occur. As such, no improvements would occur within the banks of the LA River. Later activities under Alternative B would occur from the top of the levee to the 1-mile study area boundary on each side of the LA River. There would be no <i>2020 LA River Master Plan</i> projects within the channel.</p> <p>Alternative B would include implementation of only five of the six KOP categories (i.e., KOP Category 1: Trails and Access Gateways, KOP Category 3: Crossings and Platforms, KOP</p>

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	<p>refer to the comparative impact analyses that occur later in this chapter.</p>	<p>Category 4: Diversions, KOP Category 5: Floodplain Reclamation, and KOP Category 6: Off-Channel Land Assets).</p> <p>Please refer to Section 5.4.2, <i>Environmental Evaluation of Alternative B</i>, in Chapter 5, <i>Alternatives</i>, of the Draft PEIR, which includes the environmental analysis and rationale for each environmental resource under Alternative B. Alternative B was selected for analysis in the PEIR because it would 1) avoid or reduce impacts on biological resources because of the elimination of in-channel construction activities, thereby avoiding the largest concentration of biological resources throughout the project area, and 2) reduce impacts on hydrology and water quality, resulting in less disturbance within the river channel during construction. Please refer to Table 2-2 for a comparison of the impacts of the proposed Project to those of Alternatives A and B. Table 2-2 indicates that the impacts of the alternatives would be similar to or less than those of the proposed Project. No changes to the Draft PEIR are needed.</p>
<p>A7-143</p>	<p>Were any alternatives considered that would include application of more stringent hydraulic design standards for channel improvements related to better flood risk protection and resiliency, to address potential changing storm characteristics resulting from climate change? For example, should design criteria for future river channel or other flood risk improvements address a more intensive design-year storm? If so, could that change the scope and characteristics of any of the proposed Master Plan improvements?</p>	<p>Please refer to Chapter 5, <i>Alternatives</i>, of the Draft PEIR, within which the Large-Scale Floodplain Reclamation Alternative and the Regional Upstream Detention Alternative were considered but eliminated. Under the Large-Scale Floodplain Reclamation Alternative, floodplain reclamation would expand beyond the channel. This would include widening the channel into lands that are currently developed and occupied with industrial, commercial, and residential uses. Floodplain reclamation could include wetlands, naturalized banks, braided channels, fields, storage areas, and side channels. With the channel's role as part of a flood-management system, any floodplain reclamation would need to maintain existing flood capacity. Project objectives that focus on reducing flood risks and improving resiliency would be met under this alternative, along with improved ecosystem function, increased open space, and potential improvements in water quality and reliability for the local water supply. The other objectives would not be met under this alternative.</p>

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		Under the Regional Upstream Detention Alternative, upstream detention improvements would be implemented to reduce peak flows during larger rare storm events. This alternative would reduce flood risks by building new flood retention basins or expanding existing basins (e.g., increasing the footprint and/or excavating and/or raising dams and levees). However, an alternative with more stringent hydraulic design standards for channel improvements related to flood risk protection and resiliency that address potential changing storm characteristics resulting from climate change is captured in the proposed Project. The <i>2020 LA River Master Plan</i> contains this objective: “[r]educe flood risk and improve resiliency,” which aims to maintain the existing flood-carrying capacity of all reaches of the LA River channel; increase the capacity of the river in high-risk areas to provide flood risk reduction for at least the 1 percent (100- year) annual chance flood event, or a level recommended by a risk assessment; include climate change research in the planning process for new projects along the LA River; and improve flood facility operations and maintenance. No changes to the Draft PEIR are needed.
A7-144	Page ES-42: Dust-control measures should utilize recycled water where feasible.	Please see the response to comment A7-3.
A7-145	Page ES-89: New construction design guidelines should utilize recycled water where feasible, including but not limited to irrigation and HVAC cooling.	Please see the response to comment A7-3.
A7-146	Page ES-91: New construction design guidelines should utilize recycled water where feasible, including but not limited to irrigation and HVAC cooling.	Please see the response to comment A7-3.
A7-147	Page ES-133: Water Supply Assessment should take existing and proposed Water Code Section 1211 Change Petitions into account for increased water recycling and reduced wastewater discharges into the Project. The City of Burbank intends to eventually recycle (for non-potable and potable reuse purposes)	Water Code Section 1211 is not needed for changes associated with the discharge or use of treated wastewater that do not result in decreased flows in any portion of a watercourse or direct discharges to the ocean or a bay. In addition, please refer to Section 3.9, <i>Hydrology and Water Quality</i> , of the Draft PEIR,

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	<p>all its wastewater and reduce recycled water discharges into the Burbank Channel to zero.</p>	<p>which notes that the water supply throughout the study area is from groundwater and greatest in the lowest reaches of the LA River (Frames 1 through 4). However, irrigation supplies and system components would comply with Public Works' <i>Low-Impact Development Standards Manual</i>, County water conservation standards, and the current California Green Building Standards Code. Recycled or reclaimed water would be used for irrigation, where possible. In addition, Water Code Section 1211 is not within the scope of the environmental analysis. No changes to the Draft PEIR are needed.</p>
<p>A7-148</p>	<p>Page 2-13: Proposed channel modifications should take Water Code Section 1211 Change Petitions into account for increased water recycling and reduced wastewater discharges into the Project, which will minimally affect stream flows. The City of Burbank intends to eventually recycle (for non-potable and potable reuse purposes) all its wastewater and reduce recycled water discharges into the Burbank Channel to zero.</p>	<p>Please see the response to comment A7-147.</p>
<p>A7-149</p>	<p>Page 2-22: LA River Planting Guidelines within the channel should take Water Code Section 1211 Change Petitions into account for increased water recycling and reduced wastewater discharges into the Project, which will minimally affect stream flows. The City of Burbank intends to eventually recycle (for non-potable and potable reuse purposes) all its wastewater and reduce recycled water discharges into the Burbank Channel to zero. Plants that require supplemental water should be irrigated with recycled water when feasible.</p>	<p>Please see the response to comment A7-147. Please refer to Section 3.18, <i>Utilities/Service Systems</i>, of the Draft PEIR, which describes how plantings would be chosen; such plantings would flourish with little maintenance or water after they become established. Also, please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, which describes how planting strategies along setbacks, buffers, levees, and floodwalls would provide opportunities for stormwater treatment before water enters the river. Recycled or reclaimed water would be used for irrigation, where possible. Channel refurbishment, such as removing invasive vegetation; removing sediment from the channel bottom; replacing dense or woody vegetation with more pliant, lower-profile native grasses; and conducting ongoing maintenance, would increase hydraulic capacity and improve flood risk mitigation. No changes to the Draft PEIR are needed.</p>

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A7-150	Page 2-29: Pavilion Best Practices should include usage of recycled water when feasible such as for irrigation, construction, and cleaning of outdoor surfaces.	Please see the response to comment A7-3.
A7-151	Figure 2-11: Walt Disney Studios should also be featured on the figure.	The Draft PEIR has been revised to correct this figure (see Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>). These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.
A7-152	Page 3.1-14: The Los Angeles Equestrian Center is not within the City of Burbank.	This comment is acknowledged. The address for the Los Angeles Equestrian Center is 480 Riverside Drive, Burbank, CA 91506. No changes to the Draft PEIR are needed.
A7-153	<p>Page 3.1-15: Corrected the BWP potable water system description:</p> <p>"BWP's potable water system includes approximately 276 miles of pipelines ranging in size from 30 inches to 1.5 inches in diameter, 27 booster pumps, 22 tanks and reservoirs, eight wells, five MWD connections, and over 26,000 service connections ...</p> <p>The annual potable water sales for 2011 through 2015 averaged 5,660 million gallons or 17,338 AF. Over the same 5 years, the average water demand was 15.9 mgd. Annual maximum day demands averaged 21.9 mgd."</p>	The Draft PEIR has been revised to correct this description (see Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>). These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.
A7-154	Page 3.1-15: The Lakeside Golf Club is not within the City of Burbank.	The Draft PEIR has been revised to correct this description (see Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>). These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.
A7-155	Page 3.1-56: Burbank Water and Power Rules and Regulations mandate the usage of recycled water, when feasible, for existing and proposed projects located near existing and proposed recycled water mains. The usage of recycled water is also required for construction purposes when feasible.	The Draft PEIR has been revised to correct this description (see Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>). These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.

Comment#	Comment Text	Response
A7-156	Page 3.7-32, 3.7-35: Water Conservation and Efficiency Guidelines should also utilize recycled water when feasible.	Please see the response to comment A7-3.
A7-157	Page 3.18-15: BWP also provides recycled water outside of the City via interconnections and exchange agreements with the City of Glendale and the City of Los Angeles.	The Draft PEIR has been revised to include this information (see Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>). These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.
A7-158	Page 3.18-15: The statement on recycled water distribution in Burbank is incorrect. The correct statement should read: "Of the 935 million gallons of reclaimed water distributed in 2019, 35 percent was used for power generation purposes, 7 percent was used at the DeBell Golf Course, 3 percent was used at the City of Burbank Landfill, and the remaining 55 percent was used for other purposes such as landscape irrigation and HVAC cooling."	The Draft PEIR has been revised to correct this description (see Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>). These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.
A7-159	Page 3.18-34: Water Code Section 1211 Change Petitions are state regulations relevant to impact analysis of utilities in this PEIR. The City of Burbank intends to eventually recycle all its wastewater (for non-potable and potable reuse purposes) and reduce recycled water discharges into the Burbank Channel to zero.	<p>This comment is acknowledged. Please see the response to comment A7-147.</p> <p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements). Because the PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, "Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase."</p> <p>The Draft PEIR analyzes two Typical Projects and six KOP categories. If wastewater facilities or recycled water pipes are implemented as subsequent projects, the implementing agency would be required to adhere to existing regulations. No changes to the Draft PEIR are needed.</p>

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A7-160	Page 3.18-66: Water Conservation and Efficiency Guidelines should also utilize recycled water when feasible.	Please see the response to comment A7-3.
A7-161	Page 3.18-74: There is no mention of the City of Burbank's Recycled Water System in this section. The City of Burbank can also potentially supply recycled water, where feasible, for the Project.	The Draft PEIR has been revised to correct this description. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i> . These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.

2.3.2.8 Comment Letter A8: Water Replenishment District, May 10, 2021

Comment#	Comment Text	Response
A8-1	<p>I am writing on behalf of the Water Replenishment District (WRD) to provide you with the District’s perspective regarding the Los Angeles River Management Plan (Plan). As a member of the Plan’s Steering Committee, WRD is pleased to see the positive impact this project may bring to the Los Angeles Region. Specifically, WRD is pleased to see how recycled water is incorporated into the project and the positive attributes it can bring to the community.</p> <p>Headquartered in Lakewood, California and established by a vote of the people in 1959, WRD manages and protects local groundwater resources for over four million residents in southern Los Angeles County (11 percent of California’s population). WRD has over 60 years of experience in water management. We work with regional partners to maintain healthy water levels in groundwater basins. Our service area includes 43 cities that use about 82 billion gallons of groundwater annually which accounts for approximately half of the region’s water supply.</p> <p>In 2019, WRD achieved the goals of its Water Independence Now (WIN) program. The goal of the WIN program was to create a supply of locally sourced and drought resilient water to be used for groundwater replenishment. The cornerstone project of WIN was the Albert Robles Center (ARC) for Water Recycling and Environmental Learning, which treats 3.25 billion gallons of water each year to near distilled levels. The completion of ARC created a new source of water for groundwater replenishment. Thanks to WIN, WRD no longer imports water and half of southern Los Angeles County’s water supply is 100% locally sustainable and drought resilient.</p>	<p>The County appreciates the Water Replenishment District (WRD) for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This is an introductory comment about the WRD that precedes specific comments. No further response is required.</p>

Comment#	Comment Text	Response
A8-2	<p>Now that WRD has completed its WIN initiative, our next major goal is to complete our Water Independence for All (WIN 4 All) program. The goal of WIN 4 All is to create a 100% locally sustainable water supply for the entire region. This means all water needs would be met by a drought resilient water supply. It is exciting to see that components of the WIN 4 All program aligns with project proposals in the Plan. In the next two decades, WRD aims to create new recycled water sources and increase stormwater capture to achieve the goals of WIN 4 All. WRD is encouraged to see that the Plan includes proposals for a network of pipelines for recycled water to be used for replenishment purposes and proposed plans to increase stormwater capture.</p>	<p>This comment regarding WRD’s Water Independence Now (WIN) and Water Independence for All (WIN 4 ALL) goals is acknowledged.</p>
A8-3	<p>The Plan also includes proposals to develop corridor-based water quality projects, technical support for feasibility studies, expand stormwater capture for groundwater recharge and debris removal from water. WRD has spearheaded similar projects in its service area and is available to provide support as these projects are further developed. WRD is especially interested in serving as a resource for cities that are included in the Plan and WRD’s service area; these cities include the Cities of Vernon, Bell Gardens, South Gate, Compton and Long Beach. WRD is hopeful that by working through partnerships, proposed projects can help increase the local supply of available recycled water and improve water quality in the region.</p>	<p>The County acknowledges the WRD as a valuable resource for the jurisdictions that are involved with the <i>2020 LA River Master Plan</i> and that are also within the WRD’s service area (Cities of Vernon, Bell Gardens, South Gate, Compton, and Long Beach) and looks forward to working together.</p>
A8-4	<p>WRD is especially supportive of the Plan’s proposal to treat stormwater, which can later be used for groundwater recharge. There are also benefits to increased recycled water flows in the Los Angeles River.</p>	<p>This comment is acknowledged.</p>

2.3.2.9 Comment Letter A9: County of Los Angeles Department of Parks and Recreation, May 6, 2021

Comment#	Comment Text	Response
A9-1	<p>Implementation Matrix</p> <p>Through DPR's involvement on the Internal County Team, we know that equity has been a through-line embedded in the fabric of the draft LARMP. With the successful implementation of the LARMP in mind, we recommend strengthening the equity language in the Implementation Matrix to ensure that the actions and methods: reflect the input of the stakeholders and communities involved in this process; are clearly defined and not subject to interpretation; and aim to serve disadvantaged communities with high and very high park needs.</p> <p>Accordingly, please include language within the Implementation Matrix chapter to:</p> <p>(1) Prioritize implementation of projects in communities with high and very high park need;</p> <p>(2) Prioritize increasing shade in communities that are lacking in trees and parks;</p> <p>(3) Promote equitable and inclusive access to the river by implementing bi-lingual and multi-lingual signage; and</p> <p>(4) The Design Guidelines include a section on Environmental Graphics and has details on bilingual, ADA, Indigenous Peoples language required on signage. This is helpful information, but it can only be found in the appendix. We recommend that the language translation be reflected within the methods.</p> <p>Include DPR's Regional Trail System Map as identified in the County's General Plan (General Plan, Fig. 10 .1) as part of the Literature Review to show access and connectivity to the larger regional trail system contemplated in the General Plan.</p> <p>Include that DPR has multi-use trail jurisdiction along ~ 10 miles of the LA River.</p>	<p>The County appreciates the County of Los Angeles Department of Parks and Recreation (DPR) for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears that the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR.</p> <p>This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary.</p>

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	<p>Include DPR as a partner.</p> <p>Revise with the following: Utilize river channel right-of-way and adjacent areas to increase park space and prioritize implementation of ROW projects in disadvantaged and/or high and very high park need communities.</p> <p>Revise with the following: -Yse Develop river channel right-of-way and adjacent areas to assist in ensuring equitably to ensure that all LA County residents live within a half mile of a park.</p> <p>Revise with the following: Secure ongoing and long-term funding for land acquisition, construction and maintenance of additional parks and recreational facilities, and prioritize funding for park facilities in high and very high park need areas to ensure that funding benefits the communities with the greatest need.</p> <p>Include DPR as a partner.</p> <p>Revise with the following: Increase shade along the trail, 111here possible using shade trees (LA River Design Guidelines). Promote shade equity by increasing shade amenities along the trail, prioritizing areas that are lacking in trees and parks.</p> <p>Revise with the following: Ensure there is a shaded place to rest every half mile, on average, along the river, and prioritize implementation in communities that are lacking in trees and parks.</p> <p>Add another method: Method 2.3.6 Ensure signage includes best practices for universal accessibility and multi-lingual translation.</p> <p>Revise with the following: Repurpose single-use spaces, such as power-line easements, rail rights-of-way, or flood infrastructure, to serve multiple functions such as multi-use trails or habitat, and prioritize spaces that are in high and very high park need areas.</p> <p>Revise with the following: Develop master agreements with utilities for easements to maximize use of ground space under overhead or above buried utility lines for parks, open space, and</p>	

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	<p>trails, and prioritize agreements in high and very park need areas.</p> <p>Include DPR as a partner.</p> <p>Include DPR's multi-use trail as a notable feature in Planning Frames 2 and 3, to support the Design Considerations for Frame 2 that reference equestrian trails within the Frame.</p> <p>The Plan contemplates separate paths for active transport, pedestrians, and equestrians. While separating uses within large rights-of-way can be beneficial, separate trails pose a maintenance challenge for the operating agency, and limits use in areas where there is limited right-of-way. DPR's existing trail along the LA River accommodates, pedestrians, equestrians, and cyclists, and is somewhat represented in the minimum multi-use trail combination cross-section shown on page 67; however, equestrian use should be shown furthest from the riverside, and the cross section on page 67 should be revised to reflect as such.</p> <p>Apply consistent language to the cross sections in the Access and Mobility chapter of the Design Guidelines. The Minimum-Preferred trail combination cross sections on pgs. 67 and 68 should reference the right of way combinations identified on pg. 70. For cross sections that describe trail combinations in narrow right-of-way, equestrian and pedestrian use should be combined.</p> <p>Add Equestrians as a user for the Stone Fines + Decomposed Granite surface type</p> <p>Add Pedestrians as a user for Compacted Earth surface type</p>	
A9-2	<p>Draft PEIR</p> <p>Page 3.15-2, Regional Trails</p> <ul style="list-style-type: none"> The County operates two separate trails along segments of the LA River. The Department of Public Works maintains the bike trail, which is described in this section. DPR operates and maintains the ~ 10-mile multi-use trail that runs from Imperial Highway south to 	<p>Figures, tables, and text in the Draft PEIR have been revised in Section 3.15, <i>Recreation</i>, with the requested information. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>

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	<p>Willow Street. Please revise this section to include the natural surface multi-use trail. Establish consistent terminology for trails throughout the document and distinguish when the trail is referring to the bike path, the multi-use trail, or both.</p> <p>Figure 3.15-1 .2- Frame 2. Parks and Recreational Facilities</p> <ul style="list-style-type: none"> • Revise #47 72nd Street Staging Area to 72nd Street Equestrian Park. <p>Figures 3.15-2.1, 2.2, 2.3 and 2.4: Trails and Access Point</p> <ul style="list-style-type: none"> • Revise the legend to change "Dept. of Regional Planning Trails" to either County Trails or distinguish between DPW bike paths and DPR Trails. <p>Pages 3.15-8, -11, -16, -17, -18, -24, -25, -29, -30, -32, -36, -39 and -40</p> <ul style="list-style-type: none"> • Revise the source: "Los Angeles County, Department of Recreation 2020" to "Los Angeles County Department of Parks and Recreation 2020." <p>Page 3.15-3, Table 3.15-1. Los Angeles County Park Classifications</p> <ul style="list-style-type: none"> • The Draft EIR has the description of park amenities condensed in one paragraph. The park amenities should be categorized as passive park amenities, active park amenities, and park facilities. Please update the table as follows: (SEE TABLE ON PAGE 6 OF THE COMMENT PDF. UNABLE TO COPY CONTENT HERE) <p>Page 3.15-11, Table 3.15-10. Parks and Recreational Resources within Frame 2</p> <ul style="list-style-type: none"> • Revise #47 72nd Street Staging Area to 72nd Street Equestrian Park • List #47 72nd Street Equestrian Park under Special Use Parks/Facilities. <p>Page 3.15-13, Existing Local Resources, 2nd paragraph, last sentence</p>	

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	<ul style="list-style-type: none"> • Revise the size of Los Amigos Golf Course to 120.75 acres <p>Page 3.15-16, Table 3.15-10. Parks and Recreational Resources within Frame 3</p> <ul style="list-style-type: none"> • Move #74 Los Amigos Golf Course under Special Use Parks/Facilities. • Revise the size of Los Amigos Golf Course to 120.75 acres. • Move #88 Washington Ave Park under Pocket Parks. 	
A9-3	<p>Page 3.15-41, Regional Regulatory</p> <p>Add the following paragraph regarding the County Trails Manual after the Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment: Los Angeles County Trails Manual</p> <p>The LA County Trails Manual provides guidance to County departments that interface with trail planning, design, development and maintenance of hiking, equestrian, and mountain biking trails. The Manual provides guidelines for implementation of multi-use trails within the unincorporated communities of LA County and recognizes the existence of the broader regional trail network in the County of LA and surrounding counties that provides access to recreational resources operated by federal, state, and local agencies. The Manual sets the guidelines for reviewing plans and specifications for trails that are provided in conjunction with land use planning and the entitlement process for projects proposed for development within the County. Proposed developments are reviewed for consistency with the Trails Manual. The goal of the Trails Manual is to establish well-defined trail types, guidelines, and priorities to facilitate the development of high-quality trails that benefit the public.</p>	<p>The Draft PEIR has been revised to include the County’s <i>County Trails Manual</i> in the identified regulatory setting of Section 3.15, <i>Recreation</i>, of the Draft PEIR. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>

2.3.2.10 Comment Letter A10: City of Los Angeles, May 13, 2021

Comment#	Comment Text	Response
A10-1	<p>Thank you for including the City of Los Angeles, Department of City Planning in the environmental review process for the above referenced project. The proposed 2020 LA River Master Plan builds upon the adopted 1996 Master Plan and other previous studies. The program involves a series of projects that will improve a two-mile wide corridor along 51 miles of the LA River aimed at improving health, equity, access, mobility, and economic opportunity for the diverse communities it traverses from the Santa Susana Mountains to the Pacific Ocean in Long Beach. The 2020 LA River Master Plan proposes six categories of project improvements, or kit of parts (KIP) over the next 25 years: 1) Trail and Access Gateways; 2) Channel Modifications; 3) Crossings and Platforms; 4) Diversions; 5) Floodplain Reclamation; 6) Off Channel Land Assets.</p> <p>The LA River Master Plan includes 9 frames, of which frames 5-9 are within the City of Los Angeles and traverse 12 of the City’s 35 Community Plan Areas from east to west including: Boyle Heights, Central City, Central City North, Northeast Los Angeles, Silver Lake-Echo Park-Elysian Valley, Hollywood, North Hollywood- Valley Village, Sherman Oaks-Studio City-Toluca Lake -Cahuenga Pass, Van Nuys-North Sherman Oaks, Reseda-West Van Nuys, Encino-Tarzana, and Canoga Park-Winnetka-Woodland Hills-West Hills at the river’s headwaters.</p>	<p>The County appreciates the City of Los Angeles, Department of City Planning for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This is an introductory comment that summarizes the content of the <i>2020 LA River Master Plan</i> and precedes specific comments. No further response is necessary. No changes to the Draft PEIR are needed.</p>
A10-2	<p>Given this scope, it will be important for the Master Plan EIR and subsequent projects to reflect the diversity of communities, ecology, and land uses along the course of the River, and ensure enhanced community connections to the resource are made at every opportunity.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the</p>

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		<p>2020 LA River Master Plan team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
A10-3	<p>The City of Los Angeles has a regulatory framework implemented by many City agencies including the Departments of Public Works, City Planning, Building and Safety, Transportation and others and is continuously updating its ordinances to reflect state laws and regional standards. The PEIR should meet or exceed the City’s Regulatory Framework. The PEIR preparer should review the City of Los Angeles’s CEQA Regulatory Framework document and include any footnotes and references contained therein. (See: Regulatory Framework - Google Drive; please contact the Department of City Planning if there are issues accessing the document).</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). The PEIR is not a regulatory document and is not required to “meet or exceed” local regulations. The PEIR summarizes the City of Los Angeles’ land use policies that are pertinent to the 2020 LA River Master Plan. Please refer to Section 3.10, <i>Land Use and Planning</i>.</p>
A10-4	<p>Additionally, the City of Los Angeles adopted the LA River Improvement Overlay (LA RIO), Section 13.17 of the Los Angeles Municipal Code (Ordinance Nos. 183144 and 183145 which became effective on August 11, 2014). The Master Plan PEIR and all subsequent Projects will be subject to the LA RIO standards.</p>	<p>The Draft PEIR has been revised to include references to the LA River Improvement Overlay. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
A10-5	<p>The City of Los Angeles would like to see clarification on the implementation of the 2020 LA River Master Plan Design Guidelines document included as Appendix B. The City of Los Angeles would like to see the Design Guidelines be included as Project Design Features to ensure that they are enforceable.</p>	<p>The Design Guidelines have been evaluated as part of the proposed Project to the extent that they are required. For future projects that are carried out by the County, the County would incorporate Design Guidelines and mitigation measures as required to reduce impacts to less than significant.</p> <p>Please refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR, which notes that, while a majority of the proposed Design Guidelines are not described as mandatory requirements, select Design Guidelines (such as those related to access points, gateways, maintenance buffers and clearances, emergency access, lighting, and monitoring and maintenance plans) are described as requirements (through the use of “must” and “shall”) rather than recommendations under the 2020 LA River Master Plan. Accordingly, this PEIR assumes that the 2020 LA River Master Plan will be implemented consistent with these required Design Guidelines. Similarly, it is assumed that all</p>

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		<p>subsequent projects under the <i>2020 LA River Master Plan</i> would be implemented in accordance with the required Design Guidelines by implementing agencies (1 county and 17 cities). For the purposes of the impact analysis presented in Chapter 3, <i>CEQA Environmental Impact Assessment</i>, of the Draft PEIR, compliance with these required Design Guidelines is assumed and factored into the impact analysis and CEQA determination for the <i>2020 LA River Master Plan</i>.</p> <p>In addition, as this is a program-level EIR, the analysis presented is conservative in nature. Under State CEQA Guidelines Section 15168, where the later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the PEIR. The <i>2020 LA River Master Plan</i> is a conceptual plan. All future specific projects would be subject to subsequent environmental compliance under State CEQA Guidelines Section 15168.</p> <p>At the time of project-level CEQA compliance, if there are changes proposed to the manner in which Design Guidelines will be included in a project, additional impact analysis and significance conclusions should be analyzed and disclosed.</p>
A10-6	<p>Aesthetics:</p> <p>Within the City of Los Angeles frames numbered 5-9, all development must adhere to LA RIO standards with respect to nighttime illumination and views. The RIO includes development standards to ensure the screening of electrical and mechanical equipment from public view as well as lighting standards to prevent glare, light spillover, and encourage downcast and dark sky compliant lighting. See excerpt below and amend Aesthetic mitigation measures as appropriate.</p> <p>“Electrical transformers, mechanical equipment, water meters and other equipment shall be screened from public view. The screening may be opaque or perforated, provided that not more</p>	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). The PEIR is a programmatic document and does not include project-specific or site-specific analysis.</p> <p>Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, “Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The</p>

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	<p>than 50 percent of the face is open. The screen shall be at least 6 inches taller than the equipment and not more than 2 feet taller than the equipment.</p> <p>Exterior Site lighting. (a) All site and building mounted lighting shall be designed such that it produces a maximum initial luminance value no greater than 0.20 horizontal and vertical foot candles at the site boundary, and no greater than 0.01 horizontal foot candles 15 feet beyond the site. No more than 5.0 percent of the total initial designed lumens shall be emitted at an angle of 90 degrees or higher from nadir (straight down). (b) All low pressure sodium, high pressure sodium, metal halide, fluorescent, quartz, incandescent greater than 60 watts, mercury vapor, and halogen fixtures shall be fully shielded in such a manner as to not exceed the limitations in Subdivision 3(a), above.”</p> <p>(Note: see also comments under the Land Use section)</p> <p>Aesthetics</p> <p>3.1(d): Would the proposed Project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?</p> <p>Mitigation Measure AES-3a: Design Exterior Lighting to Minimize Nighttime Illumination</p> <p>Spillover. Exterior lighting will be designed to shield and direct illumination to the subsequent project sites and minimize light spillover to any adjacent residential uses.</p> <p>Mitigation Measure AES-3b: Design Exterior Structures to Minimize Glare. The exterior of the proposed buildings/structures will be constructed of materials such as high-performance, tinted, non-mirrored glass; painted metal panels; and pre-cast concrete or fabricated wall surfaces.</p>	<p>level of the environmental document, if required, will be identified at this subsequent phase.”</p> <p>No changes to the Draft PEIR are needed.</p>
A10-7	Biological Resources:	The California mountain lion is granted special protection under California statute. The Draft PEIR has been revised to include the California mountain lion in the impact analysis in Section 3.3,

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	<p>The Biological Resources Analysis does not include any mention of the Southern California Mountain Lion, which has been observed throughout Griffith Park in Frame 6. In April 2020, the California Department of Fish and Game Commission granted mountain lions Los Angeles’ environmentally sensitive areas “candidate status” under the California Endangered Species Act (CESA). The City of Los Angeles is currently developing a Wildlife Protection Pilot ordinance in the Santa Monica mountains. However, mountain lions are known to traverse large expanses of areas and have been observed in urban areas outside of Griffith Park. As such, areas along the LA River and tributaries are critical for wildlife migration. The PEIR must be amended to reflect the known presence of this critical Special Status species. (See Table 3.3-1. CNDDDB Special- Status Wildlife Observed within the LA River Study Area). Furthermore, additional analysis is warranted to determine if additional mitigation measures are necessary to protect this candidate species during construction and operation</p>	<p><i>Biological Resources.</i> See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR.</i> These are clarifying changes only, and no changes to the conclusions of the Draft PEIR are needed.</p> <p>Additionally, Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys, includes the requirement that a regulatory assessment be conducted for individual subsequent projects. This would include a construction and operation impact analysis and the identification and implementation of appropriate avoidance and minimization measures based on the presence of biological resources. Impact analysis includes appropriate assessment of project-specific disturbances (e.g., recreational effects, night lighting, noise). This means that all subsequent projects would be evaluated individually for impacts and would implement appropriate avoidance and minimization measures for the individual project.</p> <p>Furthermore, Mitigation Measure BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements, requires the implementing agencies to consult with the resource agencies to avoid, reduce, or minimize impacts on biological resources, with activities that may include California Natural Diversity Database (CNDDDB) observations and reporting of any CNDDDB species.</p>
A10-8	<p>Cultural Resources, Section 3.4:</p> <p>The document includes context for the Zanja Madre, and states that it is included as "historical facts that are most important to understanding the types of cultural resources that could be located in the project study area" on page 3.4-11. The inclusion of the context is an acknowledgement of the potential to discover this resource or type during a project. Extensive information on the Zanja Madre is not included in the report likely due to the classification of archaeological resources.</p>	<p>This is a general comment that does not raise any issues about the Draft PEIR. No response is necessary.</p> <p>The commenter is correct in stating “extensive information on the Zanja Madre is not included in the report likely due to the classification of archaeological resources.” Additionally, please refer to the mitigation measures identified in Section 3.4, <i>Cultural Resources</i>, of the Draft PEIR. Mitigation Measure CR-1a, Conduct a Cultural Resources Assessment for Historical/Built Archaeological and Tribal Cultural Resources to Determine the Presence of Resources, requires</p>

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		later activities to conduct a cultural resources assessment to determine the potential for the presence of historical/built, archaeological, and tribal cultural resources.
A10-9	On page 3.4-32, the Los Angeles Cultural Heritage ordinance is referred to as "a historic preservation ordinance," this section should be amended to more accurately call it the Cultural Heritage Ordinance.	The Draft PEIR has been revised to clarify the name of the Cultural Heritage Ordinance. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i> . These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.
A10-10	The first sentence of the first paragraph on page 3.4-33, should read "in the Conservation Element of the City of Los Angeles General Plan" versus "in the City of Los Angeles General Plan".	The Draft PEIR has been revised to clarify the reference to the Conservation Element. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i> . These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.
A10-11	<p>Page 3.4-42 includes "SurveyLA historic resource information at the City's website Historic Places LA" as the sole source to search for all historic resources data. The section should additionally include the datasets and various individual surveys completed for the Community Plan Areas (CPAs) and overlays within the City of Los Angeles frames, which include: Boyle Heights, Central City, Central City North, Northeast Los Angeles, Silver Lake-Echo Park-Elysian Valley, Hollywood, North Hollywood- Valley Village, Sherman Oaks-Studio City-Toluca Lake - Cahuenga Pass, Van Nuys-North Sherman Oaks, Reseda-West Van Nuys, Encino-Tarzana, and Canoga Park-Winnetka-Woodland Hills-West Hills at the river's headwaters. Additional overlays such as Cornfield Arroyo Seco Specific Plan Area (CASP), Northeast Los Angeles River Revitalization Area (NELARRA), and the Adelante Eastside Redevelopment Area should also be reviewed. If Historic Places LA is not available, researchers should know where else they can look for this information. The historic resources surveys are:</p> <ul style="list-style-type: none"> - SurveyLA CPA Historic Resources Survey for Boyle Heights - SurveyLA CPA Historic Resources Survey for Northeast Los Angeles 	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements).</p> <p>Given that the approach to this analysis is programmatic, no cultural records search or background literature research was conducted. The authors reviewed the Built Environment Resource Directory, City of Los Angeles Historic Preservation Overlay Zones, the Historic-Cultural Monuments list, and the results of SurveyLA available at historicplacesla.org to provide initial insight on historical resources along the corridor. The results of this review were not intended to provide a comprehensive list of historical resources in the City of Los Angeles. As specific projects and their locations are identified, a formal records search at the South Central Coastal Information Center as well as additional literature and desktop research will be conducted, including reviews of specific plans, Historic Preservation Overlay Zones, Community Plan Areas, and the results of SurveyLA, as applicable.</p> <p>Additionally, please refer to Section 3.4, <i>Cultural Resources</i>, of the Draft PEIR, which includes Mitigation Measure CR-1a,</p>

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	<ul style="list-style-type: none"> - Historic Resources Survey for the Confield Arroyo Seco Specific Plan Area - Historic Resources Survey for the Northeast Los Angeles River Revitalization Area - Intensive Historic Resources Survey for the Adelante Eastside Redevelopment Area 	<p>Conduct a Cultural Resources Assessment for Historical/Built Archaeological and Tribal Cultural Resources to Determine the Presence of Resources.</p> <p>No changes to the Draft PEIR are needed.</p>
A10-12	<p>The table that starts on Page 3.4-44 titled "City of Los Angeles Historical Resources within 1 mile to Either Side of the LA River" appears to only include designated HCMs. The table should also include properties determined eligible through Section 106 and those recorded through a historic resources survey. It does not appear that the table includes any Section 106 determined eligible, SurveyLA, or CRA survey historic resources. A note clarifying that these are missing from the table would be helpful to not mislead readers into assuming the list is the full extent of the resources present.</p>	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements).</p> <p>Please refer to Section 3.4, <i>Cultural Resources</i>, of the Draft PEIR, which presents the best information that could be obtained from the desktop search at the time of preparation of the Draft PEIR, in keeping with the methodology described in Section 3.4.3.1. It should be understood that this list is not comprehensive and may not include properties identified through survey or project documents that are available at the South Central Coastal Information Center, through in depth research or reviewing local municipalities' hard files, or in the course of coordination with municipal historic preservation staff.</p> <p>Additionally, see Mitigation Measure CR-1a, Conduct a Cultural Resources Assessment for Historical/Built Archaeological and Tribal Cultural Resources to Determine the Presence of Resources.</p>

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A10-13	On page 3.4-55, Under "Office of Historic Preservation" add "Built Environment Resource Directory (BERD)" as this resource includes many of the 2-status code properties the CHRIS is missing.	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements).</p> <p>The Draft PEIR has been revised to add "Built Environment Resource Directory (BERD)." See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only and no changes to the conclusions of the Draft PEIR are needed.</p>
A10-14	<p>Land Use:</p> <p>The Department of City Planning is interested in broadening connections within the LA River network and KOP projects to neighborhoods in the study area and providing equity of access to river improvements. During the site selection process and feasibility studies, the County should consult with the City of Los Angeles to ensure that site selection, planning, and design meet requirements of Zoning Information (Z.I) NO. 2358, River Improvement Overlay Supplemental Use District, LAMC Section 13.17, the Citywide Design Guidelines, adopted Community Plans and overlay districts and any other applicable regulations.</p>	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements).</p> <p>Additionally, the implementing agency will consult, when applicable, with adjoining jurisdictions, including the City of Los Angeles, when initiating future projects under the <i>2020 LA River Master Plan</i> (see Mitigation Measures LU-2, Consultation, and LU-4, Site Selection Process).</p>
A10-15	<p>Amend Mitigation Measure LU -1: Construction Management Plan</p> <p>Require signs to be posted at least 30 days prior to construction to inform community members that construction will begin, provide detour signage, and wayfinding to nearby amenities during LA River pathway closure. See also REC-1.</p>	<p>The Draft PEIR has been revised to incorporate the suggested clarification to this mitigation measure. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions of the Draft PEIR are needed.</p>
A10-16	<p>Amend Mitigation Measure LU-3: Alternative Connectivity.</p> <p>During the subsequent project design process, determination will be made whether the project design would result in a physical barrier to the community in the form of road closures, walls, or other project features that could disrupt connectivity within the community. If it is determined that physical barriers would result, the implementing entity or person shall meet with</p>	<p>The Draft PEIR has been revised to incorporate the suggested clarification to this mitigation measure. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions of the Draft PEIR are needed.</p>

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	<p>the jurisdiction having authority of the site and will do one or more of the following:</p> <ul style="list-style-type: none"> * Redesign the project to avoid the impact. * Provide alternative connections that maintain connections across the community. This may include constructing off-site street connections, including alleys and other roadways, that maintain community connectivity and access, to the satisfaction of the local jurisdiction. 	
A10-17	<p>Amend Mitigation Measure LU-4: Site Selection Process.</p> <p>Add language: During site selection and feasibility studies for future development within the City of Los Angeles, consult with LA City Planning to ensure that site selection, planning and design meet requirements of Zoning Information (Z.I) NO. 2358, River Improvement Overlay Supplemental Use District, LAMC Section 13.17 and any other applicable regulations</p>	<p>This comment is acknowledged. Mitigation Measure LU-4, Site Selection Process, was designed to be applicable to all jurisdictions in the Project Study area. As described in Mitigation Measure LU-4, the implementing agency will coordinate with and obtain all necessary land use entitlements permits and approvals from all agencies with jurisdiction, including the City of Los Angeles. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements). No change to the Draft PEIR is needed.</p>
A10-18	<p>Recreation:</p> <p>During construction activities for the life of the Master Plan it is likely that construction will result in periodic disruptions in the availability of the LA River bicycle and pedestrian trails, both as recreational trails and as thoroughfares for commuters. As such, Los Angeles City Planning recommends the following amendment to ensure that users have adequate advance notice of closures due to construction.</p> <p>Amend Mitigation Measure REC-1: Minimize Disruption of Recreational Uses During Construction. As specific subsequent project and location information is identified during detailed design, the implementing agency will confirm the timing, duration, and area extent of construction activities that would occur. If temporary closures of existing recreational facilities would be necessary for construction, the specific increase in use</p>	<p>The Draft PEIR has been revised to incorporate the suggested revision to this mitigation measure. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions of the Draft PEIR are needed.</p>

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	<p>of other nearby recreational facilities will be evaluated. Factors to be considered in the evaluation include the duration of the closure, acreage and type of facility that would be unavailable due to the closure, and existing usage levels at the relevant nearby recreational facilities. If there is an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or is accelerated, the implementing agency will apply measures including, but not limited to, one or more of the following:</p> <ul style="list-style-type: none"> * Minimize duration of construction period. * Modify construction phasing to limit disturbance of existing recreational facilities. * Avoid construction during peak use periods. * At least 30 days prior to initiating construction activities, post courtesy signage at start/end points and at points along pathway informing users community members of the duration of construction, with additional wayfinding to adjacent facilities with similar amenities. <p>See comment above: Add language to bullet #4 and to CMP (MM LU-1). Signs must be posted prior to start of construction to inform community members of LA River pathway closure, and provide alternative routes.</p>	
A10-19	<p>Transportation:</p> <p>For portions of the LA River within the City of Los Angeles, the PEIR and subsequent Projects, should utilize Los Angeles Department of Transportation’s VMT calculator to determine screening criteria rather than LA Country VMT criteria. See LADOT Development review processes and procedures: https://ladot.lacity.org/businesses/development-review. Mitigation Measure TRA-1a. “Determine VMT Based on Type of Subsequent Project” should be modified accordingly</p>	<p>The 2020 LA River Master Plan is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements).</p> <p>The County will be using the County’s VMT when later activities are carried out by the County. However, the lead agency of later activities carried out not by the County have the option to use the County’s VMT or their local TIA. Additionally, other agencies may use the PEIR as the basis upon which to tier future project environmental analyses under CEQA. In those situations, as provided in State CEQA Guidelines Section 15168(c), the other</p>

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		<p>agencies could rely upon and implement the mitigation measures identified in the PEIR. However, the County cannot require other agencies to implement the mitigation identified in the PEIR.</p> <p>No changes to the Draft PEIR are needed.</p>
A10-20	<p>Amend Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT</p> <p>Clarify TRA-1b to include TDM strategies that promote pedestrian use and other modes of active transportation. Los Angeles Department of City Planning recommends the following modification to MM TRA-1b:</p> <p>The implementing agency (County or other jurisdictional agency) will implement a subsequent project-specific program utilizing transportation demand management (TDM) strategies and neighborhood or site enhancements to reduce VMT, and any other appropriate strategies to address identified impacts and reduce VMT to the River Corridor. The program to reduce VMT will be based on the suite of eligible TDM strategies included in the County Guidelines or other measures with substantial evidence, or, if the subsequent project is located in an incorporated city, the program will be based on Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise) Significance after Mitigation (when carried out by County) Significance after Mitigation (when not carried out by County) that city’s list of qualifying VMT mitigation strategies.</p> <p>Specific measures can include but are not limited to:</p> <ul style="list-style-type: none"> * Increasing transit accessibility * Relocating a project in order to be adjacent to transit * Pricing any provided parking at river access sites to discourage vehicle trips to the River Corridor 	<p>The Draft PEIR has been revised to modify this mitigation measure to incorporate the City of Los Angeles’ comments. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the Draft PEIR are needed.</p>

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	<p>* Add: Providing bicycle parking</p> <p>* Implementation of neighborhood or site enhancements such as pedestrian network improvements (for example, high-visibility crosswalks, continuous sidewalks, and Americans with Disabilities Act [ADA]-compliant directional curb cuts at intersections), and traffic calming measures such as speed humps or chicanes.</p>	

2.3.2.11 Comment Letter A11: Los Angeles County Metropolitan Transportation Authority, May 13, 2021

Comment#	Comment Text	Response
A11-1	<p>Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed 2020 LA River Master Plan (Master Plan) located in Los Angeles County (County). Metro’s aim is to create and maintain a world-class transportation system that focuses on providing the best customer experience possible and enhancing the quality of life for those who live, work, and play within the County. As transportation planner and coordinator, designer, funder, builder and transit operator, Metro is constantly working to deliver a regional system that supports increased transportation options and associated benefits, such as improved mobility options, air quality, health and safety, access to goods and services, and quality of life.</p> <p>Per Metro’s area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the County with Metro’s comments on the Program Environmental Impact Report (PEIR) for the Master Plan. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.¹</p> <p>PEIR Project Description</p> <p>The proposed Master Plan encompasses an area along a 51-mile-long, 2-mile-wide corridor (i.e., 1 mile on each side) of the LA River in Los Angeles County and spans through 17 cities and unincorporated Los Angeles County (18 total jurisdictions). The proposed 2020 LA River Master Plan builds on the adopted 1996 Master Plan and other regional planning studies prepared since then. It is intended to improve 51 miles of connected open space along the LA River to improve health, equity, access, mobility,</p>	<p>The County appreciates Los Angeles County Metropolitan Transportation Authority (Metro) for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This is an introductory comment about Metro and a description of the PEIR project description that precedes specific comments. No further response is required.</p>

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

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	and economic opportunity for the diverse communities of Los Angeles County while still providing flood risk management.	
A11-2	<p>General Comments</p> <p><i>Metro Policy Planning Efforts</i></p> <p>Metro would like to advise the County that it has adopted four plans of interest that are within the Master Plan’s area of study. Metro encourages the County to review these plans and identify synergies with the Master Plan and opportunities to support and implement their goals and recommendations.</p> <p>1. <u>Long Range Transportation Plan</u>: Adopted September 2020, the revised Long Range Transportation Plan (LRTP) provides a detailed roadmap for how Metro will plan, build, operate, maintain, and partner for improved mobility in the next 30 years. The LRTP will guide future funding plans and policies needed to move LA County forward for a more mobile, resilient, accessible, and sustainable future. More information is available at: https://www.metro.net/projects/lrtp/</p>	<p>Please refer to page 3.16-9 of Section 3.16, <i>Transportation</i>, of the Draft PEIR for a discussion of Metro’s <i>Our Next LA 2020 Long Range Transportation Plan</i> (LRTP). This comment regarding Metro’s LRTP is acknowledged, and the County will seek opportunities to support and implement the objectives and recommendations of this plan.</p>
A11-3	<p>2. <u>Connect US Action Plan</u>: Completed in 2015, the Connect US Action Plan’s fundamental goal is to provide pedestrians and cyclists a safe and pleasurable passage to transit between Los Angeles Union Station, 1st/Central Station and the adjacent historic neighborhoods. Enhancing walkability and bikeability will facilitate a second goal, connecting people who live and work in adjacent neighborhoods to one another. More information is available at: https://www.metro.net/about/union-station/connect-us-action-plan/</p>	<p>Regarding the <i>Connect US Action Plan</i>, the URL provided in the comment does not lead to the document described. However, the document was located and reviewed for consistency. The County notes that Metro completed the <i>Connect US Action Plan</i> in 2015, which affects portions of Frame 5. The fundamental objectives of that plan as stated in the comment are complementary to the objectives of the proposed <i>2020 LA River Master Plan</i> that relate to access, transportation, recreation, and water quality. The County will seek opportunities to support and implement the objectives and recommendations of the <i>Connect US Action Plan</i>. The Draft PEIR has been revised to include a summary of this plan in Section 3.16, <i>Transportation</i>, and Appendix I, <i>Transportation Impact Assessment</i>, of the Draft PEIR. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>

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A11-4	<p>3. <u>Active Transportation Strategic Plan (ATSP)</u>: Adopted in 2016, the ATSP is Metro's county-wide effort to identify strategies to increase walking, bicycling and transit use in Los Angeles County. The ATSP's focuses on improving first and last mile access to transit and proposes a regional network of active transportation facilities, including shared-use paths and on-street bikeways, and develop a funding strategy for implementation. More information is available at: https://www.metro.net/projects/active-transportation-strategic-plan/</p>	<p>Regarding the <i>Active Transportation Strategic Plan</i>, the URL provided in the comment does not lead to the document described. However, the document was located and reviewed for consistency. The County notes that Metro completed the <i>Active Transportation Strategic Plan</i> in 2016. The fundamental objectives of that plan as stated in the comment are complementary to the objectives of the proposed <i>2020 LA River Master Plan</i> that relate to access, transportation, and recreation. The County will seek opportunities to support and implement the objectives and recommendations of the <i>Active Transportation Strategic Plan</i>. The Draft PEIR has been revised to include a summary of this plan in Section 3.16, <i>Transportation</i>, and Appendix I, <i>Transportation Impact Assessment</i>, of the Draft PEIR. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
A11-5	<p>4. <u>First/Last Mile Strategic Plan</u>: Completed in 2014 and authored by Metro and the Southern California Association of Governments (SCAG), the First/Last Mile Strategic Plan is an approach for identifying barriers and planning and implementing improvements for the first/last mile portions of an individual's connection to transit. The plan is available at: https://www.metro.net/projects/first-last/</p>	<p>Regarding the <i>First/Last Mile Strategic Plan</i>, the URL provided in the comment does not lead to the document described. However, the document was located and reviewed for consistency. The County notes that Metro completed the <i>First/Last Mile Strategic Plan</i> in 2014. The fundamental objectives of that plan as stated in the comment are complementary to the objectives of the proposed <i>2020 LA River Master Plan</i> that relate to access, transportation, and recreation. The County will seek opportunities to support and implement the objectives and recommendations of the <i>First/Last Mile Strategic Plan</i>. The Draft PEIR has been revised to include a summary of this plan in Section 3.16, <i>Transportation</i>, and Appendix I, <i>Transportation Impact Assessment</i>, of the Draft PEIR. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>

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A11-6	<p><i>Metro Corridor Planning Efforts</i></p> <p>Metro is studying the following new corridor projects which are within the Master Plan’s study area. These projects should be incorporated into the PEIR’s analysis. In addition, the County should consult with the Southern California Regional Rail Authority (SCRRA), which operates Metrolink, on their capital planning efforts.</p> <p>1. <u>Metro’s LA River Path Project</u>: Funded by Measure M, Metro is evaluating a new bicycle and pedestrian path along an approximately eight-mile stretch of the Los Angeles River from Elysian Valley through Downtown Los Angeles to the City of Maywood. Metro released a Notice of Preparation for this project in October 2019 with a target operation date by 2028. The project is currently in the Environmental Phase with anticipated selection of a locally preferred alternative (LPA) by 2023. More information may be found online at: https://www.metro.net/projects/lariverpath/.</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements) for a summary of the programmatic nature of the Draft PEIR. In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. As a programmatic document that does not analyze specific projects, the Draft PEIR would neither permit nor exclude the projects listed as being within the <i>2020 LA River Master Plan’s</i> study area.</p> <p>The planned extension of the LA River Bike Path and potential alignments of the Rail to River Project are shown as proposed facilities in Figure 3.16-2 and in Figure 2 of Appendix I, <i>Transportation Impact Assessment</i>, of the Draft PEIR. These projects are located in Frames 4 and 5. No changes to the Draft PEIR are needed.</p>
A11-7	<p>2. <u>West Santa Ana Branch Project</u>: Metro is evaluating a potential new transit system connecting southeast Los Angeles County to downtown Los Angeles via the abandoned Pacific Electric Right-of-Way/West Santa Ana Branch Corridor (PE ROW/WSAB) and a combination of local streets and private and Metro-owned rail ROW. This project crosses over the Los Angeles River in the City of South Gate. For additional information, please see https://www.metro.net/wsab.</p>	<p>Please see the response to comment A11-6.</p> <p>Please refer to Section 3.16, <i>Transportation</i>, of the Draft PEIR, which acknowledges Metro’s 2020 LRTP, which discusses the financial commitments of Measure M. The West Santa Ana Branch Project is funded by Measure M.</p>
A11-8	<p>3. <u>Rail to Rail/River Active Transportation Project</u>: Metro’s Active Transportation Corridor Project, Segment B, referred to as “Rail to River,” as it connects the Metro A Line (Blue) east to the Los Angeles River, will ultimately connect to the Segment A portion (“Rail to Rail”) and once complete, the entire Active Transportation Corridor Project will span roughly 10 miles and use an existing, underutilized railroad right-of-way (ROW) and convert it into a multi-purpose pedestrian and bicycle</p>	<p>Please see the response to comment A11-6.</p>

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	<p>transportation corridor on the western end of the corridor and create connections to the Los Angeles River on the eastern end of the corridor. The project is currently in a Supplemental Alternatives Analysis to determine a locally preferred alternative at Randolph St. where the West Santa Ana Branch Project is located. For more information please go to www.metro.net/r2r.</p>	
<p>A11-9</p>	<p>Adjacency to Metro-owned Right-of-Way and Facilities</p> <p>1. <u>Rail Operations</u>: The Master Plan’s study area includes Metro-owned ROW and transit facilities for Metro Rail, Metro Bus, and Metro Bus Rapid Transit operations. In particular, these lines cross over the Los Angeles River: the G Line (Orange), in the San Fernando Valley; and the A Line (Blue), to the north of Long Beach in between Del Amo and Wardlaw Stations. In addition, the Metrolink commuter rail service is adjacent to parts of the Los Angeles River, operated by SCRRA, portions of which use Metro-owned ROW. Buses and trains operate 24 hours a day, seven days a week in these facilities.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>The implementing parties will consult with applicable rail operators (i.e., Metro and Southern California Regional Rail Authority) during the process of developing site-specific plans, in addition to consultation during the subsequent CEQA process (see Mitigation Measures LU-2, Consultation, and LU-4, Site Selection Process). Additionally, please see Master Response MR-4 (Adherence to Local Jurisdictions’ Requirements).</p>
<p>A11-10</p>	<p>2. <u>Impact Analysis</u>: Due to the Project’s proximity to the G Line (Orange), A Line (Blue), and Metrolink, the PEIR should analyze potential effects on light rail operations and identify mitigation measures or project design features for subsequent implementation actions as appropriate. Critical impacts to be studied should include (without limitation): impacts of Project construction and operation on and potential damage to the structural and systems integrity of tracks and related infrastructure; disruption to light rail service; and temporary and/or permanent changes to customer access and circulation to the stations.</p> <p>Specific impacts and mitigation measures that should be studied include:</p> <p>a. <u>Overhead Catenary System (OCS) Setback</u>: Overhead catenary wires and support structures adjacent to the Project power</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements) for a summary of the programmatic nature of the Draft PEIR. In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. As a programmatic document that does not analyze specific projects, the Draft PEIR would neither permit nor exclude the projects listed as being within the <i>2020 LA River Master Plan’s</i> study area.</p> <p>The Draft PEIR analyzes 1) the potential for impacts related to geometric design features and incompatible uses on pages 3.16-53 through 3.16-57 in Section 3.16, <i>Transportation</i>, of the Draft</p>

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	<p>Metro trains. OCS wires should be treated like any high voltage electrical utility wires. Construction equipment such as cranes or aerial work platforms for installing Project landscaping or utilities may be in close proximity to the OCS and can pose an electrocution hazard during Project construction and operation.</p> <p><i>Recommended mitigation measure:</i> The Project Sponsor shall take all necessary measures to protect the OCS from damage due to Project activities during and after construction, pursuant to applicable California Department of Industrial Relations regulations (Cal. Code of Regulations, Title 8). The Project Sponsor shall post proper signage for equipment working around the OCS wires. Any landscaping shall be set back at least ten (10) feet from the OCS wires and support structures.</p>	<p>PEIR; and 2) applicability of Mitigation Measures LU-1, Construction Management Plan, and LU-4, Site Selection Process. Please also refer to Master Response MR-4 (Adherence to Local Jurisdictions’ Requirements), which identifies that implementation of subsequent projects would require consultation with (and adherence to) applicable Federal, State, and local agencies and regulations, including affected transit operators and public utilities. The implementing agency will consult with affected entities, including Metro, as applicable, when it proposes specific projects under the <i>2020 LA River Master Plan</i> (see Mitigation Measures LU-2, Consultation, and LU-4, Site Selection Process, of the Draft PEIR). No changes are needed to the Draft PEIR.</p>
A11-11	<p>In addition, Metro strongly recommends that the following standard Project Design Features be incorporated into the Project to address these potential impacts:</p> <p>b. <u>Technical Review</u>: The Project Sponsor will submit civil engineering and landscaping drawings and calculations, as well as construction work plans and methods for any utility work in the public right-of-way and any crane placement and radius, to evaluate any impacts to Metro or Metrolink infrastructure in relationship to the Project. Before the start of any construction activities, the Project Sponsor will obtain Metro’s approval of final construction plans.</p> <p>c. <u>Construction Safety</u>: The construction and operation of the Project shall not disrupt Metro’s and/or Metrolink’s operation and maintenance activities, or the structural and systems integrity of Metro’s or and/or Metrolink’s infrastructure. Not later than one month before Project construction, the Project Sponsor shall contact Metro to schedule a pre-construction meeting with all Project construction personnel and Metro Real Estate, Construction Management, and Construction Safety staff. During Project construction, the Project Sponsor shall:</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements) for a summary of the programmatic nature of the Draft PEIR. In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Because the PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. Other agencies may use the PEIR as the basis on which to tier future project environmental analyses under CEQA. However, the County cannot require other agencies to implement the mitigation identified in the PEIR.</p> <p>Please see the response to comment A11-10, which discusses Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements), both of which pertain to consultation with affected transit operators and public utilities, including Metro, where applicable. No changes to the Draft PEIR are needed.</p>

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	<p>i. Work in close coordination with Metro to ensure that Metro and/or Metrolink service, visibility, and structural integrity are not compromised by construction activities or permanent build conditions;</p> <p>ii. Notify Metro of any changes to construction activities that may impact the use of the ROW;</p> <p>iii. Permit Metro staff to monitor demolition and/or construction activities to ascertain any impact to Metro and/or Metrolink infrastructure.</p> <p>d. <u>ROW Entry Permit</u>: For any temporary or ongoing access to Metro ROW for demolition, construction, and/or maintenance activities, the Project Sponsor shall complete Metro’s Track Allocation process with Metro Rail Operations and obtain a Right of Entry Permit from Metro Real Estate. Approval for single tracking or a power shutdown, while possible, is highly discouraged; if sought, the Project Sponsor shall apply for and obtain such approval from Metro not later than two months before the start of Project construction. The Project Sponsor shall apply for and obtain approval from Metro for any special operations, including the use of a pile driver or any other equipment that could come into proximity to the OCS or support structures, not later than one month before the start of Project construction.</p>	
A11-12	<p><u>1. Chapter 3, CEQA Environmental Impact Assessment, Page 3-10:</u></p> <p>a. NextGen Bus Plan: As the Plan raises issues around connection/access to the river, it should discuss how Metro’s NextGen Bus Plan may change accessibility to the river. It may also be worthwhile to mention Metro’s plans for Rail to River Active Transportation Path, Segment B as it relates to the Plan.</p>	<p>Please refer to page 3.16-3 and Figures 3.16-4, 3.16-5, and 3.16-6 of Section 3.16, <i>Transportation</i>, of the Draft PEIR and the text on pages 11–14 and Figures 4–6 of Appendix I, <i>Transportation Impact Assessment</i>, of the Draft PEIR for a description of public transit service at the time the Draft PEIR was written (i.e., 2020). Metro and other transit agencies regularly review and adjust service and coverage to better serve the public. Metro’s <i>NextGen Bus Plan</i> is a major reorganization that was approved by the Metro Board on October 22, 2020. When fully phased in by the end of 2021, the plan will improve service by doubling the number of frequent bus lines, providing 80 percent of riders with service on headways of 10 minutes or less, ensuring a 0.25-</p>

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		<p>mile walk to a bus stop for 99 percent of current riders, expanding the hours of service, and improving facilities at stops. Service changes made by the <i>NextGen Bus Plan</i> would affect the majority of bus lines in the system. Within the overall framework, transit access to the LA River and other destinations in the region would be improved.</p> <p>Please refer Section 3.16, <i>Transportation</i>, and Appendix I, <i>Transportation Impact Assessment</i>, of the Draft PEIR for reference to the Rail to Rail Active Transportation Corridor Project. Studies by Metro are underway to determine the specific routing for Segment B. The preferred alternative is expected to be selected in Fall 2021/Winter 2022. When this project is complete, it will provide a biking and walking path connecting the A Line (formerly Metro Blue Line) Slauson Station to the LA River. It is located in Frame 4.</p> <p>No changes to the Draft PEIR are needed.</p>
A11-13	<p>b. It may also be good to include language on how the Metro LA River Path project is funded by Measure M, since Measure M is listed as an existing LA County Funding Source (p442) but there is no language on the project directly related to the Plan that Measure M funds.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
A11-14	<p><u>2. Chapter 3, CEQA Environmental Impact Assessment, Page 3-10:</u> Metro’s Board of Directors adopted the 2020 Long Range Transportation Plan (LRTP) on September 24, 2020. Last sentence: change “The 2020 Draft LRTP “ to “The 2020 LRTP” to refer to the final document.</p>	<p>The Draft PEIR has been revised to indicate the 2020 LRTP was adopted. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>

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A11-15	<p><u>3. Chapter 3, CEQA Environmental Impact Assessment, Page 3-10, 3.16-9:</u> LRTP section can have more language on Metro’s footprint in the LA River development such as focused language on Metro plans for the LA River Path (San Fernando Valley and Central LA) and Rail to River Active Transportation Corridor Segment B.</p>	<p>The comment refers to Segment B of the Rail to Rail Active Transportation Project, but the LRTP referred to describes Segment A of the Rail to Rail Active Transportation Project as a funded project. The Draft PEIR has been revised to update the description of the 2020 LRTP. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
A11-16	<p><u>4. Chapter 3, CEQA Environmental Impact Assessment, Page 3.16-1:</u> Hard to understand last three sentences of paragraph 3, regarding mitigation measures carried out by County on activities not to be carried out by the County under the Plan. Rephrase to clarify.</p>	<p>As this is a program-level EIR, the analysis presented is conservative in nature. Under State CEQA Guidelines Section 15168, where the later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the PEIR. The <i>2020 LA River Master Plan</i> is a conceptual plan. All future specific projects would be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168.</p>
A11-17	<p><u>5. Chapter 3, CEQA Environmental Impact Assessment, Page 3.16-4:</u> 1st paragraph last sentence: hard to read- suggested change to “primary means of regional movement of people and goods, providing for direct vehicular access to river access points, places of employment, services such as healthcare and recreation, and goods”.</p>	<p>The Draft PEIR has been revised to clarify the language on page 3.16-4 of Section 3.16, <i>Transportation</i>, of the Draft PEIR. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
A11-18	<p><u>6. General:</u> a. Consider adding temporary construction phase artwork banners in place of, or in addition to, "screening" at fences as a mitigation.</p>	<p>The County will consider adding construction phase artwork banners in place of screening at fences as mitigation. For example, Mitigation Measure AES-1, Install Construction Fencing for Screening and Security for Construction Lasting Longer than 30 Days, could be implemented by the County or individual agencies to include other artwork banner screening options to a solid green or blue fabric perimeter fencing, as noted in the mitigation measure. Such changes or alterations to a project are within the responsibility and jurisdiction of other public agencies and not the agency making the finding. This</p>

Comment#	Comment Text	Response
		comment is available for review by the decision-makers when making the decision to approve the project.
A11-19	b. Include existing and planned Cultural Resources such as Judith Baca's "the Great Wall," the future potential water wheel, "Bending the River" by Lauren Bon, Defining Line by Debra Scacco, and the SELA Arts Festival to name a few.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
A11-20	<u>7. General. Transportation:</u> For the EIR's transportation section, the County should clarify whether its analysis of Vehicle Miles Traveled (VMT) will (or will not) use data that incorporates the effects of the recent coronavirus pandemic. The County should also advise on the status and use of the pending update to the County's transportation assessment guidelines.	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements), which discuss the programmatic nature of the Draft PEIR. The projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Because impacts are analyzed qualitatively at a program level, trip generation estimates and user vehicle trip lengths cannot be developed and therefore cannot be evaluated quantitatively with any specific data that incorporates the effects of the coronavirus pandemic. As described in Section 3.16, <i>Transportation</i>, and Appendix I, <i>Transportation Impact Assessment</i>, of the Draft PEIR, the programmatic analysis does not analyze specific projects, but provides a qualitative level of evaluation following the methodology described in Los Angeles County's updated Transportation Impact Analysis Guidelines. These were released on July 23, 2020, and had a minor editorial change for clarification on September 2, 2020. They are available online at dpw.lacounty.gov/traffic/docs/Transportation-Impact-Analysis-Guidelines-July-2020-v1.1.pdf. Future projects located wholly within Los Angeles County jurisdiction would be subject to</p>

Comment#	Comment Text	Response
		detailed analysis using this methodology, including future revisions that may be made.

2.3.2.12 Comment Letter A12: City of Long Beach, May 12, 2021

Comment #	Comment	Response
A12-1	<p>As provided in the Draft PEIR, two frames encompass the City of Long Beach. Frame 1 (Estuary) is primarily within the City of Long Beach and extends 4.0 miles from river mile 0.0 to 4.0, and it encompasses approximately 10.79 percent of the total 2020 A River Master Plan study area. This portion of the LA River is characterized by brackish water year-round and is identified as an important bird habitat. The Shoreline Aquatic Park and the Queen Mary are in the Long Beach Port near river mile 0.0; Santa Cruz Park, Golden Park, and Cesar Chavez Park are on the left bank at river mile 0.3 to 0.8; and Wrigley Greenbelt is on the left bank of the LA River from river mile 2.9 to 4.0. Frame 2 (South Plain) is in the Cities of Long Beach, Carson, and Compton and unincorporated County areas, and it extends 4.4 miles from river mile 4.0 to 8.4. Frame 2 encompasses approximately 8.66 percent of the 2020 LA River Master Plan study area and has some of the widest right-of-way (ROW). Industrial and residential development, transmissions easements, Interstate 710, and SR-91 cut into the landside ROW in the northern portion of the frame. This frame is identified as having freshwater year-round and is an important bird habitat area. DeForest Park and DeForest Wetlands is between river mile 6.8 and 7.5 along the left bank.</p>	<p>The County appreciates the City of Long Beach for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This is an introductory comment regarding the frames of the proposed Project located within the City that precedes specific comments. No further response is necessary.</p>
A12-2	<p>The underlying GIS information used to generate maps for the LA River Master Plan and subsequent EIR omits certain parks and open space in Long Beach and includes incorrect spatial information: Certain parks are shown as developed that are undeveloped. Certain parks are omitted altogether, but have been developed, open, and publicly accessible for several years, and should be included on maps and in tables.</p> <p>Park inventory information used in tables in the PEIR – referencing the source as Los Angeles County, Department of</p>	<p>The underlying geographic information system (GIS) information has been updated in the <i>2020 LA River Master Plan</i> through data retrieved from the City of Long Beach's online data resource and other publicly available data sources. Please refer to the <i>2020 LA River Master Plan</i> for any updated information and mapping of resources based on this new data. Additionally, figures and tables in the Draft PEIR have been revised in Section 3.15, <i>Recreation</i>, with the updated information. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>

Comment #	Comment	Response
	<p>Recreation 2020 – does not reflect certain Long Beach parks and open space, double counts certain sites, or are misclassified.</p> <p>The Existing Resources section on page 27, and subsequent tables, are missing several parks and open space in this section of the map.</p>	<p>Additionally, as the County is the lead agency for the proposed Project, the County used Los Angeles County Assessor and Los Angeles County Department of Recreation data for creating maps. This data was compiled at the date of the Notice of Preparation. The programmatic approach to the PEIR takes into account that later activities would have to be assessed for any new or worsened issues associated with any particular site proposed for development.</p> <p>The commenter appears to be referencing Existing Resources of parks and open space on page 27; however, the County was unable to locate this specific information in either the Draft PEIR or <i>2020 LA River Master Plan</i>. Page 3.15-27 contains Parks and Recreational Resources within Frame 6, which includes the Cities of Los Angeles and Glendale, and not the City of Long Beach.</p> <p>However, with respect to the level of specificity, it should be noted that, as discussed in Section 3.15.3.1 of the Draft PEIR, the methodology used to evaluate impacts on parks was disclosed as being qualitative. At a program level, the PEIR evaluates the impacts of the proposed Project on existing recreational resources as a result of both construction and operations.</p> <p>The analysis determines if there is the potential for impacts on existing resources in the 18 jurisdictions (17 cities and unincorporated County areas) in the project study area during construction and operation. Data from the Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment (2016) and the 18 jurisdictions’ respective general plans were used to evaluate impacts on parks and trails, as shown in the <i>2020 LA River Master Plan</i>.</p> <p>The Draft PEIR identifies that there are numerous parks and recreational facilities within the 51-mile-long, 2-mile-wide study corridor and identifies that there could be impacts on those parks and recreational facilities related to implementation of the <i>2020 LA River Master Plan</i>. As identified in Chapter 1, <i>Introduction</i>, of the Draft PEIR the approach to the PEIR is</p>

Comment #	Comment	Response
		<p>programmatic and not site-specific. Please see Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). Furthermore, the level of specificity in the PEIR is consistent with State CEQA Guidelines Section 15146, Degree of Specificity, which states that the EIR for a plan “need not be as detailed as an EIR on the specific construction projects that follow.” As such, the content provided in the PEIR is sufficient at a programmatic level to disclose anticipated impacts of <i>2020 LA River Master Plan</i> implementation and allow meaningful review by decision makers.</p> <p>Therefore, this does not change conclusions in the Draft PEIR.</p>
<p>A12-3</p>	<p>The listing of Long Beach regulatory documents on page 61 is missing references to other adopted City of Long Beach plans, including, but not limited to Climate Action and Adaptation Plan, Long Beach RiverLink, Sustainable City Action Plan, Uptown Open Space Vision Plan, DeForest Park Vision Plan, Hamilton Loop Vision Plan, Drake Chavez Vision Plan, General Plan Mobility Element, CX3 Plan and Bike Master Plan.</p> <p>This information was previously submitted, and the document has not been corrected. City staff requests that the above be rectified prior to the adoption of the LARMP.</p>	<p>This comment is acknowledged. The City of Long Beach Climate Action and Adaptation Plan is included in the local regulatory setting section in Section 3.5, <i>Energy</i>, of the Draft PEIR. The Long Beach RiverLink is discussed in the relevant land use plans and policies (non-regulatory) section in Section 3.10, <i>Land Use and Planning</i>, of the Draft PEIR. The City of Long Beach’s General Plan Mobility Element and Bike Master Plan are included in Section 3.16, <i>Transportation</i>, of the Draft PEIR, and relevant policies to the proposed Project are highlighted.</p> <p>The Draft PEIR has been revised to include the Sustainable City Action Plan, Uptown Open Space Vision Plan, DeForest Park Vision Plan, Hamilton Loop Vision Plan, Drake Chavez Vision Plan, and CX3 Plan. See Chapter 3, <i>Clarifications and Modifications to the Draft PEIR</i>, of the Final PEIR.</p>
<p>A12-4</p>	<p>The underlying GIS information used to generate opportunity maps on pages 353, 395, 399 of the LA River Master Plan continue to be incorrect, omitting developed and open Long Beach parks and wetlands.</p> <p>This page also omits key opportunity sites identified in the City’s adopted Uptown Open Space Vision Plan, DeForest Park Vision Plan, and Hamilton Loop Vision Plan shown in the links below. Uptown Open Space Vision Plan:</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR.</p> <p>Please see response to comment A12-2.</p>

Comment #	Comment	Response
	<p>http://longbeach.legistar.com/LegislationDetail.aspx?ID=3554305&GUID=CE055640-ABF1-48F8-A970-C3E5C9F8EA1D, DeForest Park Vision Plan: http://longbeach.legistar.com/LegislationDetail.aspx?ID=4665783&GUID=A91099AD-0726-4375-9286-2FB577C274BC, Hamilton Loop Vision Plan: http://longbeach.legistar.com/LegislationDetail.aspx?ID=4749654&GUID=7F167952-C4BB-4EE0-83AD-CCCA6A01F8DF</p>	
A12-5	<p>Similarly, the map in the EIR shown on page 4 in Figure 3.15-1.2 - Frame 2 is incorrect, omitting developed and open Long Beach parks and wetlands. The map is also incorrectly labeled with corresponding numbers not aligning with the proper names of parks.</p>	<p>Please see response to comment A12-2.</p>
A12-6	<p>There appears to be a series of pages missing after 357 that show the opportunity sites at the mouth of the LA River in Long Beach, which appeared in a previous draft of the plan. These missing pages reflected the image on page 399. The missing pages and Page 399 need to be updated to reflect adopted open Long Beach parks and wetland opportunities identified in the adopted Drake Chavez Vision Plan. This information was previously submitted, and the document not corrected. These corrections need to be rectified prior to the adoption of the Master Plan. http://longbeach.legistar.com/LegislationDetail.aspx?ID=4057684&GUID=865C218F-D400-4EF9-AABD-D8560BD23FAECity staff requests that the above be rectified prior to the adoption of the LARMP.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. No further response is necessary. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see response to comment A12-2.</p> <p>Additionally, the PEIR has been revised to include the Drake Chavez Vision Plan in the regulatory section of Section 3.15, <i>Recreation</i>. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>.</p>
A12-7	<p>Page 3.16-1, second paragraph. Why were there not trip generation assumptions made if the modeling data was not available?</p>	<p>Trip generation is related to congestion (i.e., vehicle delay); congestion is no longer a CEQA issue (State CEQA Guidelines Section 15064.3(a)). This is discussed in Section 3.16, <i>Transportation</i>, of the Draft PEIR.</p>

Comment #	Comment	Response
A12-8	VMT analysis is good and acceptable practice.	The PEIR is consistent with the requirement to examine vehicle miles traveled (VMT)-related transportation impacts.
A12-9	Page 3.16-1, last paragraph. Does this mean that the impacts could be significant if agencies other than the County do not perform the mitigation measures? If so, then the County should coordinate with outside agencies to ensure that all elements are put in place to mitigate the potential impacts of the project.	Except for significant and unavoidable impacts, all identified significant environmental effects of the proposed <i>2020 LA River Master Plan</i> can be avoided or reduced to a less-than-significant level if the mitigation measures identified in this PEIR are implemented. The County can ensure that these mitigation measures will be implemented for subsequent projects that are carried out by the County. However, because some later activities under the <i>2020 LA River Master Plan</i> could be carried out by other public agencies or private parties over which the County has no legal jurisdiction, the County cannot enforce or guarantee that the mitigation measures would be incorporated in all potential subsequent projects. Therefore, where this PEIR concludes a less-than-significant impact for later activities carried out by the County, the impact would be significant and unavoidable when these activities are not carried out by the County. However, the identification of a significant and unavoidable program-level impact in this PEIR does not preclude the finding of a future less-than-significant impact for individual projects that will tier from the PEIR. Additionally, please refer to Master Response MR-4 (Adherence to Local Jurisdictions' Requirements).
A12-10	Excellent chart 3.16-1.	This comment is acknowledged. No response is necessary.
A12-11	3.16-4 and 3.16-13: The City of Long Beach adopted the Safe Streets Long Beach Action Plan (Vision Zero) in July 2020. Please include this information for the streets located in the High Injury Network within Frame 1 and Frame 2. https://www.longbeach.gov/globalassets/go-active-lb/media-library/documents/programs/safe-streets-lb-action-plan---fin al	The PEIR has been revised to include this information in the regulatory section of Section 3.16, <i>Transportation</i> . See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i> .

Comment #	Comment	Response
A12-12	Page 7. Consider adding to the end of the first paragraph the following: “Although such reductions could be perceived as lofty targets, all projects should strive to achieve those goals.”	The suggested language is not necessary for understanding the impact or mitigation. Therefore, the Draft PEIR has not been revised as suggested by the commenter.
A12-13	All items in 3.16.3.2 would be undesirable.	The comment does not identify specific significant environmental issues. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. No response is necessary.
A12-14	Page 3.16-25, Item 5. Please clarify bike rental facilities. Does this mean Bike Hubs like Bikeshare? If so, consider calling out Bike Hubs and not Bike rental facilities.	The County is making a generic reference to bicycle rental facilities. This will apply to bike hubs. No change to the Draft PEIR is necessary.
A12-15	Page 3.16-25, Item 14 and 15. May be very cost prohibitive and not feasible. Too many crossings would be too redundant and not realistic. Too many crossings would take away from the aesthetics of the waterway.	<p>Items 14 and 15 as identified in Section 3.16, <i>Transportation</i>, of the Draft PEIR are direct actions from the <i>2020 LA River Master Plan</i>. This is a comment on the <i>2020 LA River Master Plan</i>, not the Draft PEIR and does not identify specific significant environmental issues. No change to the PEIR is necessary.</p> <p>However, as discussed in Section 3.1, <i>Aesthetics</i>, where scenic vistas are available, views encompass larger scenic visual elements and/or panoramic views of the Pacific Ocean, ridgelines, hillsides, or large open park and greenspace areas that encapsulate a large viewscape viewed from multiple vantage points. Once constructed, above-ground structures related to KOP Categories 1, 2, and 3 such as water towers, barriers, and bridges, if located in an area encompassing a scenic vista, would affect only a small portion of the viewshed and would not result in substantial adverse effects on a scenic vista or obscure a panoramic view. As concluded in the Draft PEIR, impacts on scenic vistas would be less than significant.</p>

Comment #	Comment	Response
A12-16	Page 3.16-52. Please confirm that the VMT baseline forecasts are the most recently available data. Consider discussing how impacts of COVID19 on commuting could change the baseline.	The VMT forecasts are the most recently available data at the time that the Draft PEIR was prepared. The long-term effects of changes in automobile use related to COVID-19 are unknown and cannot be known at this time. Therefore, the pre-COVID baseline was utilized for the proposed Project.
A12-17	Continue to see the terminology “Impacts would be significant and unavoidable for later activities not carried out by The County.” What does this exactly mean? This phrase is utilized in many places in the document. What are the implications of such a statement?	Please see the response to comment A12-9.
A12-18	Page 3.16-54, middle paragraph. Is a 12’ wide pathway/roadway feasible along the full extent of the project?	This is a comment on the <i>2020 LA River Master Plan’s Design Guidelines</i> , not the Draft PEIR. No response is necessary. This comment was shared with the <i>2020 LA River Master Plan</i> team.
A12-19	Page 3.16-54. Given all the previously stated unknowns, can this be guaranteed?	The commenter has not presented any substantial evidence that the conclusion in the Draft PEIR is incorrect. No change to the PEIR is necessary.
A12-20	Page 3.16-57, second to last sentence. While this is an aspiration, can it be guaranteed? Perhaps leading the second to last sentence with “Ideally” would better reflect this reality.	This comment is acknowledged. Regional and local transportation programs and plans are implemented by agencies and jurisdictions in addition to the County. The suggested language is not necessary for understanding the impact or mitigation. Therefore, the Draft PEIR has not been revised as suggested by the commenter.
A12-21	City staff would like to underscore the importance of access from the LA River to adjacent neighborhoods, including connectivity with surrounding uses, equitable access points, and adequate lighting. This includes access and safety considerations, such as walkway connectivity and lighting, around Caltrans overpasses.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed. Please refer to Section 3.1, <i>Aesthetics</i> , of the Draft PEIR, for a discussion of lighting, Section 3.10, <i>Land Use and</i>

Comment #	Comment	Response
		<p><i>Planning</i>, for a discussion of barriers to access, and Section 3.16, <i>Transportation</i>, for a discussion of design hazards and safety.</p>
A12-22	<p>City staff recommends that nature-based solutions be named and considered as options for site remediation when possible. Such nature-based solutions may include phytoremediation and conversion of brownfield sites to public greenspaces.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>The County chooses not to include specific solutions. Nature-based solutions can be considered when feasible and suitable for specific remediation sites.</p> <p>In the <i>2020 LA River Master Plan</i>, an extensive analysis, which included brownfield and superfund sites (see the Sites Chapter in the <i>2020 LA River Master Plan</i>), was added. On page 242, industrial land contamination is discussed as well as funding sources and streams for cleanup and redevelopment. The Technical Appendix has been revised to include a new chapter (Chapter 7, <i>Cleanup of Contaminated Sites</i>) that discusses the cleanup process and technologies.</p> <p>Additionally, Chapter 5, <i>Alternatives</i>, of the Draft PEIR includes an analysis of a Channel Avoidance Alternative as well as alternatives considered but rejected and a No Project Alternative. The alternative of developing brownfields would not serve to reduce any impacts as compared to the other alternatives or the Project as proposed. Rather, there could be additional impacts because many of the brownfields along the 51-mile corridor contain hazardous materials.</p> <p>No changes to the Draft PEIR are needed.</p>
A12-23	<p>The PEIR should explain the relationship between the LARMP and city land use plans. Specifically, the LARMP does not supersede city land use plans and zoning land use designations. The City of Long Beach’s General Plan Land Use Element (LUE), adopted in 2019, establishes PlaceTypes to organize land uses. The City will adopt new zoning regulations consistent with the</p>	<p>The City of Long Beach does not have jurisdiction over County projects. City policies and zoning designations for all applicable jurisdictions, as detailed in Section 3.10, <i>Land Use and Planning</i>, will not supersede the <i>2020 LA River Master Plan</i> where the plan applies to County projects. Nor is the <i>2020 LA River Master Plan</i> intended to supersede any of the 17 cities’ land use plans or</p>

Comment #	Comment	Response
	<p>(LUE) PlaceTypes. Along the LA River in Long Beach, PlaceTypes include single-family and low-density residential (FCN), neo-industrial (NI), neighborhood serving center (NSC-L), as well as open space (OS). These PlaceTypes and current and future zoning designations will supersede the LARMP.</p>	<p>zoning regulations/designations. Furthermore, the <i>2020 LA River Master Plan</i> is generally consistent with the 17 cities' land use plans and policies, as discussed in Section 3.10, <i>Land Use and Planning</i>.</p> <p>The City of Long Beach would have the opportunity to review future proposed CEQA compliance pursuant to the applicable provisions of CEQA for projects that tier from the PEIR as they are brought forward under the <i>2020 LA River Master Plan</i>. Additionally, please refer to Master Response MR-4 (Adherence to Local Jurisdictions' Requirements).</p>
<p>A12-24</p>	<p>City staff would like to underscore the importance of preventing displacement of low-income residents. The PEIR states that it is important to proactively implement a meaningful strategy for preventing displacement and ensuring continuing affordability of housing in river adjacent communities (1.1.3.6) and that the 2020 LA River Master Plan seeks to improve neighborhoods without causing negative effects of displacement. Low-income communities and communities of color in Long Beach are more likely to live along the LA River channel. The City seeks to ensure affordability of housing in river adjacent communities and to maximize opportunities for affordable housing development throughout the City.</p>	<p>The County acknowledges the City of Long Beach's concerns and shares those concerns. As concluded in Draft PEIR Section 3.13, <i>Population and Housing</i>, inclusion of affordable housing in the <i>2020 LA River Master Plan</i> would not induce population but would rather serve the existing underserved low-income population and facilitate development of supportive housing for people experiencing homelessness.</p> <p>Please also refer to Master Responses MR-1 (Homelessness along the LA River) and MR-6 (Gentrification and Housing Affordability) regarding homelessness along the river and gentrification and housing affordability.</p>
<p>A12-25</p>	<p>The City seeks partnerships with LA County and other municipalities within the LA River Watershed on actions that help adapt to flooding and other climate change impacts. As described in the Long Beach Climate Action and Adaptation Plan (CAAP) and its appendices, a 500-year floodplain, which represents a scenario that will become more likely in the future due to the increased intensity of precipitation events, covers an area that includes certain disadvantaged populations along the Los Angeles River and includes key infrastructure and public facilities. CAAP actions that help prepare for flooding along the LA River include FLD-5.4: Explore opportunities for tree planting in sub-watershed areas with the lowest urban forest cover to minimize stormwater runoff and help protect the area from</p>	<p>The County is open to partnerships with the City of Long Beach and other municipalities within the LA River watershed on these concerns. This does not identify specific significant environmental issues.</p> <p>Please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR.</p>

Comment #	Comment	Response
	flooding during intense storm events; FLD-7: Review and conduct studies of combined riverine/coastal flooding and increased severity of rainfall events on watershed flooding; and FLD-11: Based on results of a riverine flood study (FLD-7), work with partner agencies to elevate channel banks and levees to provide enhanced flood protection.	

2.3.2.13 Comment Letter A13: Southern California Regional Rail Authority, May 13, 2021

Comment#	Comment Text	Response
A13-1	<p>The Southern California Regional Rail Authority (SCRRA) has recently received the Notice of Availability for review of the Draft Program Environmental Impact Report (PEIR) for the 2020 LA River Master Plan. Thank you for the opportunity to comment on key issues related to SCRRA and our operations of the railroad adjacent to the LA River.</p> <p>As background information, SCRRA is a five-county Joint Powers Authority (JPA) that operates the regional commuter rail system known as Metrolink. Additionally, SCRRA provides rail engineering, construction, operations and maintenance services to its five JPA member agencies. The JPA consists of the Los Angeles County Metropolitan Transportation Authority (LA Metro), San Bernardino County Transportation Authority (SBCTA), Orange County Transportation Authority (OCTA), Riverside County Transportation Commission (RCTC) and Ventura County Transportation Commission (VCTC).</p> <p>A portion of the proposed Master Plan, specifically Frame 5: Heights, is adjacent to a heavily trafficked railroad corridor and the Metrolink Central Maintenance Facility (CMF). The railroad corridor runs along the east side of the LA River north of SR-110 and diverges into two separate corridors south of SR-110; with one corridor on the west side of the LA River and one corridor on the east side of the LA River. The railroad corridors that run parallel to the LA River between mile 20.5 and mile 31 of the River Mile System (Figure 13) are operated and maintained by SCRRA and owned by LA Metro. There are currently 30+ Metrolink train frequencies that operate on weekdays through this corridor due to COVID-19 schedule reduction. Fewer trains operate on the weekends. In addition, there are Amtrak trains and several freight trains per day. Rail traffic along this corridor occurs 24 hours a day, 7 days a week, and is expected to increase in the future to address growing demand.</p>	<p>The County appreciates the Southern California Regional Rail Authority (SCRRA) for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan Project</i>.</p> <p>This is an introductory comment about the SCRRA and a statement about the PEIR project description that precedes specific comments. No further response is required.</p>

Comment#	Comment Text	Response
	Please find the general comments to the 2020 LA River Master Plan – Draft PEIR related to SCRRRA and our operations listed below.	
A13-2	1. All drainage from any proposed improvements must drain away from the railroad corridor. This includes any irrigation runoff for landscaping along the railroad corridor.	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR), which discusses the programmatic level of analysis in the PEIR. However, the designs for potential prospective projects, including the specific locations and footprints, scale, and detailed design, would be developed in coordination with the applicable jurisdiction as driven by its needs, funding, and policy decisions. Furthermore, the <i>2020 LA River Master Plan</i> contains Design Guidelines that were developed to ensure a standard for design for future projects at all scales and help define the LA River corridor. The guidelines include specifications for landscaping and drainage.</p>
A13-3	2. All trees must be set back from the ROW line so that when fully matured, the trees do not hangover the ROW line onto railroad property.	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. However, the <i>2020 LA River Master Plan</i> contains Design Guidelines that were developed to ensure a standard for design for projects at all scales and help define the LA River corridor. The Ecology, Habitat, and Planting section of the Design Guidelines of the <i>2020 LA River Master Plan</i> provides guidance for planting setbacks and buffers, planting along levee and floodwalls, and channel modifications, among other aspects related to the creation of habitats and functioning ecosystems. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p>

Comment#	Comment Text	Response
A13-4	3. For any proposed trails along the railroad corridor, a 6' fence is required along the railroad Property line. Furthermore, adequate lighting should be provided to deter anyone from trespassing onto the railroad ROW.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary.
A13-5	4. All trails that require crossing through the railroad corridor and across the tracks will need to be grade separated and must be coordinated with SCRRA and the California Public Utilities Commission (CPUC).	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. The County would coordinate with the Southern California Regional Rail Authority and the California Public Utilities Commission on applicable projects. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary.
A13-6	5. Any proposed utility crossings with the railroad must be coordinated with Metro and SCRRA.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. The County would coordinate with SCRRA and the Los Angeles County Metropolitan Transportation Authority on applicable projects. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary.
A13-7	6. Site development plans (grading, drainage, landscaping, lighting, etc.) should be provided to SCRRA for review	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. The County would coordinate with SCRRA on applicable projects. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary.

Comment#	Comment Text	Response
A13-8	<p>To assess any requirements for construction (including demolition or alteration of structures) adjacent to the railroad, plans for construction should be sent to the SCRRRA Engineering Department at the following address: SCRRRA Engineering Department Attn: Joe McNeely, Principal Engineer 2558 Supply Street Pomona, CA 91767 mcneelyj@scrra.net</p> <p>Please consult SCRRRA Engineering and Construction standards and guidelines as necessary, including Right of Entry permit concerns, at the following web address: https://metrolinktrains.com/about/agency/engineering--construction/</p>	<p>The County would coordinate with the Southern California Regional Rail Authority on applicable projects.</p>

2.3.2.14 Comment Letter A14: City of Paramount, May 13, 2021

Comment#	Comment Text	Response
A14-1	<p>On behalf of the City of Paramount, I would like to thank you the opportunity to comment on the LA River Master Plan and Draft Program EIR.</p> <p>Regarding the Master Plan specifics and the Los Angeles River in general, Paramount is strongly invested in the joint jurisdictional and community efforts to revitalize the River into an environmental, recreational, cultural, and economic jewel while preserving a mix of housing types and documenting and celebrating a shared history. The City participated as an active member of the Lower LA River Working Group and continues as part of the Lower LA River Implementation Advisory Group. We look forward to bringing the River to the forefront as a true community asset.</p>	<p>The County appreciates the City of Paramount for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This comment regarding the city's efforts to revitalize the river is acknowledged.</p>
A14-2	<p>In terms of Art and Culture, Paramount was an early adopter of a one percent development fee toward public art. Paramount sees the arts as an important form of communication that bridges divides, and public art can help bring the River into the everyday conversation. We appreciate the discussion of the arts in the Plan, and we support all proposals for grants or assistance in bringing more artistic opportunities to the cities along the River. As an example, one program under consideration in Paramount involves connecting artists with owners of industrial properties that line the River for a series of River and community-related murals to be applied to the River-facing building facades.</p>	<p>This comment regarding the city's efforts to support public art is acknowledged.</p>
A14-3	<p>While we are glad to see specific attention to the City of Paramount, it is disingenuous to classify the "Compton-Paramount Connectivity Corridor" as such given the entirety of the River and adjacent areas are completely outside of the Paramount city boundaries. More so, the proposed cap park concept strikes us as an overly costly prospect. [As a side note with the understanding of no nexus to the River project, we</p>	<p>It appears the commenter is raising an issue identified in the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary.</p>

Comment#	Comment Text	Response
	believe a deck park is more appropriate to cover freeways such as the Century (1-105) Freeway, not a River.]	
A14-4	Regarding Actions bringing improvements to bicycle infrastructure and connectivity, Paramount is in full support. We ask for attention to the LA River Trail connection to the West Santa Ana Branch multiuse trail, which is a priority project for the City of Paramount, and a bike hub is a prime component.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. This comment does not identify specific significant environmental issues, nor does it address the adequacy or accuracy of the Draft PEIR. No further response is necessary.
A14-5	Page 300 - Please note that the Paramount Municipal Code numbering was reorganized effective December 17, 2020. Chapter 10 is now Chapter 15.04 (Buildings).	The Draft PEIR has been revised to update the code number. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i> . These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.
A14-6	<p>Page 380 - There is a statement that “None of the policies in the Paramount General Plan directly address air quality.” However, please note the following two references to air quality in the Paramount General Plan:</p> <p>Resource Management Element Policy 21. The City of Paramount will continue to cooperate with the other agencies that are charged with improving air and water quality in the region.</p> <p>Implementation Element. Air Quality Planning. The City of Paramount will continue to participate in the regional planning efforts being undertaken by the South Coast Air Quality Management District (SCAQMD) and the Southern California Association of Governments (SCAG) to develop and implement strategies to improve regional air quality. The City of Paramount will continue to work with the SCAQMD and SCAG and the surrounding cities in improving air quality.</p>	The Draft PEIR has been revised to update the code number. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i> . These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.

Comment#	Comment Text	Response
A14-7	<p>Page 559 (tree ordinances).</p> <ul style="list-style-type: none"> • Public land - refer to Chapter 12.32 of the Paramount Municipal Code. • Private land - refer to Section 17.44.270 and Section 17.96.030(G) of the Paramount Municipal Code 	<p>The Draft PEIR has been revised to update the code number. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
A14-8	<p>Page 1482. Fire is under now under Chapter 8.08 of the Paramount Municipal Code.</p>	<p>The Draft PEIR has been revised to include this reference. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>

2.3.2.15 Comment Letter A15: Eco-Rapid Transit, May 13, 2021

Comment#	Comment Text	Response
A15-1	<p>Eco-Rapid Transit appreciates having an opportunity to comment on the LA River Master Plan Draft Program Environmental Impact Report. The proposed 51-mile-long project with a 2-mile-wide corridor impacts many of our cities. Planning for recreation, open space and connections to nature are very valuable for our cities.</p> <p>Established in 2003, the Eco-Rapid Transit Joint Powers Authority (JPA) consists of 12 members: the cities of Artesia, Paramount, Cerritos, Downey, South Gate, Cudahy, Bell, Maywood, Huntington Park, Bell Gardens, Glendale and the Burbank Glendale Pasadena Airport Authority are working together to improve and implement rail transit service while promoting transit-oriented development and jobs. The JPA’s 34-mile corridor has a population that would be the 2nd largest in the state of California. It includes one of Los Angeles Metro’s top priority projects, the 19.4-mile West Santa Ana Branch rail transit project from Artesia to Union Station in Downtown Los Angeles. It also includes regional rail transit improvements in a 14-mile corridor from Burbank Airport to Union Station.</p>	<p>The County appreciates Eco-Rapid Transit for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This is an introductory comment about Eco-Rapid Transit that precedes specific comments. No further response is required.</p>
A15-2	<ul style="list-style-type: none"> • We appreciate your efforts to include anti-displacement and equitable development policies and urge you to work with Gateway Cities COG and our member cities on this important issue. 	<p>This comment is acknowledged.</p>
A15-3	<ul style="list-style-type: none"> • It is important to bring recreational amenities to our communities. Please make sure to include access from the LA River to the proposed West Santa Ana Branch light rail project (S Line). This includes current stations planned along the route such as the Pacific/Randolph, Florence/Salt Lake, Firestone/Atlantic, Gardendale, 1-105/Green Line and Paramount/Rosecrans. It should also consider the potential inclusion of a Rio Hondo Confluence Station in South Gate (located at the confluence of the Los Angeles River and Rio Hondo). 	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. However, the County agrees with bringing recreational amenities to the communities around the LA River and providing access to the LA River. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p>

2.3.2.16 Comment Letter A16: Santa Monica Mountains Conservancy, May 13, 2021

Comment #	Comment	Response
A16-1	<p>The Santa Monica Mountains Conservancy (Conservancy) respectfully submits the following comments to the County of Los Angeles, Department of Public Works (Public Works) on the Draft Program Environmental Impact Report (Draft PEIR) for the proposed 2020 Los Angeles River Master Plan (Project) Program Environmental Impact Report (PEIR) which seeks to evaluate any potential impacts on the environment pursuant to the California Environmental Quality Act (CEQA). The Conservancy is one of two state conservancies that have jurisdiction in the Los Angeles River watershed, where the proposed Project area is located- along the Los Angeles River (LA River), a 51-mile-long, 2-mile-wide corridor (1-mile on each side) of the LA River in Los Angeles County, spanning 17 cities and unincorporated Los Angeles County. Although the LA River was channelized between the late 19th and mid-20th centuries to protect lives and property from flooding as the Los Angeles region rapidly grew and transformed to a largely urbanized area, habitat and wildlife have flourished throughout and along the LA River and its tributaries.</p> <p>The Conservancy was established by the California State Legislature in 1980. Since that time, it has helped to preserve over 80,000 acres of parkland in both wilderness and urban settings, and improved more than 114 public recreational facilities throughout Southern California. Through direct action, alliances, partnerships, and joint powers authorities, the Conservancy's mission is to strategically buy back, preserve, protect, restore, and enhance treasured pieces of Southern California to form an interlinking system of urban, rural and river parks, open space, trails, and wildlife habitats that are easily accessible to the general public. The Conservancy has been one of the lead agencies in revitalizing the LA River and its tributaries. In 2001, the Conservancy and its partner conservancy in the Lower LA River, the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC) and the</p>	<p>The County appreciates the Santa Monica Mountains Conservancy (Conservancy) for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This is an introductory comment about the Conservancy's background information, including its past actions and jurisdiction along the LA River that precedes specific comments. No further response is required. No changes to the Draft PEIR are needed.</p>

Comment #	Comment	Response
	<p>California Natural Resources Agency adopted “Common Ground”, a Watershed and Open Space Plan for the San Gabriel and Los Angeles Rivers.</p> <p>More recently, in June 2020 the Conservancy adopted the Upper Los Angeles River and Tributaries (ULART) Revitalization Plan; a legislative initiative that authorized the creation of an appointed Working Group within the Conservancy to develop a revitalization plan for the Upper LA River and its tributaries using a community-centric, watershed management approach, with a prioritization on disadvantaged communities. Since its approval, the ULART plan is considered an amendment to Common Ground.</p> <p>As a lead agency investing in the LA River, the Conservancy has filled a void between local government, state and federal agencies by working on resources in a locally relevant and sensitive manner, such as the river and its tributaries, and by serving as a coordinator among citizen groups, agencies and landowners. The Conservancy has actively acquired and supported the development of open space and planning efforts that have produced parks with a natural aesthetic, public space, including greenways and trails, habitat restoration and improved water quality benefits, while protecting wildlife resources and enhancing recreation in the LA River watershed. As an official member of the LA River Master Plan steering committee, the Conservancy brings forth the following items we hope can be addressed before the draft PEIR is approved. In general, all of our comments will begin at the northern berm of the City of Vernon and will not stray to portions of the Plan outside of the Conservancy jurisdiction.</p>	
A16-2	<p>The existing analysis and study area for the PEIR is comprised of the 51-mile LA River corridor and one mile on each side of the LA River. However, environmental impacts of the 2020 LA River Master Plan would have cumulative effects that would extend well beyond the study area indicated. We believe limiting the PEIR to a corridor plan also limits opportunities for cumulative</p>	<p>This comment requests that the PEIR analyze a larger area than the study area described in the Draft PEIR. The Draft PEIR examines the proposed <i>2020 LA River Master Plan</i>; the requested expansion of the study area is outside of the scope of the PEIR because it would include areas not encompassed by the plan. Please refer to Master Response MR-7 (Master Plan Area/PEIR</p>

Comment #	Comment	Response
	<p>and substantial regional environmental impacts that could mitigate regional issues such as climate change, flood, fire, climate resiliency and heat island effect to name a few. With other plans available that address such issues beyond the river corridor and into the watershed that incorporate the tributaries, such as the ULART Revitalization plan, a plan with a regional approach can have greater impacts.</p>	<p>Study Area and Addressing the LA River in a Comprehensive Manner). Additionally, each resource topic in the Draft PEIR analyzed cumulative impacts and defined the geographic context for the analysis, criteria for determining significance, and a cumulative condition. Please refer to Chapter 3, <i>CEQA Environmental Impact Assessment</i>, of the Draft PEIR, which states the geographic boundary considered in the environmental analysis varies depending on the type of resource considered. For instance, impacts related to air quality would be regional because the emissions from construction and operation of a project would not be restricted to the immediate project area. Consequently, the cumulative impact analysis considers environmental impacts within the South Coast Air Basin. The geographic context for an analysis of cumulative impacts on hydrology and water quality would be the LA River Watershed because drainage and water quality impacts are a result of all waterbodies that are part of the watershed that contribute to downstream impacts. Generally, the cumulative impacts analysis considers the geographic scope to include the study area and beyond as relevant, and reflects consideration of whether the proposed Project would cause a new significant cumulative impact or result in a cumulatively considerable contribution to a previously identified significant cumulative impact included in an adopted local, regional, or statewide plan. Please refer to the end of each resource topic in Sections 3.1 through 3.19 of the Draft PEIR for the cumulative analysis. No changes to the Draft PEIR are needed.</p>
A16-3	<p>We ask that the PEIR seize a unique opportunity to expand its reach into the tributaries, specifically those in the ULART Plan, all of which are in the County of Los Angeles and are consistent with the mission of the 2020 LA River Master Plan.</p>	<p>This comment is acknowledged. Please see response to comment A16-2. Additionally, the <i>2020 LA River Master Plan</i> builds on over two decades of planning and implementation efforts for the LA River as described in Chapter 1, <i>Introduction</i>, of the Draft PEIR. While design strategies in the <i>2020 LA River Master Plan</i> focus on elements along or within the river right-of-way, the <i>2020 LA River Master Plan's</i> vision, goals, actions, and methods require an understanding of, and coordination with, communities, the watershed, and parallel efforts such as the Upper LA River and</p>

Comment #	Comment	Response
		Tributaries Working Group (AB466). No changes to the Draft PEIR are needed.
A16-4	<p>While much of the Los Angeles County Drainage Area (LACDA) system is already under the responsibility of the County, there is an active proposal for the Los Angeles County Flood Control District to assume responsibility from the U.S. Army Corps of Engineers which would deauthorize the Corps' role in the river and expand the County's responsibility. Should the Corps undergo this divesture from the river and the LACDA system, the County would be the primary entity responsible for the river and its tributaries- further rationalizing the need to expand the scope of the PEIR into the watershed and beyond the corridor which would indicate the County's commitment to regional, watershed wide, environmental improvements and impacts. However, given the existing authority of the Corps, NEPA is also strongly encouraged to be performed in addition to CEQA. Lastly, all of the tributaries in the Upper LA River watershed are within the Conservancy zone (see map), which could produce more opportunities for environmental conservation, enhancement and public access for urban constituencies for overall connectivity and regional benefits.</p>	<p>This comment is acknowledged.</p> <p>Please see the response to comment A16-2 and refer to Master Responses MR-2 (Program-Level Analysis in the PEIR), MR-4 (Adherence to Local Jurisdictions' Requirements), and MR-7 (Master Plan Area/PEIR Study Area and Addressing the LA River in a Comprehensive Manner), which discuss the programmatic nature of the Draft PEIR. All future specific projects would be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168. Because the PEIR does not examine specific projects at this time due to its programmatic nature, the County anticipates that future specific projects would require subsequent CEQA compliance. The responsibility of identifying, approving, and implementing specific future projects and preparing appropriate CEQA compliance to analyze the specific impacts of later activities, as sufficient details are identified, under the Master Plan (which may tier from the <i>2020 LA River Master Plan</i> and PEIR) lies with the jurisdictions that lie along the LA River. No changes are needed to the Draft PEIR.</p> <p>Additionally, as the County is not proposing using federal funding, the National Environmental Policy Act (NEPA) is not warranted at this time. Implementing agencies and other agencies with jurisdiction along the river corridor will adhere to environmental regulation, including regarding resources subject to U.S. Army Corps of Engineers (USACE) and NEPA review.</p>
A16-5	<p>Land Use/Planning/Air Quality</p> <p>There have been significant planning efforts that overlap with the PEIR study area. From the federally led Los Angeles River Ecosystem Restoration Area with Restoration Benefits and Opportunities for Revitalization (ARBOR) Alternative 20, by the Corps and is supported by all levels of government, which we expect to be funded in phases, to the Rim of the Valley Trail Corridor Masterplan; also a multi-agency initiative to preserve</p>	<p>This comment is acknowledged. The Draft PEIR has been revised to add the Rim of the Valley Trail Corridor Masterplan to the regulatory setting of Section 3.10, <i>Land Use and Planning</i>. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>Please refer to Section 3.10, <i>Land Use and Planning</i>, of the Draft PEIR for a list of relevant land use plans and policies (non-</p>

Comment #	Comment	Response
	<p>important resources within the Rim Corridor while providing public recreation whose study area that spans the LA River, Verdugo Mountains to the Santa Monica Mountains, and is currently at approximately 40% completion. As well as the latest regional plan that encompasses the northern part of the LA River watershed, the Upper LA River and Tributaries Plan which identifies optimal, multi-benefit opportunities for habitat enhancement, river restoration and connectivity. In its current state, the PEIR does not satisfactorily embed and include other plans which are critical to land uses, zoning and future planning. We urge the County to review these relevant plans and be consistent, and in particular should be certain as to not create adverse impacts or regress efforts of these plans. All the plans once implemented are expected to reduce Greenhouse Gas (GHG) emissions and sequester carbon, and mitigate climate issues such as heat island effect and urban tree canopy, which should also be a goal of the Project, although visitation to the river by vehicles is expected to rise, there should be clear environmental mitigations that account for and provide solutions for such impacts.</p>	<p>regulatory) including Southern California Association of Governments (SCAG) Regional Comprehensive Plan, SCAG Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy), Los Angeles River Revitalization Master Plan (2007), Lower Los Angeles River Revitalization Plan (2007), Long Beach RiverLink, Gateway Cities and Rivers Urban Greening Plan (2015), and Common Ground from the Mountains to the Sea: Watershed and Open Space Plan, San Gabriel and Los Angeles Rivers (2001). Additionally, regulatory land use plans and policies are incorporated by reference, and include the Los Angeles County General Plan and the general plans for the 17 jurisdictions. These land use plans and policies have been reviewed for consistency in the <i>2020 LA River Master Plan</i>.</p> <p>The analysis in Section 3.10, <i>Land Use and Planning</i>, consisted of a two-step process: consistent with the program-level approach of this PEIR, rather than addressing each individual policy of the local jurisdictions’ general plans, similar policies are grouped and analyzed against the proposed Project for consistency. The groupings include: (1) compatibility with adjacent land uses; (2) avoidance of out-of-scale development; (3) ensuring diversity of land uses; (4) protection of existing residential neighborhoods from encroachment; (5) enhanced active and passive park and recreation opportunities for all users; and (6) improved accessibility and connectivity to a comprehensive trail system including rivers, greenways, and community linkages. Consistency with regional plan policies is addressed individually in tabular format.</p> <p>Furthermore, please refer to Chapter 1, <i>Introduction</i>, of the Draft PEIR, which describes how the <i>2020 LA River Master Plan</i> builds on over two decades of planning and implementation efforts for the LA River, including efforts by the County (1996), the City of Los Angeles (2007), the LA River Ecosystem Restoration Feasibility Study (also known as the ARBOR Study [2015]), the Lower LA River Working Group (2018), and the Upper LA River and Tributaries Working Group (2019). The research and</p>

Comment #	Comment	Response
		<p>project database that forms the foundation for the <i>2020 LA River Master Plan</i> covers over 140 planning efforts along the LA River channel, across the LA River watershed, and throughout the region. In summary, the <i>2020 LA River Master Plan</i> and the Draft PEIR have included satisfactory literature review and consideration of other planning documents in the analysis of the proposed Project.</p>
A16-6	<p>Hazards and Hazardous Materials</p> <p>Thank you for including maps indicating contaminated and clean-up sites, but this section fails to identify the double benefit of addressing legacy and groundwater contamination that has affected communities and would bring more opportunity sites into play. The investment of cleaning up these sites will bring significant health benefits to the surrounding community. Cleanup costs are very significant, but they are a one-time expense that should be prioritized over developing new spaces such as platforms.</p>	<p>Contaminated and Brownfield sites as opportunity sites were raised as issues during steering committee meetings for the <i>2020 LA River Master Plan</i>. Investment in site cleanup is a policy question best addressed in the <i>2020 LA River Master Plan</i>. The PEIR examines the proposed <i>2020 LA River Master Plan</i>; it is not a policy document. The requested expansion of the County’s activities and priorities under the plan is outside the scope of the PEIR because it would include matters not included in the proposed <i>2020 LA River Master Plan</i>. However, contamination sites such as Brownfield and Superfund sites were reviewed as part of the development of the <i>2020 LA River Master Plan</i>, and these sites were considered for opportunity sites. Information and analysis regarding Brownfield and Superfund sites are included in the <i>2020 LA River Master Plan</i>. Refer to Chapter 7, <i>Sites</i>, in the main volume including the Industrial Land Contamination subsection, and Chapter 13, <i>Funding Sources</i>, and streams for cleanup and redevelopment. For additional information regarding contamination sites, the <i>2020 LA River Master Plan</i> was revised to include additional discussion regarding critical facilities (toxic sites and hazardous sites) and a new chapter was added in the <i>2020 LA River Master Plan</i> technical appendix, Chapter 7, <i>Cleanup of Contaminated Sites</i>. No changes to the Draft PEIR are needed.</p>

Comment #	Comment	Response
A16-7	<p>Aesthetics</p> <p>Public perception toward the LA River has greatly shifted, a primary factor being the river aesthetic that has been protected and allowed to thrive. Water is the source of all life, which is especially true for the wildlife and habitat that is found in the river; the existing vegetation is a byproduct of a flowing stream with intermittent flows and depths. The PEIR is expected to describe the existing visual character of the proposed Project study area and surrounding areas, and will identify key visual resources and scenic views. Very few naturalized areas in the LA River where habitat has thrived remain. These areas should be prioritized for preservation and include the Sepulveda Basin, Griffith Park, and the Glendale Narrows. The probable impacts of the Project should not include adverse effects on key visual resources and scenic vistas. Although one of the primary functions of the Flood Control District is to maintain flood capacity, it is our hope and expectation that many of the existing characteristics will not be compromised for flood control purposes, but rather will be preserved and enhanced to further create a thriving, riparian ecosystem. The mission of the Flood Control District has since been expanded to include maximum environmental and ecological benefits, as well as recreation - all of which contribute to river aesthetics.</p>	<p>The comment offers opinions regarding aesthetics within the study corridor. Please refer to Section 3.1.3, <i>Impact Analysis</i>, of the Draft PEIR for a summary of aesthetics impacts, including a description of the existing visual character, key visual resources, and scenic views. Section 3.2.3 also addresses the impacts and mitigation measures associated with the proposed Project. Project components like KOP Category 2 would provide additional recreational uses that would benefit the surrounding communities in addition to improved flood management. According to the PEIR, scenic vistas within the study area are limited in nature, with the viewshed largely consisting of an urban hardscape with limited scenic resources. Where scenic vistas are available, views encompass larger scenic visual elements and/or panoramic views of the Pacific Ocean, ridgelines, hillsides, or large open park and greenspace areas that encapsulate a large viewscape viewed from multiple vantage points. However, once constructed, above-ground structures, if located in an area encompassing a scenic vista, could result in substantial adverse effects on a scenic vista or obscure a panoramic view. Because the size, extent, and specific location of subsequent projects are not proposed, it is possible that some components of the proposed Project, including above-ground structures related to KOP Category 6, could substantially block or obstruct scenic vistas such as views of the ocean, ridgelines, and open space areas and impacts could be significant and unavoidable even with mitigation implemented (Mitigation Measure AES-2, Minimize Obstruction of Scenic Vistas). Furthermore, the <i>2020 LA River Master Plan</i> objectives seek to protect and conserve areas with natural resources and significant ecological areas. The Design Guidelines provide for the design and installation of planting along the LA River and provide guidance for planting setbacks and buffers, planting along levees and floodwalls, and channel modifications, among other aspects related to the creation of habitats and functioning ecosystems. No changes to the Draft PEIR are needed.</p>

Comment #	Comment	Response
A16-8	<p>Biological Resources</p> <p>A rich riparian ecosystem has been flourishing in the river even after its channelization. To this day, wildlife is found not only in the LA River, but also on the riverbanks and adjacent areas— areas within the 2-mile-wide PEIR study area. There are an abundance of biological resources in river corridor, both aquatic and non-aquatic invertebrates, endangered species, such as the Least Bell’s Vireo, the red- legged frog, and more than 20 species of birds. Additionally, the river is a significant stop along the Pacific flyaway being essential for migratory birds. In order to best evaluate the impacts of the Project, all of the following should be taken into consideration and assessed in the PEIR, along with appropriate consultation with the U.S. Fish and Wildlife Service as well as the California Department of Fish and Wildlife. When considering biological resources in the PEIR, the Project should prioritize for the preservation of the unique soft bottom areas where the river contains a plethora of environmental biological resources— in the Sepulveda Basin, Griffith Park, and the Glendale Narrows, where biological monitoring should be required to take place and mitigate any potential impacts by the Project.</p>	<p>The Draft PEIR includes Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys, which requires that a qualified biologist conduct a literature review, habitat assessment, and project surveys, as required based on biological conditions at the study site. Based on the results of this initial step, further studies may be required to comply with all federal and State laws related to biological resources. These are outlined in the additional mitigation measures, such as Mitigation Measure BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements. This measure requires consultation with the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife when appropriate.</p> <p>Biological monitoring (Mitigation Measure BIO-6, Conduct Biological Monitoring During Construction) is required in sensitive areas or adjacent to special-status plants, special-status wildlife, aquatic resources, sensitive habitat, and protected trees. No changes to the Draft PEIR are needed.</p>
A16-9	<p>Additionally, while achieving the required flood capacity, should the PEIR be sufficient to allow for channel modifications, such as those proposed in the City of Los Angeles Fish Passage Study led by Stillwater Sciences and funded by the Wildlife Conservation Board, endemic and native endangered fish could be reintroduced which would be an obvious impediment to biological enhancement.</p>	<p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR evaluated the biological resources at a programmatic level (please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR) and included mitigation requiring future analyses, permitting, and monitoring as projects are identified by the individual jurisdictions. Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys, would be implemented to begin the process of determining whether or not the proposed individual subsequent project would have a significant environmental impact on biological resources. During the design of individual subsequent projects and prior to construction, the implementing agency will employ a qualified biologist to review the proposed subsequent project. The qualified biologist will conduct a site-specific</p>

Comment #	Comment	Response
		literature review, which will consider, at a minimum, the proposed subsequent project, site location, geographic information system (GIS) information, and known sensitive biological resources. No changes to the Draft PEIR are needed.
A16-10	Under one of the Project’s kit of parts categories which discusses infrastructure and urban river design typologies, ‘Category 3: Crossings and Platforms’, the PEIR should analyze and include potential impacts that will have consequential results that could be indefinite. Specifically, as the Project it relates to ‘platforms’ as a design component, implementation platforms over the River raise concerns the Conservancy because of the complete and total lack of re-establishing a natural connection to the River they impose. While platforms could physically re-unite communities that have long been separated by mono-functional gray infrastructure, they would also come with great financial cost and long-term consequences to River restoration.	<p>The comment relates to the content of the <i>2020 LA River Master Plan</i> and its inclusion of platforms over the river. The potential impacts of platforms have been analyzed to the extent feasible, absent actual designs, in the Section 3.3.3.3 of the Draft PEIR. This includes KOP elements, beginning on page 3.3-138 of the Draft PEIR. According to the PEIR, the crossings and platforms of several KOP categories could provide beneficial effects by providing connections between large habitat blocks for flora and fauna. However, indirect impacts during operations could occur, for example, due to shading from the platforms in occupied habitat. If areas are intended to function as habitat corridors, design would be important for preventing unintended deleterious consequences to special-status species. As stated in the Draft PEIR, impacts would be less than significant with mitigation incorporated when carried out by the County and significant and unavoidable for later activities when not carried out by the County.</p> <p>Because the PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). No changes to the Draft PEIR are needed.</p>
A16-11	We note in the platform Technical Appendix section illustrations, the potential to be completely disconnected from the surrounding neighborhoods and River, as they are found to be up to 18’ higher than the surrounding areas. It would greatly benefit the Plan to establish parameters and criteria for the platformed spaces that include maximum width and length recommendations. There are contemporary local examples of bridges that provide connectivity for both people and wildlife, such as the recently completed Park to Playa Mark Ridley-	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR.

Comment #	Comment	Response
	Thomas Bridge and the future Liberty Canyon 101-Freeway Wildlife Bridge that do not need large footprints to offer significant benefits.	This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
A16-12	Projects that seek to encourage wildlife movement, from fish passage to quadrupedal migration, could become threatened by new barriers that large decking over the River may bring which will hinder and create the absence of light needed for habitat and wildlife to thrive. Additionally, platforms would not allow for in channel public use for recreation. Aesthetically speaking, a platform sends the message to communities that the River is an eye-sore to cover up, when we should be looking more towards it and investing in the contents of the River as well as the spaces surrounding it. We support re-connecting communities through bridges, crossings and utilizing the River itself as a connector that enables it to be a multi-functional space.	<p>This is a comment on the <i>2020 LA River Master Plan</i> and its inclusion of platforms on the river. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>The Draft PEIR has been revised to expand upon wildlife movement discussion. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
A16-13	Furthermore, criteria to demonstrate the superior need for platformed spaces should be developed that includes identification of trade-offs, habitat capabilities, systems required, comparison of operation and maintenance needs vs typical on-land, and a cost analysis compared against acquisition of nearby River sites, amongst others. Other considerations by the PEIR should analyze the extent of habitat that a platform would be able to support according to structural integrity, potential soil depths on a platform, tree weight and tree canopy capacity, as well as an analysis which determines the habitat a platform would structurally be able to support.	The purpose of the PEIR is to examine the potential significant environmental effects of the proposed Project. It is not intended to re-write the proposed Project by including new criteria for platformed spaces. The requested level of additional detail for PEIR analysis is not feasible because no specific platform designs are being proposed. Because the PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements). No changes to the Draft PEIR are needed
A16-14	The Conservancy's role is limited to the Upper LA River, where there are many opportunities for connections to large regional open spaces and habitat corridors. However, in areas with fewer opportunities for open space, the viability for platforms may be the best option. Where platforms over the River are considered necessary and supported by surrounding communities, as we understand is the case in the Lower LA River outside of Conservancy jurisdiction, a scaled down version of a platform	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR.

Comment #	Comment	Response
	with uses that maximize public use could be deemed appropriate, whereas any private development, housing and parking are not appropriate uses for platforms.	This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
A16-15	<p>Hydrology/Water Quality</p> <p>While the PEIR seeks to analyze the differences between the existing and future conditions with respect to Hydrology and Water Quality in the river, all impacts of the Project relating to hydrology and water should be better accounted for in the PEIR. There is a current study underway by the State Water Resources Control Board (State Water Board) which seeks to analyze river flows; the effects of altered flows on habitat, wildlife and recreational resources. Not only do the hydrological conditions and flows affect habitat and wildlife, but also the river’s water quality. Due to historic ground water contamination, water quality in the river is actively monitored; water treatment takes place in the San Fernando Valley, and treated water from waste water treatment/reclamation plants is discharged into the river— contributing to the necessary dilution that makes the river habitable for wildlife and useable for recreational activities. Realizing the importance of water and water quality in the river, the Conservancy contributed to the development of the study.</p>	<p>The hydrology and water quality analysis qualitatively evaluates the construction and operations impacts of the proposed Project on hydrology and water quality based on literature review of conditions within and adjacent to the project area. The impacts were assessed on a programmatic level based on the relevant regulatory framework. Additionally, the Draft PEIR contains Mitigation Measure HYDRO-1a, Require Site-Specific Drainage Studies to Address Stormwater Management. This mitigation requires the implementing agency to prepare a Drainage Report for the appropriate implementing agency review and approval prior to issuance of a grading, building, site development, or any construction permits. Mitigation Measure HYDRO-1b, Require Stormwater Control Measures, will identify site-specific drainage facilities necessary to avoid flows exceeding the existing system during construction and implement the necessary flood-reduction strategies and capacity improvements. No changes to the Draft PEIR are needed.</p>
A16-16	<p>The PEIR analysis currently does not, and therefore should also consider the State Water Board study and analyze water quality, pollutant sources and concentration of pollutants, the effects of altered hydrology and the impact on habitat, wildlife and human/recreational uses, while making the connection to the Federal Clean Water Act and upholding these standards while working to achieve water quality standards beyond existing compliance standards. Hydrological changes in the impervious surfaces, application of stormwater infrastructure, and discharges, affecting sensitive habitats such as the estuary should also be considered within the Project. In order to meet hydrological needs throughout the study area, the PEIR should look beyond the river, and into the tributaries, specifically in the upper LA River watershed so as to not overwhelm the study</p>	<p>The commenter suggests including a study conducted by the State Water Board. As the commenter previously indicated, the study is currently in progress. Additionally, the specific study is not referenced, and the County is not able to identify which study is being referenced.</p> <p>However, Draft PEIR shows that, with implementation of stormwater best management practices during construction and operation and compliance with the County’s MS4 Permit and other local water quality requirements described in the Draft PEIR analysis, degradation of water quality, including beneficial uses of waterbodies, would be minimized. As described under Impact 3.9(e), the proposed Project would not conflict with or obstruct implementation of a water quality control plan. The</p>

Comment #	Comment	Response
	<p>area, and seek opportunities to incorporate existing underutilized infrastructure to accommodate for flooding and water storage needs. The ULART plan references such areas that would reduce stress on the LA River and disperse water while slowing down water flow and offering hydrological solutions to our region’s needs.</p>	<p><i>Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties</i> (Basin Plan) specifies the beneficial uses that apply to waterbodies in the basin. Please refer to Table 3.9-1 in Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR for a summary of the beneficial uses of waterbodies with the potential to be affected by the project—including wildlife, wetland, estuarine, and marine habitat and water contact and non-contact recreation.</p> <p>Impact discussions for Frame 1 include the LA River Estuary as well as specific water quality requirements, such as the City of Long Beach MS4.</p> <p>The proposed Project includes a 2-mile-wide study area around the LA River channel, which includes tributaries to the channel. The project study area also considers three main groundwater basins: the West Coast Basin within the Coastal Plain of Los Angeles (West Coast Basin), the Central Basin within the Coastal Plain of Los Angeles (Central Basin), and the San Fernando Valley Basin.</p> <p>As described under Impact 3.9(c), Frames 5 through 9 in the Upper LA River do not meet existing design standards for flood conveyance capacity. With implementation of Mitigation Measures HYDRO-1a, Require Site-Specific Drainage Studies to Address Stormwater Management, and HYDRO-1b, Require Stormwater Control Measures, the project would not result in an exceedance of drainage system capacities because it would not impede or redirect flood flows and would minimize exposing people or structures to a significant risk involving flooding. No changes to the Draft PEIR are needed.</p>

Comment #	Comment	Response
A16-17	<p>Tribal Cultural Resources</p> <p>Due to the historic nature of the River and project area, additional work pertaining to tribal cultural resources should be given more significance. Additional and substantive consultation with tribes that are indigenous to the area as well as those that associate to the project area should be further consulted and integrated into design regarding specific planned improvements, particularly those that suggest new and additional infrastructure which would further disrupt the river and surrounding natural lands to determine what is appropriate.</p>	<p>Please refer to Section 3.17.3.1, <i>Methods</i>, of the Draft PEIR for a summary of the process by which the County consulted with Native American tribes as required by Assembly Bill (AB) 52. Also refer to <i>2020 LA River Master Plan Objective 7: Foster Opportunities for Continued Community Engagement, Development, and Education; Action 7.2.6: Consult with Local Native American Tribal Governments and Work with Native American Communities; and Action 7.3: Engage the Indigenous Peoples of the Region</i>. No changes are needed to the Draft PEIR. Implementing agencies and others tiering from the PEIR will be subject to the subsequent CEQA compliance requirements of State CEQA Guidelines Section 15162. As further projects are proposed under the <i>2020 LA River Master Plan</i>, additional consultations will occur when the further project requires a subsequent CEQA document. However, some future subsequent projects may not require additional CEQA review as these projects may be exempt from CEQA, and tribal consultation and compliance with AB 52 may not be required. For subsequent project activities, site-specific CEQA compliance under State CEQA Guidelines Section 15060 for preliminary review of projects by a lead agency and State CEQA Guidelines Section 15378 for the definition of a “project” subject to CEQA review would be the responsibility of the implementing agency prior to proposed project implementation, including any associated tribal consultation that would be required for compliance with CEQA and AB 52.</p> <p>No changes to the Draft PEIR are needed.</p>
A16-18	<p>Furthermore, the Plan should acknowledge that there are Indigenous tribes that are not Federally recognized, but still exist as they are actively involved in the leadership of their communities and should equally benefit from participating in the revitalization of the LA River.</p>	<p>Consultation under AB 52 involves “California Native American tribes.” This includes non-federally recognized tribes. No changes to the Draft PEIR are needed.</p>

Comment #	Comment	Response
A16-19	<p>Wildfire</p> <p>The PEIR should not only identify and address potential wildfire impacts that may result from implementation of the 2020 LA River Master Plan but should also develop suggested fire prevention and mitigation strategies. The PEIR does identify Fire Hazard Severity Zones (FHSZs), where solutions to fire prevention should be thoroughly assessed and recommended based on urban interface risks. Furthermore, additional coordination with the conservancy should be required given the conservancy’s role in the state Regional Forest Fire Capacity program, where joint wildfire prevention practices are being developed and implemented which could be applicable to designated FHSZ areas within the project area which have already been identified.</p>	<p>The Draft PEIR addresses wildfire impacts and includes mitigation. Specifically, Mitigation Measure WF-3, Prepare a Fire Protection Plan, addresses the commenter’s concern. The Draft PEIR has been revised to include consultation with the affected jurisdictions, including applicable regulatory and resource agencies. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
A16-20	<p>Recreation</p> <p>Since the River was designated a navigable waterway, recreation in channel has become a popular passive activity that has expanded usage of the River to the public. Improvements and concepts as described in the 2020 LA River Master Plan should enhance recreational access and opportunities, rather than hinder and reduce the existing recreation available to the public. The project does not currently go far enough to plan for increased recreational usage and limits the public to the riverbanks rather than expanding usage within the channel. The PEIR analyzes data pertaining to parks along the project area, including location, acreage, and amenities offered, as well as park provisions such as park acreage per 1,000 Residents versus the adopted standards. However, still lacking in the project is the direct access or lack thereof to the river from the parks identified, an identification of barriers, and solutions to create riparian connectivity. Furthermore, the PEIR undergoes little to no analysis of the existing recreational activities and amenities, both of which may inform project opportunities.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>The PEIR analyzes the <i>2020 LA River Master Plan</i> and its potential to impact the environment, not existing recreational activities and amenities and how this analysis can inform project opportunities. Please refer to Section 3.15.2, <i>Setting</i>, of the Draft PEIR for a description of existing activities and amenities on a regional level and by frame. No changes to the Draft PEIR are needed.</p>

Comment #	Comment	Response
A16-21	<p>Public Services</p> <p>Most of the public services identified in the PEIR relate to municipal police departments. Alternatively, a comprehensive strategy for public services derived from a state mandated plan was developed in 2019 in partnership with local jurisdictions, the County and river adjacent communities which serves as a framework and blueprint for existing and needed public services in the project area. Input and meetings contributed to this substantive plan, the Los Angeles River Ranger Establishment Plan which goes beyond policing and provides recreational, social, educational, interpretive, and public safety services to neighbors and visitors of the project area and beyond. The PEIR defers project responsibility to local police departments, when historically, communities have requested less policing and likewise, local police departments have refused to assume the river as part of their responsibility. Being that the project is a public amenity and natural resource, management and providing public safety would be better and more appropriately served by a Ranger, which is a designated role for open space, parks, habitat protection and public safety. The project should defer and seek to fund an already locally recognized plan, such as the LA River Ranger Plan which developed criteria and cadence for services that should be provided throughout the project area.</p>	<p>CEQA requires an EIR to examine and disclose whether a proposed project would result in a physical change that would result from the extension of public services to the project. This does not extend to the availability or funding of services. (<i>City of Hayward v. Board of Trustees of the California State University</i> (2015) 242 Cal.App.4th 833).</p> <p>The PEIR examines whether the <i>2020 LA River Master Plan</i> would result in any new impacts as a result of the deterioration of or need for new physical infrastructure. This is consistent with CEQA's requirements.</p> <p>Additionally, as described in the <i>2020 LA River Master Plan</i>, the Los Angeles River Ranger Program Establishment Plan (2019) was prepared in response to AB 1558 and is led by the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy and the Santa Monica Mountains Conservancy. The plan develops a program for a network of river rangers along the LA River, with a mission to foster connections between communities, agencies, and resources to promote safe, equitable usage and stewardship of the LA River and its tributaries as an activated greenway that supports ecological, social, and recreation opportunities. As river-related projects are prepared, additional staff may be needed to supplement specific needs, and the River Ranger Program is one of the types of programs to help meet those needs. The County was involved in earlier planning phases of the River Ranger Program to develop the framework as part of the steering committee and as a stakeholder, and it is now a member of the Los Angeles River Ranger Advisory Committee. No changes to the Draft PEIR are needed.</p>
A16-22	<p>Compatibility with State Investment</p> <p>Since its inception, the Conservancy has invested in the LA River watershed to address the region's environmental needs. Through the California Resources Agency, the Conservancy in conjunction with the RMC jointly developed the Watershed and Open Space Plan for the San Gabriel and Los Angeles Rivers,</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at</p>

Comment #	Comment	Response
	<p>Common Ground. The plan sets forth principles for future open space, water resources, and habitat projects, to advance restoration of the watershed, and also aims to extend the discussion of restoring balance between human and natural systems from beyond the rivers to the entire watershed.</p> <p>Projects currently underway that are aligned with previous river plans are those such as the Bowtie and G2 parcels at Taylor Yard, which have a commitment from the State of California and City of Los Angeles totaling more than \$100 million dollars in public spending to acquire 100-acres of public open space at Taylor Yard for the purposes of habitat restoration, open space and public access to the river. The ULART plan, as recognized by the State Public Resources code, section 33220 is also an example of state investment in the upper LA River watershed which has elevated the principles of Common Ground to tangible opportunities that are optimal for implementation throughout the PEIR study area and beyond. The Project too should seek to provide compatibility with State investments and uses, while being on par to support fruition of the regional open space improvements in planning.</p>	<p>full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

2.3.2.17 Comment Letter A17: City of Torrance Transit Department, March 16, 2021

Comment#	Comment Text	Response
A17-1	My name is Daniel Lim and I work for Torrance Transit. I am wondering if you can provide GIS data/shapefiles related to the LA River Master Plan because we would like to find out whether or not some of our transit routes are within a half-mile of the corridor. If so, then we may be able to serve riders that seek to access the bike/walking trails by the river. Please let me know if you have any questions.	The County appreciates the City of Torrance Transit Department for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project. This comment is acknowledged. The County responded to this email on March 17 and provided a link to the geographic information system files.

2.3.2.18 Comment Letter A18: City of Los Angeles Department of Public Works, Bureau of Engineering, May 19, 2021

Comment#	Comment Text	Response
A18-1	The PEIR should make sure to include in its analysis the findings from the Los Angeles River Environmental Flows Study developed by the Southern California Coastal Water Research Project in 2021.	<p>The County appreciates the City of Los Angeles Bureau of Engineering for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Thank you for providing the new study that was published since the Draft PEIR was circulated. The County was able to locate a January 12, 2021 progress report for the Los Angeles River Environmental Flows Project and outreach material. As described in the Draft PEIR in Section 3.9, <i>Hydrology and Water Quality</i>, the analysis qualitatively evaluates the construction and operations impacts of the proposed Project on hydrology and water quality based on literature review of conditions within and adjacent to the project area. The impacts were assessed on a programmatic level based on the relevant regulatory framework.</p> <p>All project elements were analyzed by comparing baseline conditions, as described in Section 3.9.2, <i>Setting</i>, to conditions during construction and/or operations of the proposed Project. The analysis focuses on issues related to surface hydrology, groundwater supply, surface water and groundwater quality, and flood hazards. The key construction-related impacts were identified and evaluated qualitatively based on the physical characteristics of the proposed Project and the magnitude, intensity, location, and duration of activities. The analysis in the Draft PEIR incorporates pertinent and current resources.</p>
A18-2	The PEIR should include the Los Angeles City adopted and congressionally authorized Los Angeles Ecosystem Restoration Project (EIRIEIS certified in 2016) in section 3.0.2.3.	The reference provided in this comment is included in Section 3.3, <i>Biological Resources</i> , of the Draft PEIR. Additionally, the Los Angeles River Ecosystem Restoration Project is included in Table 3.3-13 of the Draft PEIR, <i>Applicable City Community Plans, Master Plans, and Other Regulations for Biological Resources</i> .

Comment#	Comment Text	Response
A18-3	<p>Regarding the County vs Non-County Impact Determination, presumably if an impact can be reduced by the stated mitigation measures, and a jurisdiction or entity other than the County is implementing the proposed Project and chooses to rely on the PEIR for CEQA compliance, they would and should be committing to the responsibility to implement the mitigation measure. Any jurisdiction/entity that follows the same mitigation measures to address the same type of impact would achieve the same reduction in impacts and should have a similar CEQA finding.</p>	<p>This topic is discussed in Section 1.3.1.1, <i>Enforceability of Mitigation Measures</i>, Section 1.3.1.2, <i>PEIR and Later Activities</i>, and Section 1.4.2, <i>Later Activities</i>, of the Draft PEIR.</p> <p>The comment is correct that if a jurisdiction or entity other than the County is implementing a project proposed under the <i>2020 LA River Master Plan</i> and relies on the PEIR for CEQA compliance, it can and should be committing to the responsibility for implementing the mitigation measures identified in the PEIR, pursuant to State CEQA Guidelines Section 15168(c). The County would commit to the mitigation proposed in the PEIR, if approved as recommended, and the County believes that other entities that propose projects under the master plan and PEIR similarly can and should adopt the proposed mitigation. However, the County cannot enforce or guarantee that the mitigation measures in the PEIR will be implemented by the other agencies, which is why the County provided two separate impact conclusions: County and non-county. However, if the mitigation measures identified in the Draft PEIR are adopted by another agency for impacts that are considered less than significant after the mitigation is implemented for County-led projects, then the impact would be reduced to less than significant, for the projects not carried out by the County, for the same reasons as discussed for later activities carried out by the County.</p> <p>Other agencies may use the PEIR as the basis upon which to tier future CEQA compliance. In those situations, as provided in State CEQA Guidelines Section 15168(c), the other agencies could rely upon and implement the mitigation measures identified in the PEIR. However, the County cannot require other agencies to implement the mitigation identified in the PEIR.</p>

Comment#	Comment Text	Response
A18-4	The Executive Summary references channelization beginning in the late 19th century, but there are no references provided to document this, and further in the document it states that channelization began in the 1900's. Please clarify and provide references in the PEIR.	The Draft PEIR has been revised to clarify that channelization began in the 1900s and references have been added to the Executive Summary. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i> .
A18-5	The icons for Rio de Los Angeles State Park and Sepulveda Basin are in the wrong location in the Executive Summary frame slides.	Please note that there are no frame slides or references to these resources in the Executive Summary of the Draft PEIR. However, regarding Figure 2-10 and Figure 2-13 in Chapter 2, <i>Project Description</i> , there are multiple parcels for Rio de Los Angeles State Park and Sepulveda Basin and the icon location is placed approximately over their designated locations. No change to the PEIR is necessary.
A18-6	Figures 3.3-7, 3.3-9 and 3.3-11 fail to include existing native vegetation communities within the channel and adjacent to the channel in areas such as the Glendale Narrows and the Valley.	Individual subsequent projects will be required to field-verify existing vegetation communities as part of the subsequent CEQA review (Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys). Existing native vegetation communities will be mapped at that time as stated in Mitigation Measure BIO-1 , which has been revised to add additional details regarding literature review and the determination for presence/absence of rare plants. No other change to the PEIR is necessary.
A18-7	The document should identify and analyze the potential impacts from the construction of the Kit of Parts (KOP) 1-6 separately on existing beneficial uses of the LA River to aid in prioritization of future project implementation.	As noted in the Draft PEIR, specific location (in-channel or off-channel), configuration, and design for KOP Categories 1 through 6 have not been determined. However, construction activities such as grading, excavating, site clearing, and associated temporary water quality impacts would be similar for KOP Categories 1 through 6. During construction activities, best management practices would be implemented to minimize impacts on water quality and for the protection of existing beneficial uses of water, which are summarized in Table 3.9-1 in Section 3.9, <i>Hydrology and Water Quality</i> , of the Draft PEIR. Also refer to Impact 3.9(a) (Would the proposed Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater

Comment#	Comment Text	Response
		<p>quality?) and Impact 3.9(e) (Would the proposed Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?) for the CEQA analysis of KOP Categories 1 through 6. Furthermore, the analysis of KOP Categories 1 through 6 on existing beneficial use to aid in prioritizing future project implementation is not required of CEQA. Additionally, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The PEIR is a programmatic document and does not include project-specific or site-specific analysis. Because the PEIR does not examine specific projects, the County anticipates that many future specific projects would require subsequent CEQA compliance.</p>

2.3.2.19 Comment Letter O1: Studio City Neighborhood Council Transportation Committee, February 8, 2021

Comment#	Comment Text	Response
O1-1	45 days is just not enough time for our Studio City Neighborhood Council to adequately address our comments to the massive Draft PEIR with our monthly rotation of committee and Board meetings. Can we have 90 days total?	<p>The County appreciates the Studio City Neighborhood Council for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR). In response to this comment and others initially received, on March 4, 2021, the review period was extended to April 2, 2021 (60 days). The review period was then extended a second time to May 13, 2021, to provide additional review time to all interested parties. In total, the review period was open from February 1, 2021, to May 13, 2021, for 101 days, which is more than twice the 45-day minimum required by CEQA (State CEQA Guidelines Section 15105).</p>

2.3.2.20 Comment Letter O2: East Yard Communities for Environmental Justice, February 10, 2021

Comment#	Comment Text	Response
O2-1	<p>Hello, we have various community members who are reading the LARMP, however we saw that the Program EIR is only available in English and cannot find a Spanish translation of the PEIR. We have community members requesting to read the PEIR and submit comments but are unable to because there are monolingual spanish. Could you please send a spanish translation of the PEIR?</p>	<p>The County appreciates the East Yard Communities for Environmental Justice (EYCEJ) for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>The County was unable to accommodate translation of the <i>2020 LA River Master Plan</i> Draft PEIR during the comment period; however, notices for the Draft PEIR, including the Notice of Availability and flyers announcing the March 3, 2021 Draft PEIR public meeting, were provided in Spanish and published in the following Spanish newspapers in Los Angeles County serving the project area:</p> <ul style="list-style-type: none"> • <i>La Opinión</i> • <i>Excélsior</i> • <i>LA Times en Español (Hoy Los Angeles)</i> <p>Spanish translations were available during the July 29, 2020 scoping meeting and March 3, 2021 Draft PEIR public meeting. Spanish translations for both meeting presentations were also made available online at pw.lacounty.gov/go/larmpceqa for the meetings and are still available to the public. In addition, a Spanish translation of the Draft <i>2020 LA River Master Plan</i> was available for public review.</p>

2.3.2.21 Comment Letter O3: art HYPE, March 7, 2021

Comment#	Comment Text	Response
O-3-1	We hope the city note than fairly compensates any displaced people or homes, and plants as many trees as possible in the bee green spaces.	<p>The County thanks ArthYPE for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>The commenter requests that any displacement of homes or homeless people resulting from implementation of the <i>2020 LA River Master Plan</i> is compensated. It should be noted that although the commenter refers to the “city,” the PEIR is a County of Los Angeles document. With respect to displacement of homes, the <i>2020 LA River Master Plan</i> does not include plans to acquire any residential properties. Please refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR for a discussion of how an objective of the <i>2020 LA River Master Plan</i> is to address potential adverse impacts on housing affordability and people experiencing homelessness. Please refer to Master Response MR-1 (Homelessness along the LA River) for additional information regarding homelessness along the LA River and efforts that will be (and are currently) undertaken by the County and cities involving the relocation of transient populations to safer, more sanitary shelters or more permanent residences.</p> <p>With respect to the planting of trees in green spaces, please refer to the design guidelines included in the <i>2020 LA River Master Plan</i>. Additionally, with respect to planting of trees, Section 2.5.2.3, <i>Ecology, Habitat, and Planting</i>, of the Draft PEIR provides a description of the ecology and planting design guidelines found in the <i>2020 LA River Master Plan</i>, which provide guidance for species, planting, and maintenance.</p>

2.3.2.22 Comment Letter O4: Glassell Park Improvement Association, March 15, 2021

Comment#	Comment Text	Response
O4-1	<p>The L.A. River Master Plan has value as a compilation of river-related studies, past plans and completed & proposed projects; but it is merely an overview of what currently exists. It contains no plan.</p> <p>The L.A. River Master Plan includes a huge amount of valuable information about the river and river-adjacent communities that can be used to create a “master plan”, but doesn’t actually provide that plan. Instead, it focusses on “kits” for future, undescribed projects alongside the river while leaving the river itself the same cement-sided, inaccessible trough the Army Corps of Engineers created years ago.</p>	<p>The County appreciates the Glassell Park Improvement Association (GPIA) for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears that the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. However, please refer to Master Response MR-7 (Master Plan Area/PEIR Study Area and Addressing the LA River in a Comprehensive Manner), which discusses the Draft PEIR’s study area and efforts undertaken to ensure that the <i>2020 LA River Master Plan</i> addresses the LA River in a comprehensive fashion.</p>
O4-2	<p>Results of the County’s community outreach show that our river-adjacent communities want one thing above all others: a cohesive, integrated, ecologically sound rehabilitation of our river as natural habitat.</p>	<p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please refer to Master Response MR-5 (Naturalization of the LA River), which discusses the naturalization of the LA River, and Master Response MR-7 (Master Plan Area/PEIR Study Area and Addressing the LA River in a Comprehensive Manner), which discusses efforts to ensure that the river is addressed in a cohesive and comprehensive manner.</p>
O4-3	<p>The Glassell Park Improvement Association, of course, was most interested in the future of projects such as Bowtie State Park, the Paseo del Rio Project and G2/Taylor Yard. Imagine our surprise when a keyword search for "Glassell" yielded only four mentions: 1-Glassell Park on a map of all the river adjacent communities along the river; 2-a historical photo of the Pigeon</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements), which discuss the programmatic nature of the Draft PEIR and the fact that the Draft PEIR analyzes two Typical Projects and six KOP categories. In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of</p>

Comment#	Comment Text	Response
	<p>Ranch along the river; 3-a credit for that photo; and 4-two paragraphs about Taylor Yard/G2 project under "Planned Major Project Spotlight"• . Neither of the two appendices had a single mention of Glassell Park.</p>	<p>implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. As a programmatic document that does not analyze specific projects, the Draft PEIR would neither permit nor exclude the projects listed as being within the <i>2020 LA River Master Plan's</i> study area.</p> <p>Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, "Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase."</p>
<p>04-4</p>	<p>A search for "Bowtie" that we expected would describe the plans for the State Park on that parcel, had five mentions in the Master Plan. Two of the mentions were captions in generic photos, two were the sources for those photos, and one includes only the name, "G1 Bowtie", in a list titled "Project List by Impact" on page 239. In Appendix 1, the only mention of "Bowtie" is in photo captions, and in Appendix 2 there is no mention at all.</p>	<p>This comment regarding the "bowtie" project is acknowledged. In the <i>2020 LA River Master Plan</i>, projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>.</p> <p>Please see the response to comment 04-3.</p>
<p>04-5</p>	<p>Searching for the word "Paseo", as in "Paseo del Rio Project", had "no result" in the Master Plan or either appendix.</p>	<p>This comment regarding the "Paseo del Rio Project" is acknowledged. In the <i>2020 LA River Master Plan</i>, projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>.</p> <p>Please see the response to comment 04-3.</p>
<p>04-6</p>	<p>If a document is to be called a "Master Plan", it should contain a plan. The Draft contains a wealth of information about the river's history and current state. It lists existing and proposed projects along the river. What it doesn't do is provide an actual plan.</p>	<p>Please refer to Master Response MR-7 (Master Plan Area/PEIR Study Area and Addressing the LA River in a Comprehensive Manner), which discusses the 51-mile LA River corridor and efforts undertaken to ensure that the <i>2020 LA River Master Plan</i> addresses the LA River in a comprehensive fashion.</p>

Comment#	Comment Text	Response
		<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No Changes to the Draft PEIR are needed.</p>

2.3.2.23 Comment Letter O5: Los Feliz Neighborhood Council, March 15, 2021

Comment#	Comment Text	Response
O5-1	<p>The Los Feliz Neighborhood Council commends the County of Los Angeles for its dedication to revitalizing the Los Angeles River. The draft LA River Master Plan and the draft Program Environmental Impact Report (EIR) reflect years of thoughtful analysis and community engagement. We are convinced that the LA River can be revitalized so that it serves as an urban oasis for the larger LA community. But we are concerned that the draft Master Plan and accompanying environmental analysis do not go far enough to achieve that goal.</p>	<p>The County appreciates the Los Feliz Neighborhood for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This is an introductory comment that precedes specific comments that follow. No further response is required.</p>
O5-2	<p>Revitalization of the LA River presents an unprecedented opportunity to prioritize critical environmental and social issues at a time when our County so urgently needs to do so. LA County, California, the nation, and the world face a climate crisis of our own making. Record-breaking heatwaves, ever expanding and worsening fire seasons, and increasing weather extremes are just some of the effects we are already experiencing from climate change. In LA County, we are often up against droughts. And many neighborhoods are extremely park poor, lacking open space where kids can play and enjoy nature. Simultaneously, LA faces a homelessness crisis of unequalled scope, and the COVID-19 pandemic has left many residents on the brink of housing insecurity. Our County also suffers from racial and class-based inequities that have long persisted and were laid bare in the past year.</p>	<p>This comment discusses important issues pertaining to the County as a whole, as well as California and the nation. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>However, please refer to Sections 3.7 <i>Greenhouse Gas Emissions</i> and 3.16 <i>Wildfire</i> of the Draft PEIR for discussions on global climate change and wildfires. No changes to the Draft PEIR are needed.</p>
O5-3	<p>There is much the LA River revitalization effort can do to recognize and address these crises. First, the revitalization effort needs to ensure that it reflects the most sustainable and ecologically friendly approach possible. That means developing and implementing projects that minimize greenhouse gas emissions and, in fact, serve as carbon sinks. It also means maximizing rainwater capture and renaturalizing the River to the maximum extent possible to allow water infiltration. And it</p>	<p>It appears that the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
	means prioritizing water quality improvements and committing to open space along, rather than above, the River.	To the extent that the commenter is referring to global climate change or hydrology/water quality, please refer to Sections 3.7 <i>Greenhouse Gas Emissions</i> and 3.9 <i>Hydrology and Water Quality</i> of the Draft PEIR.
05-4	We do not believe that pouring more concrete into or above the River would achieve these goals. Further, the Master Plan could do more to address climate change by better facilitating zero-emission bike transit throughout LA County. In this sense, the LA River is not just a point of leisure, but a resource. The LA River bike path could be expanded to create a bike “freeway” that would connect more communities and allow for safer bike transit.	<p>It appears that the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>To the extent that the commenter is referring to global climate change or zero emission bike transit, please refer to Sections 3.7 <i>Greenhouse Gas Emissions</i> and 3.16 <i>Transportation</i> of the Draft PEIR.</p> <p>One of the objectives of the <i>2020 LA River Master Plan</i> is to connect trails and paths along the length of the river to create a mobility network across Los Angeles County for cyclists, pedestrians, and equestrians and accommodate as many user types as safely as possible. Additionally, please refer to Section 3.16, <i>Transportation</i>, of the Draft PEIR for a discussion of how one of the objectives of the <i>2020 LA River Master Plan</i> is to complete the LA River Trail so that there is a continuous route along the entire river and encourage future routes on both sides of the river, where feasible.</p>
05-5	Further, we urge the County to prioritize equity concerns by ensuring that all communities are heard and are part of the revitalization effort and to do more to address the risk of displacement of communities along the River. A number of creative proposals have been presented to better ensure that the voices of local communities are heard and that these communities are strengthened rather than displaced as a result of the LA River revitalization. We encourage the County to look closely at these proposals and incorporate the most effective	<p>It appears that the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Please also refer to Master Response MR-3 (Public Outreach for Draft PEIR), which discusses the public outreach efforts</p>

Comment#	Comment Text	Response
	<p>ones into the final Plan. In particular, we urge the County to engage with and listen to the voices of indigenous people, whose knowledge of the history of the River and of flood control could result in better revitalization solutions.</p>	<p>undertaken to ensure that all of the communities bisected by (or adjacent to) the LA River are provided an opportunity to provide input.</p>
05-6	<p>With respect to the draft Program EIR, we urge the County to ensure that its environmental analysis thoroughly captures the enormous scope of this Master Plan. We are concerned, for instance, that the scope of analysis which includes an area two miles from the River may not sufficiently address the impacts that communities may feel from the LA River Master Plan.</p>	<p>The scope of the Draft PEIR is consistent with the area identified for <i>the 2020 LA River Master Plan</i>, which includes a 1-mile buffer in each direction. Please refer to Master Response MR-7 (Master Plan Area/PEIR Study Area and Addressing the LA River in a Comprehensive Manner), which discusses the <i>2020 LA River Master Plan</i> study area.</p>
05-7	<p>Further, we are concerned that in combining a Program EIR with subsequent project-level analyses, certain environmental impacts will not be fully analyzed. We therefore urge the County to commit to fully analyzing all potentially significant environmental impacts of each project rather than relying only on the program-level analysis to sidestep critical environmental analyses. For each project, the public must have an opportunity to fully engage with the proposal and draft environmental analysis before the project is finalized.</p>	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements).</p> <p>In addition, because this is a program-level EIR, the analysis presented is conservative in nature. Under State CEQA Guidelines Section 15168, where the later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the PEIR. The <i>2020 LA River Master Plan</i> is a conceptual plan. All future specific projects would be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168.</p>
05-8	<p>Finally, we have heard concerns that the Master Plan and Program EIR process has been confusing to the public and that many people do not find it very accessible. We commend the County for having conducted many stakeholder meetings in the development of its Master Plan. But we urge the County to make the draft Master Plan and Program EIR more accessible to the public through additional public meetings and opportunities for clarification about the purpose of each of the documents that have been released to date.</p>	<p>This comment is acknowledged and was shared with shared with the <i>2020 LA River Master Plan</i> team. Please refer to Master Response MR-3 (Public Outreach for Draft PEIR), which discusses the public outreach efforts that were undertaken to ensure that all of the communities bisected by (or adjacent to) the LA River were provided an opportunity to provide input on the CEQA process and documentation.</p>

2.3.2.24 Comment Letter O6: Atwater Village Neighborhood Council, March 11, 2021

Comment#	Comment Text	Response
O6-1	<p>The Atwater Village Neighborhood Council requests immediate relief for our community members. Our riverfront community is not represented in the County’s 2020 LA River Master Plan.</p> <p>We are requesting an addendum for our segment of the river. (Miles 26-30) In addition, we request a review extension to properly review the corrected version of the 2020 LA River Master Plan draft. We do not take this request lightly. There are egregious errors in the Master Plan. Due to the burdensome amount of corrections that are needed before an assessment can take place, this situation has placed undue hardship on our community members.</p> <p>We have been reviewing the immense 2020 LARMP documents for weeks. Our review has revealed dozens of omissions and errors in the plan. Below are a few highlighted concerns: This is, by far, not the full list of our concerns; it simply reflects many of the larger errors in the plan.</p>	<p>The County appreciates the Atwater Village Neighborhood Council for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Regarding concerns related to errors in the <i>2020 LA River Master Plan</i>, it appears the commenter is raising issues related to the community engagement and the content of the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team. Furthermore, two community engagement meetings were conducted near the Atwater Village community (Friendship Auditorium, 3201 Riverside Drive, Los Angeles, on November 13, 2018; and at the Adult Recreation Center, 201 East Colorado Street, Glendale, on June 12, 2019) to solicit input for the <i>2020 LA River Master Plan</i>.</p> <p>The design information for the <i>2020 LA River Master Plan</i> is at conceptual level; therefore, the PEIR does not include site-specific or design information about the potential impacts of the proposed Project because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. Please see Master Response MR-2 (Program-Level Analysis in the PEIR). For subsequent project activities, site-specific CEQA compliance would be the responsibility of the implementing agency prior to project implementation.</p> <p>With respect to representation of the Atwater Village Neighborhood Council and the request for additional time to review the <i>2020 LA River Master Plan</i> PEIR, please refer to Master Response MR-3 (Public Outreach for the Draft PEIR).</p>

Comment#	Comment Text	Response
06-2	<p>1. Omission: Multiple LA River access points (residential, multifamily, equestrian and multi-use) on the East Bank along our 4 mile border with the river.</p>	<p>The commenter is referencing existing LA River access points that are said to be omitted in the <i>2020 LA River Master Plan</i>. The underlying geographic information system (GIS) information has been updated in the <i>2020 LA River Master Plan</i>. Please refer to the <i>2020 LA River Master Plan</i> for any updated information and mapping of resources based on this new data.</p> <p>As described in Chapter 2, <i>Project Description</i>, of the Draft PEIR, future access points are discussed as components of the Multi-Use Trails and Access Gateways Typical Project and KOP Category 1. Implementation of the Multi-Use Trails and Access Gateways Typical Project and KOP Category 1 would provide new and enhanced access to the LA River and opportunities for recreation and community engagement.</p> <p>In the Draft PEIR, existing access points are discussed in Section 3.15, <i>Recreation</i>, and are shown in Tables 3.15-5, 3.15-8, 3.15-11, 3.15-14, 3.15-17, 3.15-20, 3.15-25, and 3.15-28, which list the access points in Frames 1–6 and 8–9 (there are no access points to the LA River Trail within Frame 7). As discussed in Section 3.15, the environmental analysis is focused on the implementation of new access points and the improvement of current access points. Impact 3.15 (a) addresses the implementation of the <i>2020 LA River Master Plan</i> on existing trails and access points.</p> <p>Additionally, in Section 3.16, <i>Transportation</i>, Figures 3.16-10 through 3.16-12 present the existing river access points, existing and planned trails, and park lands within the study area. As discussed in Section 3.16, Impacts 3.16(c)/(d) addresses the implementation of new or improved access points. Although locations have not been determined, proposed new access points will be required to be designed according to criteria established by the County (as appropriate), including the Trails Manual adopted in 2011, and, where applicable, of the local agency in which they are located. Among the requirements for river access points is that they must be well-lit and provide clear lines of sight.</p>

Comment#	Comment Text	Response
		<p>Additionally, as the County is the lead agency for the proposed Project, the County used Los Angeles County Assessor and Los Angeles County Department of Recreation data for creating maps. This data was compiled at the date of the Notice of Preparation. The programmatic approach to the PEIR takes into account that later activities would have to be assessed for any new or worsened issues associated with any particular site proposed for development.</p> <p>The Draft PEIR identifies that there are numerous access points within the 51-mile-long, 2-mile-wide study corridor. As identified in Chapter 1, <i>Introduction</i>, of the Draft PEIR, the approach to the PEIR is programmatic. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). Furthermore, the level of specificity in the PEIR is consistent with State CEQA Guidelines Section 15146, Degree of Specificity, which states that the EIR for a plan “need not be as detailed as an EIR on the specific construction projects that follow.” As such, the content provided on the PEIR is sufficient at a programmatic level to disclose anticipated impacts of <i>2020 LA River Master Plan</i> implementation and allow meaningful review by decision makers.</p> <p>The commenter does not provide specificity insofar as which access points are being omitted. However, as noted in the preceding paragraph, the analysis included in the Draft PEIR determines if there is the potential for impacts on existing resources in the jurisdictions in the project study area during construction and operation. Impacts on access points are adequately addressed in Section 3.15, <i>Recreation</i>, and 3.16, <i>Transportation</i>, of the Draft PEIR.</p> <p>No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
O6-3	2. Incorrect West Bank access labeling	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR.</p> <p>However, labels in the <i>2020 LA River Master Plan</i> have been reviewed for placement and clarity and have been corrected, where applicable.</p> <p>Also, please see the response to comment O6-2.</p> <p>No changes to the Draft PEIR are needed.</p>
O6-4	3. Inaccuracies to proposed access/sites	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR.</p> <p>As identified in Chapter 1, <i>Introduction</i>, of the Draft PEIR the approach to the PEIR is programmatic. Please see to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements). Furthermore, the level of specificity in the PEIR is consistent with State CEQA Guidelines Section 15146, Degree of Specificity, which states that the EIR for a plan "need not be as detailed as an EIR on the specific construction projects that follow." As such, the content provided in the PEIR is sufficient at a programmatic level to disclose anticipated impacts of <i>2020 LA River Master Plan</i> implementation and allow meaningful review by decision makers.</p> <p>The commenter does not provide specificity insofar as what are the inaccuracies to proposed access/sites. However, as noted in the preceding paragraph, the analysis included in the PEIR determines if there is the potential for impacts on existing resources in the jurisdictions the project study area during construction and operation. Impacts on access points are adequately addressed in Section 3.15, <i>Recreation</i>, and 3.16, <i>Transportation</i>, of the Draft PEIR.</p>

Comment#	Comment Text	Response
		No changes to the Draft PEIR are needed.
06-5	4. Incorrect references to 2007 Los Angeles River Revitalization Master Plan (LARRMP) projects	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR.</p> <p>No changes to the Draft PEIR are needed.</p>
06-6	5. Omission of a known community park on Los Feliz Blvd.	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR.</p> <p>Although not identified by name, the missing park is believed to be Bond Park, which was included in a more recent publicly available parks dataset. This has been updated on the map in the <i>2020 LA River Master Plan</i>. Please refer to the <i>2020 LA River Master Plan</i> for any updated information and mapping of resources based on this new data.</p> <p>Section 3.15, <i>Recreation</i>, of the Draft PEIR identifies parks and recreational resources within the 51-mile-long, 2-mile-wide study corridor. As discussed in Section 3.15.3.1 of the Draft PEIR, the methodology used to evaluate impacts on parks was disclosed as being qualitative. At a program level, the PEIR evaluates the impacts of the <i>2020 LA River Master Plan</i> on existing recreational resources as a result of both the construction and operations.</p> <p>The Draft PEIR identifies that there are numerous parks and recreational facilities within the 51-mile-long, 2-mile-wide study corridor and identifies that there could be impacts on those parks and recreational facilities related to implementation of the <i>2020 LA River Master Plan</i>. As identified in Chapter 1,</p>

Comment#	Comment Text	Response
		<p><i>Introduction</i>, of the Draft PEIR the approach to the PEIR is programmatic. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). Furthermore, the level of specificity in the PEIR is consistent with State CEQA Guidelines Section 15146, Degree of Specificity, which states that the EIR for a plan “need not be as detailed as an EIR on the specific construction projects that follow.” As such, the content provided in the PEIR is sufficient at a programmatic level to disclose anticipated impacts of <i>2020 LA River Master Plan</i> implementation and allow meaningful review by decision makers. The environmental impact analysis and applicable significance conclusions of recreation as a resource topic in the Draft PEIR is not contingent on the specific location or presence of a specific existing park.</p> <p>No changes to the Draft PEIR are needed.</p>
06-7	6. Omission of infrastructure connectivity for river trail along the East Bank	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. The omitted infrastructure connectivity for the river trail along the East Bank was not identified by the commenter.</p> <p>As discussed in Section 3.16, <i>Transportation</i>, existing transportation amenities are compiled by frame in Table 3.16-1, Existing Transportation Amenities by Frame. Additionally, existing and proposed bicycle facilities within the study area are shown on Figures 3.16-1 through 3.16-3, and existing river access points, trails, and park lands are shown on Figures 3.16-10 through 3.16-12.</p> <p>No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
06-8	7. Clear evidence of lack of outreach to proposed residential and residential adjacent sites	<p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR), which discusses the public outreach efforts that were undertaken to ensure that all of the communities bisected by (or adjacent to) the LA River were provided an opportunity to provide input.</p> <p>No changes to the Draft PEIR are needed.</p>
06-9	8. Inconsistent mapping throughout main document and technical volume	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR.</p> <p>However, other comments in this letter do identify clarifications to the <i>2020 LA River Master Plan</i>, and those comments are responded to individually in this comment letter.</p> <p>Additionally, in the Draft PEIR, as the County is the lead agency for the proposed Project, the County used Los Angeles County Assessor and Los Angeles County Department of Recreation data for creating maps. This data was compiled at the date of the Notice of Preparation. The programmatic approach to the PEIR takes into account that later activities would have to be assessed for any new or worsened issues associated with any particular site proposed for development.</p> <p>No changes to the Draft PEIR are needed.</p>
06-10	9. The plan does not address needs of current access points, which have been operational since the late 90- early 2000s	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR.</p> <p>The needs of current access was not identified by the commenter.</p>

Comment#	Comment Text	Response
		<p>As found in the <i>2020 LA River Master Plan Design Guidelines</i>, details regarding potential improvements to access points along the LA River are discussed.</p> <p>The commenter does not provide specificity insofar as which needs are not addressed regarding access points. However, as noted in response to comment O6-4, the analysis included in the PEIR determines if there is the potential for impacts on existing resources in the jurisdictions in the project study area during construction and operation. Impacts on access points are adequately addressed in Sections 3.15, <i>Recreation</i>, and 3.16, <i>Transportation</i>, of the Draft PEIR.</p> <p>No changes to the Draft PEIR are needed.</p>
O6-11	10. Atwater Village Equestrian District not acknowledged: bridle trail (adjacent to multi-use trail), Griffith Park access tunnel and public riding ring.	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR.</p> <p>As the County is the lead agency for the proposed Project, the County used Los Angeles County Assessor and Los Angeles County Department of Recreation data for creating maps. This data was compiled at the date of the Notice of Preparation. The programmatic approach to the PEIR takes into account that later activities would have to be assessed for any new or worsened issues associated with any particular site proposed for development.</p> <p>The Draft PEIR identifies that there are numerous trails and equestrian trails within the 51-mile-long, 2-mile-wide study corridor. As identified in Chapter 1, <i>Introduction</i>, of the Draft PEIR the approach to the PEIR is programmatic. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements). Furthermore, the level of specificity in the PEIR is consistent with State CEQA Guidelines Section 15146, Degree of Specificity, which states that the EIR for a plan "need not be as detailed as an EIR on the specific construction projects that follow." As such,</p>

Comment#	Comment Text	Response
		<p>the content provided on the PEIR is sufficient at a programmatic level to disclose anticipated impacts of <i>2020 LA River Master Plan</i> implementation and allow meaningful review by decision makers.</p> <p>No changes to the Draft PEIR are needed.</p>
06-12	<p>In addition, the CEQA process has been faulted by missing and incorrect information which should have been included by the project team prior to publication. The public “Atwater Village” is providing basic known LA River information, which should have been included from community members who attended multiple community outreach events conducted by the LA River Master Plan team or in the review of past plans.</p>	<p>The County appreciates Atwater Village Neighborhood Council’s comment on the proposed Project. As described in responses to comments O6-2 through O6-11, which refer to requests for additional clarifications made to the <i>2020 LA River Master Plan</i>, the <i>2020 LA River Master Plan</i> has been revised when applicable. However, these clarifications do not affect the impact analyses and conclusions of the Draft PEIR.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for a summary of outreach activities performed by the County. The County took into consideration all public and agency comments received during project development and as comments were provided.</p> <p>These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project. No changes to the Draft PEIR are needed.</p>
06-13	<p>Since Atwater Village's community input and information has been excluded from the current Master Plan, the PEIR's foundational information is also incorrect. Therefore any "not significant" impacts in the PEIR for the 4 miles of Atwater Village in frame 6 are questionable, at best.</p> <p>The following pages point to our Atwater Village specific grievances in the 2020 LA River Master Plan and PEIR.</p>	<p>It appears the commenter is raising an issue related to the community engagement conducted for the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team. Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR), which discusses the public outreach efforts that were undertaken to ensure that all of the communities bisected by (or adjacent to) the LA River are provided an opportunity to provide input.</p> <p>This is an introductory comment to the specific comments that precedes specific comments. No further response is required.</p>

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06-14	<p>Planned projects:</p> <p>We disagree with LA County’s underlying notion for a PEIR, that there are no planned projects in the LA River Master Plan. In the LA River Master Plan main document, on page 334, two new projects Located at Los Feliz Boulevard, this Tier III Gathering Pavilion has left and right bank structures, projects are presented and detailed on pages 334 to 339. These two projects have never been presented to community members.</p>	<p>As discussed on page 322 of the <i>2020 LA River Master Plan</i>, the section the commenter is referencing is intended to provide the reader with possible site-based project examples. These examples are prospective projects reflected in various planning documents in the region that are in various stages of planning; however, they are not projects that are proposed for approval as part of the <i>2020 LA River Master Plan</i>. If these prospective projects were to be proposed for approval, they would still be required to comply with CEQA at a site-specific level. Other considerations for project approval could include community input, funding, engineering design, and other considerations before they could be approved for construction. Therefore, project-level approvals are not a part of the <i>2020 LA River Master Plan</i> approval, and the County’s decision to prepare a program EIR is consistent with this approach.</p> <p>For more information, please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements), which discuss the programmatic nature of the Draft PEIR and the fact that the Draft PEIR analyzes two Typical Projects and six KOP categories but does not intend to and does not analyze any specific prospective projects at a project level. No changes to the Draft PEIR are needed.</p>
06-15	<ul style="list-style-type: none"> • New “planned” project: your documents incorrectly reference the 2007 LARRMP, project number 149 at the site of the Los Feliz Boulevard River Bridge. <p>A “river bridge” is described on page 5-32 of the LARRMP (2007) “Vehicle roadway bridges will continue to serve as a primary means of crossing the River for non-motorized users. As such, they must be retrofitted or expanded to include enhanced bicycle and pedestrian facilities.”</p> <p>➤ Guidelines: as described on page 5-32</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental</p>

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	<ul style="list-style-type: none"> ○ Create safe bike lanes on bridges according to Los Angeles Department of Transportation (LADOT), CALTRANS HDM, California 2006 MUTCD, and 2003 MUTCD standards for bike paths. ○ Construct overlooks and belvederes to view the River. ○ Include lighting below bridges for safe undercrossings. ○ Integrate modifications to avoid impacting the character of historic River Bridges. • The 2020 LARMP proposes a Tier III Gathering Pavilion at the same site of the Los Feliz Bridge, described as follows: "The left bank facility utilizes the existing bridge piers to create a unique user experience over the channel and connects to the Los Feliz bridge while providing shade, amenities, and community space." ○ This project clearly and demonstrably conflicts with the Glendale Narrows Flood section, "Bridges In The Narrows", on page 300, under the subheading, "Los Feliz Blvd", stating that, "this bridge is high priority. See the "High Priority Bridges" section for more details." • Page 302: Bridge Examples, Los Feliz Boulevard, "The 1-D modeling indicates that the bridge deck will be impacted and possibly overtopped during the 4% flood event, although additional analyses may be needed to confirm this. Modeling indicates that better than 1% flood event capacity can be achieved through modifying the bridge to be clear span,..." ○ This project is at one of only three major roadways to cross the LA River, into and through Atwater Village. 	<p>impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River. Please see Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>All future specific projects would be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168. Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance.</p> <p>No changes to the Draft PEIR are needed.</p>
06-16	<ul style="list-style-type: none"> ○ This project proposes to be a gathering spot, yet offers no parking, offers no bike lanes on a major thoroughfare which has no parking, no stopping and no loading zones. 	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Parking is not a CEQA Appendix G topic, and is not discussed within the Draft PEIR in terms of transportation impact</p>

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		conclusions. However, the commenter can find additional information about the topic of parking within the Transportation Impact Assessment (Appendix H) of the Draft PEIR. No changes to the Draft PEIR are needed.
06-17	<ul style="list-style-type: none"> • New, improved access: The right bank pavilion at the I5 Northbound entrance, which consists of multiple structures providing numerous services such as a café and restrooms. (3 buildings) ○ You have to define what an “improvement” is, this is more than an improvement based on the description. It goes beyond what one would assume to be an improvement. 	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the response to comment 06-15.</p> <p>No changes to the Draft PEIR are needed.</p>
06-18	<ul style="list-style-type: none"> • We would summarize this as a S/XS project, due to its scale and impact. ○ River experience: A cafe next to the i5 on ramp is a questionable place to suggest enjoying a coffee or meal by the LA River. 	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the response to comment 06-15.</p> <p>No changes to the Draft PEIR are needed.</p>
06-19	<ul style="list-style-type: none"> ○ See notes above for information on Los Feliz Blvd. as a major roadway and thoroughfare for Atwater Village. 	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>No changes to the Draft PEIR are needed.</p>
06-20	<ul style="list-style-type: none"> • Proposing a 2nd Cafe at this location would take customers from the river adjacent Golf Course Cafe and divert potential river driven business from our local cafes and eateries on Los Feliz Blvd. one of our main business districts. 	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the response to comment 06-15.</p> <p>No changes to the Draft PEIR are needed.</p>

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06-21	<p>Maps:</p> <p>The maps throughout the documents are difficult to read for understanding of the LARMP projects</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the response to comment 06-9.</p> <p>No changes to the Draft PEIR are needed.</p>
06-22	<ul style="list-style-type: none"> • The maps do not clearly show streets. • Project sites are not labeled; ○ This requires a reader to reference multiple pages for street, location and/or project information. ○ “Dislocation” of information, one must have river knowledge to assess maps and projects. 	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the responses to comments 06-9 and 06-15.</p> <p>No changes to the Draft PEIR are needed.</p>
06-23	<ul style="list-style-type: none"> • Inconsistency in maps, the main document map is different from the tech volume connectivity map, which is different from the existing access point ruler mapping (figure 80) all of which are in need of corrections.(see ERRORS AND OMISSIONS: MAPPING/CONNECTIVITY) 	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>However, other comments in this letter do identify clarifications to the <i>2020 LA River Master Plan</i>, and those comments are responded to individually in this comment letter.</p> <p>Additionally, in the Draft PEIR, as the County is the lead agency for the proposed Project, the County used Los Angeles County Assessor and Los Angeles County Department of Recreation data for creating maps. This data was compiled at the date of the Notice of Preparation. The programmatic approach to the PEIR takes into account that later activities would have to be assessed for any new or worsened issues associated with any particular site proposed for development.</p> <p>No changes to the Draft PEIR are needed.</p>

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06-24	<p>Proposed/Planned projects:</p> <p>References to the LARRMP are incorrect, changed or non-existent.</p> <p>(see ERRORS AND OMISSIONS: PROJECT LIST ERRORS)</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the response to comment 06-15.</p> <p>However, other comments in this letter do identify clarifications to the <i>2020 LA River Master Plan</i>, and those comments are responded to individually in this comment letter.</p> <p>Additionally, in the Draft PEIR, as the County is the lead agency for the proposed Project, the County used Los Angeles County Assessor and Los Angeles County Department of Recreation data for creating maps. This data was compiled at the date of the Notice of Preparation. The programmatic approach to the PEIR takes into account that later activities would have to be assessed for any new or worsened issues associated with any particular site proposed for development.</p> <p>No changes to the Draft PEIR are needed.</p>
06-25	<p>Lack of community outreach and input: LARMP Goal #7</p> <p>There has been no opportunity for community members to learn about LARMP proposed projects and locations until this publishing, in 2021. There has been no outreach at proposed sites or adjacent to residential areas. The LARMP as a 25-year plan, fails to acknowledge and address community concerns at residential access sites. Those concerns are typical of “open space” issues which include 24/7/365 access, parking, trash, public safety and noise level increases to name a few. These proposed sites and access improvements include:</p> <p>Tyburn/Ferncroft, Sunnynook River Park & Los Feliz Blvd.</p>	<p>It appears the commenter is raising an issue related to the community engagement conducted for the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team. Furthermore, two community engagement meetings were conducted near the Atwater Village community (Friendship Auditorium, 3201 Riverside Drive, Los Angeles, on November 13, 2018; and at the Adult Recreation Center, 201 East Colorado Street, Glendale, on June 12, 2019) to get input for the <i>2020 LA River Master Plan</i>. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the response to comment 06-15.</p> <p>In addition, please refer to Master Response MR-3 (Public Outreach for the Draft PEIR), which discusses the public outreach efforts that were undertaken to ensure that all of the</p>

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		communities bisected by (or adjacent to) the LA River are provided an opportunity to provide input. No changes to the Draft PEIR are needed.
06-26	Regarding the communitywide goal of connectivity, LA River connectivity is not realized in this 25 year implementation period. There appears to be no proposed projects to connect over the 4 mile of trail of this plan: Colorado Bridge Underpass, Los Feliz Blvd Overpass (or crosswalk), Glendale-Hyperion (G-H) Bridge Underpass or Fletcher Drive Underpass, all of which are called out in the 07 LARRMP.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team. Please see the response to comment 06-15. No changes to the Draft PEIR are needed.
06-27	Missing the community led Atwater Village East Bank Riverway. City of LA planned project, North Atwater Village East Bank Riverway multi-use trail improvement from Doran St. to Los Feliz Blvd. This grant project is supported by the community's work done to connect the trail, Atwater Village East Bank Riverway.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team. Please see the response to comment 06-15. No changes to the Draft PEIR are needed.
06-28	Based on the Master Plan draft, the lack of transparency or community inclusion, we are hard pressed to believe that goal #7 (Foster opportunities for continued community engagement, development, and education) is realistic or honest. (see Atwater Village participation in 2020 LA River Master Plan Processes)	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team. Please see the response to comment 06-15. In addition, please refer to Master Response MR-3 (Public Outreach for the Draft PEIR), which discusses the public outreach efforts that were undertaken to ensure that all of the communities bisected by (or adjacent to) the LA River are provided an opportunity to provide input. No changes to the Draft PEIR are needed.
06-29	Public Safety: Master Plan and PEIR On Pg. 161 Master Plan reads "Community members named SAFETY as THE TOP reason they do not use the LA River." If safety is the top reason why the public is not using the river,	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.

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	<p>then we feel that the Master Plan does not do anything significant to prioritize public safety.</p>	<p>Additionally, as described in the <i>2020 LA River Master Plan</i>, the Los Angeles River Ranger Program Establishment Plan (2019) was prepared in response to Assembly Bill 1558 (AB 1558) and is led by the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy and the Santa Monica Mountains Conservancy. The plan develops a program for a network of river rangers along the LA River, with a mission to foster connections between communities, agencies, and resources to promote safe, equitable usage and stewardship of the LA River and its tributaries as an activated greenway that supports ecological, social, and recreation opportunities. As river-related projects are prepared, additional staff may be needed to supplement specific needs, and the River Ranger Program is one of the types of programs to help meet those needs. The County was involved in earlier planning phases of the River Ranger Program to develop the framework as part of the steering committee and as a stakeholder, and it is now a member of the Los Angeles River Ranger Advisory Committee.</p> <p>No changes to the Draft PEIR are needed.</p>
<p>06-30</p>	<p>From PEIR - Section 3.14 reads "Public services have been actively developing in tandem with growth in the communities and the region." This above statement is simply not correct. Law enforcement agencies have not been "actively developing in tandem with growth." According to LAPD, there is currently no active law enforcement on the LA River itself. In addition, the LA River is not mapped in the 311 system City of LA residential call system; therefore when a resident tries to place a service request, city agencies often are not able to locate the issue (i.e. trash, graffiti, homeless outreach needs, environmental waste, etc.).</p>	<p>This comment is acknowledged. Section 3.14, <i>Public Services</i>, of the Draft PEIR, identifies Mitigation Measure PS-1, Ensure Police and Fire Service Providers Have Adequate Resources, to ensure police and fire service providers have adequate resources to continue to serve the project area within their respective required levels of service and response times once the subsequent project is constructed. Per Mitigation Measure PS-1, during subsequent project design and development, the implementing agency will regularly notify and coordinate with police and fire service providers that have jurisdiction over subsequent project sites on project construction design, activities, and scheduling—including any street or lane closures related to subsequent projects—to ensure police and fire service providers have adequate resources to continue to serve the project area within their respective required levels of service and response times once the subsequent project is constructed. While it is acknowledged that the significance conclusion is still</p>

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		<p>significant and unavoidable even with the implementation of Mitigation Measure PS-1, adherence to Mitigation Measure PS-1 would nevertheless reduce impacts to the greatest extent feasible. With respect to LA River law enforcement, the State of California, in partnership with conservancies and several entities; developed the LA River Rangers Program under AB 1558. The River Rangers is one type of programs that can fulfill the outlined “River Staff” objectives in the <i>2020 LA River Master Plan</i>. No changes to the Draft PEIR are needed.</p>
<p>O6-31</p>	<p>The Master Plan needs to, at the very minimum, prioritize a thorough mapping (with mileage markers and wayfinding signage) on BOTH banks of the river. In addition, we recommend the plan needs to prioritize increased county and city funding for staffing along the river to address public safety, including the placement and upkeep of emergency call boxes along the river.</p> <p>1. LA River Master Plan, Public Draft, Jan 2021, Pg 280 states: “After the completion of the 51-mile river trail along one bank, further efforts to have continuous access along both sides of the river, though important, will take many more decades given the spatial restrictions along the right-of-way.”</p> <p>a. We believe not addressing connectivity on the East Bank in the LA Master Plan now is a serious omission. Atwater Village shares a 4 mile border with the east bank of the LA River and the connectivity both along its length and into and out of the river in our community is of vital importance.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the response to comment O6-15.</p> <p>To the extent that this comment pertains to the CEQA issue of emergency response, please refer to Section 3.8, <i>Hazards and Hazardous Materials</i>, under Impact 3.8(f), which states that the project would implement Design Guidelines that require permanent access for first responders and emergency personnel and vehicles and would not include any characteristics (e.g., permanent road closures, long-term blocking of road access) that would physically impair or otherwise interfere with emergency response or evacuation in the project vicinity. The section concludes that impacts would be less than significant, with no mitigation required.</p> <p>No changes to the Draft PEIR are needed.</p>
<p>O6-32</p>	<p>2. The east bank of the LA River in the community of Atwater Village is highly segmented. Each region is isolated from the other. To pass along the river from one segment to the next a biker or pedestrian would have to either (1) leave the river to the East and enter the neighborhood for as much as a quarter mile to the nearest cross walk, (2) pass under the overpasses on the slopes of the river, or (3) cross a bridge to the west bank and</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the response to comment O6-15.</p> <p>To the extent that this comment may be referring to project access, as described in Chapter 2, <i>Project Description</i>, of the Draft</p>

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	then cross back to the east bank (in Central Atwater the Sunnynook bridge is not designed for bike traffic.)	<p>PEIR, future access points are discussed as components of the Multi-Use Trails and Access Gateways Typical Project and KOP Category 1. Implementation of the Multi-Use Trails and Access Gateways Typical Project and KOP Category 1 would provide new and enhanced access to the LA River and opportunities for recreation and community engagement.</p> <p>No changes to the Draft PEIR are needed.</p>
06-33	3. The Atwater Village, East Bank, riverfront is an anomaly! We have more access points along the East Bank’s unconnected trail than the bike path, regarding your statement “Access points, like the path, tend to be located on one side of the river at a time”.	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the response to comment O6-2.</p> <p>No changes to the Draft PEIR are needed.</p>
06-34	4. The current access points have provided years of service, they should be upgraded for ADA access and public safety, included in the 25 year implementation of this plan. Possibly, including neighborhood gates and regular maintenance. The burden of residential access falls hardest on the connecting streets and first block of residents.	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>As described in Chapter 2, <i>Project Description</i>, of the Draft PEIR, all gateways would include ample lighting for security, Americans with Disabilities Act (ADA) accessibility, and environmental graphics and signage.</p> <p>No changes to the Draft PEIR are needed.</p>
06-35	5. Atwater Village shares a significant relationship to the river and is home to many diverse points of interest for the city such as an equestrian district unique in the city of Los Angeles, various parks and planned developments at the Bowtie Parcel and the water treatment facilities. Connecting these valuable city assets together and to the other significant developments just south of Atwater Village's border at Taylor Yard and 100 Acre Park requires an LA River Master Plan that considers the seamless connectivity along the east bank of the LA River.	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the response to comment O6-15.</p> <p>No changes to the Draft PEIR are needed.</p>

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06-36	<p>6. The current mapping suffers from lack of project explanation and missing information. The only references to the S and XS project are in the Technical Appendix II, and provide a dearth of information, such as the below. More information is needed to effectively evaluate the plan.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the responses to comments 06-2 and 06-14.</p> <p>No changes to the Draft PEIR are needed.</p>
06-37	<p>Noise: PEIR 3.12</p> <p>Atwater Village's community currently experiences excessive noise from Interstate 5 (I5). The PEIR noise study does not represent the current ambient noise in Atwater Village: the LA River bike path, east bank trail or the rail corridor all have planned and proposed sites in the LARMP.</p> <p>Our community is situated between infrastructure on all sides:</p> <p>West: Interstate 5 (LA River)</p> <p>East: Railroad</p> <p>South: 2 Freeway</p> <p>North: 134 Freeway</p> <p>Your study did one short-term measurement, ST8, at the north side of Los Feliz Golf Course, on May 14th, 2020, 2:30 PM for a duration of 20 minutes. On page 3.12-7 you state "ST measurement locations were selected to supplement LT measurements at surrounding land uses". The north corner of the Los Feliz Golf Course is not reflective of our general or sensitive land use areas: residential homes adjacent to the LA River trail, current residential access points or your planned and proposed project sites near sound sensitive areas.</p> <p>This site, ST8 is not reflective of current access points or future planned and proposed, bike path and riverfront projects. We need a baseline, a long-term sound study in Atwater Village</p>	<p>Field measurement ST8 was conducted within the Atwater Village community. The field measurement was conducted on May 14, 2020, and is representative of the ambient noise level in the vicinity of the Los Feliz golf course, which is north of Los Feliz Boulevard. The ambient measurement is representative of the single-family homes to the south of Los Feliz Boulevard, which are considered noise sensitive. This field measurement is considered acoustically equivalent to those homes, as the source-to-receiver geometry is very similar with relatively flat topography and Interstate 5 across the LA River from the homes. While this area is not representative of the entire Atwater Village community, other field measurement locations such as ST7 to the north are included to reflect ambient noise levels at locations that have more noise-intensive uses (such as interstate or state highways). Therefore, the noise measurements prepared during the course of the noise study are reflective of the alignment as a whole and can be considered at locations that have similar noise sources.</p> <p>Additionally, please see Master Response MR-2 (Program-Level Analysis in the PEIR) regarding the programmatic analysis in the Draft PEIR. As the PEIR provides a program-level analysis of the <i>2020 LA River Master Plan</i>, the noise measurements were conducted at a program-level for the Draft PEIR and are sufficient for this level of analysis. A long-term baseline sound study in Atwater Village is not required. Further site-specific noise analysis could be conducted for future projects or subsequent actions, if determined necessary. No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
06-38	<p>On page 3.12-8, Table 3.12-4. Summary of Noise Measurement Results (Short Term)1. The a footnote 1 reads "It should be noted that field measurements were conducted during the time frame when the COVID-19 Stay-at-Home Order (Executive Order N-33-20) was in effect throughout Los Angeles County. Therefore, traffic volumes along local roadways may have been depressed."</p> <p>ST8's date, time and location:</p> <p>(unable to copy table into this cell, see pg 7 of the comment letter)</p> <p>ST8's 64.3 hourly average with an Lmax high value of 73.3 shows our community needs further study:</p> <ul style="list-style-type: none"> • This location is isolated and not reflective of Atwater Village riverfront land uses. • i5 noise not accurately measured: <ul style="list-style-type: none"> o Thursday afternoon o Non-peak travel time of 2:30 PM o Stay at home order in effect • Site not located near any major local roadways in Atwater Village • Atwater Village has southern(?) afternoon/evening breezes (sound was measured with windscreen) 	<p>Please see the response to comment 06-37 with respect to context of the location of field measurement ST8.</p> <p>As discussed, field measurements may have been depressed during the noise study. Therefore, it is possible that ambient noise levels may be higher. As impacts from construction relate to the Atwater Village community, as discussed on pages 3.12-88 through 3.12-90 of the Draft PEIR, based on the ambient noise levels measured at field measurement location ST8, noise would exceed the ambient noise level by 20 decibels (dB) based on the on the construction calculations, which would result in project impacts from construction being potentially significant without mitigation incorporated. Mitigation Measure NOI-3, Require Noise-Reducing Practices Be Incorporated into Construction Activities, was included to reduce construction noise to the greatest extent practicable. If the field measurement was conducted close to a major arterial such as Los Feliz Boulevard, noise levels would have been considerably higher. As such, the field measurement taken was considered conservative and more representative of the homes within the community. Additionally, peak travel hours (i.e., when the most traffic is accessing facilities such as Interstate 5) are not necessarily the loudest noise hours, as generally the traffic volumes are such that speeds are greatly reduced due to congestion. Therefore, it is preferable to conduct field measurements during non-peak times when traffic volumes are free flowing in both directions to capture higher ambient noise levels.</p> <p>As impacts from operations relate to the Atwater Village community, as discussed on pages 3.12-105 through 3.12-106 of the Draft PEIR, noise levels from the Common Elements Typical Projects proposed by the <i>2020 LA River Master Plan</i> were predicted to be no more than 53 A-weighted decibels (dBA) 1-hour equivalent noise level (L_{eq}) at a distance of 50 feet. The ambient daytime noise level at field measurement location ST8 was 64 dBA 1-hour L_{eq}, which suggests that the predicted noise level from the Project would be 9 dB below the ambient level, indicating noise levels from the Project would not be discernable</p>

Comment#	Comment Text	Response
		<p>above the ambient noise environment. However, the Draft PEIR discusses that “noise from [heating, ventilating, and air conditioning] systems could affect nearby noise-sensitive receptors within the City of Los Angeles. Based on the uncertainty of the location of the Common Elements Typical Project, the implementing party would incorporate the mitigation measure below to make sure that impacts would be less than significant.”</p> <p>Mitigation Measure NOI-4, Prepare Focused Noise Study and Implement Findings to Reduce HVAC Noise, was included in order to ensure that noise levels would not negatively affect surrounding land uses by requiring a focused noise study to reduce noise to 50 dBA at the closest noise-sensitive receptor, including by using housings or shielding stationary noise sources.</p> <p>The use of a windscreen is common practice and is required to avoid artificial noise associated with wind causing vibration of the microphone diaphragm with the sound level meter equipment. No changes to the Draft PEIR are needed.</p>
06-39	<ul style="list-style-type: none"> • The LARMP (and this study) omits miles of riverfront homes and residential access points <ul style="list-style-type: none"> o Dover Street to Glendale Blvd o Glendale Blvd to Silver Lake Blvd 	<p>As discussed on pages 3.12-6 and 3.12-7 of the Draft PEIR, “In order to quantify the existing ambient noise conditions throughout the project area, noise monitoring was conducted at 29 locations in the vicinity and along the LA River on May 13 through May 15, 2020, and June 10, 2020. Long-term (LT) noise monitoring was conducted at five locations, designated LT1 through LT5, and short-term (ST) noise monitoring was conducted at 24 locations, designated ST1 through ST24. Ambient field measurements were taken at representative land uses with consideration given to locations that would be considered noise sensitive. All measurement locations are indicated on Figure 3.12-1. These locations were selected to document the existing noise environment.” As the PEIR provides a program-level analysis of the <i>2020 LA River Master Plan</i>, the field measurements were conducted at a program-level for the Draft PEIR and are sufficient for this level of analysis. Further</p>

Comment#	Comment Text	Response
		site-specific data collection could be conducted for future projects or subsequent actions, if determined necessary. No changes to the Draft PEIR are needed.
06-40	<ul style="list-style-type: none"> • The LARMP (and this study) omits miles multiunit and single family homes adjacent to, near river parks and mixed use river trail <ul style="list-style-type: none"> o Chevy Chase Drive to Fletcher Drive 	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the responses to comments 06-2 and 06-39.</p> <p>No changes to the Draft PEIR are needed.</p>
06-41	<ul style="list-style-type: none"> • The LARMP (and this study) omits equestrian district access points <ul style="list-style-type: none"> o Noise on mixed use trails which include equestrian use o Vol II Tech page 161, 28.77 “Rigali Ave” (Proposed non-motorized bridge) Noise impacts on potential bridge ending at bike path at i5. • North Atwater Crossing horse incident (death), 1/17/20 (due in part to i5 noise) 	<p>The methodology related to analyzing operational noise for the Multi-Use Trails and Access Gateways Typical Projects is discussed on page 3.12-73 of the Draft PEIR. Noise sources of traffic and user access are also discussed on page 3.12-73. Operational noise as it relates to Multi-Use Trails and Access Gateways Typical Projects and future operations is discussed in the Draft PEIR on page 3.12-121.</p> <p>Additionally, based on CEQA case law established in <i>California Building Industry Assoc. v. Bay Area Air Quality Management District</i> (2015) 62 Cal. 4th 369, it is not within the purview of the PEIR to analyze the impacts from the environment on the Project. Therefore, the effects of noise impacts on the Project from the bridge or related to horse incidents are outside the scope of the PEIR. No changes to the Draft PEIR are needed.</p>
06-42	<ul style="list-style-type: none"> • ST8 does not adequately measure for LARMP planned project sites (and future noise from operations) <ul style="list-style-type: none"> o Los Feliz Blvd (LARMP p334-339) <ul style="list-style-type: none"> ▪ Pavilion, Café, Restrooms, Showers, Lockers: at i5 entrance along bike path (river bike path abutting i5 north entrance) 	<p>The methodology related to analyzing operational noise for Common Elements Typical Projects is discussed on page 3.12-73 of the Draft PEIR. Noise sources associated with the Common Elements Typical Projects (e.g., pavilions, cafes, restrooms) are also discussed there. An operational noise discussion, as it relates to future operations, is presented in the Draft PEIR on pages 3.12-105 and 3.12-106.</p> <p>As these noise levels relate to field measurement location ST8, as discussed previously, they are considered conservative. Noise</p>

Comment#	Comment Text	Response
	<ul style="list-style-type: none"> Pavilion, Café, Restrooms, Lockers, Showers, Gathering Bldgs.: parallel to Los Feliz Blvd adjacent to i5, Bond Park and the adjacent residential homes 	<p>levels could be louder in the future, which would further mask any potential impact (please see the response to comment O6-38).</p> <p>Additionally, please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements), which discuss the programmatic nature of the Draft PEIR and the fact that the Draft PEIR analyzes two Typical Projects and six KOP categories but does not intend to and does not analyze any specific prospective projects that may be of interest to the Atwater Village Neighborhood Council. No changes to the Draft PEIR are needed.</p>
O6-43	<ul style="list-style-type: none"> ST8 does not adequately measure for LARMP "M" project "San Fernando Railroad Glendale Bike Plan" 4.5 miles impacting residential homes abutting and across from the rails from Los Feliz Blvd to Tyburn St. 	<p>Please see the response to comment O6-39.</p> <p>No changes to the Draft PEIR are needed.</p>
O6-44	<ul style="list-style-type: none"> LA River Master Plan omits most of our current East Bank river access sites 	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the response to comment O6-2.</p> <p>No changes to the Draft PEIR are needed.</p>
O6-45	<ul style="list-style-type: none"> ST8 does not adequately measure for LARMP X/XS Sites (LARMP Vol. II tech pages 161-162) 	<p>Please see the response to comment O6-39.</p> <p>No changes to the Draft PEIR are needed</p>
O6-46	<ul style="list-style-type: none"> ST8 does not adequately measure for LARMP M/L/XL Sites (LARMP Vol. II tech pages 136-139) 	<p>Please see the response to comment O6-39.</p> <p>No changes to the Draft PEIR are needed</p>
O6-47	<ul style="list-style-type: none"> ST8 does not measure LA River bike path and proposed river sites 	<p>Please see the response to comment O6-39.</p> <p>No changes to the Draft PEIR are needed</p>

Comment#	Comment Text	Response
06-48	<p>As we have noted, the LA River Master Plan in its current form is full of errors and omission along Atwater Village’s 4 mile riverfront East Bank, West Bank bike path and along our Rail Road border.</p> <p>The sound study’s ST8 is incapable of assessing current noise levels in Atwater Village, let alone at future projects along the bike path and adjacent to i5. Projects that include Cafés, Showers, Restrooms, Lockers, Gathering Spaces and etc., will have 24/7/365 access, which also increases the ambient noise all hours of the day. Let’s imagine sitting in an outdoor Café, next to i5?</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the responses to comments 06-39, 06-41, and 06-42.</p> <p>No changes to the Draft PEIR are needed</p>
06-49	<ul style="list-style-type: none"> • The success of the LARMP implementation will hinge on community impacts being acknowledged and addressed. 	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>No changes to the Draft PEIR are needed</p>
06-50	<ul style="list-style-type: none"> • The success of the LARMP projects will hinge on comfort, usability of bike path and river amenities! 	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>No changes to the Draft PEIR are needed</p>
06-51	<p>This sound study, as a tool for 25 year planning purposes, fails the present. Therefore, it fails our future, we demand a more robust sound study in Atwater Village. A long term study that measures current access points and future project and access points locations along the LA River and our Railroad border.</p> <ul style="list-style-type: none"> • Mitigation Measure NOI-5: Prepare Focused Noise Study and Implement Findings. • Mitigation Measure NOI-6: Prepare a Noise Study 	<p>As discussed on pages 3.12-6 and 3.12-7 of the Draft PEIR, “In order to quantify the existing ambient noise conditions throughout the project area, noise monitoring was conducted at 29 locations in the vicinity and along the LA River on May 13 through May 15, 2020, and June 10, 2020. Long-term (LT) noise monitoring was conducted at five locations, designated LT1 through LT5, and short-term (ST) noise monitoring was conducted at 24 locations, designated ST1 through ST24. Ambient field measurements were taken at representative land uses with consideration given to locations that would be considered noise sensitive. All measurement locations are</p>

Comment#	Comment Text	Response
		<p>indicated on Figure 3.12-1. These locations were selected to document the existing noise environment.” Please see the response to comment 06-37 for further discussion relating to how field measurements are representative of the entire alignment. Regarding Mitigation Measure NOI-5, Prepare Focused Noise Study and Implement Findings, or NOI-6, Prepare a Noise Study, no specific comments are offered, hence no specific response can be provided.</p> <p>Please see the responses to comments 06-41 and 06-42 for the discussion related to future project analysis. No changes to the Draft PEIR are needed.</p>
06-52	<p>FLOOD: LARMP Goal #1</p> <p>To date, the County and City have not improved or proposed improvements to reduce flood hazard either for Atwater Village or the wider Glendale Narrows. The 1992 LACDA study did not provide any flood risk mitigation measures due to “cost/benefit” analysis that seemingly prioritizes fiscal prudence over human life and property. Due to this lack of action, when FEMA digitized the map lines in 2008, there were 115 parcels added to the Special Flood Hazard Area (SFHA), 3-4 have a LOMA. (Currently the City doesn't acknowledge the SFHA on it’s planning site, Zimas).</p> <p>In 2016 the City/USACE announced the Glendale Narrows “potential SFHA” to all parcels within the potential flood area. In 2017, the City moved forward with the Glendale Narrows LOMR, which begins the FEMA remapping process. If that remapping were to take place the number of Atwater Village parcels would increase exponentially. This could have impacts on housing affordability and displacement issues. The heaviest impact would be felt by South Atwater Village, which is classified as a disadvantaged community.</p> <p>Page 90 states; It is estimated that approximately 3,300 parcels will be impacted by a 1% flood event⁵⁶.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see the response to comment 06-15.</p> <p>No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
	<p>EN# 56 USACE 2016. U.S. Army Corps of Engineers, Los Angeles District: Hydraulics Report, Floodplain Analysis, Los Angeles River: Barham Boulevard to First Street, floodplain Management Services Special Study, Los Angeles, California, October 2016.</p> <p>Cost of High-Risk Flood Insurance 2021 dollars:</p> <p>Single family home NFIP \$3,400.00</p> <p>Single family home Private Insurer \$1,100.00</p> <p>Cost rises every year. (Multifamily, non-occupied and commercial rates trend higher, each building must be individually quoted for actual cost)</p> <p>LA County is the State appointed lead for flood matters and we understand that the County is planning to take over the ARMY Corp controlled river jurisdiction in the Glendale Narrows. Since the county intends to claim this portion of the LA River, it is surprising that there are no planned projects for flood protection.</p> <p>On page 88 of the 2020 LARMP, the flood hazard is openly and clearly acknowledged, “The Narrows reach (RM 33 to RM 22) has known deficiencies that are exacerbated by the heavy vegetation that has established itself in the soft bottom of the trapezoidal channel. Despite the presence of levees along portions of this reach, the flood capacity level is worse than 2% (50-year), with many regions having worse than 10% flood (10-Year) capacity and as low as 25% flood capacity (4-Year).”</p>	
06-53	<p>Further explication of floodplain risks, beyond floodwaters, is presented on page 90. Residents and infrastructure within the floodplains may be substantially impacted by flood events. Of paramount importance during such emergencies are critical facilities where emergency operations are conducted, including police and fire stations, medical care facilities, and schools that may be used as evacuation centers. Also of importance are hazardous materials sites, that may pose a significant threat to</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please refer to Section 3.8, <i>Hazards and Hazardous Materials</i>, and Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR.</p> <p>Please see the response to comment 06-15.</p>

Comment#	Comment Text	Response
	<p>public safety and health and the environment should they become inundated with water.</p> <p>In the flood section pages 288-313, there are over 10 pages dedicated to the Glendale Narrows (p. 292-303) which directly impacts Atwater Village. On page 292, it's stated that "A combination of this approach with other flood risk reduction strategies, including bridge modifications and a bypass tunnel, could potentially bring the LA River in the Narrows up to the 1% flood event capacity goal." None of those items are in the proposed or planned project lists? Furthermore, we question the feasibility of these suggestions/proposals.</p> <ul style="list-style-type: none"> • Channel rehabilitation program: • Jurisdiction of ARMY Corp, the county hasn't funded any of these activities. (Channel built as rating is 51-year IF totally cleared) • Bridge modifications: none are planned in the 25-year LARMP <ul style="list-style-type: none"> o Colorado Sto Los Feliz Blvd: High Priority Bridge o Glendale Blvd: High Priority Bridge o Fletcher Dr: High Priority Bridge • Bypass Channel: <ul style="list-style-type: none"> o What is the County's commitment to this concept? This proposal represents a massive and costly civil engineering effort, with outsized importance in the wider flood reduction effort for the Glendale Narrows portion of the channel, and due to it's high cost, it would likely be the most endangered part of any flood mitigation effort by the County, and hence, not a very plausible solution. o We understand that this concept was previously considered, and later dropped by the ARMY Corp due to cost. • Bypass Channel Alternatives: Flood mitigation and water conservation 	<p>No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
	<p>o We would like to see the County couple future flood mitigation efforts together with water conservation and sustainable water practices, and consider smaller public works projects that emphasize water capture and storage along the watershed, in the spirit of the City’s Green Streets initiative. In reducing stormwater run-off from ever reaching the river in the first place, this could potentially serve an important role with the City and County’s larger mission of achieving independence from imported water and becoming 100% self reliant on local water sources by the year 2050.</p> <p>Based on the LARMP, we see no commitment to flood risk reduction.</p>	

2.3.2.25 Comment Letter O7: Boulevard Management, January 14, 2021

Comment#	Comment Text	Response
07-1	<p>Boulevard Management has been engaged to provide business management services to Stephen R. Perry and his related entities. On a going-forward basis, Todd Bozick and/or Lynda Burton of Boulevard Management will be my primary contacts for all banking, accounting, tax, royalty statements and administrative matters relative to their accounts.</p> <p>Please update your records to reflect the new contact information:</p> <p>Boulevard Management 21731 Ventura Blvd., Suite 300 Woodland Hills, CA 91364 818-592-2000</p>	<p>This comment is acknowledged.</p>

2.3.2.26 Comment Letter O8: Friends of Griffith Park, May 11, 2021

Comment#	Comment Text	Response
O8-1	<p>First, Friends of Griffith Park was very disappointed to see that although Appendix II p. 245 lists all the advocacy groups that LARMP met with, Friends of Griffith Park was not one of them. Griffith Park is quite large at 4,310 acres; so how was our organization overlooked? Since four and a half miles of the river flows through Griffith Park, what happens in and around the river is very important to the Park and to our organization. Because we know the park, its habitat, and its wildlife well, we could serve as a valuable resource to the LARMP. Likewise, LARMP failed to include the Griffith Park Advisory Board in its advocacy groups. This is a serious oversight on the part of LARMP.</p> <p>As specific projects are proposed along the river where it flows through Griffith Park, we respectfully request that Friends of Griffith Park be included in the design and review of the individual projects that will impact the Park.</p>	<p>The County appreciates the Friends of Griffith Park for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR), which discusses the public outreach efforts that were undertaken to ensure that all of the communities bisected by (or adjacent to) the LA River are provided an opportunity to provide input.</p>
O8-2	<p>FoGP has concerns about how the LARMP will interact with the city-adopted “Vision for Griffith Park” both broadly and specifically. We are particularly concerned about increasing access to the river and wildlife connectivity. One of the possibilities proposed for increasing flood capacity in the river was to convert the trapezoidal concrete channel on the west side of the river to a vertical wall. We are pleased that the LARMP recognizes that this would have a serious negative impact on wildlife’s ability to access the river. For that reason the current trapezoidal walls should remain.</p>	<p>This comment is acknowledged. It appears the commenter is raising issues related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please refer to Section 3.10, <i>Land Use and Planning</i>, of the Draft PEIR where consistency with land use plans is analyzed. Mitigation Measures LU-2, Consultation, and LU-4, Site Selection Process, would be implemented with the proposed Project. Additionally, please refer to Master Response MR-4 (Adherence to Local Jurisdictions’ Requirements).</p>

Comment#	Comment Text	Response
08-3	Although the LARMP briefly references the City of Los Angeles River Revitalization Plan a few times, little heed has been paid to its recommendations. The goal of the City's plan was to make the Los Angeles River look and act as much like a river as possible within the constraints of the concrete channels. That concept appears to be minimized in the LARMP.	Please refer to Master Response MR-5 (Naturalization of the LA River) regarding the potential for naturalization of the LA River and flood control.
08-4	FoGP was very surprised to see the bypass tunnel running underneath Griffith Park and residential communities from Headworks to Piggyback Yard in the LAMRP (p. 298). At 40 feet in diameter and 9 miles long, it is a massive and expensive project. This diversion tunnel was one of the alternatives proposed and evaluated for the Los Angeles City River Revitalization Plan, and was soundly rejected due to the excessive cost. In order to make the LARMP financially feasible, this bypass tunnel should be eliminated as an option from the LARMP.	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Additionally, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR) in regard to improvements being shown in a given frame.</p>
08-5	The LARMP contains some flood plain restoration opportunities. The large MRCA project at the southeast junction of the I-5 and the 134 is an excellent example of an area to create wetlands to increase the capacity of the river during flood periods. The proposed Ferraro Fields Side Channel is another prime example of maximizing additional river capacity (p. 340). Each acre of wetlands can store 1-1.5 million gallons of floodwater which would help protect communities like Atwater Village from flooding. This approach has the additional benefit of increasing habitat connectivity from Griffith Park to the river.	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Additionally, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR) in regard to improvements being shown in a given frame.</p>

Comment#	Comment Text	Response
08-6	<p>We would like to see more opportunities for side channels. The City plan included another side channel near the golf course on the east side of the river at approximately mile 30. It also proposed terracing along the west side of the river between mile 29 and 30 that would create narrow landscaped areas containing trees where people could sit and watch the river flow by. Another benefit: the placement of more trees along these areas would help combat climate change currently plaguing the globe and further reduce air pollution in the LA Basin.</p>	<p>This comment is acknowledged. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No changes to the Draft PEIR are needed.</p> <p>Side channels are improvements that can be implemented by local jurisdictions under the <i>2020 LA River Master Plan</i>. Specifically, the impacts of implementing side channels are analyzed as part of KOP Category 4 (Diversions) and KOP Category 5 (Floodplain Reclamation) of the <i>2020 LA River Master Plan</i>. Pursuant to Section 15204 of the State CEQA Guidelines, the lead agency’s responsibility is to respond to significant environmental issues raised. No further response is necessary.</p>
08-7	<p>Friends of Griffith Park would like to propose an additional project to increase wildlife connectivity and access to the river – a wildlife bridge spanning Forest Lawn Drive from an area just northeast of Mount Sinai Memorial Park to Headworks (mile 33). Currently, wildlife is forced to cross the busy Forest Lawn Drive near a freeway ramp which unfortunately results in extensive wildlife deaths. And once Headworks’ habitat restoration is complete, it will attract more wildlife and even more deaths will occur. A wildlife bridge from the hill of Mt. Sinai to Headworks would provide safe access for animals to navigate over the road. Construction of a ramp to the river could also be provided, allowing wildlife to cross, unimpeded by man-made obstacles to the river. This concept was enthusiastically received by Army Corps of Engineer biologists as well as city staff when it was explored in depth a few years ago.</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements), which discuss the programmatic nature of the Draft PEIR and the fact that the Draft PEIR analyzes two Typical Projects and six KOP categories but does not intend to and does not analyze any specific prospective projects at a project level. Project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the other jurisdictions along the LA River.</p> <p>Addition of another project to the <i>2020 LA River Master Plan</i> is outside the scope of this PEIR.</p>
08-8	<p>The Kit of Parts contains “platform parks” which bear no resemblance whatsoever to a natural looking river. Indeed, they add more concrete into the river and cover the river blocking natural sunlight from reaching the water. They make the river</p>	<p>This comment is acknowledged. The illustrations are conceptual only and do not necessarily reflect what an actual platform park would look like. The platform park designs would be subject to</p>

Comment#	Comment Text	Response
	<p>look more like an amusement park than a river. Currently, numerous footbridges allow people to safely crisscross the river, and engage with the more natural environment. FoGP recommends removing these platform parks from the Kit of Parts.</p>	<p>the nine goals described in the <i>2020 LA River Master Plan</i> and would respect the natural features of the river.</p> <p>Please refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR, which describes that given its width and length, the LA River channel can separate communities and be an obstacle for connectivity. Crossings can connect existing or proposed communities or assets on one side of the river with existing or proposed communities or assets on the other side of the river. Crossings and platforms would typically include multi-use bridges for pedestrian, bike, and equestrian access, and they would connect communities to nearby parks and community facilities. Platforms are wider than crossings and can create space for parks, recreation, and habitats above the channel in addition to providing cross-river connectivity. Platforms can also host a range of habitat typologies, including riparian and upland conditions, and can allow for wildlife migration. Crossings and platforms can connect people to the river, creating new spaces for gathering and panoramic views of the river and surroundings.</p>
<p>08-9</p>	<p>We commend the LARMP for providing consistent designs in the Kit of Parts and signage so the river will have coherent and cohesive elements.</p> <p>We also commend the LARMP for its efforts to increase biodiversity along the length of the river.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR.</p> <p>This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>08-10</p>	<p>The map of the Glendale Narrows on p. 378 - 379 needs some clarification to make it as accurate as possible. Bond Park, located on the southeast intersection of Los Feliz Boulevard and</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In</p>

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	the river, is not identified on the map. Are all access points identified correctly? Is the Atwater Bridge correctly located?	<p>accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR.</p> <p>This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
08-11	The gray area labeled North Atwater Park appears to be the Central Service Yard for the Los Angeles City Department of Recreation and Parks. As a service yard it is not open to the public. That said, there have been numerous discussions over the years about consolidating services or moving some to another location that is not on prime riverside property so that North Atwater Park could be expanded into this service yard. Does the gray "Planned Major Project" indicate conversion of the service yard into parkland is in progress? That would indeed be welcome news.	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR.</p> <p>This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
08-12	<p>Questions we would like resolved:</p> <p>What is the Headworks Connector project identified in pink in the map on p. 378?</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR.</p> <p>This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
08-13	What is the source of funding for these projects? Is each project separately funded?	Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements), which discuss the programmatic nature of the Draft PEIR. The responsibility for implementation (including

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		funding) of specific future projects that may tier from the <i>2020 LA River Master Plan</i> and PEIR lies with the jurisdictions along the LA River.
08-14	Once built, what entity is responsible for maintaining each project? Would all projects built on Griffith Park acreage be maintained by the Department of Recreation and Parks?	Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements), which discuss the programmatic nature of the Draft PEIR. The responsibility for implementation (including maintenance) of specific future projects that may tier from the <i>2020 LA River Master Plan</i> and PEIR lies with the jurisdictions along the LA River.

2.3.2.27 Comment Letter O9: Griffith Park Advisory Board, May 12, 2021

Comment#	Comment Text	Response
O9-1	<p>Devising a cohesive Master Plan for the entirety of the LA River is a nearly herculean effort requiring thoughtfulness and finesse to bring many disparate stakeholders to the table. We therefore salute the effort to update the prior 1996 plan and provide an overall, forward-looking vision for the river. Despite its length, we did our best to digest the draft LA River Master Plan (LARMP) in order to parse out the long-term implications for Griffith Park. In our role as park stewards, we would like to underscore the importance of the relationship between the LA River, Griffith Park, and the many users of both. We believe the Master Plan provides an opportunity to truly connect the park, the river and the surrounding communities – and we look forward to working together in seeking to realize this goal.</p> <p>At this time, our board is evaluating the merits of the draft LARMP from the perspective of its framework and conclusions rather than focusing on the identified “proposed projects,” several of which are large and would have major impacts on Griffith Park. Our understanding, from reading the available documents and attending the April 2021 Virtual Meeting, is that these projects are more illustrative of potential solutions arising from the iterative process that the LARMP has outlined - based on the framework goals, kit of parts, and common elements - rather than foregone conclusions about what may be built. We will therefore withhold comment on specific projects until they are brought forward for review on their own merits.</p> <p>Broadly speaking, we are pleased to see that several of the framework goals are directly aligned with the values of our board. Providing equitable, inclusive, and safe parks, open space and trails is a lens that we consistently apply when considering various proposals that impact Griffith Park. Similarly, as a large urban wilderness, it is crucial to support healthy, connected ecosystems. We appreciate that there is not a one-size-fits-all solution for each of the challenges along differing stretches of</p>	<p>The County appreciates the Griffith Park Advisory for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This is an introduction to the specific comments that follow. No further response is required. No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
	<p>our 51-mile river. We have had the opportunity to see feedback letters from other organizations that we respect, several of which have articulated concerns or outright rejection of the LARMP. For the sake of our analysis, we tried to focus on how the guiding principles of the LARMP would impact frames 6 & 7 – those that abut Griffith Park. Through this lens, we are cautiously optimistic about the conclusions of the Master Plan. At our April board meeting we voted to support the major goals of the LARMP; we would, however, like to raise several issues that need to be addressed.</p>	
<p>09-2</p>	<p>The draft LARMP consistently highlights the breadth of community outreach and engagement as a testament to a thorough, feedback-driven process. Unfortunately, we were surprised to find in Appendix Volume II - Technical Backup (pg. 246-248) that our board is notably absent from the list of “Advocacy Organizations.” Nor has our board yet received any direct outreach from the project team. Given our role as community stewards for Griffith Park, which shares several miles with the LA River, we would like to be included in future outreach as this process continues. Further, given that we work directly with relevant City of LA officials on park-related issues, we can help to ensure that river improvements make use of sites already in place - along both sides of the river - so they augment existing traffic flow and location specifics. While we understand that the current phase of the process is not about agreeing to any specific projects, even those labeled as “proposed,” we want to ensure that our board will have a voice in the Master Plan and its implementation in the decades to come, especially considering how much of the LA River borders and intermingles with Griffith Park.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR), which discusses the public outreach efforts that were undertaken to ensure that all of the communities bisected by (or adjacent to) the LA River are provided an opportunity to provide input.</p>
<p>09-3</p>	<p>In much the same way that the Master Plan will be the definitive, guiding vision for the LA River, Griffith Park has its own guiding plan, A Vision for Griffith Park, which was adopted by the City of Los Angeles in 2014. We urge the LARMP Steering Committee and project team to familiarize themselves with the contents of</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead</p>

Comment#	Comment Text	Response
	<p>this document, which recognizes the unique nature of this urban wilderness and great city park. We would like to be assured that any and all future projects as part of the LARMP will work in unison and under the tenets of the Vision for Griffith Park, which include major goals that pertain to the park’s urban wilderness identity, as well as significant mobility and access objectives.</p>	<p>agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
09-4	<p>Another point we would like to address is operations and maintenance. We appreciate the focus on ensuring that projects are fully funded for at least three years’ worth of O&M. This approach is both thoughtful and timely given the current financial situation for many government agencies as a result of the pandemic. Our partners at City of LA Recreation and Parks have found themselves hit particularly hard, especially in the area of maintenance. We would like to be assured that any projects resulting from the Master Plan will have a sensible, financially sound plan that does not leave LA Recreation and Parks responsible for unexpected or costly ongoing O&M outside of the mandated three-year window.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No changes to the Draft PEIR are needed.</p> <p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements), which discuss the programmatic nature of the Draft PEIR and the fact that the Draft PEIR analyzes two Typical Projects and six KOP categories but does not analyze specific projects. The responsibility of identifying, approving and implementing (including funding for operations and maintenance) specific future projects and preparing appropriate CEQA compliance to analyze the specific impacts of projects proposed, as sufficient details are identified, under the master plan (which may tier from the <i>2020 LA River Master Plan</i> and PEIR) lies with the jurisdictions along the LA River.</p>
09-5	<p>While there are certainly more questions and objections we would raise if we were discussing some of the highlighted “proposed projects” from the draft Master Plan that would directly impact Griffith Park – such as blasting a nine-mile-long, 40-foot-wide diversion tunnel through a large portion of the park – we will withhold our initial thoughts on these ideas until the appropriate stage for such community feedback. At this point, we look forward to responses on the major points highlighted above, as well as an assurance that our board will be</p>	<p>This is a closing comment. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
	<p>included in further conversations and planning for the evolution of the LA River as presented by the draft Master Plan.</p> <p>In closing, it is worth recalling that the LA River once ran along a wider swath of Griffith Park – until the construction of Interstate 5 along the river’s western bank in the 1950s separated the two entities for a long stretch. It is our sincere hope that this Master Plan will enable new connections and access points between these two great natural features. In so doing, the Los Angeles community would be well-served.</p>	

2.3.2.28 Comment Letter O10: LA River Walkers & Watchers, May 12, 2021

Comment#	Comment Text	Response
O10-1	<p>We are preparing comments on the LA River Master Plan and on the PEIR. We have an email address for the PEIR comments but cannot locate an email address for submitting comments on the LA River Master Plan itself. Or are you accepting comments on both the Plan and the PEIR? Unfortunately, the LA River Master Plan website comment forms will not accept attachments and I have received no response to my question when I posted via the comment form.</p>	<p>The County appreciates the LA River Walkers & Watchers for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>The commenter was replied to, and it was explained that this email address was for comments on the Draft PEIR. Comments will be shared with the <i>2020 LA River Master Plan</i> team, but the email for the <i>2020 LA River Master Plan</i> was additionally provided.</p>

2.3.2.29 Comment Letter O11: Los Angeles Waterkeeper, May 12, 2021

Comment#	Comment Text	Response
O11-1	<p>On behalf of Los Angeles Waterkeeper (“Waterkeeper”), I submit this comment on the LA River Master Plan Draft PEIR (“Draft PEIR”). The Draft PEIR claims that the 2020 LA River Master Plan (“Master Plan”) has nine goals, two of which relate to the ecological health of the LA River watershed: 3. Support healthy connected ecosystems; and 9. Promote healthy, safe, clean water. As it stands now, the Draft PEIR does not sufficiently take into account the current and future ecological health of the LA River mainstem and tributaries. The Draft PEIR and the Master Plan in general must fully consider and address the River’s ecology and apply a watershed approach as opposed to the current fragmented approach.</p>	<p>The County appreciates Los Angeles Waterkeeper for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-7 (Master Plan Area/PEIR Study Area and Addressing the LA River in a Comprehensive Manner), which discusses the efforts taken by the <i>2020 LA River Master Plan</i> team to ensure that the <i>2020 LA River Master Plan</i> addresses the LA River in a comprehensive manner. The 51-mile-long LA River passes through 18 total jurisdictions (1 county and 17 cities). The entirety of the 51-mile LA River corridor for 1 mile on each side of the river was defined as part of the study area and evaluated in the Draft PEIR.</p> <p>The Draft PEIR evaluates the potential adverse impacts of the <i>2020 LA River Master Plan</i>. Specifically, please refer to Sections 3.3 <i>Biological Resources</i> and 3.9 <i>Hydrology and Water Quality</i> of the Draft PEIR for discussion of the biological and hydrological impacts associated with implementation of the proposed Project, including cumulative conditions that take into account the past, present, and foreseeable future projects affecting those resources.</p> <p>Please refer to Chapter 5, <i>Alternatives</i>, Section 5.3.4, <i>Watershed Restoration Alternative</i>, of the Draft PEIR which discusses why this alternative was considered but eliminated from detailed consideration. Specifically, this alternative would not reduce or avoid significant impacts for these environmental resources: aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas (GHG) emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, public services, recreation, transportation, tribal cultural resources (TCRs), utilities and</p>

Comment#	Comment Text	Response
		service systems, and wildfire. No changes to the Draft PEIR are needed.
011-2	<p>In order to assist Los Angeles County Public Works in this effort, I have attached to this comment letter a Waterkeeper report authored by our former Watershed Programs Manager, Melissa von Mayrhauser, and titled River Assessment Fieldwork Team: Connecting our Los Angeles River Watershed Community through Bioassessment (“RAFT Report”). The RAFT Report presents and discusses the results of a two-year long study in which “LA Waterkeeper trained over 100 community members in the California Rapid Bioassessment Protocol to monitor eight sites along the LA River and its tributaries,” including natural, soft-bottom, and concrete-lined sites. The study evaluates the ecological condition and integrity of each site through indicators such as organism abundance, taxa richness, taxa evenness, temperature, pH, and level of dissolved oxygen. The RAFT Report makes clear that we need to stop treating the LA River “as a flood control channel, and fully recognize it once again as a river.”</p>	<p>This comment is acknowledged. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No changes to the Draft PEIR are needed.</p> <p>To the extent that the RAFT Report is relevant to the PEIR, please refer to Master Response MR-5 (Naturalization of the LA River) regarding naturalization of the LA River.</p> <p>Please refer to Chapter 1, <i>Introduction</i>, of the Draft PEIR for a description of how the <i>2020 LA River Master Plan</i> includes nine objectives, including objectives to reduce flood risk and improve resiliency; support healthy, connected ecosystems; foster opportunities for continued community engagement, development, and education; and promote healthy, safe, clean water. These objectives state the need to address the issues associated with the LA River comprehensively. The proposed Project is an update to the existing 1996 Master Plan and includes more comprehensive objectives beyond the critical flood-management needs of the river. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
O11-3	<p>Importantly, “[t]he results show that we cannot assume that more natural sites are ecologically healthy just because they do not have concrete bottoms or levees, and they need to be monitored regularly.” Every single soft-bottom and concretized site scored low on the Family Level Index (“FLI”), indicating high levels of degradation. Some soft-bottom sites scored even lower than concretized sites. These sites face consistent “upstream pollution, artificially high flows, lack of connection to floodplain, ongoing sediment removal and other pressures [which] continue to prevent a return of ecological integrity.” It is futile to expect the addition of “superficial elements to the river (i.e. planter boxes, terraced vegetation, etc.) [to] increase ecological structure or function.”</p>	<p>Please refer to Master Response MR-5 (Naturalization of the LA River) and see the response to comment O11-2 regarding naturalization of the LA River. Please also refer to Section 2.5.1.2, <i>Kit of Parts (KOP)</i>, of the Draft PEIR for a description of how the design components under kit of parts (KOP) Category 5: Floodplain Reclamation include wetlands, naturalized banks, braided channels, fields, storage, and side channels, which can be considered as options to naturalize the river on a more localized scale. No changes to the Draft PEIR are needed.</p>
O11-4	<p>I will let the attached RAFT Report’s data and recommendations speak for themselves. It is imperative to realize that in order to meet the aforementioned goals laid out in the Draft PEIR and Master Plan, we must treat the River as a River.</p>	<p>This comment is acknowledged. As discussed in the Introduction of the <i>2020 LA River Master Plan</i>, the LA River performs an extremely important flood-control function. The <i>2020 LA River Master Plan</i> balances the need for flood control with opportunities to improve natural functions along portions of the river when flood control would not be jeopardized. No changes to the Draft PEIR are needed.</p>

2.3.2.30 Comment Letter O12: LA River Walkers & Watchers, May 13, 2021

Comment#	Comment Text	Response
O12-1	<p>These comments on the 2020 Los Angeles River Master Plan (“LARMP”) and the Los Angeles River Master Plan Draft Program Environmental Impact Report (“PEIR”) are submitted by the Los Angeles River Walkers and Watchers and by the individuals listed below.</p> <p>The Los Angeles River Walkers and Watchers (“LARWW”) is a diverse group of residents and neighbors who volunteer to help preserve the Bike Path along the Los Angeles River in the west San Fernando Valley, including the park-underserved communities of Reseda and Canoga Park. LARWW works to ensure that local and state government agencies with Los Angeles River jurisdiction provide public safety, maintenance and resource-management services, enforce regulations, address health concerns, and care for the overall wellbeing of resources along the Los Angeles River Bike Path. Since 2017, LARWW has a held a monthly walk along the river. Community residents and volunteers engage in trash and graffiti removal, monitor problem areas, and identify and report concerns. LARWW volunteers on these monthly walks have devoted thousands of hours to cleaning up the Los Angeles River Bike Path and making this key resource safer and more user-friendly for all.</p> <p>LARWW members and volunteers are residents who live by the river and its tributaries. Our members use the Los Angeles River for a multitude of purposes including walking, hiking, and biking for exercise and transit purposes, bird and wildlife watching, photography, and simply enjoying the beauty of being by running water. Because the Los Angeles River is such a key component of our immediate environment, LARWW members have participated throughout the planning process including attending public meetings and submitting scoping comments for the PEIR process. More information on LARWW can be found on our website <http://www.larww.org> and Facebook page <https://www.facebook.com/LARiverWW>.</p>	<p>The County appreciates the LA River Walkers and Watchers for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This is an introductory comment that precedes specific comments. No further response is required. No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
O12-2	<p>Centralized Coordination and Management is Needed for the LA River Master Plan to Help Ensure a Reimagined LA River:</p> <p>As we pointed out in our scoping comments, “Our experience working to preserve the LA River Bike Path has frequently been frustrating because jurisdiction along the river is so heavily fragmented. The multi-jurisdictional oversight of the LA River and the Bike Path means that local communities don’t just have to deal with Los Angeles Country and Los Angeles City, but with multiple departments within the County and the City. There are also other state and federal entities that are involved. This fragmented jurisdiction creates a management nightmare, wastes public funds, and exasperates local communities. Accordingly, we would like to see the preferred alternative include turning over Los Angeles River management to a single, park-oriented, agency such as the MRCA. We see this as the only viable alternative that will allow the plan to meet the listed 2020 LA River Master Plan Objectives.” The PEIR ignored consideration of our requested alternative.</p> <p>Unfortunately, what the draft Plan does offer for future management along the Los Angeles River is nebulous and self-limiting. We are told that, “LA County Public Works shall establish an implementation team responsible for ongoing coordination after the completion of the Master Plan.” LARMP at 50. With all due respect to the County’s overworked Public Works employees, “ongoing coordination” is the current situation and it is inadequate to the tasks at hand. Instead, the Plan should designate a specific entity responsible for implementing the Master Plan that is capable of bringing a comprehensive vision to the transformation of the Los Angeles River.</p> <p>Our experience as volunteers working to help protect and preserve the Los Angeles River Bike Path in the west San Fernando Valley has taught us that the Los Angeles River clearly needs a responsible and responsive management agency with oversight powers if it is to be “reimagined” as a river for all</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Specifically, this comment suggests creation of a single, park-oriented agency to manage the river corridor as an alternative to be analyzed in the PEIR. Because the river is 51 miles long and flows through multiple jurisdictions, the County does not have the authority to turn over management to a single entity.</p> <p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements).</p>

Comment#	Comment Text	Response
	<p>Angelinos. Unfortunately, the draft Master Plan lacks a core management component, and has no explicit provision for direct public input and oversight of the future “ongoing coordination”. Instead of having a defined management structure to tap into, members of the public will still have to wade through a jurisdictional nightmare to get simple things done in our own communities along the river. Frankly, it is difficult to see a County departmental “implementation team responsible for ongoing coordination” doing any more than shepherding through a few piecemeal development projects. This is a far cry from the grand vision that was put forward by the planners. The PEIR failed to address this key issue.</p>	
012-3	<p>Los Angeles River Ranger Program:</p> <p>The PEIR at 3.13-11 lists the Los Angeles River Ranger Program Establishment Plan (“River Ranger Plan”) that was developed in response to Cristina Garcia’s Assembly Bill 1558, Los Angeles River: River Ranger Program. That bill was enacted in 2017 to address river-adjacent communities’ limited contact with and responsibility for the Los Angeles River, as well as to coordinate with current revitalization plans working to enhance the river to increase its ecological, social, and recreational opportunities. The bill provides for a network of River Rangers to assist the public at sites along the Los Angeles River and its tributaries.</p> <p>Over the last three years, LARWW has worked closely with the Office of Los Angeles City Council Member Bob Blumenfield to implement a pilot project to use Mountains Recreation and Conservation Authority (“MRCA”) Park Rangers along the river between its source in Canoga Park and Lindley Avenue in Reseda. This pilot project finally went into effect in late April of this year (April 2021).</p> <p>Despite Assembly Bill 1558 being explicitly aimed at increasing ecological, social, and recreational opportunities along the Los Angeles River in planning efforts, the draft LA River Master Plan does not even mention River Rangers or similar programs along the Los Angeles River. While Assembly Bill 1558 is listed in the</p>	<p>As described in the <i>2020 LA River Master Plan</i>, the Los Angeles River Ranger Program Establishment Plan (2019) was prepared in response to Assembly Bill 1558 (AB 1558) and is led by the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy and the Santa Monica Mountains Conservancy. The plan develops a program for a network of river rangers along the LA River, with a mission to foster connections between communities, agencies, and resources to promote safe, equitable usage and stewardship of the LA River and its tributaries as an activated greenway that supports ecological, social, and recreation opportunities. As river-related projects are prepared, additional staff may be needed to supplement specific needs and the River Ranger Program is one of the types of programs to help meet those needs. The County was involved in earlier planning phases of the River Ranger Program to develop the framework as part of the steering committee and as a stakeholder, and it is now a member of the Los Angeles River Ranger Advisory Committee.</p> <p>The Draft PEIR properly includes the Los Angeles River Ranger Program Establishment Plan in the regulatory setting. As the Los Angeles River Ranger Program Establishment Plan is not a component of the proposed Project as described in Chapter 2, <i>Project Description</i>, of the Draft PEIR, an analysis of the beneficial</p>

Comment#	Comment Text	Response
	<p>PEIR, the PEIR lacks any analysis of the Master Plan’s compliance with the bill, the PEIR fails to explain any role for Los Angeles County in promoting River Rangers, the PEIR lacks any analysis of the beneficial or negative impacts of River Rangers, and the PEIR fails to explain what if any of the coordination envisioned by AB 1558 actually occurred.</p>	<p>or negative impacts of River Rangers is not warranted or required.</p>
<p>012-4</p>	<p>Under the California Environmental Quality Act, a project’s potential impacts on land use and public safety should be disclosed and analyzed. In our scoping comments, we urged the planners to make public safety a key issue and to address that issue. The County’s own data shows that 61% of residents report not using the river due to safety concerns. LARMP at 152. But the proposed measures listed in the Master Plan under “2.8. Promote public safety along the river” are largely aspirational and punt public safety to third parties. Knowing that the LARMP will “Encourage adjacent neighborhood watch groups to include the river in their areas of influence”; and “Encourage local police departments to employ community policing best practices along the river” (LARMP at 161) will not assuage residents’ fears of using the river. As we stated in our scoping comments, we consider that having rangers patrolling all 51 miles of the river to be an essential component of revitalizing the river, and of key importance in making the Los Angeles River a safe and healthy environment for all residents to enjoy. The Master Plan and PEIR simply ignore this straightforward approach to community safety, health, and welfare. We urge the County to seriously rethink its approach to public safety along the Los Angeles River.</p>	<p>Please refer to Section 3.14, <i>Public Services</i>, of the Draft PEIR, which identifies Mitigation Measure PS-1, Ensure Police and Fire Service Providers Have Adequate Resources, to ensure police and fire service providers have adequate resources to continue to serve the project area within their respective required levels of service and response times once the subsequent project is constructed. Per Mitigation Measure PS-1, during subsequent project design and development, the implementing agency will regularly notify and coordinate with police and fire service providers that have jurisdiction over subsequent project sites on project construction design, activities, and scheduling—including any street or lane closures related to subsequent projects—to ensure police and fire service providers have adequate resources to continue to serve the project area within their respective required levels of service and response times once the subsequent project is constructed. CEQA specifically excludes analysis of social or economic issues unless they relate to a physical adverse change in the environment (State CEQA Guidelines Section 15131). Security is a social issue. The Draft PEIR has addressed those aspects of security that may adversely affect the physical environment.</p>
<p>012-5</p>	<p>Maintenance Provisions: All too frequently we have seen projects along the Los Angeles River implemented, but then left unmaintained and unpatrolled. Until members of LARWW took the initiative and numbered the street lamps along the LA River Bike Path in the west San Fernando Valley there was no mechanism to even report the location of problems there. We feel that it is critical that the County learn from its own and its sister agencies’ experiences as</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. Additionally, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). As the comment pertains to CEQA, project phasing, construction, operations/maintenance</p>

Comment#	Comment Text	Response
	<p>it addresses ongoing challenges along the river so as not to repeat the same costly mistakes. The Master Plan should require that all projects approved under the program include specific provisions explicitly requiring that the project will be routinely maintained for the entire life of that project, that the parties responsible for the project’s maintenance are explicitly identified so that the public can provide input and oversight, and that the parties responsible for decommissioning a project at the end of its life be explicitly identified. For example, if information kiosks and signage are proposed, the project should specify their expected lifespan, should designate the parties responsible for their routine maintenance including graffiti removal over the life of the project, and should designate the party that will be responsible for removing (or replacing) the signage when its lifespan has expired.</p>	<p>scenarios as discussed in Chapter 2, <i>Project Description</i>. Additionally, operations and maintenance scenarios for these future projects would be described in future CEQA compliance once details related to design, location, and operations of subsequent projects are determined.</p>
012-6	<p>The current language in the Master Plan with respect to schedules for making routine checks for vandalism, graffiti, or weathering is too weak. Routine checks should be required not simply recommended. LARMP Design Features at 155. Making routine checks a requirement will ensure that projects fully allow for maintenance and that project budgets incorporate realistic funding for maintenance.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

2.3.2.31 Comment Letter O13: Los Angeles Conservancy, May 13, 2021

Comment#	Comment Text	Response
O13-1	<p>On behalf of the Los Angeles Conservancy, I am writing to comment on the 2020 Los Angeles River Master Plan Draft Program Environmental Impact Report (PEIR). The Los Angeles River is one of the County’s most important natural and historic resources with a complex and layered history.</p> <p>As a Program EIR (PEIR) the 2020 Los Angeles River Master Plan will be the guiding document for an estimated 107 projects over a period of 25 years. The Master Plan study area spans fifty-one miles of river from Canoga Park to Long Beach and extends one mile from either side of the river’s banks. The study area encompasses seventeen cities, unincorporated L.A. County communities and various other government agencies that exist within the L.A. River.</p> <p>In 1996, the Los Angeles River Master Plan expanded its vision from the originally single-purpose flood control into a multi-benefit amenity that reflects aesthetic, environmental, economic, and recreational values of residents.</p> <p>We thank the L.A. River Master Plan team for meeting with the Conservancy on May 10, 2020 in an effort to better understand its scope and impacts and to open a dialogue between the two parties. During that meeting we raised concerns about the following issues.</p>	<p>The County appreciates the Los Angeles Conservancy for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This is an introductory comment that precedes specific comments. No further response is required.</p>
O13-2	<p>The Los Angeles River Master Plan Area encompasses roughly twenty jurisdictions that include local municipalities, the Army Corps of Engineers, Amtrak, and California High Speed Rail Authority. Because of its intersection with a multitude of government agencies, the Plan should clearly articulate processes for future proposed projects that may have competing priorities between agencies. Given there are multiple goals, including heritage conservation, we strongly encourage you to articulate this specifically within the plan by stating them and adding none is overriding or more important than another. Such</p>	<p>It appears that the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR.</p>

Comment#	Comment Text	Response
	<p>language would help position future discussions and planning efforts to ensure there is a thoughtful and balanced approach for considering competing priorities. Further, this approach can help mitigate impacts to the overall Plan and provide a road map for non-County agencies.</p>	<p>This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>013-3</p>	<p>One such example is the High-Speed Rail Authority’s L.A. to Anaheim Extension. As currently proposed, the project would have negative impacts on the collection of historic Los Angeles River Viaducts. Constructed between 1909-1939 by the City of Los Angeles, the grouping of bridges are not only iconic civic monuments but also tell an important history of urban growth and its intersection with the River before and after channelization. To meet HSR regulations, the Project will construct barriers along the bridges above the train lines. These barriers are likely to cause potential adverse impacts to the historic resources.</p> <p>In this case as well as others, the Master Plan has the opportunity to be a tool to guide competing agencies with clearly defined communication protocols in an effort to successfully meet Master Plan goals. The benefit of including this language is not exclusive to historic preservation, rather all areas of environmental review would benefit.</p>	<p>It appears that the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR.</p> <p>This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>013-4</p>	<p>As stated in the PEIR, the Plan Area extends one mile in either direction from the river’s banks along it’s fifty-one-mile course. Stretching from Canoga Park to Long Beach, countless historic resources are within the Plan Area. Historic resources along the river are integral to telling the story of Los Angeles County. The communities that have formed along the river’s banks are as diverse as the County itself with unique stories and experiences.</p> <p>Historic resource surveys are intended to help identify eligible individual historic resources and concentrations of contributing resources that qualify as potential historic districts. Historic resources may include individual buildings, structures, public art, natural features, and sites connected to important events.</p>	<p>It appears that the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No changes to the Draft PEIR are needed.</p> <p>For reference, please refer to Section 3.4, <i>Cultural Resources</i>, of the Draft PEIR, which addresses historical resources. The Draft PEIR acknowledges that there is a wealth of historical resources throughout the study area (i.e., within 1 mile to either side of the LA River). Under Impact 3.4(a), the Draft PEIR concluded there were potentially significant impacts and required mitigation for</p>

Comment#	Comment Text	Response
	<p>The incorporation of historic resources into the Plan help to tell the history and celebrate cultural identity within L.A. River communities.</p> <p>On page 61 of the Master Plan, surveys are referenced as part of the River’s “Arts and Culture Assets.” However, the Plan does not provide concrete survey objectives and timelines. We strongly urge the County to incorporate a more detailed plan for future surveys and the accessibility of survey data in a single user-friendly database.</p> <p>On page 458, the County has referenced the Los Angeles Conservancy as a potential partner for identifying and activating cultural assets along the LA River corridor. We welcome the opportunity to meet with the County and partners on this matter.</p>	<p>new construction that may cause ground disturbance, demolish historical resources, or alter character-defining features of a historical resource and/or make changes to the setting of historical resources. Impact 3.4(b) and Impact 3.4(c) discuss potential impacts on archaeological resources and human remains (respectively).</p>
013-5	<p>Historic preservation should be more strongly incorporated throughout the Master Plan and a section dedicated to preservation goals. Presently historic preservation is briefly referenced in the Plan but does not have a strong presence. Preservation should be incorporated more wholistically as it impacts the following objectives.</p> <p>Objective #2 - Provide equitable, inclusive, and safe parks, open space, and trails;</p> <p>Objective #5 - Embrace and enhance opportunities for arts and culture; and</p> <p>Objective #7 - Foster opportunities for continued community engagement, development and education.</p>	<p>It appears that the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR.</p> <p>No further response is necessary. No changes to the Draft PEIR are needed.</p>
013-6	<p>Including a dedicated section for historic preservation in the Master Plan is important for the County’s preservation program as well as to encourage river communities with dormant or nonexistent programs to save their historic resources. Preservation is a powerful tool for empowering and celebrating underrepresented communities by engaging stakeholders to save historic places. Connections to the historic environments</p>	<p>It appears that the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues</p>

Comment#	Comment Text	Response
	<p>provide an important tangible link to history that cannot be achieved through literature. Historic preservation is an equitable solution to history and community engagement.</p>	<p>when responding to comments and make a good-faith effort at full disclosure in the EIR.</p> <p>This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>013-7</p>	<p>IV. The Conservancy requests additional meetings with the County’s 2020 Los Angeles River Master Plan representatives, steering committee, and community partners.</p> <p>The Conservancy is appreciative of time the Master Plan took to meet with us. Continued dialogue with County staff and community partners is welcomed as we believe it ensures a more well-rounded Master Plan that fully incorporates historic Preservation. As the Plan moves forward, the Conservancy can provide further insight into the role of preservation and how it may positively impact and strengthen the Plan. We hope a meeting with County representatives will facilitate a meaningful dialogue and help to create a more well-rounded 2020 Master Plan.</p>	<p>It appears that the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>This comment is acknowledged. Please see Master Response MR-3 (Public Outreach for the Draft PEIR).</p>
<p>013-8</p>	<p>The 2020 Los Angeles River Master Plan is an important tool for future projects along the river. The L.A. River is one of the County’s most important resources that impacts many communities along its fifty-one-mile length. The Conservancy is encouraged by the opportunity for the County’s Master Plan to provide equitable access to the river and celebrate its significant cultural resources. The Conservancy recommends the following for the finalized Master Plan:</p> <ol style="list-style-type: none"> 1. The Master Plan should include detailed language regarding conflicting priorities amongst various agencies within the Master Plan Area 	<p>It appears that the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
013-9	2. Historic Resources within the Study Area should be surveyed and compiled into a publicly accessible database	<p>It appears that the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Please see the response to comment 011-5.</p>
013-10	3. Historic Preservation objectives and goals to be clearly articulated within Master Plan	<p>It appears that the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
013-11	4. The Conservancy requests additional meetings with the County's 2020 Los Angeles River Master Plan representatives, steering committee, and community partners.	<p>It appears that the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for information about the public outreach program that was conducted during preparation of the <i>PEIR</i>.</p>

2.3.2.32 Comment Letter O14: Riverpark Coalition, May 13, 2021

Comment#	Comment Text	Response
O14-1	<p>Natural habitat restoration, historic preservation, cultural significance and respect for stakeholders should be the vision for the LA River Master Plan. The Lower Los Angeles Revitalization Bill “AB530” was written to carry out those tasks and started this entire process. The CA State Legislature acknowledged that “No one entity could consider all the complex issues along the river corridor”. The necessity for cooperation in planning with thorough environmental review, to include accountability must be required for all planned projects on public and private land in the corridor, if the mission is to become reality.</p> <p>The vision of collaboration is the essence of the law. There must accountability to the LA River Master plan, to include real sanctions, if it is not followed. There needs to be a steering committee and multiple agency review. During all phases and particularly during the CEQA process, adherence to the master plan needs to be evaluated if the primary objective to “revitalize” the river corridor is to be achieved with equity and justice.</p>	<p>The County appreciates the River Park Coalition for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Regarding the first part of this comment, it appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. The commenter’s assertion that adherence to the <i>2020 LA River Master Plan</i> needs to be evaluated during the CEQA process is acknowledged and is the primary goal and purpose of the PEIR for the <i>2020 LA River Master Plan</i>. This comment is introductory to more specific CEQA comments that follow. No further response is required.</p>
O14-2	<p>When a project is proposed in the corridor 1-mile zones, whether public or private property, LA County Flood Control District “LACFCD” and the US Army Corps of Engineers “USACE” should be consulted for review to include storm drain infrastructure. Those structures are all ancillary to the flood control channel and on a project-by-project basis need to be assessed and compared for any impacts, changes or deficiencies to the “on-the-whole” system. This is an obligation of LACFCD and local municipalities and is an example of critical cooperation and a basis requirement as agreed with the Federal entity the Army Corps.</p>	<p>The first part of this comment regards consultation with the Los Angeles County Flood Control District or U.S. Army Corps of Engineers; it appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>To the extent that the commenter is referring to the CEQA process and/or the PEIR, individual entities with jurisdiction along the river corridor—including Los Angeles County Flood Control District, U.S. Army Corps of Engineers, and the cities—</p>

Comment#	Comment Text	Response
		<p>will continue having decision-making authority associated with any master plan implementation activities affecting their respective jurisdictions. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). Master Response MR-2 discusses the programmatic nature of the Draft PEIR and the fact that the Draft PEIR analyzes two Typical Projects and six kit of parts (KOP) categories but does not approve or analyze specific projects. Master Response MR-4 describes how the responsibility for approving and implementing specific future projects that may tier from the <i>2020 LA River Master Plan</i> and PEIR lies with the other jurisdictions along the LA River.</p>
<p>O14-3</p>	<p>The Master Plan proposes a “Program EIR” that unsuccessfully places accountability for adherence to the master plan in the lap of the local entities. Based on past history, local level project review in the LA River corridor is insufficient - the City of Long Beach continues to exhibit such conduct with projects such as the Wrigley Greenbelt and 3701 Pacific Place. The result is continued cumulative negative impacts in this fragile river habitat that used to be a vibrant, rich and lush resource. Natural habitats, culturally significant equestrian trails and stakeholder communities all suffer while the regional complex review promised in the legislation NEVER happens.</p> <p>The Program EIR is based on the assumption that the local entity would use a “kit of tools” or review in 5 mile segments. The problem with that is the river has features that should not be broken into segments – such as the historic equestrian trail. The linear nature of the natural river habitat and trail must be considered in its’ entirety. The demise of just one small section can have a cumulative and permanent negative consequence and change that cannot be re-stored. This is been a consequence of local level planning and without larger scale accountability to the master plan of flooding along with historic features such as the equestrian trail is why, in order to address all the complex issues when planning a project large or small, broad or site specific along the LA River corridor, a regional “committee”</p>	<p>The commenter appears to be requesting a different approach to the planning process and stating that local-level project review is not sufficient. This request to modify the planning process for the <i>2020 LA River Master Plan</i> is outside the scope of CEQA and the PEIR. In addition, the PEIR is required to analyze the project as proposed. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
	<p>approach beholden to the Master Plan is needed instead of assuming entities will “do the right thing” through Program EIR. A different approach and sanctioning powers are needed.</p>	
<p>014-4</p>	<p>Flood control risks</p> <p>The storm drain infrastructure is currently incapable of handling the rain run off for current density in the City of Long Beach within the LA River sub-watershed vicinity. Those deficiencies require many steps to cooperate in planning, permitting, review, corrective action, documenting, reporting and mitigation. Any projects and added density/development within the river 1 mile zone that do not also have through review for compliance with flood control policies, permits and procedures will stress an already under-sized flood control storm drain system. Due to lack of proper permitting, review or collaboration with many other entities such as at the USACE, LACFCD, or an “LA River 41 Member Steering Committee” level, additional flood impacts that could be avoided will be compounded and may become catastrophic. This is an example of a complex issue that AB530 referred to, one that has much larger impact but left in the hands of the local entity and the District is not being adequately reviewed for conduct, procedure and mitigation.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. In addition, please refer to response to comment O14-2. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>014-5</p>	<p>Provide Equitable, Inclusive and Safe Parks Open Space, and Trails</p> <p>Page #153 GOAL TWO and Page #250</p> <p>The 1996, 2006 and 2020 LA River master plans identified Wrigley Heights North and South, approx 70 acres of public and private land, as open space necessary to retain and/or acquire. It was listed as “the jewel of the river”. It is both critical and necessary in order to protect the little remaining habitat viable for restoration. To set in motion it’s preservation/acquisition will also achieve more equity balance for park and open space deficiencies for the citizens in the south LA River zones and west side of Long Beach. This is also part of the larger Wrigley Greenbelt, also culturally significant land with historic</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>In addition, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR).</p>

Comment#	Comment Text	Response
	<p>equestrian zones and trails and habitat. Due to lack of collaboration by the local entities, these lands represent the largest swath of land along the river adjacent to the historic horse bridle-equestrian/hiking trail with habitat, cultural and open space/recreation significance. The trails and open spaces are the life-line for the horse culture. Un-obstructed trail passage and safe mobility is critical and that requires detailed trail planning and design with equestrian expertise to include signage, education and consideration for safe horse right of way passage at all gateways, destination, crossings, trailheads and mergers. Proposals for development of county and private lands within the equestrian zones and the 1 mile river corridor zones continue to put at risk the health, safety and livability needs for these animals. Also the river corridor trail serves as the main lifeline for the integrity of the trail and the master plan. The program EIR should require linear review to prevent negative impacts brought by non-compatible uses such as high density development. The City of Long Beach conducted an in-depth EIR review in 1977 for the protection of these river-adjacent equestrian zones and that EIR should be considered in projects within the Master Plan scope.</p>	
<p>014-6</p>	<p>Support healthy connected ecosystems Page #165 GOAL THREE</p> <p>This is a large linear environmental corridor that many species depend upon. As a resource, the river has been vastly and negatively altered since it was deeded to the State of CA. The south LA River, is sovereign land - owned by the people of the State of CA. The resource continues to experience negative impacts every time development occurs on or adjacent to the river habitats and trails. The corridor ecosystem is not defined by the man-made parcel lines. The river corridor and trails were once all open space; however encroachment development right up to the levee is just as negative an impact as building right up to the edge of any wetlands or coastal protected zone.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
014-7	<p>Enhance opportunities for equitable access to river corridor</p> <p>The corridor includes wild species and domestic horses, habitat and historic and established underserved communities that need open space and protection. It is not equitable that these established stakeholders be overtaken and their survival threatened due to lack of collaboration or “buy in” by any single entity. The City of Long Beach, for example, which simply opts out of this Master Plan, is replacing habitat and historic resources with high density, impermeable spaces without thorough EIR and Master Plan compliance review.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
014-8	<p>Embrace and enhance opportunities for arts and culture</p> <p>The reality of the historic flow patterns of the river that the Tongvan seasonal villages encompassed is what we now identify as the watershed. Contemporary Tongva and other indigenous people rely on access to the river and engagement with its diverse riparian, woodland and fresh water habitats. Therefore the entire river, the watershed and adjacent lands once part of the historic flow patterns should be considered a fragile area worthy of protection for its cultural significance. The life of the river cannot be extracted from the life of the people who have depended on it since time immemorial. Therefore the land, and indeed the river itself, should be considered a living tribal cultural resource and treated as such. Priority should be given to rehabilitate and naturalize the river, its’ tributaries, and watershed areas wherever possible. This is especially true throughout Long Beach, where plans have been in place to create naturalized green parks favoring naturalized habitat - yet ignored, for decades.</p> <p>Preservation and restoration of the entire historic equestrian trail network and protecting the horse culture is culturally significant and provides for many education opportunities. Natural habitat restoration and tribal lands protections will enhance what otherwise will be lost if entities are allowed to ignore this master plan and other such documents such Long</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
	<p>Beach Riverlink and the 1947 Equestrian Trail act. As long as any local or private entity does not adhere to the master plan and related documents, the master plan serves only as a guideline without any real teeth and complex negative impacts will persist and this extensive master planning process will be in vain.</p>	
<p>O14-9</p>	<p>Address potential adverse impacts on housing affordability and people experiencing homelessness</p> <p>This needs to be done in a balance manner so that adverse impacts are not further created by too much density with disregard for existing communities and their needs as well.</p>	<p>Please refer to Master Response MR-1 (Homelessness along the LA River) for information regarding people experiencing homelessness along the LA River and efforts that will be (and are currently) undertaken by the County and cities involving the relocation of transient populations to safer, more sanitary shelters or more permanent residences. Additionally, please refer to Master Response MR-6 (Gentrification and Housing Affordability).</p>
<p>O14-10</p>	<p>Foster opportunities for continued community engagement, development and education</p> <p>The community has engaged over these master plans for the last 3 decades and yet the City of Long Beach actively ignores those historic efforts that include full scale EIR review to establish protected river adjacent equestrian trails, horse overlay zones and associated open spaces earmarked for recreation and habitat. Until there is accountability for these plans that truly include the needs and wishes of the people and environmental concerns, none will be realized.</p>	<p>While the commenter mentions “full scale EIR review,” it appears that this comment is directed toward the <i>2020 LA River Master Plan</i> and the past planning efforts for recreation and open space. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>O14-11</p>	<p>Improve local water supply reliability</p> <p>Page #: 207 Goal Eight</p> <p>The deficient storm drain pipes, a known condition in the south LA River Sub-watershed in the City of Long Beach, allow the excess to flow overland, outside the pumps and site construction without proper permits and review allows for sub-watershed and sheet-flow risks that continue to pose many flood risks and non-compliance issues.</p> <p>Promote healthy, safe clean water</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. It should be noted that the project study area is 51 miles long, with a 1-mile buffer along each side of the LA River. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
	<p>Page #: 215 Goal Nine</p> <p>This requires a larger scale review and collaborative effort that is not achieved in the “five mile”, “program EIR” or “tool of kits” concept in planning.</p>	
<p>014-12</p>	<p>Jurisdictions, Ownership, and Rights</p> <p>Page #: 48 Paragraph #: 1</p> <p>This section of the report is isolated to water issues when so many other major concerns must be addressed such as a broader and more in depth review of projects similar to those found in an EIR. It should be transparently outlined who the chain of responsible parties are, starting with the US Army Corps of Engineers (USACE), to LA County Flood Control District (LACFCD) “District Operator” to municipalities “Local Operator” and so on. If an agency, such as a municipality, neglects to responsibly evaluate environmental conditions and explore viable and better alternates in favor an economic or some other outcome over health, environmental justice, water retention, habitat, downstream impacts, the adverse impacts of climate change, then this Master Plan is not doing its job.</p> <p>We cannot allow tacit approval of adverse uses when we can and must do better for our environment and our very survival. We need our governing bodies to be more responsible for actually implementing the mitigating measures they portend to support. Words on paper have no value if they are never acted upon. The Master Plan needs actionable efforts to make incremental progress toward a healthier region.</p> <p>Role of the County</p> <p>Page #: 50</p> <p>A statement must be included to disclose the layers of responsibility (LA County, LACFCD, Municipalities) regarding who is the steward of the River, watershed and existing open space. There are serious issues that must be overseen and evaluated before allowing development. A Program EIR is</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
	<p>inadequate to address the numerous uses and elements that must be adhered to without identifying the responsible parties and layers jurisdictional gaps that remain un-resolved.</p> <p>For example: does a proposed housing development on a toxic site or a self-storage facility with nearly 600 RV parking spaces take precedent over the documented need for a safe watershed management, best management practices, healthy environment, habitat, and a health-related need for open space and greening in the most disadvantaged areas? This is where life spans on the north and west side of Long Beach are now several years less than those on the east and south. Environmental justice issues must be addressed.</p> <p>Another example is dangerous motorized vehicles/cycles allowed to travel the levee pathways in exponential numbers creating enormous public, levee and habitat safety risks. This is an obligation of LA County and LACFCD to maintain the safety integrity of the levees as agreed with the USACE. The responsibility conveyed without transparency, the buck is passed off to the Cities or Sheriffs, due to “jurisdictional cross-overs” and the problem goes un-checked. In the meantime with no clear line of action or recourse for the public nothing is being done to resolve this enormous safety issue along the entire river corridor.</p> <p>There are already agencies in place with technical expertise, along with the “steering committee” that should be able to independently and diligently evaluate projects and alternatives for the best outcome not continually favoring economic interests over the health and welfare of its citizens. These agencies and and/or a committee should not and cannot be the usual political supporters of so many poorly considered projects. The chain of command with a presence armed with jurisdictional powers should be exercised as outlined by Federal legislative Acts and contractual agreements. Following those pre-ordained agreements would outline a more secure process, where this plan fall short - to ensure homes will not be built on toxic sites,</p>	

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	<p>that water tables and the health of the river and surrounds will be improved, not threatened.</p> <p>A long term commitment must be made in improving soil and water conditions, while diligently addressing the impacts of climate change and the environmental damage done by industries and permitted by various jurisdictions. The river and surrounding land must be healed for our own survival. We must with confidence have a responsible and accountable body in the USACE, LACFCD, Coastal Commission and municipalities such as the City of Long Beach that will ensure honest and thorough evaluations rather than tacit approvals for blatant violations of best management practices and healthy outcomes. We cannot continue to allow the responsible agencies, districts and parties to ignore the obvious issues that must be addressed during their watch.</p> <p>In summary, the master plan must be embraced and the vision of restored natural habitats, respect for environmental concerns, social equity, historic, cultural and stakeholder input and accountability must be primary for this to be a successful master plan.</p>	

2.3.2.33 Comment Letter O15: East Yard Communities for Environmental Justice, May 12, 2021

Comment#	Comment Text	Response
O15-1	<p>On behalf of East Yard Communities for Environmental Justice (EYCEJ), we submit these comments on the Draft Program Environmental Impact Report (PEIR) for the Los Angeles River Master Plan (LARMP). While most of the following comments are directly in response to the PEIR, many of these concerns and recommendations allude to the LARMP and we request that the LARMP Project Team and LA County Public Works also take these comments into consideration for the LARMP itself.</p> <p>PROJECT SUMMARY & OUR PROCESS</p> <p>In this comment letter, you will find that we have various questions, concerns, and recommendations as it pertains to the following topics:</p> <ol style="list-style-type: none"> 1. Tribal Consultation 2. Population and Housing 3. Land Use and Planning 4. Biological Resources 5. Public Services 6. Hydrology and Water Quality 7. Hazards and Hazardous Materials 8. Recreation 9. Transportation <p>Over the course of two months, a group of EYCEJ members from East Los Angeles, Southeast Los Angeles, and Long Beach met to read the Draft Program EIR for the LARMP and draft a collective comment letter on behalf of the organization. Throughout this reading period, members annotated and recorded key concerns, brainstormed responses and recommendations, as well as observed major gaps and limitations in the document. Although this letter can in no way cover the full extent of our ideas and sentiments, we all agree that the points and concerns addressed in this letter represent the group’s attitude and vision of the LARMP, and therefore EYCEJ memberships’ comments. We write</p>	<p>The County appreciates the East Yard Communities for Environmental Justice (EYCEJ) for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan Project</i>.</p> <p>This is an introductory comment to the comments that follow. No further response is required.</p>

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	<p>this letter with questions, concerns and observations regarding the over 1,992 page document, and materials which were only provided in English to a population that also is heavily Spanish speaking, because we feel that it is our responsibility to address questions and concerns that the PEIR overlooks.</p>	
<p>015-2</p>	<p>1. Indigenous communities have not been invited to consult, review, and make recommendations for the LA River Master Plan.</p> <p>We urge the county to invite all CA Native American tribes with territories along the Los Angeles watershed and indigenous people local to Los Angeles County to consult, review, and make recommendations for the LA River Master Plan.</p> <p>The Paayme Paxaayt/Orit/Wanüt has always been, and will always be, a place of significance to the Native American Tribes through whose ancestral homelands the River flows, including the Fernandeno/Tataviam Band of Mission Indians, the Gabrieleno/Tongva San Gabriel Band of Mission Indians, and the Kitz Nation Gabrieleno Band of Mission Indians. There are dozens of Tongva and Tataviam villages along the River. Both communities' connection to land and water was disrupted with the establishment of the Spanish mission system. For the Tongva this disturbance arose in 1771 with the founding of the Mission San Gabriel. For the Tataviam, their Spanish period began in 1797 with the "recruitment and enslavement of Indians¹ to Misión del Señor San Fernando Rey de España (San Fernando Mission), the Seventeenth established mission in California."²</p> <p>The current status of the Los Angeles River and Tributaries is first and foremost a result of colonialism and it is Native American Tribes and indigenous groups that have been most impacted by this. The State of California and County of Los Angeles share responsibility for the loss, trauma, and displacement experienced by tribal community members from the Native Nations through whose homelands the River flows.</p>	<p>As discussed in Section 3.17, <i>Tribal Cultural Resources</i>, of the Draft PEIR, multiple paths of consultation were undertaken during preparation of the environmental document. Firstly, the Native American Heritage Commission (NAHC) was consulted on March 5, 2020, and subsequently responded stating that a search of the Sacred Lands File was positive for sacred lands or traditional cultural properties within two quadrangles in the study area. Secondly, the County sent letters via certified mail to five Native American tribes who had previously requested notification under Assembly Bill 52 to seek recommendations or concerns regarding the proposed Project. Letters were sent to Mr. Jairo Avila, Tribal Historic and Cultural Preservation Officer of the Fernandeno/Tataviam Band of Mission Indians; Mr. Andrew Salas, Chairman of the Gabrieleno Band of Mission Indians—Kizh Nation; Mr. Anthony Morales, Chief of the Gabrieleno/Tongva San Gabriel Band of Mission Indians; Mr. Lee Clauss, representing the San Manuel Band of Mission Indians; and Mr. Octavio Escobedo, Tribal Chair of the Tejon Indian Tribe. Written responses were received from the San Manuel Band of Mission Indians, the Fernandeno/Tataviam Band of Mission Indians, and the Gabrieleno Band of Mission Indians—Kizh Nation. The San Manuel Band of Mission Indians declined consultation in an email dated June 10, 2020, and the Fernandeno/Tataviam Band of Mission Indians and Gabrieleno Band of Mission Indians—Kizh Nation have requested formal consultation. Pursuant to those two requests the County formally initiated consultation with the Fernandeno/Tataviam Band of Mission Indians via a teleconference on July 8, 2020, and with the Gabrieleno Band of Mission Indians—Kizh Nation via a teleconference on August 19, 2020. At these confidential meetings, the County and the tribal representatives discussed</p>

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	<p>It is therefore important for the cities and County to recognize the connection Indigenous communities have with the LA River and their traditional ecological/ cultural/ social knowledge pertaining to the River that has been passed down over many generations. In addition, they should be engaged in the implementation and governance of the Los Angeles River Master Plan. The fact that the LA River Master Plan’s steering committee did not have any Tongva representatives and did not sufficiently represent the indigenous diaspora along the Los Angeles River should in itself invalidate this process and document. Multiple families should be representing the voice of the river, and that was not the case with the development of the LARMP and PEIR analysis.</p> <p>Recognizing that the River is part of a larger system, the Plan should consider more creative governance models that include representation from all of the California Native American Tribes³ with territories along the river to establish cohesive management over the watershed. California Native American Tribes are sovereign nations and there are multiple scenarios, including related to watershed management, river restoration, and development, which require state and local agencies to engage in government-to-government consultation with Native American Tribes as part of the planning process. Therefore the LARMP and PEIR must include Tribal Representation on all Governance and Advisory Bodies. Representation from all tribes along the River and on all future governance and advisory bodies created as a result of the Plan should be mandatory.</p> <p>The United Nations Declaration on the Rights of Indigenous Peoples, adopted by the UN General Assembly in 2007, supported by the United States in 2010, adopted by California Assembly Joint Resolution 42 in 2014, and ratified by the Organization of American States in 2016, uplifts the concept of Free, Prior and Informed Consent in Article 324, Section 2: “States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent</p>	<p>the proposed Project and the Draft PEIR analytical approach, as well as the tribes’ initial input on the proposed Project and suggestions for potential mitigation measures. As a result of the consultation, the tribes’ comments regarding mitigation measures were incorporated into the Draft PEIR.</p>

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	<p>prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.”</p> <p>As is, both the LARMP and PEIR has failed to do this. While the plan alludes to recreation and economic growth opportunities it fails to acknowledge that to inidgenous tribes, both the river and surrounding land is not just recreation, it is sacred land that is significant for ceremonies and cultural and ecological practices.</p>	
<p>015-3</p>	<p>2. The LA River Master Plan and its Program EIR does not treat ongoing displacement and gentrification as an environmental justice issue and therefore fails to analyze the significant environmental impacts this would have on LA River communities.</p> <p>The current status of the Los Angeles River and Tributaries is first and foremost a result of settler colonialism and it is Native American Tribes and indigenou groups that have been most impacted by this act of displacement and dispossession. The State of California and County of Los Angeles share responsibility for the loss, trauma, and displacement experienced by tribal community members from the Native Nations through whose homelands the River flows.</p> <p>It is difficult to be Indian under any circumstances; think what it must be like to see a phenomenon like Los Angeles spreading over your meadows and valleys, diverting your rivers, building parking structures on your holy sites, transforming the land that nurtured your ancestors into something unrecognizable.”⁵</p> <p>As is the LARMP and PEIR does not treat both the ongoing displacement of Black, Indigenous, unhoused, and communities of color as an environmental justice issue and therefore does not analyze nor mitigate potential environmental impacts as a result. The plan lists all the policies and programs that each city, located near the LA River basin, has implemented that specifically respond to housing needs. However, it is very clear and alarming</p>	<p>This comment is acknowledged. Environmental justice is not an issue that is subject to CEQA review.</p> <p>Please refer to Master Response MR-1 (Homelessness along the LA River) for information regarding homelessness along the LA River and efforts that will be (and are currently) undertaken by the County and cities involving the relocation of transient populations to safer, more sanitary shelters or more permanent residences.</p> <p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements), which provide details regarding the fact that the <i>2020 LA River Master Plan</i> analyzed parcels that could provide opportunities to site 107 potential projects. However, implementation of the potential 107 subsequent projects would depend on many factors, including, but not limited to, the location, agency oversight, and jurisdiction; proponent of subsequent projects; implementing party; local community needs; policy decisions; timing of implementation; and availability of funding. Because of these factors, the Draft PEIR did not include any site-specific or project-specific analysis and instead presented a program-level analysis of the <i>2020 LA River Master Plan</i>. The County anticipates that future specific projects would require subsequent CEQA compliance because the PEIR does not examine specific projects. The County or the other jurisdictions may use the PEIR as the basis upon which to tier their future project environmental analyses under CEQA.</p>

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	<p>that there are uneven protections across these cities. Especially in Southeast LA, there is a lack of strong tenant protections and programs for unhoused and rent-burdened folks. Not all communities have sufficient and comprehensive enough policies and programs to support housing needs which is crucial as these LA River projects will definitely increase housing prices, maximize pricing of these areas which will impact the unhoused, Black, Indigenous and People of Color, and already disenfranchised folks, and will cause further displacement across all these regions. The County needs to work towards increasing these protections and programs so that all the cities by the LA River basin have the resources necessary to respond adequately to housing needs. The report needs to be clear and direct with its approaches to combat the potential displacement of folks in these communities especially as housing injustices are being exacerbated due to the COVID-19 pandemic. The plan and the EIR analysis of the plan needs to treat this displacement and gentrification as a result of the LARMP as an environmental impact on local communities.</p>	<p>Individual entities with jurisdiction along the river corridor—including Los Angeles County Flood Control District, U.S. Army Corps of Engineers, and the cities—will continue having decision-making authority associated with any master plan implementation activities affecting their respective jurisdictions. Additionally, issues of displacement and gentrification are different for each jurisdiction and would need to be addressed at the local level by jurisdictions proposing individual projects tiering from the PEIR.</p>
<p>O15-4</p>	<p>The plan also states that the LA River Projects will “accommodate” anticipated growth and not induce new growth in housing/population. However, this statement relies on data they gathered prior to the COVID-19 pandemic and does not reflect the current situation of cities by the LA River basin. The PEIR needs to be updated with data from the current COVID-19 pandemic because this report does not take into consideration the socioeconomic hardships that have been exacerbated by this crisis such as unemployment, poverty, eviction, displacement, food insecurity, etc.</p>	<p>Baseline conditions are pre-COVID-19 pandemic and comply with CEQA’s requirements for analysis. The pandemic is not expected to be a long-term phenomenon or result in permanent changes to cities along the river. The commenter provides no substantial evidence to the contrary.</p>
<p>O15-5</p>	<p>Additionally, we are concerned with the statement that no existing permanent housing structures will be displaced but that construction of these projects will displace unhoused communities. Unhoused folks are people, and they will be displaced even if existing permanent housing will not. In addition, although the permanent housing will not be</p>	<p>As discussed in Chapter 2, <i>Project Description</i>, of the Draft PEIR, one of the objectives of the <i>2020 LA River Master Plan</i> is to address potential adverse impacts on housing affordability and people experiencing homelessness. Please refer to Master Response MR-1 (Homelessness along the LA River) for additional information regarding homelessness along the LA</p>

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	<p>demolished, the residents living there might be displaced due to rising housing prices caused by the LA River projects. This impact analysis is focusing on structures and not on the people who will be potentially impacted by these projects!!! This analysis needs to use language that is more people centric as well as include impacts that decenter housing structures and instead, focus on people who will be relocated or displaced such as unhoused folks, low income and or housing insecure families and individuals, etc.</p>	<p>River and efforts that will be (and are currently) undertaken by the County and cities involving the relocation of transient populations to safer, more sanitary shelters or more permanent residences.</p> <p>Additionally, CEQA does not require analysis of social or economic issues unless they relate to a physical change in the environment (State CEQA Guidelines Section 15131). Security is a social issue. The Draft PEIR has addressed those aspects of security that may affect the physical environment.</p>
<p>015-6</p>	<p>Lastly, we are concerned with the statement that the project will not result in a cumulatively considerable impact on its own. It discusses that the proposed project could only produce impacts in combination with other projects within the County. These proposed projects will generate significant impacts on their own as they will contribute to pre existing housing insecurity, gentrification, and policing/criminalization. The report needs to stop trying to distance their projects from displacement and population growth. These projects are not isolated from ongoing trends of displacement, criminalization, etc. This impact report desperately needs to take into consideration how displacement and gentrification are environmental justice issues!!! These projects will drastically change the social environment of these communities as people will be relocated, businesses led by community members will be socioeconomically impacted, and the various community spaces and networks that have been formed by these folks will be forever changed. By not assessing the cumulative impacts of the LARMP and resulting projects, the Program EIR fails to adequately assess and analyze the full extent of environmental impacts the LARMP will have on local communities.</p>	<p>The cumulative impacts are discussed in the respective sections for each individual issue area, including for housing and population growth (Section 3.13, <i>Population and Housing</i>) and traffic (Section 3.16, <i>Transportation</i>). For information about housing insecurity, homelessness, displacement, and gentrification, please refer to Master Responses MR-1 (Homelessness along the LA River) and MR-6 (Gentrification and Housing Affordability).</p> <p>Environmental justice is not an issue subject to CEQA analysis.</p>

Comment#	Comment Text	Response
O15-7	<p>3. When envisioning the land use and planning for LARMP, it is important for LA County to consider all users of the LA River, which includes residents, indigenous people, and unhoused individuals who live by and in the immediate community. The Program EIR fails to study this.</p> <p>To protect residents, the PEIR must address important questions and concerns related to land use and planning. It is the County’s duty to protect these residents and to ensure that communities remain socially, economically, and culturally stable in the long term. One question that must be addressed is, given that gentrification is real and ongoing in most Black, Indigenous, Communities of Color near the LA River, how is the county ensuring that all users enjoy the benefits provided by these public spaces? As is the PEIR is inadequate until it requires the LARMP to fully outline an anti-gentrification plan to meet land use planning, policy, and regulation goals.</p>	<p>Please see the response to comment O15-2, which discusses the tribal outreach efforts that were undertaken as part of the <i>2020 LA River Master Plan</i> effort. The purpose of the PEIR is to examine and disclose the significance of impacts resulting from the physical change created by the <i>2020 LA River Master Plan</i>. CEQA does not require consideration of social impacts other than as they may relate to an adverse physical change in the environment (State CEQA Guidelines Section 15131). The commenter has not provided substantial evidence that gentrification would occur as a result of the <i>2020 LA River Master Plan</i> nor that it would result in any adverse physical changes. Therefore, no mitigation is required.</p>
O15-8	<p>Another important question our community members have is: Why is the PEIR analysis defining the division of a community only through connectivity to other areas? Division can happen within an established community. The PEIR should analyze how the LARMP can divide neighborhoods within a community and how communities can be divided from each other, socially and spatially. For example, the operation analysis section fails to outline how building amenities such as pavilions, cafes, and performing arts spaces can create division by fostering gentrification, centering white affluent visitors (soon to be gentrifiers) as premier amenity users, and displacing existing local neighborhood businesses that already offer such amenities (i.e.: bringing in a new coffee shop when there is one down the block that has served the community for decades). A thorough analysis and mitigation plan that incorporates the already existing Lower Los Angeles River Revitalization Plan Community Stability Toolkit is needed.</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements), which discuss the programmatic nature of the Draft PEIR and the fact that the Draft PEIR does not analyze specific projects in specific locations or neighborhoods. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the other jurisdictions along the LA River.</p> <p>Please refer to Master Responses MR-1 (Homelessness along the LA River) and MR-6 (Gentrification and Housing Affordability) for discussions regarding displacement/homelessness and gentrification (respectively).</p> <p>CEQA does not require consideration of social impacts other than as they may relate to adverse physical changes in the environment (State CEQA Guidelines Section 15131).</p>

Comment#	Comment Text	Response
O15-9	<p>PEIR states that Construction and Operation for Kit of Parts (KoP) would be less than significant, but once again, Green Gentrification⁶ is real, it is violence, and yet is not considered as a potential impact. Often, when affordable units are built, there is no guarantee that those units will be for community members from the local neighborhoods. KOP 6 does not strictly prioritize these units for locals. If these limitations are in place, PEIR should indicate the policies or measures in place and the assessment that proves induction of a population will not take place. Additionally, we are aware that affordable housing nonprofits maintain their own running list of possible candidates. This could bring in unplanned growth to the neighborhoods and this concern should be addressed in the PEIR if housing for locals only truly is the goal.</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements), which discuss the programmatic nature of the Draft PEIR and the fact that the Draft PEIR analyzes two Typical Projects and six kit of parts (KOP) categories but does not but does not intend to and does not analyze any specific prospective projects at a project level. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River.</p> <p>Please refer to Master Responses MR-1 (Homelessness along the LA River) and MR-6 (Gentrification and Housing Affordability) for discussions regarding displacement/homelessness and gentrification (respectively).</p> <p>CEQA does not require consideration of social impacts other than as they may relate to adverse physical changes in the environment (State CEQA Guidelines Section 15131). The purpose of the PEIR is to examine and disclose the significance of impacts resulting from the physical change created by the <i>2020 LA River Master Plan</i>. Gentrification is not inherently an adverse physical change. The commenter has not provided substantial evidence that gentrification would occur as a result of the <i>2020 LA River Master Plan</i> nor that it would result in any adverse physical changes. Therefore, no mitigation is required.</p>

Comment#	Comment Text	Response
O15-10	<p>With regards to the LARMP’s consistency with the Lower LA River Revitalization Plan, the document stated, “Typical Projects, 6 KOP categories, and the overall 2020 LA River Master Plan Yes. Please see above consistency discussion for SoCal Connect policies.” The information “above” fails to outline how the LARMP is inconsistent with the goals outlined in the Lower LA River Revitalization Plan. Here are the goals the PEIR must properly address:</p> <p>1. Prevent gentrification and resulting residential and commercial displacement through comprehensive community-driven and informed policies and programs such as, but not limited to affordable housing, rent stabilization, enhanced infrastructure financing districts (EIFDs), community land trusts, city housing policies, thoughtfully planned commercial development, and additional LA River multi-use trail and bikeway access points to avoid real estate hot spots. Not a single paragraph was written in the Land Use and Planning Section about how the PEIR integrates anti-gentrification and community stability safety nets. Our question is the following: Which of the above mentioned policies and programs are in place to protect tenants and community members and thus, allow such development by the River to begin?</p>	<p>Please refer to Master Response MR-6 (Gentrification and Housing Affordability) for a discussion about gentrification in the context of the <i>2020 LA River Master Plan</i>. Also, please see the response to comment O15-9.</p>
O15-11	<p>2. Address homelessness by preventing residential displacement, support regional initiatives such as increasing the affordable housing stock, long-term homelessness interventions, and incorporating support services for the homeless into river revitalization projects. PEIR fails to mention unhoused folks who currently shelter near the LA River and how PEIR will abide by goals outlined in the Lower LA River Revitalization Plan.</p>	<p>As discussed in Chapter 2, <i>Project Description</i>, of the Draft PEIR, one of the objectives of the <i>2020 LA River Master Plan</i> is to address potential adverse impacts on housing affordability and people experiencing homelessness. Please refer to Master Response MR-1 (Homelessness along the LA River) for additional information regarding homelessness along the LA River and efforts that will be (and are currently) undertaken by the County and cities involving the relocation of transient populations to safer, more sanitary shelters or more permanent residences.</p>

Comment#	Comment Text	Response
O15-12	<p>4a. As proposed, the LA River Master Plan may lead to the decline or displacement of biological resources and therefore cause a significant environmental impact on the LA River and adjacent communities.</p> <p>The PEIR analysis states that construction, maintenance, and operational activities along the LA River can potentially and significantly decline species and their natural habitat. This instills in us worries about the longevity of habitats and species and potential displacement of biological resources. Although prevention measures are planned, indigenous tribes were not consulted, and potential impacts are still significant. We recommend the county explore alternate mitigation measures and work with different preceptors to significantly reduce impacts.</p>	<p>Biological resources and the <i>2020 LA River Master Plan's</i> potential impact on such resources are discussed extensively in Section 3.3, <i>Biological Resources</i>. Additional information is found in Appendix D of the Draft PEIR.</p> <p>Please see the response to comment O15-2 regarding the outreach and consultation with Native American tribes that was undertaken during preparation of the Draft PEIR.</p>
O15-13	<p>California Native American Tribes and Traditional Ecological Knowledge (TEK)—the value of TEK in land and watershed planning should be uplifted in the Plan. “Traditional Ecological Knowledge (or TEK) refers to the evolving knowledge acquired by indigenous and local peoples over hundreds or thousands of years through direct contact with the environment....TEK is an accumulating body of knowledge, practice, and belief, that encompasses the world view of indigenous people which includes ecology, spirituality, human and animal relationships, and more.” The Plan should cite California Landscape Conservation Partnerships Traditional Ecological Knowledge Resources page for additional information related to California Native American Tribes and TEK.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
O15-14	<p>It is stated that, as a mitigation, permit distribution will be required for projects that will pose risks to biological resources. For example, Mitigation Measure BIO-21c: states: “If wetlands or jurisdictional aquatic resources are identified within the project footprint and would be affected by construction of the project, the appropriate permits will be obtained from the USACE, SWRCB or RWQCB, CDFW, and/or the CCC, as required. The</p>	<p>The Biological Resources Draft PEIR Section 3.3.2.2, <i>Regulatory</i>, describes the applicable regulations and requirements for permits in some detail. The individual mitigation measures are comprehensive and descriptive. No additional explanations are necessary. Please also refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements), which discuss the</p>

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	<p>permittee will implement all measures and conditions included in those permits”. After reading this, we asked ourselves, “What will these permits implement? What about obtaining these permits makes construction a more secure process?”. This is not clearly stated and creates a concern about any gaps permits may not be able to address. We recommend an explanation for what the permits will address and how they will make construction a more secure process. “Permanent construction” is also indicated in the plan. However, this is not defined, and no scenarios or reasons are given to why construction will be permanent.</p>	<p>programmatic nature of the Draft PEIR and the fact that the Draft PEIR analyzes two Typical Projects and six KOP categories but does not intend to and does not analyze any specific prospective projects at a project level.</p>
<p>015-15</p>	<p>The PEIR also states the use of pesticides, herbicides, and fungicides can have a detrimental effect on biological resources. It is stated that pesticides and herbicides can indirectly impact species and “increase invasive plant species”. Additionally “herbicide use can degrade habitat and remove floral resources”, pesticide use can cause “mortality” and have “sublethal effects”, and fungicides “can also lead to increased susceptibility to pathogens and parasites”.</p> <p>The PEIR should also consider the impacts of pesticides used on biological resources would have on nearby communities and users of the LA River. There is an emphasis on the usage of pesticides, but no serious effort to ban them. They put adjacent communities at risk, including Indigenous members who connect with the land for ceremony and for cultural practices. For example, tribal members of Los Angeles engage in basket weaving along the LA River and collect plants for medicinal purposes⁷. If plants are sprayed with pesticides, there is a risk of ingesting and coming in contact with toxins. There is also the potential for pesticides to contaminate stormwater runoff. Pesticide exposure has been linked to a number of acute and chronic health problems including a variety of different cancers, diabetes, Parkinson’s disease, asthma, and neurological damage. Based on the health risks to community members and biological resources, we recommend that these pesticides are banned.</p>	<p>The use of pesticides, herbicides, and fungicides that may result from the implementation of the <i>2020 LA River Master Plan</i> is required to conform to the applicable laws and regulations and the applicable project mitigation measures.</p> <p>The use of pesticides and/or herbicides may occur during maintenance of the proposed Project. However, these materials would be used in small amounts, intermittently, and with proper care as dictated by their accompanying Safety Data Sheet (SDS). Spills involving these materials would be contained and cleaned as they occur. The California Environmental Protection Agency regulates the use of pesticides to ensure the protection of public health, environmental quality, and economic vitality.</p> <p>In addition, Mitigation Measure BIO-17, Prepare and Implement Pest Management Plan, requires the prohibition of rodenticides (rodenticides pose a risk to pets and small children) and neonicotinoid pesticides. The Pest Management Plan will be prepared by a qualified biologist and will be based on the most current research regarding pesticides.</p> <p>The impacts of pesticides, herbicides, and fungicides on water and groundwater quality are mitigated through stormwater best management practices (BMPs) as described in the Design Guidelines. These may include rain gardens, vegetated swales/bioswales, vegetated filter/infiltration strips, infiltration trenches, stormwater planters, and tree well filters. Implementation of these features would allow water to percolate</p>

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		<p>into the ground, thereby treating stormwater runoff through biological uptake and reducing the discharge of pollution to the storm drain system. Any potential contaminants would be filtered, minimizing adverse effects on groundwater quality. With implementation of stormwater BMPs and compliance with National Pollutant Discharge Elimination System (NPDES) Construction General Permit post-construction stormwater standards, the County Municipal Separate Storm System (MS4) Permit, and other local water quality requirements, degradation of surface water and groundwater quality from operations of the proposed Project would be minimized.</p>
015-16	<p>Another concern of ours is attributed to the PEIR primarily highlighting biological resources that are recognized and protected by various agencies. This largely leaves out the impact to biological resources found in the community and in homes. For example, the report must consider and conduct an analysis on how LA River construction, maintenance, and operations may lead to water run-offs, pesticides, dust, etc. affecting community biological resources.</p>	<p>In addition to the requirements identified in Section 3.3, <i>Biological Resources</i>, Section 3.9, <i>Hydrology and Water Quality</i>, and Section 3.8, <i>Hazards and Hazardous Materials</i>, of the Draft PEIR include requirements to follow laws and regulations related to community health.</p> <p>Section 3.3 of the Draft PEIR includes requirements that benefit community biological resources. For instance, Mitigation Measures BIO-9, Prepare and Implement Construction Best Management Practices and Operations Recreation Plan, and BIO-17, Prepare and Implement Pest Management Plan, would benefit all biological resources.</p> <p>Mitigation Measure BIO-9 requires that all hazardous spills are promptly cleaned and hazardous materials appropriately contained; dust control measures are implemented; fire-suppression materials are available; no erodible materials are deposited into channels, drainages, ditches, drains, lakes, etc.; pet dropping/waste bag dispensers are installed; and fertilizer runoff is prevented.</p> <p>Mitigation Measure BIO-17 prohibits the use of rodenticides (rodenticides pose a risk to pets and small children) and neonicotinoid pesticides. The Pest Management Plan will be prepared by a qualified biologist and will be based on the most current research regarding pesticides.</p>

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		<p>Other requirements and laws that apply to the proposed Project within the PEIR to protect community health include items such as (but not limited to) the inclusion in the Project design of structural and non-structural BMPs that would be implemented to capture, convey, and control pollutant discharge, and infiltrate stormwater during a rain event; compliance with the Los Angeles County MS4 Permit and its associated provisions; adherence to the Public Works Low Impact Development (LID) Standards Manual; compliance with the Clean Water Act (CWA); preparation of a Stormwater Pollution Prevention Plan (SWPPP); and compliance with the California Toxics Rule. These requirements are set in place with many goals in mind, including to protect human health and the environment, protect the quality of nation’s surface waters, improve water quality, and reduce impacts on surface water quality.</p>
<p>015-17</p>	<p>4b. The naturalization of the LA River DOES NOT and SHOULD NOT equate to displacement.</p> <p>Communities that, traditionally, have not had access to green spaces are worthy of green spaces without needing to worry about potential increase to living costs (including housing), direct and indirect displacement, or gentrification. LA County is making the argument that naturalization would lead to displacement. Our communities are not asking for a complete and vast development along the entire LA River. Naturalization does not mean we have to remove concrete that will uproot houses and communities. We believe that the county can and should work on designing a realistic and achievable plan: naturalizing certain parts of the LA River that would not uproot homes and to put protections in place against skyrocketing rent and house prices and also reserving affordable housing to locals along the corridors in which naturalization does take place. Other ways in which we can promote greenery and the existence of biological resources without taking extreme measures can and should be explored by the Program EIR.</p>	<p>As discussed in Chapter 2, <i>Project Description</i>, of the Draft PEIR, one of the objectives of the <i>2020 LA River Master Plan</i> is to address potential adverse impacts on housing affordability and people experiencing homelessness. Please refer to Master Responses MR-1 (Homelessness along the LA River) and MR-6 (Gentrification and Housing Affordability) regarding displaced/homeless persons and the issue of gentrification. With respect to naturalization of the river, please refer to Master Response MR-5 (Naturalization of the LA River).</p>

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015-18	<p>4c. The Program EIR is more concerned with economic growth rather than ecological growth. Revitalizing the LA River should mean prioritizing naturalization over economic growth. Revitalizing the LA River should mean prioritizing naturalization over economic.</p> <p>The Program EIR assesses the environmental impacts to biological resources caused by construction, operations, and maintenance along the LA River. After analyzing both the master plan and PEIR, we believe “revitalizing” the LA River is centered around development rather than naturalization. It centers impacts to biological resources around developmental projects, such as pavilions, cafes, and spaces that offer entertainment and recreation. However, there is no emphasis on naturalization and supporting current ecological development or restoration efforts of native life. It fails to commit and mandate the healing and remediation of the existing river, its watershed, and surrounding land. The proposed LA River Master Plan holds potential to bring ecological life back to the River. However, its current focus is misguided and short-sighted. A true and just revitalization of the LA River should emphasize and advocate for ecological development. We recommend projects related to ecological development, backed by community input, be prioritized and assessed as well.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please see Master Response MR-5 (Naturalization of the LA River).</p>
015-19	<p>4d. The county has not honored Indigenous community members’ connection to ecological life. Nor have they consulted with them about ecological knowledge of the LA River.</p> <p>We recommend that the County and LARMP Project team use the aspiration gathered at community meetings as the starting point for tribally-led projects, specifically those that emphasize habitat restoration and community education forums. Both the LARMP and PEIR must recognize local tribes as partners in ideas, and programs, especially in stewardship programs and strive for Indigenous stewardship & co-management.</p>	<p>Please see the response to comment 015-2 for information about the consultation with Native American tribes that occurred during the development of the <i>2020 LA River Master Plan PEIR</i>.</p>

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	<p>Indigenous community members, whose families have lived by and have gathered by the LA River for generations, have a deep connection with the LA River. Their vast knowledge on ecological life and restoration should be considered important expertise, yet the majority of CA Native American tribes with territories along the LA watershed have not been invited or consulted to review the plans. The Program EIR is incomplete and should be invalidated without their review. LA County must acknowledge their role in the violent history of the water wars and how their decisions have impacted Indigenous communities residing by the River. For example, Paiute people and Owens Valley people have been suffering severe health impacts, such as asthma and cancer, due the channelization of water, which caused today’s dust emitted from the shallow river bed that was once abundant, rich with ecological life, and health. Los Angeles’s lack of regard for Indigenous life on and by rivers has been detrimental and by still not consulting with them, they continue to disrespect communities whose lives have been negatively impacted by their decisions and are posing risks to village communities adjacent to the LA River. By not acknowledging Los Angeles’s violent water history and engaging with Indigenous communities in developing the LA River Master Plan and PEIR, the project produced will be unethical and unjust.</p>	
O15-20	<p>4e. Recognize the River as a Living Being</p> <p>Both the LARMP and the PEIR must incorporate local Indigenous languages, theories and practices throughout the document to carry out the true spirit of revitalization. Native American Tribes and Indigenous Peoples around the world have adopted similar stances regarding Rivers, Mountains and other land and water entities within their ancestral homelands. Most recently the Yurok Tribe in California adopted a resolution recognizing legal rights for the river.</p>	<p>This is not a CEQA requirement. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. In the interest of overall clarity and conciseness, the County respectfully declines to include this in the PEIR.</p>

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O15-21	<p>5a. The Program EIR’s analysis of public services within the LA River Master Plan does not adequately address how first responders will assist community members on the LA River.</p> <p>The section lists an inventory of police service providers for jurisdictions in the LA River Study Area but does not assess how police, sheriffs, and public safety departments will oversee the LA River. Outlining their duties and the extent of their presence on the LA River will be beneficial to help us understand their roles.</p>	<p>This comment is acknowledged. Section 3.14, <i>Public Services</i>, of the Draft PEIR identifies Mitigation Measure PS-1, Ensure Police and Fire Service Providers Have Adequate Resources, to ensure they can continue to serve the project area within their respective required levels of service and response times once a subsequent project is constructed. Per Mitigation Measure PS-1, during subsequent project design and development, the implementing agency will regularly notify and coordinate with police and fire service providers that have jurisdiction over subsequent project sites on project construction design, activities, and scheduling—including any street or lane closures related to subsequent projects.</p>
O15-22	<p>Our community members would also like to know if the county plans to utilize other first response providers aside from the police to protect the LA River? For example, the EIR does not mention anything relating to the LA River Ranger program that is being considered to monitor the Lower LA river. Additionally, as BIPOC members of Los Angeles, we fear unwarranted policing towards local community members and excessive force towards unhoused locals or individuals who experience mental health struggles. The LARMP and PEIR fails to analyze how increased policing and criminalization due to the LARMP could potentially harm local communities. Currently, unhoused, Indigenous folks, and other local residents access the river for cultural or day to day use. Criminalizing these uses or making these populations feel unsafe with increased police presence, would cause environmental impacts which are not analyzed in the PEIR. As an alternative the Lower Los Angeles River Revitalization proposed the creation of a River Ranger Public Safety Ambassador program. The LARMP and PEIR analysis on public services does not mention this program nor how this plan may conflict with this program, which provides an alternative to armed policing. This program actually discusses the need to educate and build cultural competence for whoever leads public safety in the river. However the LARMP does not discuss this.</p>	<p>Please see the response to comment O15-21 for information about police response and to O10-3 for information regarding the River Rangers program.</p>

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015-23	<p>Additionally, it is mentioned that there may be localized road closures and detours that could increase response times for emergency services that would be required on the LA River. No mitigation measures are mentioned for this hazard. We recommend the county to consider having first responders stationed at hard to reach areas.</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements), which discuss the programmatic nature of the Draft PEIR and the fact that the Draft PEIR analyzes two Typical Projects and six KOP categories but does not intend to and does not analyze any specific prospective projects at a project level. Requiring emergency access during construction is a common practice, with accepted standards such as signage and flag persons to ensure access by emergency responders. There is no reason to believe that future projects will not employ standard methods to ensure access.</p>
015-24	<p>5b. Program EIR’s analysis of public services within the LA River Master Plan fails to acknowledge unhoused people and Indigenous communities as LA River user groups.</p> <p>The County needs to plan and design with the unhoused and Indigenous communities in mind. People experiencing houselessness utilize public services more than any other user group. In addition, the LARMP and PEIR fails to acknowledge or be in conversation with indigenous communities and what their needs for public services are as a result of the LARMP. Indigenous people are often criminalized for ceremonial practices or for “trespassing” on their own land. Both the LARMP and PEIR fail to assess to what extent the LARMP will encroach on indigenous people’s birthright to use the LA River for these practices.</p>	<p>Please refer to Master Response MR-1 (Homelessness along the LA River) for information about homelessness along the LA River. One of the nine objectives of the <i>2020 LA River Master Plan</i> (Objective 6) is addressing potential adverse impacts on housing affordability and people experiencing homelessness. Objective 6 of the proposed Project recognizes that the goal of increasing parks and open space may simultaneously have the potential of negatively affecting housing affordability. The <i>2020 LA River Master Plan</i> seeks to improve neighborhoods without causing negative effects of displacement by proactively implementing a strategy for preventing displacement and supporting continuing affordability of housing in river-adjacent communities. Furthermore, as concluded in Section 3.13, <i>Population and Housing</i>, of the Draft PEIR, inclusion of affordable housing in the <i>2020 LA River Master Plan</i> would not induce population but would rather serve the existing underserved low-income population and facilitate development of supportive housing for people experiencing homelessness.</p>
015-25	<p>5c. The Program EIR’s analysis of public services within the LA River Master Plan does not include an assessment that studies long term growth rate or implications related to LA River development.</p>	<p>As discussed in Section 4.4 of the Draft PEIR, many of the approximately 107 projects proposed under the <i>2020 LA River Master Plan</i> are intended to provide flood management, recreational uses, and ecological uses. Projects are intended to serve the local community and not intended to substantially increase population growth. As concluded in Section 3.13,</p>

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	<p>The section states that public services have been actively developing in tandem with growth in the communities and the region, but does not include an assessment that studies growth rate or implications related to potential LA River development.</p>	<p>inclusion of affordable housing in the <i>2020 LA River Master Plan</i> would not induce population but would rather serve the existing underserved low-income population and facilitate development of supportive housing for people experiencing homelessness. Therefore, the Typical Projects and KOP Categories 1 through 6, even when considered together, would not induce substantial unplanned population growth in the project study area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., by extending roads or other infrastructure). Consequently, the proposed Project is not expected to result in significant growth-inducing impacts on the environment.</p>
<p>015-26</p>	<p>6. The Program EIR does not adequately assess the environmental impacts the LA River Master Plan will have on Hydrology and Water Quality.</p> <p>Various industrial facilities expose and contaminate the Lower LA River and adjacent communities to industrial waste. This has current impacts on the river, wildlife, and residing community members and makes the river unsafe. Yet within this section, there is no commitment to addressing, repairing and protecting the river from present and future harm. This is critical for the plan, no development should be happening without this being at the center.</p>	<p>Hydrology and water quality are addressed at a program level in Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, and the impacts associated with implementation of the <i>2020 LA River Master Plan</i> are disclosed, as are the mitigation measures required to mitigate impacts to the extent feasible. The remainder of this comment regarding cleanup of existing contamination relates to the <i>2020 LA River Master Plan</i> and is the responsibility of the individual local jurisdictions or agencies such as the Department of Toxic Substances Control.</p> <p>CEQA does not apply to impacts of the environment on a project (<i>California Building Industry Assoc. v. Bay Area Air Quality Management District</i> (2015) 62 Cal.4th 369). The effects of existing industrial facilities on the <i>2020 LA River Master Plan</i> are therefore outside the scope of the PEIR.</p>
<p>015-27</p>	<p>Additionally, during construction there is an expected temporary contamination. There should be a commitment for any proposed construction to use zero-emission equipment and provide appropriate monitoring to prevent runoff contamination.</p>	<p>Please see the response to comment 015-26, as well as Section 3.8, <i>Hazards and Hazardous Materials</i>, of the Draft PEIR.</p>
<p>015-28</p>	<p>Lastly, we believe the County and Project Team needs to fully analyze and consider naturalizing the river in a way that will not displace adjacent communities. This will allow the river to breathe, it can expand ecology and wildlife across the river, and offer outdoor learning opportunities that Lower LA River</p>	<p>Please refer to Master Response MR-5 (Naturalization of the LA River) for a discussion regarding naturalization of the LA River and flood control and to Master Response MR-1 (Homelessness</p>

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	<p>communities currently lack access to. Specifically the County and Project team needs to analyze and consider ways to reclaim the floodplain that will not directly and indirectly displace residents within and along the LA River. As is, the PEIR does not list this as an alternative and therefore fails to study the merits of this alternative.</p>	<p>along the LA River) for information about homelessness and displacement.</p>
<p>O15-29</p>	<p>7. The Program EIR analysis on Hazards and Hazardous Materials is inadequate</p> <p>As is the PEIR did not consult with indigenous governance structures when it comes to oversight and handling toxic materials. This section also fails to mention hazardous runoff that goes into water and there is no mention nor analysis of impacts to adjacent homes (who live near hazardous sites).</p>	<p>The commenter offers no examples or substantial evidence of inadequacies within the hazards and hazardous materials analyses. Please refer to the responses to comments O15-2 and O15-26 for discussions regarding consultation with Native American tribes in the region and the handling of hazardous/toxic materials, respectively. For additional information about hydrology and water quality, please refer to Section 3.8 of the Draft PEIR.</p>
<p>O15-30</p>	<p>8a. The Program EIR analysis of Recreation is inadequate, as it fails to mention how the LARMP's park access goals will be equitable across different cities in LA county. Many cities along the LA River have their own goals set forth in their general plans. Cities should prioritize allocating more resources to public spaces. This should especially be considered in communities that lack recreational and green spaces. Providing more recreational spaces can lead to healthier and more environmentally equitable communities. In order to achieve true equity of recreational use across cities, the county should invest in disinvested cities so that they are not left behind when it comes to tree canopy coverage, open spaces, and other basic needs or resources. We must ask, how do we make sure that there is an adequate amount of open space available to cities with a higher density population, such as cities with multigenerational households? The fact that the LARMP prioritized developing green spaces but not remediating contaminated land or regulating polluting facilities that will be adjacent to these proposed opportunity sites demonstrates how the LARMP fails to address true community concerns. The fact that the PEIR fails to see this speaks to how inadequate the PEIR analysis is. As a result the</p>	<p>As discussed in the response to comment O15-24, Objective 6 of the proposed Project recognizes that the goal of increasing parks and open space may simultaneously have the potential to negatively affect housing affordability. The <i>2020 LA River Master Plan</i> seeks to improve neighborhoods without causing negative effects of displacement by proactively implementing a strategy for preventing displacement and supporting continuing affordability of housing in river-adjacent communities. Furthermore, as concluded in Section 3.13, <i>Population and Housing</i>, of the Draft PEIR, inclusion of affordable housing in the <i>2020 LA River Master Plan</i> would not induce population but would rather serve the existing underserved low-income population and facilitate development of supportive housing for people experiencing homelessness.</p> <p>CEQA does not apply to impacts of the environment on a project (<i>California Building Industry Assoc. v. Bay Area Air Quality Management District</i> (2015) 62 Cal.4th 369). The <i>2020 LA River Master Plan</i> would not exacerbate the effects of existing contaminated land or polluting facilities unless they are within the actual sites of future parks and other facilities identified in</p>

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	<p>LARMP fails to address the health of the river and river-adjacent communities. We are also worried about who is categorizing these new open spaces and if there is community involvement for this process. We are also interested in knowing the walkability and rideability per access point to the L.A. River/per trail. We propose an in-depth study for use, accessibility, and equity, all of which are related to the environment and should be considered for the PEIR.</p>	<p>the <i>2020 LA River Master Plan</i>. As a result, the actions requested by the commenter are outside the scope of the PEIR.</p>
<p>015-31</p>	<p>Additionally, it is concerning that it is known that recreational resources are inadequate, yet these resources available may be shut down due to construction. If the PEIR recognizes that there will be accelerated deterioration of recreational facilities, there should be funds allocated to neighborhoods that already have a shortage of open space and facilities.</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements), which discuss the programmatic nature of the Draft PEIR and the fact that the Draft PEIR analyzes two Typical Projects and six KOP categories but does not analyze specific projects in specific locations or neighborhoods. In addition, please refer to Mitigation Measure REC-1, Minimize Disruption of Recreational Uses During Construction, which seeks to minimize the duration of construction periods and/or modify construction phasing to limit disturbance of existing recreational facilities; the mitigation measure also requires avoiding construction during the park's peak use periods.</p>
<p>015-32</p>	<p>Lastly, it would be beneficial to require and prioritize the construction and expansion of recreational facilities that might have an adverse physical effect on the environment. Our recommendation is prioritizing jurisdictions that would suffer adverse physical effects on their environment and requiring recreational expansion in these areas first.</p>	<p>Please see the response to comment 015-31.</p>
<p>015-33</p>	<p>8b. There was no community input in deciding whether mitigation measures proposed would be sufficient. It is recommended that there be input from Black, Indigenous, unhoused communities and communities of color in deciding whether the mitigation measures proposed will be sufficient. As is, the PEIR failed to consult with these communities. Both the LARMP and the PEIR failed to consult the traditional ecological and cultural knowledge of local indigenous tribes. Therefore the</p>	<p>Please see the response to comment 015-2 for information about consultation with Native American tribes that occurred during the development of the <i>2020 LA River Master Plan</i>. Additionally, please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements), which discuss the programmatic nature of the Draft PEIR and the fact that the Draft PEIR analyzes two Typical Projects and six KOP categories but does not intend</p>

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	<p>mitigation measures and alternatives proposed in the PEIR are incomplete without this initial engagement. This is exemplified in Section 3.04 within “Cultural Resources”, where the phrase “prehistoric setting” is used. This phrase is white supremacist settler terminology that insinuates there was “no history” prior to the Spanish colonial conquest of indigenous land through settler colonialism and genocide. Both the development of the LARMP and PEIR analysis are examples of violence on BIPOC communities. These acts of violence are facilitated through state-enacted micro-aggressions, such as the use of this phrase, and a refusal to intentionally engage with and follow the lead of BIPOC communities. As long as the LARMP follows a top down approach, does not consult with BIPOC and unhoused communities, and in fact doesn’t take the lead of these communities, this plan and its implementation will replicate ongoing racist and settler colonial structures that created many of the injustices the plan claims to want to address in the first place.</p>	<p>to and does not analyze any specific prospective projects at a project level.</p>
015-34	<p>8c. As an act of equity and compensation, there should be an equitable distribution of greenery in highly polluted areas.</p> <p>Our concern is that communities such as the Southeast LA cities, where there are elevated pollutants from industry, are already lacking in green open spaces and canopy coverage. There should be more greenery in highly polluted areas to compensate for the pollution. Our recommendation is to repurpose contaminated and industrialized spaces for restoration. Remediation and restoration of contaminated sites, brownfields, and vacant or industrial sites are an example of this. Implementing a strategy like this could clean contaminated urban runoff and yet is not listed as an option to mitigate environmental impacts as a result of the LARMP. In addition this approach will actually meet the LARMP’s vision of revitalizing the LA River. As is the Plan (and the PEIR which enables this plan) only economically “revitalize” the river yet fails to ecologically and socially revitalize and stabilize the river and adjacent communities. This also points to the fact that the LARMP doesn’t make this distinction and</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

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	<p>therefore erroneously claims revitalization, since their implementation of revitalization conflicts with how the community sees revitalization.</p> <p>For example, LARMP's Frame 4 depicts an insufficient amount of green open space (15). Wetlands would be a beneficial best water management practice in this location due to the amount of industrial land use. We believe that restoration strategies should be prioritized along industrial land use areas. Due to Exide, we now have lead in our surrounding soils. This affects the air quality as well as our water. Therefore, a good way to remediate this would be to introduce more greenery and wetlands in place of Exide and other similar locations. Both the LARMP and PEIR fail to analyze how remediation, restoration, and reclamation are viable alternatives to just further development without addressing past harms. In addition, the plan and the PEIR fail to consult with indigenous tribes on recreation, water and air quality, hazardous waste and other factors which could potentially create environmental impacts on recreational uses. Indigenous partners should therefore be consulted for both the LARMP and PEIR due to their traditional ecological knowledge (for example there are traditional ways to mitigate water and soil contamination which could increase park access if done intentionally.)</p>	
015-35	<p>Frame 4 also depicts proposed trails along heavily industrialized adjacent sites (15). We feel that these proposed trails should be prioritized projects for repurposing contaminated open space. Our recommendation is to prioritize heavily industrialized areas such as those belonging to Frame 4 for remediation projects to help contamination and pollution immediately.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

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O15-36	<p>8d. The Los Angeles County General Plan’s goal of 4 acres of local parkland per 1,000 people requires further explanation and reassessment.</p> <p>Our community members would like to know the metrics involved in holding this goal accountable. It is also concerning that all park classification is the same throughout the county when there are clearly some contaminated and polluted areas that should require more than 4 acres of green space per 1000 people. Are all local park systems in the county classified the same?</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No changes to the Draft PEIR are needed. It should be noted that the County is just one of 18 jurisdictions that took part in the <i>2020 LA River Master Plan</i>, each of which has its own general plan goals and objectives that deal with parkland goals specific to the respective cities and populace.</p>
O15-37	<p>Additionally, this PEIR is insufficient because it is trying to move forward with this project without first addressing disparities pointed out by its own referenced Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment (2016). According to Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment (2016) City of Bell Study Area ID number 71 has a disparity of parks in the vicinity. Currently in the City of Bell there are 0.4 park acres available per 1000 people. This is well below the park classifications requirement. It is problematic that this PEIR would consider moving forward with this project when the amount of park land provided per resident is already inadequate based on current standards’. We recommend addressing the shortage of open spaces available to current residents before moving forward with new project development and to secure more open space for these residents so that there is no need to put a stress on current recreational facilities.</p>	<p>Section 3.15, <i>Recreation</i>, of the Draft PEIR does state that cumulative development would incrementally increase the need for new or expanded facilities, which would have the potential to result in adverse environmental effects. There is an inherent deficit between the ratio of local parkland the County would like to maintain and the amount of parkland it can provide in accordance with County Code. Therefore, although much of the demand for local parkland can be accommodated, a deficit of parkland would remain compared to the County’s goal. While the Draft PEIR concludes that there is a general cumulative condition, it also states that “the proposed Project would increase opportunities for recreation for residents and visitors. The Project would provide additional recreational trails and multi-use facilities as well as connectivity to the existing County and local trail networks.” Therefore, the proposed Project would add to the current inventory of parks and recreational facilities within the County. As such, the proposed Project would not contribute to the existing cumulative impact on recreation; in fact, the proposed Project would result in a beneficial contribution to recreational opportunities within the County.</p>
O15-38	<p>9. The Program EIR analysis for Transportation is insufficient. There are many unknowns in regard to trip generation, safety, and traffic because a lot of these projects along the river are not yet solidified. The preparation of trip generation estimates and</p>	<p>Please refer to Section 3.16, <i>Transportation</i>, of the Draft PEIR for information about transportation impacts that would potentially occur with adoption of the <i>2020 LA River Master Plan</i>. The Draft PEIR analyzes the programmatic implementation of up to 107</p>

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	<p>distribution of trips for individual project elements and intersection operational analysis is crucial and the analysis without it is inadequate. It is recommended it be used for a proper and sufficient analysis.</p>	<p>projects along the LA River but, as discussed in Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements), the Draft PEIR analyzes two Typical Projects and six KOP categories but does not intend to and does not analyze any specific prospective projects at a project level. At such time that specific projects are implemented, the local agency or agencies with jurisdiction over a project would be required to analyze (tiering from the PEIR) transportation impacts and adopt any mitigation measures necessary to reduce significant impacts.</p>
<p>015-39</p>	<p>The 2-mile wide, 51-mile long study area of the PEIR is also insufficient. The report doesn’t take into account that displaced community members may have to have longer commutes causing an increase in traffic and therefore increasing Greenhouse Gas Emissions and Particulate Matter 2.5/10 exposure. When considering traffic, we must also take into account current and on-going beautification projects at the local city level such as medians that add to the congestion in our communities. These medians that are inconveniently placed along main streets leading to the Los Angeles River, eliminate left turn movements, subsequently diverting these movements to adjacent intersections, which in our communities have historically already been heavily congested and areas marked with many pedestrian fatalities.</p>	<p>Please refer to Master Response MR-7 (Master Plan Area/PEIR Study Area and Addressing the LA River in a Comprehensive Manner) for information about (and the rationale for) how the study area for the Draft PEIR was established.</p> <p>Traffic congestion, including congestion caused by medians, is not a CEQA consideration (State CEQA Guidelines Section 15064.3).</p> <p>Please see the response to comment 015-23 regarding the <i>2020 LA River Master Plan’s</i> minimal result on displacement and Draft PEIR Section 3.13, <i>Population and Housing</i>, for the discussion of that topic. Greenhouse gas emissions and air quality are discussed in Draft PEIR Sections 3.7, <i>Greenhouse Gas Emissions</i>, and 3.2, <i>Air Quality</i>, respectively. The greenhouse gas analysis takes into account potential increases in vehicle miles traveled. Given the minimal displacement expected, the <i>2020 LA River Master Plan</i> would not result in a significant increase in greenhouse gases from that source. The commenter has not presented any substantial evidence that would lead to another conclusion.</p>
<p>015-40</p>	<p>Which implores us to ask, how are these projects considering the safety and well-being of our community members? The current PEIR is inadequate in addressing this question and Collision Concentration Corridors and fails to connect how on-going projects in our communities are contributing and exacerbating</p>	<p>Please see the response to comment 015-38 with respect to where transportation and traffic-related safety impacts are discussed. Response to comment 015-38 also explains the responsibility of local jurisdictions to analyze impacts and</p>

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	<p>traffic related deaths. In driving along our communities, we see how prior projects have centered and catered to industrial businesses as we see designated “do not block” intersection markings and median cut-outs, conveniently placed at the driveways of major industries in our cities. With signs indicating that drivers are not allowed to turn in these areas, these spaces remain clear for industrial trucks to take their turns and join traffic. It is astounding to see the level of detail that is possible in these projects. This same project, however, failed to consider how narrow travel lanes force bicyclists and motor vehicles to share the same space, failing further in not designating a space to safely distance bicyclists from vehicles. As we engage in new projects, and particularly move forward with the LARMP, we need all entities involved to prioritize the health and safety of our residents, and take actionable steps in all levels of design consideration and execution to accommodate bicyclists and pedestrians</p>	<p>mitigate accordingly, at such time that specific projects are approved for implementation</p>
<p>015-41</p>	<p>9b. The LARMP and PEIR does not adequately study and analyze active transportation user safety and infrastructure. As is the PEIR’s mitigation efforts are inadequate. The PEIR as is, does not accurately account for our safety. There aren’t enough safety measures in place for pedestrians and bicyclists to access the LA River safely, especially when there are so many diesel trucks in our communities. Throughout the plan we see that many bikeways proposed in our communities are Class 3, in essence, a painted symbol on a road shared with motor traffic. It is important to understand the communities we live in, situated along freeways, railyards, and the ports. Back in 2014, it was estimated that there are up to 260,000 cars and over 50,000 diesel trucks traveling on the I-710 daily. This number has since grown tremendously as we have seen a rise in e-commerce in most recent years and an unprecedented boom in sales alone in 2020 with the COVID-19 pandemic. Our communities are the ones that see these changes, that see the increase of truck traffic as new Amazon facilities appear in our cities bringing in countless diesel trucks and delivery vans to consume our streets.</p>	<p>Please see the response to comment 015-40.</p>

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	<p>Class 3 bikeways are not a viable solution for our communities and to even consider them just adds to the perpetual negligence we experience daily.</p>	
<p>015-42</p>	<p>In place of Class 3 bikeways, we'd like to see Class 2 bikeways, enhanced with buffered protections as this type of bike lane provides greater separation from adjacent traffic lanes and/or between the bike lane and on-street parking. In addition to this, the PEIR, proposes Class 2 bikeways along our cities roadways with higher motor traffic speeds or volumes. This is also inadequate, as these are the areas where we see higher collisions and pedestrian fatalities. Our communities deserve to have proper safety measures in place and on heavily-trafficked corridors we deserve nothing less than a Class 4 separated bikeway, for the exclusive use of bicycles, physically separated from motor traffic with a vertical feature. This separation may include, but is not limited to, grade separation, flexible posts, inflexible barriers, or on-street parking. By providing physical separation from motor traffic, Class 4 bikeways can reduce the level of stress, improve comfort for more types of bicyclists, and contribute to an increase in bicycle volumes and mode share. All of which help to accomplish the regional goals the city has set out to improve mobility, accessibility, reliability, and travel safety for people and goods.</p>	<p>Please see the response to comment 015-40. The Draft PEIR only proposes mitigation for impacts of the <i>2020 LA River Master Plan</i>, not to correct existing problems outside the jurisdiction of the <i>2020 LA River Master Plan</i>. The Draft PEIR discusses traffic safety in Section 3.16, <i>Transportation</i>, specifically under Impacts 3.16(c) and (d).</p>
<p>015-43</p>	<p>The LARMP is proposing a change to our physical environment. In vetting these proposed bikeways, pathways, and any other transportation aspects, we need to honor the ancestral homelands of our Indigenous communities and ensure that we aren't creating additional harm to their lands; their ceremonial gathering sites, their burial grounds, medicinal areas, and all that they hold sacred. Indigenous communities should be consulted in ensuring that our proposed changes to the natural landscape do not increase decades of harm to their homelands.</p> <p>Our recommendation is to expand the Transportation analysis and include a study on the increases in traffic from displacement of community members as a result of gentrification, lack of</p>	<p>Please see the response to comment 015-2 regarding the consultation with Native American tribes that was undertaken during the preparation of the <i>2020 LA River Master Plan</i> and the response to comment 015-38, which discusses transportation impacts. Please refer to Master Response MR-1 (Homelessness along the LA River) for discussions regarding displacement/homelessness.</p>

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	<p>planning of prior projects, and lack of consultation from Indigenous communities.</p>	
<p>015-44</p>	<p>1. The entity that will produce the least significant impact and is committed to addressing past harms should be designated to carry out projects related to the LA River.</p> <p>Throughout the PEIR, it is stated that “impacts would be significant and unavoidable for later activities when not carried out by the county” and “impacts would be less than significant for later activities when carried out by the county”. If certain activities are not carried out by the county, we can potentially see significant impacts. It is problematic that this PEIR admits that because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated and that the impact would be significant and unavoidable when these activities are not carried out by the County. This should not absolve the County of its responsibility to mitigate significant impacts. It is recommended that significant measures be taken in advance to enforce and guarantee that the mitigation measures be incorporated in later activities not carried out by the County. The LARMP and PEIR fails to study whether the County or an agency or governance structure could be designated to take jurisdiction rather than non-county entities if there is potential for significant impacts to occur. Additionally, we would like to know how these decisions are made. Our recommendation would be to grant jurisdiction to the entity (either county, or to study the creation of a new entity (whether a Joint Powers Authority, regional district, new governance structure, etc) that would create the least impact and be committed to address past and future manifestations of environmental racism. The PEIR and LARMP should also clearly state the jurisdictional power and roles the county versus cities versus other entities will have along the LA River. In addition to whether these governance structures will change or remain the</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements), which discuss the programmatic nature of the Draft PEIR and the fact that the Draft PEIR analyzes two Typical Projects and six KOP categories but does not intend to and does not analyze any specific prospective projects at a project level.</p> <p>The County is the lead agency with respect to preparing the Draft PEIR and will mitigate the impacts of <i>2020 LA River Master Plan</i> projects that it undertakes. However, the County is just one of many separate governmental agencies with jurisdiction along the LA River. The County cannot guarantee that those other agencies will implement the mitigation measures because those agencies are outside of the County’s control.</p>

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	<p>same as a result of this LA River Master Plan. As is, both the LARMP and PEIR fail to study this.</p>	
<p>015-45</p>	<p>2. Noise compliance and mitigation during construction must be adequately addressed in the PEIR.</p> <p>No procedures are in place to make sure that construction noise levels really do comply with local noise regulations. Also, an adequate study on current noise levels that may already be a burden to communities does not exist. Continual, loud noise can lead to anxieties in our communities and can contribute to the noise pollution which adversely affects health. In addition, noise pollution can also have an adverse impact on biological resources along the river.</p> <p>Our recommendation is for the county and preceptors to first study current and potential disturbances and noise levels before bringing in excavators, dump trucks, etc. Another recommendation is to properly train city departments, property owners, and property managers on tenants’ rights to live in habitable housing, the health effects of environmental hazard exposure, and appropriate management of environmental hazards such as lead and noise pollution to prevent tenant exposure. Communities, for example, should be provided proper windows that can better block out construction sounds.</p>	<p>The methodology for analyzing construction-related noise is presented in Section 3.12, <i>Noise</i>, of the Draft PEIR on pages 3.12-66 through 3.12-70. The discussion as it relates to the construction impact determination is presented on pages 3.12-75 through 3.12-91. The discussion includes all applicable municipal code standards and general plan guidance as they relate to construction. Where appropriate, mitigation measures have been prescribed to reduce noise from construction to the greatest extent practical. The methodology specifically addresses noise levels associated with dump trucks, excavators, and other equipment. The impact discussion specifically addresses noise levels from construction as they relate to ambient noise levels gathered as part of the field investigation.</p>
<p>015-46</p>	<p>3. Mitigation measures to minimize disruption during construction are inadequate and must be reassessed.</p> <p>The PEIR says that a mitigation measure to minimize disruption during construction is to minimize duration of construction period. However, this is insufficient since the implementing agency has yet to specify subsequent project and location information nor has it confirmed the timing, duration, and the aerial extent of the construction activities. Our recommendation is for the implementing agency to first specify project location information and confirm the timing, duration, and aerial extent of the construction.</p>	<p>The Draft PEIR analyzes the programmatic implementation of up to 107 projects along the LA River but, as discussed in Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements), the Draft PEIR analyzes two Typical Projects and six KOP categories but does not intend to and does not analyze any specific prospective projects at a project level. When specific projects are implemented, the local jurisdiction responsible for implementing a project would be required to analyze (tiering from the PEIR) construction-related impacts and adopt any mitigation measures necessary to reduce significant impacts.</p>

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O15-47	<p>Another mitigation measure proposed by the PEIR is to avoid construction during peak use periods, however, this is not specific enough. Most residents use recreational facilities year-round and communities such as the Southeast LA cities already have a shortage of recreational facilities. We recommend being more specific about what is meant by avoiding construction during peak use periods and also recommend being mindful that all periods are peak periods in communities with a shortage of green spaces and recreational facilities.</p>	<p>Please see the response to comment O15-46.</p>
O15-48	<p>4. There is no analysis revealing actual environmental impacts to schools.</p> <p>The report needs to identify areas for available public and accessible green space outside of traditional parks (pocket parks, community gardens, or other green spaces). These areas constitute part of the LA River ecosystem and also fulfill communities with necessary resources.</p>	<p>The Draft PEIR analyzes the programmatic implementation of up to 107 projects along the LA River but, as discussed in Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements), the Draft PEIR analyzes two Typical Projects and six KOP categories but does not intend to and does not analyze any specific prospective projects at a project level. Because design, construction, and operational details of these projects have not been determined at this time, the environmental impact analysis is presented at a programmatic level and does not include project-specific or site-specific analysis. When specific projects are implemented, the local jurisdiction responsible for implementing a project would be required to analyze (tiering from the PEIR) construction-related impacts and adopt any mitigation measures necessary to reduce significant impacts.</p>
O15-49	<p>5. The environmental impact study area should be expanded beyond the 1-mile radius that is currently being proposed from the river.</p> <p>It is important to survey for biological resources beyond the 2-mile radius from all sides of the river since they exist beyond this radius. A plan must be established for their protection, and for their expansion since the development is considering revitalizing parts of the river. Environmental impacts of the LA River Master Plan may also affect the other topics assessed in the PEIR beyond the 2-mile radius and, therefore, the extent of</p>	<p>As discussed in Section 3.14, <i>Public Services</i>, of the Draft PEIR, construction workers are anticipated to come from the existing pool of workers in the Los Angeles region; it is not anticipated workers would move to the area to work on development projects associated with the construction of the Common Elements and Multi-Use Trails and Access Gateways Typical Projects. Construction workers would not enter into the local school system. Therefore, implementation of the <i>2020 LA River Master Plan</i> would not result in an increased demand on public school services, and it is not anticipated that any of the 107 future projects would directly affect any schools or school</p>

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	<p>impact should be further investigated and assessed. Specifically, the implementation of the LARMP can have a negative impact on population and housing, land use planning, public services and transportation use beyond the one-mile radius studied by the LARMP.</p>	<p>property. Furthermore, as discussed in the response to comment O15-48, the Draft PEIR provides a programmatic level of analysis. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River.</p> <p>Additionally, please refer to Master Response MR-7 (Master Plan Area/PEIR Study Area and Addressing the LA River in a Comprehensive Manner) for a discussion of the 2-mile radius survey area that was used for the proposed Project.</p> <p>Please refer to Sections 3.10, <i>Land Use</i>, 3.14, <i>Public Services</i>, and 3.16, <i>Transportation</i>, of the Draft PEIR for information about these topics. However, because the commenter did not provide specific information relating to an inaccuracy or inadequacy in the PEIR, no further response is necessary.</p>
O15-50	<p>On the whole, the PEIR suffers from incomplete and inaccurate assessments and findings. The public comment period and process was marred by inaccessible documents and severely limited outreach. The fact that this public review process and outreach for it was pushed through during a pandemic is also very problematic. Key populations are rendered invisible in both the LARMP and the PEIR analysis. Significant environmental impacts in the areas of water quality, noise, population and housing, recreation, demographic and neighborhood change, public services, land use and planning, transportation, cultural resources, and hazardous waste are overlooked or grossly understated. The PEIR fails to adequately assess the cumulative impacts for every single section, completely ignoring that there are several projects along the LARMP alone that will also have a detrimental impact on housing, population growth, traffic, neighborhood change, etc. This PEIR does not account for those cumulative impacts.</p>	<p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for a discussion regarding the extensive public outreach program that was conducted during development of the <i>2020 LA River Master Plan</i> as well as during the 101-day public review period. In addition, please see the response to comment O15-2, which provides information regarding the Native American consultation that occurred. With respect to the comment regarding the environmental analysis, the issues of water quality (Section 3.9), noise (Section 3.12), population and housing (Section 3.13), recreation (Section 3.15), demographic and neighborhood change (Sections 3.13 and 3.10), public services (Section 3.14), land use and planning (Section 3.10), transportation (Section 3.16), cultural resources (Section 3.4), and hazardous wastes (Section 3.8) are addressed at a programmatic level in the Draft PEIR. The cumulative impacts are discussed in the respective sections for each individual issue area, including for housing and population growth (Section 3.13) and traffic (Section 3.16). It is assumed that “neighborhood change” is referring to the issue of gentrification, which is</p>

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		discussed in Master Response MR-6 (Gentrification and Housing Affordability).
015-51	The PEIR does not provide adequate mitigation measures to address potential pollution, gentrification, and displacement, caused by the Master Plan itself to the river or to those living, visiting, or using the LARMP or any of the mentioned opportunity sites. As is, the PEIR fails to provide adequate mitigation measures for any of these concerns. The mitigation measures for air, soil, and soil quality proposed in the PEIR are insufficient and do not make clear who will enforce the measures and by what timeline.	This is the commenter’s opinion and is not supported by substantial evidence. Please refer to Master Response MR-1 (Homelessness along the LA River) for additional information regarding homelessness and displacement along the LA River and efforts that will be (and are currently) being undertaken by the County and cities involving the relocation of transient populations to safer, more sanitary shelters or more permanent residences, and to Master Response MR-6 (Gentrification and Housing Affordability), which discusses the issue of gentrification. Mitigation measures, as well as enforcement mechanisms and timelines, are provided at a programmatic level in Sections 3.2, <i>Air Quality</i> , 3.6, <i>Geology and Soils</i> , and 3.8, <i>Hazards and Hazardous Materials</i> . As discussed in Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements), the Draft PEIR analyzes two Typical Projects and six KOP categories but does not intend to and does not analyze any specific prospective projects at a project level.
015-52	For the mitigation measures the PEIR does study, there was a failure to consult with Black, Indigenous, and unhoused communities and communities of color. By failing to engage with these communities in the development of the LARMP and PEIR and failing to mention how they will be engaged or consulted in the implementation of the plan, the LARMP fails to address the past harms and will instead replicate and further facilitate these injustices. This has resulted in a disingenuous process by the County and the Project Team which developed this LARMP. For all of these reasons, both the LARMP and the PEIR should be redrafted, recirculated and amended to address these and other matters.	Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for a discussion regarding the extensive public outreach program that was conducted during development of the <i>2020 LA River Master Plan</i> , as well as the response to comment 015-2, which provides information regarding the Native American consultation that occurred. Pursuant to State CEQA Guidelines Section 21091, the Draft PEIR was submitted to the State Clearinghouse for 101 days; which exceeded the minimum requirement of 45 days.

2.3.2.34 Comment Letter O16: Forest Lawn Memorial-Park Association, May 13, 2021

Comment#	Comment Text	Response
O16-1	<p>On behalf of Forest Lawn Memorial-Park Association, we respectfully provide the following comments on the Draft Program EIR for the 2020 LA River Master Plan (SCH# 2020070128) (the “Draft PEIR”). Forest Lawn is a non-profit, mutual benefit corporation that has operated cemeteries in the Los Angeles area for over a hundred years.</p> <p>Forest Lawn’s approximately 444-acre Hollywood Hills property, which is located in Frame 7 (East Valley) of the draft 2020 LA River Master Plan, was approved for cemetery use by the City of Los Angeles in 1948 and has served the community for over 70 years. Forest Lawn Memorial-Park, Hollywood Hills currently includes approximately 300,000 individual interment spaces, and received a public benefit approval from the City in 2012 (Case No. CPC-2007-1059-DA-PUB-ZV-SPR; ENV-2007-1060-EIR), as well as a Development Agreement in 2013 (Ordinance No. 182609), for the long-term development of the memorial-park over the next few decades.</p> <p>In addition, a portion of Forest Lawn Memorial-Park, Glendale, is located in Frame 6 (Narrows) of the draft 2020 LA River Master Plan. The Glendale Memorial-Park is approximately 305 acres, located partially within the City of Glendale and largely within the City of Los Angeles. Forest Lawn Memorial-Park, Glendale opened in 1906 and has served the community for 115 years. It currently includes over 460,000 individual interment spaces</p>	<p>The County appreciates the Forest Lawn Memorial-Park Association for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This is an introductory comment that precedes specific comments that follow. No further response is required. No changes to the Draft PEIR are needed.</p>
O16-2	<p>The LA River Master Plan & Draft PEIR Should Acknowledge Existing Cemeteries The Draft PEIR should acknowledge the existence of Forest Lawn Memorial-Park, Hollywood Hills within Frame 7 of the LA River Master Plan and of Forest Lawn Memorial-Park, Glendale within Frame 6. The description of Frame 7 in Section 2.3.7 of the Project Description does not mention Forest Lawn Memorial-Park, Hollywood Hills (or the adjacent Mount Sinai Memorial Park) as an existing use in the</p>	<p>This comment regarding the fact that cemeteries are a distinct use that can function as a gathering place in a serene setting is acknowledged. Please refer to Section 3.19, <i>Wildfire</i>, of the Draft PEIR (page 3.19-4) under the <i>Frame 6</i> subheading for mention of Forest Lawn Cemetery. Page 4-5 in Chapter 4, <i>Other CEQA Considerations</i>, of the Draft PEIR states: “Existing cemeteries are not anticipated for incorporation into any of the proposed project scenarios for the Typical Projects and KOP categories.”</p>

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	<p>study area. The description of Frame 6 in Section 2.3.6 does not mention Forest Lawn Memorial-Park, Glendale. Neither description even generically identifies that there are cemetery uses within the study area, nor does the existing land uses discussion in the Land Use section of the Draft PEIR. Except for a few isolated references, this omission appears to occur throughout the Draft PEIR. The public and decision-makers would not have sufficient information from the Draft PEIR’s descriptions and analysis to understand that there are existing cemetery uses within Frames 6 and 7 of the 2020 LA River Master Plan.</p> <p>Cemeteries are a distinct use, of a unique and sensitive nature. The memorial park fulfills a significant need, as a sacred resting place for generations of Angelenos, in a serene and beautiful setting where families come to visit and remember loved ones. The cemetery is a private place dedicated to interment, worship and reflection (Forest Lawn Memorial-Park, Hollywood Hills includes two churches and a chapel, for example), quiet respect, and reverence. Forest Lawn’s Memorial-Parks also function as a gathering place for various cultural and community events for the benefit of the public consistent with the primary mission as a place of interment.</p>	<p>While cemeteries are not anticipated to be affected directly, Mitigation Measure CR-7, Avoid or Minimize Impacts to Human Remains and Associated or Unassociated Funerary Objects, provides protocols that would be followed in the event that human remains are found (regardless of location).</p>
016-3	<p>Further, state law requires that a dedicated cemetery must be held, occupied, and used exclusively for a cemetery and for cemetery purposes.¹ Given the unique and sensitive nature of the use, it is important that the Draft PEIR consistently recognize this use throughout the analyses.</p>	<p>This comment regarding the state law that requires dedicated cemeteries must be held, occupied, and used exclusively for a cemetery and for cemetery purposes is acknowledged. Please see the response to comment 016-2 regarding the ways in which the Draft PEIR addresses cemeteries and human remains.</p>
016-4	<p>The LA River Master Plan & Draft PEIR Should Protect Cemetery Uses</p> <p>Given the nature of the cemetery use, it is important for guests and visitors to have a peaceful and dignified experience at the Memorial-Parks. To that end, Forest Lawn respectfully requests that the 2020 LA River Master Plan and any projects that are implemented pursuant to it recognize the sensitive nature of the</p>	<p>Please see the responses to comments 016-2 and 016-3. It is not anticipated that any cemeteries would be directly affected by any Typical Project or kit of parts (KOP).</p> <p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements), which discuss the programmatic nature of the Draft PEIR and the fact that the Draft PEIR analyzes two Typical</p>

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	<p>cemetery use and that the environmental analyses incorporate all feasible design features and mitigation measures to minimize impacts to the Memorial-Parks.</p> <p>For example, any construction or operational activities related to the LA River Master Plan that would increase noise sources in the vicinity of the Memorial-Parks should be addressed, and coordination with Forest Lawn ensured to minimize impacts during graveside services and other sensitive activities. The noise measurement locations identified in Figures 3.12-1- Frame 6 and -Frame 7 are not near the Memorial-Parks and are not representative of noise-sensitive cemetery land uses along the study area, which are not identified in the analysis. Mitigation Measure NOI-3 should include specific additional noise-reducing measures to protect cemetery uses (including but not limited to advance coordination to minimize disruption to graveside services and to avoid interference with funeral processions).</p>	<p>Projects and six KOP categories but does not intend to and does not analyze any specific prospective projects at a project level. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River.</p>
016-5	<p>In addition, construction management plans for river projects near the Memorial-Parks should include: advance coordination with Forest Lawn, prior to commencement of construction, to discuss construction plans and schedules, general traffic mitigation plans, and visual mitigation measures (e.g., screening of machinery and equipment, no visible construction staging); direct access for Forest Lawn to construction site management to address immediate issues that may arise; no construction on Sundays and holidays; prioritizing funeral procession traffic; and 72-hour notice of any major impairments to roadways near the Memorial-Parks. Mitigation Measure LU-1 (Construction Management Plan) does not include specific measures to address potential impacts to nearby cemetery uses; therefore, Forest Lawn respectfully requests that they be included.</p>	<p>Mitigation Measure LU-1, Construction Management Plan, is included to minimize construction impacts on the surrounding communities. Each individual jurisdiction participating in the <i>2020 LA River Master Plan</i> could tier from the PEIR and implement Mitigation Measure LU-1 for specific projects. However, as discussed in Master Response MR-2 (Program-Level Analysis in the PEIR), being a programmatic document, the Draft PEIR does not analyze impacts on specific locations or sites (e.g., Forest Lawn).</p> <p>The County acknowledges that Forest Lawn would like to be notified should specific projects (which are tiering from the <i>2020 LA River Master Plan</i>) be proposed in the vicinity.</p>

Comment#	Comment Text	Response
016-6	<p>The Biological Resources Analysis Incorrectly Identifies a Freshwater Pond</p> <p>We understand the biological resources analysis, as with most of the analyses in the Draft PEIR, was largely performed on a desktop basis and covers a very broad area and range of conditions. We further understand that future projects implemented under the LA River Master Plan will be subject to site-specific and project-level review. Therefore, Forest Lawn expects to have the opportunity to comment on any future analyses that purport to identify resources within or adjacent to the Forest Lawn Memorial-Parks.</p>	<p>The commenter is correct that future projects under the PEIR would need to demonstrate compliance with CEQA, and that the CEQA process provides opportunities for affected parties to review and comment on future CEQA analyses of individual projects. Please see the response to comment 016-7 regarding the freshwater pond designation.</p>
016-7	<p>However, at this time, we note that Figure 3.3-41 (National Wetland Inventory within Frame 7) and Figure 3.3-45 (National Wetland Inventory Impacts within Frame 7) incorrectly identify a “Freshwater Pond” on the Forest Lawn Memorial-Park, Hollywood Hills property. In the area of the Memorial-Park identified as a freshwater pond on Figures 3.3-41 and 3.3-45, there is a decorative fountain. There is no freshwater pond on the Forest Lawn property.</p>	<p>The Draft PEIR has been revised to include this revision. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
016-8	<p>Location of Potential Future River Plan Projects</p> <p>While unclear with the scale of the figures in the Technical Appendix, it appears that one of the projects identified in the draft 2020 LA River Master Plan (RM 33.5 – Sennett Creek) is depicted to be located partially within Forest Lawn Memorial-Park, Hollywood Hills. For the reasons described above, the memorial-park is not a viable location for any public river plan projects. Any planning documents or diagrams that show potential future river-related projects within the memorial-park should be corrected.</p>	<p>This comment is acknowledged. As provided in previous responses, it is not anticipated that any cemeteries would be directly affected by any Typical Project or KOP. Furthermore, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR), which discusses the programmatic nature of the Draft PEIR and the fact that the Draft PEIR does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River.</p>

2.3.2.35 Comment Letter O17: Los Angeles Waterkeeper, May 13, 2021

Comment #	Comment	Response
O17-1	<p>The Master Plan “is intended to be a visionary and practical document for all 18 local jurisdictions within the study area.” (DPEIR p. 2-7.) The Master Plan has nine objectives:</p> <ol style="list-style-type: none"> (1) Reduce flood risk and improve resiliency. (2) Provide equitable, inclusive, and safe parks, open space, and trails. (3) Support healthy connected ecosystems. (4) Enhance opportunities for equitable access to the river corridor. (5) Embrace and enhance opportunities for arts and culture. (6) Address potential adverse impacts on housing affordability and people experiencing homelessness. (7) Foster opportunities for continued community engagement, development, and education. (8) Improve local water supply reliability. (9) Promote healthy, safe, clean water. (DPEIR p. 2-7.) <p>However, in lieu of actual project information, the DPEIR states, “In addition to common elements that projects need to include, to achieve the nine objectives, the 2020 LA River Master Plan proposes six categories of project improvements, or “kit of parts” (KOP), consisting of infrastructure and urban river design typologies that illustrate the range of possible strategies that the proponents of subsequent projects, including the County, can use along the river.” (DPEIR p. 2-8.) The KOP categories and potential included components are:</p> <ul style="list-style-type: none"> • Trails and Access Gateways (pedestrian, equestrian, bike, and multi-use trails; lookouts, boardwalks, vehicular access, habitat corridor) • Channel Modifications (Terraced bank, check dam, levee, armored channel, concrete bottom, soft bottom/concrete removal) 	<p>The County appreciates the Los Angeles Waterkeeper for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). Because the <i>2020 LA River Master Plan</i> is conceptual, the PEIR is a programmatic document and does not include project-specific or site-specific analysis, including for the Typical Projects. Project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p>

Comment #	Comment	Response
	<ul style="list-style-type: none"> • Crossings and Platforms (bridges, cantilever, platform) • Diversions (pipe, side channel, tunnel, overflow weir, wetland) • Floodplain Reclamation (side channel, wetland, naturalized bank, field, recreation field, storage) • Off-Channel Land Assets (urban agriculture, solar power, composting, natural treatment system, wetland, recreation field, storage, injection well, water treatment facility, spreading ground, affordable housing, art and culture facility) <p>(DPEIR pp. 2-8 – 2-9.) The DPEIR claims to analyze these diverse (and internally conflicting) KOPs as well as two “typical projects.” The Common Elements Typical Project would consist of pavilions, cafes, restrooms, benches, water fountains, bike racks, lighting, fencing, stormwater BMPs, and performance spaces implemented individually or in any combination on a site up to 3 acres in size or arranged along up to one mile of river. (DPEIR p. 2010.) The Multi-Use Trails and Access Gateways Typical Project would consist of a continuous multi-use path and welcoming access gateways to the River. For purposes of analysis, each project is assumed to be 5 miles long and 40 feet wide. (DPEIR p. 2-11.) Although Typical Projects have a generally recognizable form, they lack information about location. Even the same project will have differing effects in different locations. Projects consisting of the KOPs, however, could take almost any form in almost any location. For example, Channel Modifications could consist of increasing concrete lining – which has a certain set of adverse environmental impacts – or of removing concrete lining – which has altogether different long-term benefits and impacts. The DPEIR provides, “Under the 2020 LA River Master Plan, the multi-benefit design components can be implemented individually or in combination with other design components as subsequent projects under the 2020 LA River Master Plan.” (DPEIR p. 2-12.) Thus, the Master Plan is a menu, not a project.</p>	

Comment #	Comment	Response
O17-2	<p>The California Environmental Quality Act (CEQA) serves two basic, interrelated functions: ensuring environmental protection and encouraging governmental transparency. (<i>Citizens of Goleta Valley v. Bd. of Supervisors</i> (1990) 52 Cal. 3d 553, 564.) CEQA requires full disclosure of a project’s significant environmental effects so that decision-makers and the public are informed of these consequences before the project is approved to ensure that government officials are held accountable for these consequences. (<i>Laurel Heights Improvement Ass’n of San Francisco v. Regents of the University of California</i> (1988) 47 Cal.3d 376, 392.) The environmental impact report (EIR) process is the “heart of CEQA” and is the chief mechanism to effectuate its statutory purposes. (<i>In Re Bay-Delta Programmatic EIR Coordinated Proceedings</i> (2008) 43 Cal. 4th 1143, 1162.) Waterkeeper is concerned the DPEIR fails to adequately disclose, analyze, and mitigate the Project’s significant adverse environmental impacts.</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). The PEIR is a programmatic document and does not include project-specific or site-specific analysis. Additionally, approval of the <i>2020 LA River Master Plan</i> does not include project-level approvals.</p> <p>The Draft PEIR makes reasoned assumptions about the Typical Projects, the six kit of parts (KOP) categories, and the overall <i>2020 LA River Master Plan</i> and includes anticipated impacts and mitigation for them, as well as cumulative impacts in Chapter 3, <i>CEQA Environmental Impact Analysis</i>, of the Draft PEIR.</p>
O17-3	<p>Although an EIR need not be perfect, the County “must use its best efforts to find out and disclose all that it reasonably can.” (CEQA Guidelines § 15144.) If important information cannot be obtained, the EIR must explain why. (<i>Sierra Club v. County of Fresno</i> (2018) 6 Cal.5th 502, 519-522.) The County must also “ensure that CEQA [GHG] analysis stays in step with evolving scientific knowledge and state regulatory schemes.” (<i>Cleveland National Forest Foundation v. San Diego Assn. of Governments</i> (2017) 3 Cal.5th 497, 519.)</p>	<p>The PEIR reflects the County’s best good-faith effort to disclose the potential impacts of the <i>2020 LA River Master Plan</i> and explains in Chapter 1, <i>Introduction</i>, of the Draft PEIR that the analysis is necessarily programmatic in nature. As this is a program-level EIR, the analysis presented is conservative in nature. In the <i>2020 LA River Master Plan</i>, the projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices (BMPs) to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along</p>

Comment #	Comment	Response
		<p>the LA River. Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>Additionally, the greenhouse gas emissions analysis for the <i>2020 LA River Master Plan</i> is provided in Section 3.7, <i>Greenhouse Gas Emissions</i>, in the Draft PEIR.</p>
O17-4	<p>Throughout the administrative processes, Waterkeeper has documented its concerns about the vagueness of the Master Plan and urged the County to prioritize the Plan’s lofty but often competing goals. (See, Attachment 1.) While Waterkeeper lauds the County’s efforts to incorporate the goals of a broad stakeholder community, it reminds the County that the purpose of a Master Plan is to provide a workable road map for future restoration and development decisions along the Los Angeles River.</p> <p>Unfortunately, despite Waterkeeper’s detailed feedback, the Master Plan Update remains more of a vague vision statement than any kind of defined plan. It does not contain defined projects at defined locations and, instead, seems to permit opposing projects at all locations. Consequently, the Draft Programmatic EIR fails to adequately define a “project” as needed for CEQA review. The failure to define the Project cascades into the DPEIR’s failure to provide any useful information about the Project’s likely impacts on biological resources, recreation, displacement, hydrology, land use, hazards, and others, on an area stretching 200 square miles. Without adequate disclosure, the DPEIR further fails to adequately analyze and mitigate the Project’s impacts. In short, the Project, as described, is not ripe for environmental review.</p>	<p>The County appreciates the additional information provided in Attachment 1:</p> <ul style="list-style-type: none"> • River Assessment Fieldwork Team, “Connecting our Los Angeles River Watershed Community Through Bioassessment,” 2021 • LA River Management Strategies for the Glendale Narrows Feasibility Study, FOLAR, 2021 • Rio Hondo Confluence Area Project, Chapter 9, Projects • Rio Hondo Confluence Area Project, Site Design Concept Project Boards • Southern California Coastal Water Research Project’s 2021 LA River Flows Project Study, Restoring the Los Angeles River for Ecosystems and People, Dr. Sabrina Drill, Natural Resources Advisor, UC Cooperative Extension, Los Angeles County • Frank Gehry’s Bold Plan to Upgrade the River Seeks to Atone for Past Injustices, Los Angeles Times, January 11, 2021 • Omission Accomplished II: The Lack of Municipal Stormwater Enforcement in the Los Angeles Region, Natural Resources Defense Council, April 2019 <p>This information was shared with the <i>2020 LA River Master Plan</i> team.</p>

Comment #	Comment	Response
		<p>Regarding comment letters on the <i>2020 LA River Master Plan</i> itself, those comment letters have been considered and reviewed by the <i>2020 LA River Master Plan</i> team.</p> <p>The August 4, 2020, Notice of Preparation comments were reviewed and included in the Draft PEIR in Appendix A, <i>Notice of Preparation and Scoping Comments</i>.</p> <p>The commenter suggests the <i>2020 LA River Master Plan</i> does not contain defined projects at defined locations and, instead, seems to “permit opposing projects” at all locations. This comment does not provide enough detailed information to understand what the specific opposing projects could be.</p> <p>However, the PEIR has taken a conservative approach to impact analysis and disclosure based on the program-level review of potential future, yet-to-be-approved site-specific projects, considering the anticipated KOP categories. Therefore, the PEIR’s analysis undertakes a general examination of the potential impacts of the Typical Projects, the KOP categories, and the overall <i>2020 LA River Master Plan</i> on the LA River and the adjoining study area. Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). Additionally, project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>As lead agency, the County is responsible for complying with CEQA prior to adopting the <i>2020 LA River Master Plan</i>. Based on State CEQA Guidelines Section 15004 (b), the County has determined that there is sufficient information available about the <i>2020 LA River Master Plan</i> to initiate the CEQA process. The County does not agree with the suggestion that it could adopt the <i>2020 LA River Master Plan</i> absent a CEQA analysis because the <i>2020 LA River Master Plan</i> is considered a project under CEQA and adoption of the <i>2020 LA River Master Plan</i> is a discretionary action and requires CEQA clearance prior to adoption. Specifically, State CEQA Guidelines Section 15004 (b) states:</p> <p>“(b) Choosing the precise time for CEQA compliance involves a balancing of competing factors. EIRs and negative declarations should be prepared as early as feasible in the planning process</p>

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		<p>to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment.”</p> <p>With the foregoing in mind, the County has chosen to undertake a program-level CEQA analysis of the <i>2020 LA River Master Plan</i>. This level of analysis does not include site-specific or design information about the potential impacts of the proposed Project because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. However, this level of analysis does provide sufficient general information to inform decision-makers. Therefore, the County disagrees with the comment that the Draft PEIR fails “to provide any useful information about the Project’s likely impacts on biological resources, recreation, displacement, hydrology, land use, hazards, and others.” In fact, as described in Sections 3.0.1.1. and 3.0.1.2 of Chapter 3, <i>CEQA Environmental Impact Assessment</i>, of the Draft PEIR, detailed regulatory and geographic setting, significance criteria, impacts, and mitigation are provided for aesthetics; air quality; biological resources; cultural resources; energy, geology, soils, and paleontological resources; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; mineral resources; noise; population and housing; public services; recreation; transportation; tribal cultural resources; utilities/service systems; and wildfire.</p> <p>As discussed in Master Response MR-2 (Program-Level Analysis in the PEIR), as future projects are designed and considered for approval under the <i>2020 LA River Master Plan</i>, they will be subject to project-specific subsequent CEQA compliance, would need to consider project-specific impacts, and, when pertinent, consider the future project’s contribution to cumulative impacts.</p>
O17-5	The DPEIR also fails to include useful project objectives, to provide an alternatives analysis directed at reducing the Project’s potentially significant environmental impacts, to provide concrete and enforceable mitigation for activities as varied as installing and removing concrete channel bottoms, and	<p>The <i>2020 LA River Master Plan</i> is the County’s conceptual plan, and its contents and the utility of its project objectives are for the County to decide.</p> <p>Please refer to Chapter 5, <i>Alternatives</i>, of the Draft PEIR, which analyzes a range of reasonable alternatives. Please refer to</p>

Comment #	Comment	Response
	<p>to analyze hydrology, impacts on biological resources, and other important environmental concerns in a useful way.</p>	<p>Section 5.4., <i>Environmental Evaluation of Alternative B</i>, of the Draft PEIR, which discusses how the Channel Avoidance Alternative would reduce impacts on biological resources and hydrology/water quality in relation to the <i>2020 LA River Master Plan</i> as proposed.</p> <p>Please refer to Section 5.3, <i>Alternatives Considered but Eliminated from Detailed Consideration</i>, of the Draft PEIR, which outlines the reasons why other potential alternatives were considered but rejected for detailed review.</p> <p>Please refer to the various sections within Chapter 3, <i>CEQA Environmental Impact Assessment</i>, of the Draft PEIR, which identify mitigation measures for each potentially significant impact.</p> <p>Please refer to Chapter 1, <i>Introduction</i>, Section 1.3.1.1, <i>Enforceability of Mitigation Measures</i>; Section 1.3.1.2, <i>PEIR and Later Activities</i>; and Section 1.4.2, <i>Later Activities</i>, of the Draft PEIR. The County would commit to the mitigation proposed in the PEIR, if approved as recommended, and the County believes that other entities that propose projects under the <i>2020 LA River Master Plan</i> and PEIR similarly can and should adopt the proposed mitigation. However, the County cannot enforce or guarantee that the mitigation measures in the PEIR will be implemented by the other agencies, which is why the County provided two separate impact conclusions: County and non-County. Such changes or alterations to a project are within the responsibility and jurisdiction of other public agencies and not the agency making the finding. However, if the mitigation measures identified in the Draft PEIR are adopted by another agency for impacts that are considered less than significant after the mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for projects not carried out by the County, for the same reasons as discussed for later activities carried out by the County.</p>

Comment #	Comment	Response
O17-6	<p>Los Angeles Waterkeeper understands the importance of flexibility in Master Planning, but that doesn't obviate the need for the County to adopt a Master Plan that provides clear direction about the types of uses that will be permitted and cultivated along the river and that ranks objectives to provide at least a modicum of certainty in future planning. After this, the County should revisit its environmental review to ensure it actually discloses, analyzes, and mitigates the Master Plan's potential adverse environmental impacts. However, in the interest of preserving its legal rights if the County chooses to certify this inadequate programmatic EIR, Waterkeeper provides the following CEQA comments.</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements).</p>
O17-7	<p>I. The Programmatic EIR Fails to Define a Project.</p> <p>"An accurate, stable and finite project description is the Sine qua non of an informative and legally sufficient EIR." (County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 192-193.) To the contrary, a "curtailed or distorted project description may stultify the objectives of the reporting process" and does not allow "outsiders and public decision-makers [to] balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the 'no project' alternative) and weigh other alternatives in the balance." (Ibid.) Instead of following this central CEQA requirement, the DPEIR relies on a vague and unstable project description. The project description first includes two basic outlines of what it considers typical projects: a common elements project, which includes pavilions along the River with varying levels of public facilities; and multi-use trails and access gateways. (DPEIR pp. 2-10 to 2-11.) The DPEIR assumes pavilions that will provide the greatest number of public services when analyzing impacts but provides no basis for that assumption. While these Tier III pavilions would likely take up the most space, they would also provide services that could potentially reduce impacts as compared to the Tier I and II pavilions – services including public safety stations, bike rental</p>	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements). The PEIR is a programmatic document and does not include project-specific or site-specific analysis.</p> <p>The PEIR does not include site-specific or design information about the potential impacts of the proposed Project because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The PEIR's project description remains the same throughout the environmental analyses contained in the PEIR.</p> <p>In regard to the comment stating Tier III pavilions do not provide an adequate assessment of the <i>2020 LA River Master Plan's</i> potential impacts, please refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR. Tier I pavilions are the smallest of the pavilions. They provide shade and seating options along the length of the river, in addition to drinking fountains, waste disposal, and an emergency call box. Tier II pavilions offer enhanced facilities and amenities beyond the baseline Tier I pavilions, and additionally include restrooms, bike racks, picnic tables, charging stations, and vending machines, with optional barbecues and outdoor showers. Tier III pavilions are the largest of the pavilions and can serve as significant hubs for programming and activity. Tier III pavilions included all Tier I</p>

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	<p>and repair and indoor showers. Thus, the DPEIR’s analysis of only Tier III pavilions fails to provide an adequate assessment of the plan’s potential impacts. It also fails to provide necessary information to the public and decisionmakers to use when commenting on and adopting the plan.</p>	<p>and Tier II amenities in addition to a café, indoor showers, lockers, public safety station, bike rental and repair, equipment rental, multi-purpose rooms, community kitchens, and management offices. The analysis of the Tier III pavilion is the conservative approach.</p> <p>In addition, as this is a program-level EIR, the analysis presented is conservative in nature, which is why Tier III pavilions were used for the analysis. Under State CEQA Guidelines Section 15168, where the later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the PEIR. The <i>2020 LA River Master Plan</i> is a conceptual plan. All future specific projects would be subject to subsequent environmental compliance under State CEQA Guidelines Section 15168.</p> <p>The PEIR takes a conservative, good-faith approach in its environmental analyses, often assuming the greatest level of future development. This approach avoids underestimating potential impacts.</p> <p>No changes to the Draft PEIR are needed.</p>
017-8	<p>The project description then includes six kit of parts (KOPs) along with the two typical, although only vaguely defined, projects. The DPEIR includes a long list of potential activities that could fit within each KOPs. While the DPEIR claims these KOPs are intended to inform future projects, many of listed potential activities are competing or contradictory. For example, KOP Category 2 “Channel C298Modifications” include both installing concrete bottoms and removing concrete bottoms. (DPEIR p. 2-9.) KOP Category 1 “Trails and Access Gateways” includes pedestrian, bike, and equestrian trails to increase nonvehicular connectivity, but it also includes “vehicular access” which may counter the safety or benefit of multi-modal trails. (DPEIR p. 2-9.) KOP Category 3</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). Because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval and the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, “Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase.”</p>

Comment #	Comment	Response
	<p>“Crossings and Platforms” contains both habitat/wildlife bridges, which would promote habitat connectivity, and platforms, which might destroy habitat beneath them. (Ibid.) KOP Category 4 “Diversions” include pipes, pumps, and wetlands. (Ibid.)</p>	<p>The KOP categories reflect a range of activities that can be undertaken, not a mandate to undertake the entire range in each future project. The PEIR presumes that implementing agencies and parties would act in a reasonable manner to avoid competing or contradictory activities in the same area.</p> <p>The PEIR’s use of “Typical Projects” is intended to illustrate how the KOP categories can be employed and potential environmental impacts. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including BMPs to reduce environmental impacts.</p>
<p>017-9</p>	<p>The design components within a single KOP could also serve competing interests, with different environmental impacts. For example, the DPEIR describes Trails and Access Gateways with similar cross sections and arrangements that could either serve recreational uses with playing fields or ecological uses with habitat corridors and vegetated buffers. (DPEIR p. 2-12.)</p>	<p>Please see the response to comment 017-8.</p>
<p>017-10</p>	<p>Adding to the confusion, the DPEIR references “up to 107 potential projects ranging in size from extra-small (less than 1 acre) to extra-large (150+ acres/10 miles) that would be implemented over the 25-year horizon period,” but the DPEIR never describes what these projects are. (DPEIR p. 2-15.) The next two sentences appear intended to provide this exposition, but only serve to confuse a reader:</p> <p>These would include the two Typical Projects...that would be constructed at a specified cadence, or spacing, along the river to ensure equitable distribution of facilities throughout the 51-mile-long corridor and help improve access and safety; and additional subsequent projects from the KOP categories; multi-benefit design components. These elements together comprise the entirety of the 202 LA River Master Plan. (DPEIR p. 2-15.) The DPEIR next states these 107 potential projects are identified in the Master Plan as well as in several other published plans. (Ibid.) But they are not reproduced here. CEQA does not permit</p>	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements).</p> <p>With respect to the commenter’s assertion that the Draft PEIR has outsourced its project description, the 107 potential projects refer to the opportunity sites or proposed project sites that are based on a project’s size and ability to address multiple high-level needs. These project sites do not include the planned major projects identified the <i>2020 LA River Master Plan</i> that are derived from previously published plans or newly proposed project sites based on the parcel analysis. The 107 potential projects are identified by adding the extra-large, large, medium, small, and extra-small proposed project sites in Chapter 7, <i>Sites</i>, and Appendix Volume II: <i>Technical Backup Document</i> of the <i>2020 LA River Master Plan</i>.</p> <p>Additionally, as described in Chapter 2, <i>Project Description</i>, the Draft PEIR analyzes two Typical Projects that are most likely to</p>

Comment #	Comment	Response
	<p>an EIR to outsource its project description to a list of other documents.</p>	<p>be proposed throughout the 51-mile-long corridor: Common Elements Typical Project and Multi-Use Trails and Access Gateways Typical Project. The Typical Projects were identified based on the availability of construction and operations scenario assumptions from Public Works along with relatively detailed design concepts for these projects being described in the <i>2020 LA River Master Plan</i>. Therefore, two Typical Projects are analyzed in greater detail in the PEIR than the other elements because even though specific locations have not been determined at this time, the scope of the typical projects can be estimated with more certainty. The six KOP categories and related design components—as well as the <i>2020 LA River Master Plan</i> in its entirety—are analyzed qualitatively at a program level.</p> <p>All future specific projects would be subject to subsequent environmental compliance under State CEQA Guidelines Section 15168. Because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval and the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance.</p> <p>Other agencies may use the PEIR as the basis upon which to tier future project environmental analyses under CEQA. In those situations, as provided in State CEQA Guidelines Section 15168(c), the other agencies could rely upon and implement the mitigation measures identified in the PEIR. However, the County cannot require other agencies to implement the mitigation identified in the PEIR.</p> <p>No changes to the Draft PEIR are needed.</p>
<p>017-11</p>	<p>The project description includes no identification of project phases by priority or any other means. Instead, the project description serves as nothing more than a laundry list of vaguely described potential activities that does not allow for an assessment of potential impacts, the development of mitigation or an assessment of project alternatives. The DPEIR has provided only a “blurred view of the project” and thus fails an</p>	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements).</p> <p>The project description mirrors the <i>2020 LA River Master Plan</i>, which does not include phases or a prioritization of projects. The</p>

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	<p>informational document. (Stopthemillenniumhollywood.com v. City of Los Angeles (2019) 39 Cal.App.5th 1, 12-13.)</p>	<p>PEIR is simply an informational document that examines the <i>2020 LA River Master Plan's</i> potential environmental impacts.</p> <p>In addition, as this is a program-level EIR, the analysis presented is conservative in nature. Under State CEQA Guidelines Section 15168, where the later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the PEIR. The <i>2020 LA River Master Plan</i> is a conceptual plan. All future specific projects would be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168.</p>
<p>017-12</p>	<p>As to actual activities and what will happen on which part of the River and when, little information is included. An EIR's purpose is to eliminate this confusion:</p> <p style="padding-left: 40px;">The CEQA process is intended to be a careful examination, fully open to the public, of the environmental consequences of a given project, covering the entire project, from start to finish. This examination is intended to provide the fullest information reasonably available upon which the decision makers and the public they serve can rely in determining whether or not to start the project at all, not merely to decide whether to finish it. The EIR is intended to furnish both the road map and the environmental price tag for a project, so that the decision maker and the public both know, before the journey begins, just where the journey will lead, and how much they-and the environment-will have to give up in order to take that journey.</p> <p>(NRDC v. City of Los Angeles (2002) 103 Cal.App.4th 268, 271.) The LA River Master Plan DPEIR contains no such road map.</p>	<p>The <i>2020 LA River Master Plan</i> is a conceptual plan. As a result, the level of detail the commenter seeks does not exist. The PEIR reflects the <i>2020 LA River Master Plan's</i> level of detail. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements).</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for a discussion of the extensive public outreach program that was conducted during development of the <i>2020 LA River Master Plan</i> as well as during the 101-day public review period for the Draft PEIR.</p>
<p>017-13</p>	<p>The County's use of a PEIR, as opposed to a project-specific EIR, does not excuse the obligation to provide clear and detailed information to the public. "The ultimate inquiry . . . is whether the EIR includes enough detail 'to enable those who did not</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements). The PEIR is a programmatic document and does not include project-specific or site-specific analysis. Additionally,</p>

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	<p>participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.' “ (Sierra Club v. County of Fresno (2018) 6 Cal.5th 502, 516.) As circulated, the DPEIR does not include the requisite detail.</p> <p>The Court of Appeal provided recent guidance about the distinctions between program and project EIRs:</p> <p>Designating an EIR as a PEIR . . . does not by itself decrease the level of analysis otherwise required in the EIR. [I]n considering a challenge to a PEIR, 'it is unconstructive to ask whether the EIR provided 'project-level' as opposed to 'program-level' detail and analysis. Instead, we focus on whether the EIR provided 'decisionmakers with sufficient analysis to intelligently consider the environmental consequences of [the] project.' (Cleveland National Forest Foundation v. SANDAG (2017) 17 Cal.App.5th 413, 426.). Even if more precise information may be available during project-specific review, the County “must still provide reasonably obtainable information, or explain (supported by substantial evidence) why it cannot do so. ‘[I]f known impacts are not analyzed and addressed in a PEIR, they may potentially escape analysis in a later-tier EIR.’ (Forest Foundation, supra, 17 Cal.App.5th at p. 440.)” (Golden Door v. County of San Diego (2020) Slip. Opinion, pp. 101-102.)</p> <p>Waterkeeper supports efforts to expand recreational access, equity, and environmental restoration along the River, but CEQA requires the activities involved in these efforts be clearly delineated for public understanding.</p>	<p>project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>The Draft PEIR analyzes two Typical Projects and six KOP categories. Because the <i>2020 LA River Master Plan</i> is conceptual in nature, the PEIR does not provide additional specific detail about potential impacts; to do so would be speculative.</p> <p>The PEIR is consistent with the direction of State CEQA Guidelines Section 15146, which states:</p> <p>“The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.</p> <p>(a) An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy.</p> <p>(b) An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow.”</p>
017-14	<p>The project description fails to provide adequate information regarding the activities allowed under the Master Plan to allow for useful environmental review and is essentially unripe. The DPEIR fails to achieve the advantages of a PEIR identified by CEQA. A PEIR is intended to “provide an occasion for a more exhaustive consideration of the effects and alternatives that would be impractical in an EIR on an individual action.” (CEQA Guidelines §15168(b)(1).) The DPEIR instead provides only</p>	<p>Please see the responses to comments 017-3, 017-4, 017-5, and 017-13. Please also refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements).</p> <p>All future specific projects would be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168. Because the PEIR does not examine specific projects at this time, the</p>

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	<p>general consideration of effects and limited assessment of alternatives.</p>	<p>County anticipates that future specific projects would require subsequent CEQA compliance.</p>
<p>017-15</p>	<p>II. The DPEIR Cannot be Used for Future Tiering.</p> <p>While CEQA does allow for tiering of environmental review, it does so only when there are issues currently ripe for consideration. (Pub. Resources Code § 21093.) The Notice of Availability provides, “It is anticipated that the County or other agencies may use the PEIR as the first-tier analysis when considering subsequent discretionary actions.” (NOA, March 8, 2021, p. 4.) The DPEIR further explains “the two Typical Projects are analyzed in greater detail in this PEIR than the other elements. The six KOP categories and related design components – as well as the 2020 LA River Master Plan in its entirety – are analyzed qualitatively at a program level.” (DPEIR p. 2-10.) Thus, it appears the County intends to use this Programmatic EIR to limit the environmental review required for future projects based on the Typical Projects and the KOPs anywhere along the River’s 51-mile reach. (See, DPEIR p. 2-2 [“study area is defined as a 2-mile wide corridor – 1 mile on each side of the river – that follows the centerline of the LA River for its entire 51 miles” and “subsequent projects could be located anywhere in the 2-mile-wide study area.”].)</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements).</p> <p>The County does not intend to limit the subsequent analysis of future projects in the manner the commenter suggests. Under State CEQA Guidelines Section 15168, where the later activities involve site-specific operations, the implementing agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the PEIR. All future specific projects would be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168.</p> <p>State CEQA Guidelines Section 15168 describes the process by which the County or other implementing agencies will analyze future projects under the <i>2020 LA River Master Plan</i> and the PEIR. To the extent that site-specific activities or projects would result in impacts that are new or substantially more severe (i.e., that were not disclosed in the PEIR), or that there is substantial new information indicating the presence of a new or substantially more severe environmental impact, the County or other implementing agency will adhere to subsequent CEQA compliance.</p> <p>When the project for which a PEIR is certified is narrowly described, the need for subsequent or supplemental documents is lessened (State CEQA Guidelines Section 15168(c)(5)). The reverse is true when the original project is not narrowly defined.</p>
<p>017-16</p>	<p>However, as discussed above, the project as described in the DPEIR does not present an issue ripe for decision. The DPEIR seems to acknowledge this, finding “The wide-ranging functions, characteristics, and complexity of the KOP categories and their respective design components – along with the lack of specific</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements).</p>

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	<p>sites or detailed design information – make it particularly challenging to make informed assumptions about reasonable construction and operations scenarios.” (DPEIR p. 2-12.) While the DPEIR contains valuable information about a wide range of opportunities for expanding access and restoration along the River, the DPEIR has limited value for purposes of environmental review pursuant to the California Environmental Quality Act (CEQA).</p> <p>CEQA permits the County to rely on an adequate, certified EIR as the basis for future entitlements. As the DPEIR document is not specific as to the activities covered (or really, what those activities could even be), Waterkeeper is concerned about the DPEIR’s use for activities whose environmental impacts have not been adequately disclosed, analyzed, or mitigated. If the DPEIR is relied upon by the County or the 17 River cities, there is no guarantee of future environmental analysis for projects employing the often-conflicting KOPs anywhere along the Los Angeles River. As a practical matter, the lack of specificity regarding what the DPEIR “covers” is likely to result in confusion as to what activities are covered, and may lead to uncertainty, wasted time, wasted resources, and CEQA abuses. Preparing and certifying an EIR now serves no purpose but to insulate the approval of the activities under the KOPs from future environmental review, when the impacts, mitigation and alternatives could and should truly be assessed.</p>	<p>As described in Chapter 2, <i>Project Description</i>, two Typical Projects were identified based on the availability of construction and operations scenario assumptions from Public Works along with relatively detailed design concepts for these projects being described in the <i>2020 LA River Master Plan</i>. The two Typical Projects are analyzed in greater detail in Draft PEIR than the other elements. The six KOP categories and related design components—as well as the <i>2020 LA River Master Plan</i> in its entirety—are analyzed qualitatively at a program level.</p> <p>However, the environmental impact analysis discussion for each resource topic addresses the environmental impacts of the two Typical Projects, six KOP categories, overall <i>2020 LA River Master Plan</i> implementation, and cumulative impacts.</p> <p>Please also see the response to comment O17-15.</p> <p>No changes to the Draft PEIR are needed.</p>
O17-17	<p>III. The DPEIR Fails to Provide Project-Level Information on Known, Future Projects.</p> <p>While on the one hand the Master Plan Update provides limited information on unknown future projects, on the other hand the County has been working with Gehry Partners, LLC on proposed Los Angeles River Platform Parks and other well-defined projects for several years. These projects would be located within the Master Plan Update study area and are well-defined on public websites. (See, Attachments 7 and 8.) The project description cannot fail to describe key elements of the Project.</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements).</p> <p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements,</p>

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	<p>(San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (1994) 27 Cal.App.4th 713, 730-35.) Despite the obvious relationships between these projects in space and time, the DPEIR fails to disclose, discuss, analyze, or mitigate the impacts of these projects. According to the website for the Lower LA River Revitalization Plan, “The Rio Hondo Confluence Area Project, also known as RHCAP, was identified in the 2018 Lower Los Angeles River Revitalization Plan and is located at a key opportunity site along the Lower Los Angeles River. Conceptual development is exploring options to connect communities to the RHCAP and create a key gathering place for Southeast Los Angeles.” (See https://lowerlariver.org/riohondoconfluence/.) The map on this website depicts several platform parks that would have significant environmental consequences that must be evaluated in an EIR. Yet none of these projects are discussed in any detail in the DPEIR.</p>	<p>including BMPs to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River.</p> <p>With respect to the portion of this comment about the Gehry platform parks, please note that while the <i>2020 LA River Master Plan</i> does look at opportunity sites along the river, the PEIR is a programmatic document that did not include any site-specific or project-specific analysis. Also, project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. This includes the Gehry platform parks, which would be considered subsequent projects subject to the approval of any of the 18 total jurisdictions (unincorporated County and 17 cities) along the river. Please see the response to comment O17-15.</p> <p>Furthermore, while the LA River has many bridges, few offer safe crossings for bikes or pedestrians. Additionally, many areas along the channel have a narrow right-of-way in the densest communities where space for parks, ecosystems, access, arts and culture, and education are often most greatly needed. While crossings can connect communities to close but otherwise inaccessible parks, community facilities, and each other, wider platforms can create space for parks and habitat in addition to cross-river connectivity. Crossings and platforms can also connect people to the river, creating new spaces for gathering and reflection with panoramic views of the river and surroundings. For additional information, see Appendix Volume I: Design Guidelines, Chapters 3 and 5, of the <i>2020 LA River Master Plan</i>.</p>
O17-18	<p>The LA River Platform Park “is situated over the LA River and creates approximately 22 acres of new opportunities for recreation and habitat.” (Attachment 8.) Similarly, “[t]he Rio Hondo Platform Park is situated over the Rio Hondo and creates approximately 11 acres of new opportunities for recreation, art, and habitat.” (Attachment 8.) RHCAP documentation provides</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p>

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	<p>more than enough detail to enable useful environmental review of these platform parks. For example, the Site Design Concepts for the RHCAP describe the LA River Platform Park in great detail:</p> <p>The LA River Platform Park is situated over an approximately 3,200-foot stretch of the LA River. The platform park site is bounded to the north by the LA River channel jurisdiction line between the LACFCD and the USACE. A separate project could potentially extend the platform park north of that line in the future, creating the Southern Avenue Bridge Park. This continuation of the platform would allow for a connection of communities on the east and west of the LA River, in alignment with Southern Avenue. To the south, the platform park boundary is offset a minimum of 300' feet from the nearest platform wall and staggered away from the residential neighborhoods directly to the west. The eastern and western edges of the platform park are defined by the location of the flood channel parapet walls, or the inner edge of the levee when no parapet walls are present.</p>	<p>No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including BMPs to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River. Please see Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>All future specific projects would be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168. Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance.</p> <p>Other agencies may use the PEIR as the basis upon which to tier future project environmental analyses under CEQA.</p>
017-19	<p>(Attachment 7.) The document also analyzes the practical challenges of implementing the LA River Platform Park and includes design options to minimize challenges: A major challenge of the LA River Platform Park is the coordination of the existing UPRR and future Metro WSAB line, which will have significant implications on the hydraulics, structure, and pedestrian access. The design of the platform park must allow for easy visitor access over this rail corridor in order to maintain continuity across the park experience. The Design Team has developed two distinct options for how the platform park will coordinate with these rail crossings. Option A, assumes full replacement of the UPRR bridge and Metro WSAB addition. Option B, assumes the Metro WSAB crossing will be an extension</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Please see the response to comment O17-18.</p>

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	<p>of the existing UPRR bridge crossing. Furthermore, as the platform park will need to be positioned above the LA River channel and the surrounding grade, the western and eastern edges of the platform park will need to be designed in such a way as to achieve an acceptable visual impact for the surrounding residential neighborhoods. The design will need to find ways to create convenient access and connectivity to and from the platform park, as well as between the northern and southern portions of the platform park. (Attachment 7.) Beyond this, the document contains detailed drawings and schematics of cross-sections and layouts for the park. (Ibid.) Pages discussing “Platform Strategies” specifically call for 4 inches of soil across the platform. There are pages discussing and showing design options for different approaches to River hydrology. These pages analyze impacts to railroad bridges, potential rebuild and relocation of the railroad bridges, river channel modifications, and detailed structural support design options. (Ibid.) This is more than enough information needed to enable informed environmental review of these platform parks. These documents contain similarly detailed design options for the Rio Hondo Platform Park. (Attachment 7.) An EIR reviewing these platform parks could assess hydrological impacts, impacts to biological resources from changed sunlight and hydrological conditions, construction impacts, land use impacts, recreational impacts, and many others. And it is far more information than the DPEIR contains about the general impacts of KOP 3, to which platform parks would belong. For example, while the DPEIR acknowledges that impacts to tidewater goby could occur due to shading from generalized platform-type projects, the DPEIR fails to give any indication of the extent of the impact on the species, or the size of the population that could be affected. (DPEIR pp. 3.3-139, 140.)</p>	

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017-20	<p>CEQA requires analysis of the “whole of a project” and prohibits analyses that divide Projects into pieces in order to minimize cumulative impacts. (CEQA Guidelines § 15003(h).) The statute recognizes, “environmental considerations do not become submerged by chopping a large project into many little ones -- each with a minimal potential impact on the environment -- which cumulatively may have disastrous consequences.” (Bozung v. Local Agency Formation Commission (1975) 13 Cal. 3d 263, 283-284.) The omission of any real analysis of the potential impacts of the platform parks is a failure to provide an adequate Project Description under CEQA as well as a possible segmentation deficiency. The court in Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora (2007) 155 Cal.App.4th 1214 set out three items to be used to determine what constitutes the whole of a project: (1) relationship in time, (2) physical location, and (3) the entity undertaking the action. (Id. at 1227.) Here, (1) the platform parks have been under consideration for years, contemporaneous with the Countywide discussion about updating the Master Plan, (2) are located in and over the LA River channel itself, and (3) would be implemented by the County and the same partners as the Master Plan Update.</p>	<p>The commenter appears to feel that the County has segmented the proposed Project.</p> <p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). The PEIR is a programmatic document and does not include project-specific or site-specific analysis. Project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>The Draft PEIR analyzes two Typical Projects and six KOP categories. Therefore, the proposed Project does not include the approval of any specific platform park and, as such, the fact that the Draft PEIR does not specifically analyze the platform parks in detail does not constitute fragmented analysis.</p> <p>The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including BMPs to reduce environmental impacts. All future specific projects would be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168. The County anticipates that future specific projects would require subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, “Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase.”</p> <p>Additionally, KOP Category 3: Crossings and Platforms is analyzed programmatically in the Draft PEIR. KOP Category 3 is discussed and analyzed in each resource topic.</p>
017-21	<p>Regardless, these are future projects that belong in this environmental analysis. In <i>Gray v. County of Madera</i> (2008) 167 Cal.App.4th 1099, 1127-28, the court defined probable future projects as “any future project where the applicant has devoted significant time and financial resources to prepare for any regulatory review should be considered as probable future projects for the purposes of cumulative impact.” As</p>	<p>The Draft PEIR includes a robust cumulative analysis and considers the condition and whether <i>2020 LA River Master Plan</i> implementation would have cumulatively considerable impacts. Furthermore, the County rejects any assertion that the <i>Gray v. County of Madera</i> case applies to this Project. In that case, the court found that substantial evidence (such as filing for reviewing with the planning department) must be shown that</p>

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	<p>demonstrated by Attachments 7 and 8, the County and its partners have devoted very significant time and resources to produce detailed descriptions, drawings, engineering solutions, and layouts for these platform parks. Gehry Partners, LLC helped lead the County Public workshop on the release of the Master Plan Update. The Los Angeles Times has reported on the County and Gehry Partners' long partnership on Los Angeles River matters. (Attachment 11.) Review of these parks is required. Future environmental documents prepared for these parks cannot rely on the lack of analysis in this PEIR to avoid full and thorough environmental review.</p>	<p>significant time and financial resources were expended in order to prepare for regulatory review.</p> <p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including BMPs to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River. Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>Because the <i>2020 LA River Master Plan</i> does not include the approval of any specific platform park or other project at any specific location, the environmental impact analysis is presented at a programmatic level and does not include project-specific or site-specific analysis. All future specific projects would be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168. Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance.</p>
017-22	<p>Moreover, CEQA requires that environmental review occur before momentum becomes unstoppable and alternatives to a project become foreclosed. (Save Tara v. City of West Hollywood (2008) 45 Cal.4th 116.) The longer that Gehry Partners, the County, and others shop these platform parks, and the greater the design detail becomes, the harder it will become to shape these projects to avoid environmental impacts or to reject them altogether if the County ultimately determines the environmental costs to be too great.</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements). The PEIR is a programmatic document and does not include project-specific or site-specific analysis.</p> <p>The Draft PEIR analyzes two Typical Projects and six KOP categories. While KOP Category 3 includes crossings and platforms, these are merely examples and tools of what could be implemented. In the <i>2020 LA River Master Plan</i>, projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and</p>

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		<p>project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including BMPs to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River.</p> <p>All future specific projects would be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168. Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance.</p> <p>Approval of the <i>2020 LA River Master Plan</i> does not commit the County or lead to the approval of any specific project (including but not limited to the Gehry platform parks).</p>
017-23	<p>IV. The Project Objectives Identified in the DPEIR Fail to Provide Adequate Direction to Guide Future Projects or Allow for a Comparison of Alternatives.</p> <p>The project description is also required to identify the project objectives. “A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits.” (CEQA Guidelines § 15124.)</p> <p>The DPEIR fails to provide a clearly written statement of objectives to allow for development of alternatives or the evaluation of the benefits of the Project. The vague and generalized goals identified for the Master Plan Update fail to prioritize goals for activities along the LA River. It includes competing goals with no identification of which goals should</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>The objectives identified in the Draft PEIR reflect the <i>2020 LA River Master Plan’s</i> expressed objectives. Presenting objectives that are not reflective of the proposed Project does not comply with the CEQA process. Whether the <i>2020 LA River Master Plan’s</i> objectives are overly broad or vague is related to the <i>2020 LA River Master Plan</i>, not the Draft PEIR.</p> <p>Please refer to Chapter 5, <i>Alternatives</i>, of the Draft PEIR for a discussion of the alternatives that were considered but rejected, as well as the alternatives that were analyzed. No further response is necessary.</p> <p>No changes to the Draft PEIR are needed.</p>

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	<p>take priority if there is a conflict, or where limited financial resources should be given priority. (DPEIR p. 2-7.)</p> <p>For example, the DPEIR project objective of addressing potential adverse impacts on housing affordability is overly broad. The steering committee’s intent in raising the issue of housing affordability was to ensure the Master Plan Update prevents housing displacement and addresses impacts to homeless populations along the river. (Attachment 1.) In recent years, the broad goal of housing affordability has been used to push through numerous market rate housing developments that promise to reserve a very small number of units as affordable. The DPEIR and Master Plan Update must clarify this project objective to ensure the broadly stated goal of “housing affordability” is not used to support market rate housing developments along the River.</p>	
017-24	<p>V. The Alternatives Analysis is Inadequate.</p> <p>Section 15126.6 of the CEQA Guidelines requires an EIR “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives . . . even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” This discussion must include “sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project,” and expressly must address “[t]he specific alternative of ‘no project,’” the purpose of which “is to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” (Ibid.)</p> <p>The DPEIR fails to provide a reasonable range of alternatives, including only two: the No Project Alternative and the Channel Avoidance Alternative. (DPEIR p. 5-2.) For a program that covers 834 square miles and includes numerous and varied potential</p>	<p>CEQA does not mandate that an EIR include a specific number of alternatives. Please refer to Chapter 5, <i>Alternatives</i>, of the Draft PEIR, which examines two alternatives and explains the reasons for rejecting other potential alternatives. This complies with State CEQA Guidelines Section 15126.6(c), which states: “The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination.”</p> <p>The alternatives analysis is also in keeping with State CEQA Guidelines Section 15126.6(a), which states, in part: “An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider</p>

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	<p>actions under the Master Plan Update, this limited assessment of alternatives is inadequate. The lack of an adequate alternatives analysis is due in large part to the lack of an accurate, stable and finite project description as discussed above. (Section I.) The DPEIR provides an inadequate project description and overly generalized project objectives that do not allow for a balancing of “the proposal’s benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the ‘no project’ alternative) and weigh other alternatives in the balance.” (County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 192–193.)</p>	<p>alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.” The analysis of alternatives is not required to be as detailed as the analysis of the project. State CEQA Guidelines Section 15126.6(d) states: “The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”</p> <p>Please see the response to comment O17-7 regarding the stability of the project description.</p>
<p>O17-25</p>	<p>A revised DPEIR must assess additional alternatives to the proposed project to provide the required reasonable range of alternative assessment. The following alternatives should be considered:</p> <ul style="list-style-type: none"> o An alternative focused on environmental contaminant clean-up to allow for reuse of brownfield and other sites adjacent to the LA River as parks, instead of committing to the impactful “platform parks.” (See, Section III, above, re Platform Parks.) Although not included in the DPEIR, the LA River and Rio Hondo Platform Parks are sufficiently well-developed to enable environmental review. It is important that alternatives permitting clean-up be discussed now, in the Master Plan Update process, so the County does not foreclose options other than platform parks without adequate CEQA review, in violation of <i>Save Tara v. City of West Hollywood</i> (2008) 45 Cal.4th 116.) 	<p>The commenter appears to be requesting that the County consider additional alternatives that reduce impacts. Please see the response to comment O17-23, which discusses State CEQA Guidelines Section 15126.6(a), which states, in part: “An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible.”</p> <p>Please refer to Chapter 5, <i>Alternatives</i>, of the Draft PEIR, which includes an analysis of a Channel Avoidance Alternative as well as alternatives considered but rejected and a No Project Alternative. With respect to the comment about an alternative focused on the reuse of brownfield sites, critical facilities (toxic sites and hazardous sites) were always included as part of the analysis in the <i>2020 LA River Master Plan</i>. In response to</p>

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	<p>o An alternative focused on enhancing access to nature and a healthy natural river while mitigating flood risk. The attached January 2021 LA River: River Management Strategy for the Glendale Narrows Feasibility Study should be relied upon in developing this alternative. (Attachment 6.)</p> <p>o The DPEIR should also assess an alternative that combines the No Project alternative with natural flood reclamation measures, such as those set forth in the above referenced Feasibility Study.</p>	<p>comments, an additional analysis that included brownfield and superfund sites was added (see the <i>Sites</i> chapter in the <i>2020 LA River Master Plan</i>). Furthermore, the <i>2020 LA River Master Plan</i> discusses industrial land contamination, funding sources, and streams for cleanup and redevelopment, and a new chapter was added to the Technical Appendix of the <i>2020 LA River Master Plan</i> (Chapter 7, <i>Cleanup of Contaminated Sites</i>) that discusses the cleanup process and technologies. Furthermore, this alternative of developing brownfields would not serve to reduce any impacts as compared to the other alternatives or the Project as proposed. Rather, there could be additional impacts because many of the brownfields along the 51-mile-long corridor contain hazardous materials.</p> <p>With respect to the portion of the comment about an alternative focused on enhancing access to nature and a healthy natural river while mitigating flood risk, an alternative for Naturalizing the LA River was considered but eliminated. Please see Master Response MR-5 (Naturalization of the LA River). Additionally, the Draft PEIR considered but eliminated a Large-Scale Floodplain Reclamation Alternative. Project objectives focused on reducing flood risk and improving resiliency would be met under this alternative, along with improved ecosystem function, increased open space, and potentially local water supply reliability and water quality improvement. The other objectives would not be met under this alternative. Due to development and urbanization in the watershed, large-scale floodplain reclamation is not feasible and would result in displacement and disruption of existing residents, businesses, transportation corridors, and other vital infrastructure. Therefore, this alternative was removed from further consideration.</p> <p>Please refer to Chapter 5, <i>Alternatives</i>, of the PEIR for a full discussion of the alternatives that were considered but rejected, as well as the alternatives that were analyzed. With respect to the portion of the comment about a No Project Alternative with natural flood reclamation features, please again refer to Master</p>

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		Response MR-5 (Naturalization of the LA River) for a discussion as to why this alternative is not feasible and was not considered.
017-26	<p>Additionally, the analysis of the No Project alternative included in the DPEIR fails to meet the requirements set forth by CEQA. “The purpose of describing and analyzing a no project alternative is to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” (CEQA Guidelines § 15126.6.) “When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the “no project” alternative will be the continuation of the existing plan, policy or operation into the future ... the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan.” (Ibid.)</p> <p>Here, the DPEIR has correctly identified the No Project Alternative as a continuation of the existing 1996 LA River Master Plan. However, the DPEIR fails to cogently disclose the differences between this 1996 Master Plan and the 2020 Master Plan Update. There is inadequate information included in the alternatives analysis to allow for a true comparison of the impacts of the existing plan with the proposed plan. Moreover, in the limited discussion provided, the DPEIR discloses that the 1996 Master Plan would eliminate or substantially lessen a number of impacts associated with the Master Plan Update, making it the superior alternative. For example, the 1996 Master Plan “would result in fewer hydrology and water quality impacts when compared to the proposed 2020 LA River Master Plan.” (DPEIR p. 5-21.) While the DPEIR claims the Master Plan Update would have benefits that make it more desirable than 1996 Master Plan, only uncertain potential benefits are discussed. The DPEIR lacks adequate information to allow for a comparison of the benefits stemming from the project and alternatives. The DPEIR refers to Master Plan Update potential actions that may or may not be implemented as the benefits of the Project. The DPEIR also fails to address why flooding and water quality benefits could not be achieved under the existing plan.</p>	<p>Please refer to Section 5.2.1, <i>Alternative A – No Project</i>, of the Draft PEIR, which states that the No Project Alternative assumes that development along the LA River would continue in accordance with the adopted <i>1996 Los Angeles River Revitalization Master Plan</i>. This approach complies with State CEQA Guidelines Section 15126.6.</p> <p>The analysis of the No Project Alternative in Draft PEIR Section 5.2.1 draws direct qualitative comparisons between this alternative’s environmental impacts and the Project’s impacts. The comparison of impacts is summarized in Table 5-2 of the Draft PEIR.</p> <p>Please refer to Section 5.5, <i>Environmentally Preferred and Superior Alternative</i>, of the Draft PEIR, which discusses the environmentally superior alternative. State CEQA Guidelines Section 15126.6(e) requires that when the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Please refer to Section 5.5, <i>Environmental Evaluation of CEQA Alternatives</i>, of the Draft PEIR, which discloses that the No Project Alternative is the superior alternative and, therefore, Alternative B is also the environmentally superior alternative. This approach complies with the State CEQA Guidelines.</p> <p>With respect to the portion of the comment regarding an alternative combining the No Project Alternative and natural flood-control measures, as suggested by the <i>LA River: River Management Strategy for the Glendale Narrows Feasibility Study</i>, please see the response to comment 017-23.</p>

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	<p>Moreover, to the extent the existing plan does not allow for these impacts to be addressed, an additional alternative should be considered that combines the No Project Alternative and natural flood control measures as discussed above.</p>	
<p>017-27</p>	<p>VI. The DPEIR Inadequately Analyzes Hydrology and Water Quality.</p> <p>As discussed above, the DPEIR fails to include an adequate project description. (Section I.) The DPEIR’s so-called analysis of the Master Plan Update’s hydrological and water quality impacts highlights the necessity of providing an adequate and accurate project description to allow for a useful assessment of a project’s impacts. The DPEIR only includes a very general and perfunctory analysis of any hydrological and water quality impacts, which is inadequate to support a determination these impacts would be less than significant. The DPEIR fails as an informational document in its assessment of hydrological and water quality impacts. (Sierra Club v. County of Fresno (2018) 6 Cal.5th 502, 515.) The lack of analysis is particularly egregious given the vast size of the LA River; its watershed covers 834 square mile and is home to millions of Los Angeles area residents. The impacts to this important resource and the numerous communities must be fully evaluated.</p> <p>Due to the DPEIR’s lack of an adequate project description, the hydrology and water quality section concludes all activities contemplated under the Master Plan Update will have a less than significant impact on water quality and groundwater, requiring no mitigation measures. (DPEIR Section 3.9.) Instead of providing the necessary analysis of impacts to allow for development of mitigation measures, the DPEIR simply assumes all components will comply with NPDES permits, the MS4 permit and yet to be disclosed BMPs and that this compliance would eliminate the potential for significant adverse impacts. (DPEIR p. 3.9-39 to 3.9-57.) Without a full assessment of the water quality and groundwater impacts, the DPEIR lacks evidentiary support for the claim that compliance with these permits would be</p>	<p>Please see the response to comment 017-7 regarding the adequacy of the project description.</p> <p>As discussed previously, the <i>2020 LA River Master Plan</i> is a conceptual plan, and detailed information about future site-specific actions is not available.</p> <p>State CEQA Guidelines Section 15126.4(a)(1)(B) states that the specific details of a mitigation measure may be developed after project approval once the type(s) of potential action(s) that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure are identified. The analysis of hydrology and water quality includes implementation of stormwater BMPs and compliance with several regional and local water quality requirements and postconstruction stormwater standards, in addition to compliance with the County Municipal Separate Storm Sewer System permit and provisions in the Los Angeles Regional Water Quality Control Board’s Basin Plan. Specific construction and operational BMPs are provided in the hydrology and water quality analysis to minimize hydrology and water quality impacts.</p> <p>No changes to the Draft PEIR are needed.</p>

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	<p>possible or that such compliance would mitigate impacts to a less than significant level. Simply deferring to a regulatory scheme instead of analyzing environmental consequences falls “short of [the] duty under CEQA to meaningfully consider the issues raised by the proposed project.” (Californians for Alternatives to Toxics v. Department of Food & Agriculture (2005) 136 Cal.App.4th 1, 16.) Moreover, the existing and past lack of compliance with the Los Angeles County MS4 permit has been well-documented by Los Angeles Waterkeeper and others. (See, NRDC Report, Omission Accomplished II, Attachment 12.) This existing and past non-compliance must be taken into consideration when evaluating the sufficiency of mitigation for potential impacts. (Laurel Heights Improvement Assn. V. Regents of University of California (1988) 47 Cal.3d 376, 420.)</p>	
<p>O17-28</p>	<p>This is also improperly deferred analysis and mitigation, prohibited by CEQA. Deferred mitigation is only allowed if “specific performance criteria” are required at the “time of project approval.” (Endangered Habitats League, supra, at 793-94; CEQA Guidelines § 15126.4(a)(1)(B); Sacramento Old City Association v. City Council of Sacramento (1991) 229 Cal.App.3d 1011, 1029.) The DPEIR fails to establish these required specific performance criteria. Instead, the DPEIR sets indefinite thresholds of significance which it appears to rely upon as performance criteria. The threshold of preventing “substantially alter[ation of] the existing drainage pattern” does not set specific performance criteria with which the actions under the Project would comply. (DPEIR p. 3.9-37.) It is vague and also unenforceable because it was not adopted as a mitigation measure.</p>	<p>The threshold employed in determining significance is just that, a threshold. It is frequently derived from the State CEQA Guidelines’ Appendix G Environmental Checklist question on this topic. The Draft PEIR does not present this as a mitigation measure. The application of this threshold to the <i>2020 LA River Master Plan</i> is discussed in Impact 3.9(c), beginning on page 3.9-59 of the Draft PEIR.</p> <p>Mitigation Measures HYDRO-1a, Require Site-Specific Drainage Studies to Address Stormwater Management; and HYDRO-1b, Require Stormwater Control Measures, will be applied to reduce impacts under this threshold to a less-than-significant level. These detailed mitigation measures are timed to apply before construction begins and are therefore not deferred. The Draft PEIR has been revised to include the requirement of a qualified hydrologist to approve performance standards identified in Mitigation Measure HYDRO-1b. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>

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O17-29	<p>The DPEIR acknowledges dewatering will be required, but instead of analyzing the potential impacts, just assumes an undefined stormwater pollution prevention plan (SWPPP) will be used that address the impact, then claiming the impact is less than significant, requiring no mitigation. (DPEIR p. 3.9-38.) This improperly compresses the impact analysis and mitigation. The DPEIR must acknowledge the potentially significant impacts and then analyze the ability of mitigation measures to address those impacts. (Lotus v. Department of Transportation (2014) 223 Cal.App.4th 645, 656 [“By compressing the analysis of impacts and mitigation measures into a single issue, the EIR disregards the requirements of CEQA”].)</p>	<p>The current analysis discusses the applicable regulations, which were previously described in Section 3.9.2.2, <i>Regulatory</i>, in Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR and how they will reduce and avoid potential impacts. The Draft PEIR has been revised to clarify how the regulations specifically will apply to the proposed Project in the impact analysis section. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
O17-30	<p>The only mitigation provided in Hydrology and Water Quality section is for potential flooding impacts. The DPEIR finds that several reaches of the LA River (Frames 5 through 9) do not meet existing design standards for flood conveyance capacity and acknowledges that an increase in site runoff from actions under the Master Plan Update would further exacerbate this impact. The mitigation included for this impact is improperly deferred because it relies on deferred drainage studies and then, based on the results of the report, “measures during construction and operation may be required to ensure flood flows are not impeded and to minimize redirected flood flows.” (DPEIR p. 3.9-61, emphasis added.) “Impermissible deferral of mitigation occurs when an EIR puts off analysis or orders a report without either setting standards or demonstrating how the impact can be mitigated in the manner described in the EIR.” (Clover Valley Foundation v. City of Rocklin (2011) 197 Cal.App.4th 200, 236; Defend the Bay v. City of Irvine (2004) 119 Cal.App.4th 1261, 1275; Preserve Wild Santee v. City of Santee (2012) 210 Cal.App.4th 260, 280-82.) That is precisely what the DPEIR has done for flooding impacts.</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). The PEIR is a programmatic document and does not include project-specific or site-specific analysis.</p> <p>The Draft PEIR analyzes two Typical Projects and six KOP categories. Mitigation Measure HYDRO-1a, Require Site-Specific Drainage Studies to Address Stormwater Management, does not rely on “deferred drainage studies.” There are no designs for later projects under the <i>2020 LA River Master Plan</i>. Without designs, no practical drainage studies can be performed. Mitigation Measure HYDRO-1a correctly applies at such time as a later project is designed, and then must be completed before any construction or earthmoving begins. This is timely mitigation, not deferred mitigation.</p>

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O17-31	<p>The DPEIR fails to acknowledge the fact that changes to the LA River’s hydrology will occur due to the changing climate. There is no analysis or required future assessment of limiting the hydrological and water quality impacts of actions under the Master Plan Update in a changing climate or mitigation measures requiring actions ensure climate resilience. This fails to address potential project impacts and is inconsistent with Los Angeles County General Plan Policy S 2.3, which requires the County to “Consider climate change adaptation strategies in flood and inundation hazard.” The County should revise the Master Plan Update and the DPEIR to take this vital concern under consideration and to develop a focus for the Plan and mitigation measures to address these impacts. The attached January 2021 LA River: River Management Strategy for the Glendale Narrows Feasibility Study should be taken under consideration in making these revisions. (Attachment 6.) This Feasibility Study communicates opportunities to enhance access to nature and a healthy natural river while mitigating flood risk by exploring possible new ways to plan for the LA River by incorporating novel and integrated solutions.</p>	<p>The California Supreme Court, in its decision in <i>California Building Industry Assoc. v. Bay Area Air Quality Management District</i> (2015) 62 Cal.4th 369, has stated, “[Public Resource Code] section 21083 does not contain language directing agencies to analyze the environment’s effects <i>on</i> a project. Requiring such an evaluation in all circumstances would impermissibly expand the scope of CEQA” (emphasis in original). Effects of climate change are impacts of the environment on the Project. As such, they are not subject to CEQA analysis.</p> <p>However, the Draft PEIR identifies Policy S 2.3 of the Los Angeles County General Plan in the regulatory section of Section 3.9, <i>Hydrology and Water Quality</i>.</p>
O17-32	<p>The DPEIR similarly fails to address the impacts of the Master Plan Update’s proposed activities on an “increasing potable water scarcity associated with population growth, drought, climate change, regulatory/legal policy, and protection of endangered species.” (Attachment 9, Southern California Coastal Water Research Project’s 2021 LA River Flows Project Study.) While the project objectives identify improving water supply reliability and the Hydrology section states that some activities may provide opportunities for reuse of water for groundwater recharge, the DPEIR does not convey the importance of expanded efforts to conserve and reuse wastewater and other discharges. This fails to address whether the Master Plan Update would be consistent with the State Water Resources Control Board recycled water policy, which encourages water reuse while ensuring the protection of existing water rights and beneficial uses. The findings of the Southern California Coastal</p>	<p>Please refer to Section 3.18, <i>Utilities/Service Systems</i>, of the Draft PEIR. As discussed under Impact 3.18(b), Typical Projects would likely use recycled water where available for landscape irrigation. The <i>2020 LA River Master Plan</i> has Design Guidelines that include graywater and rainwater reuse, as applicable and feasible. Please refer to Section 3.18, <i>Utilities/Service Systems</i>, of the Draft PEIR for further details regarding recycled water and reuse.</p> <p>No changes to the Draft PEIR are needed.</p>

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	<p>Water Research Project’s 2021 LA River Flows Project Study must be taken into consideration in evaluating the Master Plan Update’s impacts and setting priorities for activities under the plan.</p>	
<p>017-33</p>	<p>VII. The Biological Resources Analysis is Inadequate.</p> <p>As described further in comments submitted by the Center for Biological Diversity, the DPEIR fails to adequately disclose, analyze, and mitigate impacts to the Los Angeles River’s biological resources. The DPEIR improperly restricts its analysis to a narrow 1-mile on each side of the River channel, when wildlife impacts may extend beyond the channel and berm areas. The DPEIR neglects to assess wildlife corridors outside of Griffith Park. Importantly, the DPEIR also fails to identify and analyze potentially impacted wildlife species, in part, because most of the data relied upon by the DPEIR is over ten years old. Recent surveys must be incorporated into a revised and recirculated PEIR. Waterkeeper directs the County’s attention to its 2020 River Assessment Fieldwork Team report on the Los Angeles River, which contains valuable baseline information about the health of benthic communities and water quality at different sites along the River. (See, Attachment 4.)</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). The PEIR is a programmatic document and does not include project-specific or site-specific analysis.</p> <p>The Draft PEIR analyzes two Typical Projects and six KOP categories. Please also refer to Master Response MR-7 (Master Plan Area/PEIR Study Area and Addressing the LA River in a Comprehensive Manner) for a discussion of the 1-mile study area and the extent to which the <i>2020 LA River Master Plan</i> and Draft PEIR study the LA River in a comprehensive manner.</p> <p>Furthermore, the data relied on to identify and analyze potentially affected wildlife and plant species were collected using searches including, but not limited to, the California Natural Diversity Database; the California Native Plant Society; the U.S. Fish and Wildlife Service’s Information, Planning, and Consultation System; and the National Marine Fisheries Service. In addition, wetland mapping was conducting using the National Wetlands Inventory. All of this information was current as of the search date in 2020 and represents a thorough, substantial, and typical search for biological resources.</p> <p>Although the California Essential Habitat Connectivity Project (Spencer et al. 2010) is more than 10 years old, the information is still relevant. Due to urban development constraints, large habitat blocks, linkages, and connections are not being created, and the California Essential Habitat Connectivity Project represents a robust scenario of mapped and modeled wildlife corridors and linkages. The wildlife corridor analysis conducted in the Draft PEIR evaluated the region as a whole, with descriptions included within each frame and extending through</p>

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		<p>the 1-mile action area, which is sufficient given the scope of the PEIR.</p> <p>Although baseline information exists for benthic communities and water quality along the LA River, if relevant to the Federal Endangered Species Act, the California Endangered Species Act, CEQA, or other required laws or regulations, that information would be included in the analysis that would be required in Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys. The biological analysis of each individual project would be conducted by a qualified biologist and would be performed as described in this measure.</p>
017-34	<p>VIII. Project Mitigation is Deferred, Vague, and Speculative.</p> <p>The DPEIR contains very long lists of mitigation measures required to reduce most Project impacts below a level of significance. Mitigation measures must be “fully enforceable through permit conditions, agreements, or other measures.” (Pub. Resources Code § 21081.6(b).) “The purpose of these requirements is to ensure that feasible mitigation measures will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded.” (Federation of Hillside & Canyon v. City of Los Angeles (2000) 83 Cal.App.4th 1252, 1261; Katzeff v. California Dept. of Forestry and Fire Protection (2010) 181 Cal.App.4th 601, 612; Lincoln Place Tenants Assn v. City of Los Angeles (2005) 130 Cal.App.4th 1491.)</p> <p>However, the DPEIR recognizes that Master Plan Update projects could be implemented by any of the 17 cities along the River if they are not implemented by the County. Thus, the County plans to “encourage” the 17 cities along the Los Angeles River to adopt the PEIR. Unfortunately, if these cities do not adopt the PEIR, and if any of these cities go on to implement projects along the River, there could be adverse environmental impacts that are not disclosed in this DPEIR. CEQA requires that mitigation measures be concrete and enforceable. (Pub. Resources Code §</p>	<p>Please refer to Chapter 1, <i>Introduction</i>, Section 1.3.1.1, <i>Enforceability of Mitigation Measures</i>, Section 1.3.1.2, <i>PEIR and Later Activities</i>, and Section 1.4.2, <i>Later Activities</i>, of the Draft PEIR. The County would commit to the mitigation proposed in the PEIR, if approved as recommended, and the County believes that other entities that propose projects under the <i>2020 LA River Master Plan</i> and PEIR similarly can and should adopt the proposed mitigation. However, the County cannot enforce or guarantee that the mitigation measures in the PEIR will be implemented by the other agencies, which is why the County provided two separate impact conclusions: County and non-County. Such changes or alterations to a project are within the responsibility and jurisdiction of other public agencies and not the agency making the finding. However, if the mitigation measures identified in the Draft PEIR are adopted by another agency for impacts that are considered less than significant after the mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for projects not carried out by the County, for the same reasons as discussed for later activities carried out by the County.</p>

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	21081.6(b.) There is no enforceability to the mitigation measures contained in the DPEIR.	
017-35	<p>Even if actually adopted by implementing agencies, the Project’s mitigation is often vague, speculative, deferred, or unenforceable, in violation of CEQA. Examples of vague, speculative, deferred, or unenforceable mitigation include, but are not limited to:</p> <ul style="list-style-type: none"> o Preparation of the Construction Management Plan (LU-1) is impermissibly deferred. 	<p>As discussed in Section 3.10, <i>Land Use and Planning</i>, Mitigation Measure LU-1, Construction Management Plan, requires the implementation of a construction management plan that has been identified to require certain elements. The elements included range from requiring construction workers to park in specified offsite locations, no construction staging in residential neighborhoods, the requirement of construction hours and parking for construction vehicles.</p> <p>Pursuant to State CEQA Guidelines Section 15168(c)(3), “An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.”</p> <p>As the <i>2020 LA River Master Plan</i> is a conceptual plan, the Draft PEIR does not include project-specific or site-specific analysis. Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR) The mitigation provided in the Draft PEIR (Mitigation Measure LU-1, Construction Management Plan) is appropriate for this level of analysis and allows for the mitigation to be applicable and enforceable when subsequent projects are able to determine specific location (jurisdiction, planning frame, in-channel [bank to bank]/off-channel [outside of bank]), design, and timing. subsequent CEQA compliance.</p>
017-36	<p>o Mitigation Measure AES-2, protecting scenic vistas, is vague: “During project design, the implementing agency will minimize visual intrusions from public views of designated scenic vistas by following local jurisdictions’ applicable policies and ordinances that protect views of designated scenic vistas by taking into consideration sightlines, scale and massing of structures, and materials used for construction, and other measures as needed.” No performance standard is included.</p> <p>o Mitigation Measure AES-3a (lighting) does not contain an enforceable performance standard (lighting shall be designed to</p>	<p>Mitigation Measure AES-2, Minimize Obstruction of Scenic Vistas, will, to the extent practicable, maintain the scenic vistas’ visual quality and comply with the applicable jurisdiction’s general plan and design guidelines to preserve scenic vistas and minimize visual intrusions.</p> <p>Additionally, as described in 3.1, <i>Aesthetics</i>, of the Draft PEIR, installation of lighting from implementation of the proposed Project would comply with the Design Guideline requirements</p>

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	<p>minimize light spillage). Mitigation Measure AES 3b (glare) does not contain an enforceable performance standard.</p>	<p>for lighting, which require lighting to minimize light pollution to the greatest extent possible and be sensitive to ecological needs.</p> <p>Pursuant to State CEQA Guidelines Section 15168(c)(3), “An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.”</p> <p>As the <i>2020 LA River Master Plan</i> is a conceptual plan, the Draft PEIR does not include project-specific or site-specific analysis. The mitigation provided in the Draft PEIR (Mitigation Measures AES-2, Minimize Obstruction of Scenic Vistas; AES-3a, Design Exterior Lighting to Minimize Nighttime Illumination Spillover; and AES-3b, Design Exterior Structures to Minimize Glare) is appropriate for this level of analysis and allows for the mitigation to be applicable and enforceable when subsequent projects are able to determine specific location (jurisdiction, planning frame, in-channel [bank to bank]/off-channel [outside of bank]), design, and timing.</p>
<p>017-37</p>	<p>o Mitigation Measure AQ-2. Low VOC components should be required at all times, and not just if emissions exceed applicable standards in the future.</p>	<p>In regard to Mitigation Measure AQ-2, Implement Operations Strategies to Reduce VOC Emissions, as described in Section 3.2, <i>Air Quality</i>, of the Draft PEIR, the mitigation measure is implemented only when volatile organic compound (VOC) emission standards are exceeded. As identified in the mitigation measure, VOC emissions standards are implemented in effect at the time that subsequent project-specific details are proposed. Currently, the mitigation extends beyond the requirements of South Coast Air Quality Management District Rule 1113 by requiring VOC content less than or equal to 25 grams per liter.</p> <p>Pursuant to State CEQA Guidelines Section 15168(c)(3), “An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.”</p> <p>As the <i>2020 LA River Master Plan</i> is a conceptual plan, the Draft PEIR does not include project-specific or site-specific analysis. The mitigation provided in the Draft PEIR (Mitigation Measure</p>

Comment #	Comment	Response
		<p>AQ-2, Implement Operations Strategies to Reduce VOC Emissions) is appropriate for this level of analysis and allows for the mitigation to be applicable and enforceable when subsequent projects are able to determine specific location (jurisdiction, planning frame, in-channel [bank to bank]/off-channel [outside of bank]), design, and timing.</p>
<p>017-38</p>	<ul style="list-style-type: none"> o Mitigation Measure BIO-1 constitutes both deferred analysis and deferred mitigation. Analysis of the impact this measure intends to mitigate must occur now, so the public and decisionmakers may be fully informed. “A mitigation measure cannot be used as a device to avoid disclosing project impacts.” (San Joaquin Raptor Rescue Center v. County of Merced, supra, 149 Cal.App.4th at pp. 663-664.) o Mitigation Measure BIO-2 is deferred mitigation without specific performance standards. o Mitigation Measure BIO-3d provides for burrowing owl surveys to determine the presence of burrowing owls but requires no action to be taken if owls are located. The mitigation measure would not provide effective mitigation. The DPEIR must evaluate the efficacy of mitigation measures but does not appear to do so here. (San Joaquin Raptor Rescue Center v. County of Merced (2007) 149 Cal.App.4th 645.) o Mitigation Measure BIO-3g regarding American Badgers provides for eviction of non-pupping badgers from their dens but not for relocation. It is unclear how this could possibly help the species. Further, CEQA requires that EIRs evaluate any significant impacts caused by proposed mitigation measures. (CEQA Guidelines § 15126.4.) o Mitigation Measure BIO-5, the weed abatement plan, is deferred. While site-specific details may be appropriate for deferral, general methods and herbicide protocol should be developed now so that responsible agencies may evaluate the effectiveness of the mitigation and any environmental impacts of this mitigation measure. 	<p>The Draft PEIR has been revised to expand upon the mitigation measures and clarify their requirements and implementations. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>

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	<ul style="list-style-type: none"> o Mitigation Measure BIO-7 provides that intentional killing or collection of wildlife “could” result in a stop work order. This language should be made mandatory. o Mitigation Measure BIO-12 recognizes that best practices for bird and bat friendly nighttime lighting conflict but does not resolve the conflict. 	
O17-39	<p>Additionally, as discussed above, the DPEIR fails to include a defined project description sufficient to enable useful environmental review or the formulation of mitigation measures. The DPEIR must be recirculated after the development of a project ripe for review, along with concrete and useful mitigation measures that address the potentially significant environmental impacts of implementing that ripe project. The DPEIR has also failed to include analysis of defined projects under consideration for the Los Angeles River, and, consequently, lacks mitigation formulated to address the very real and likely environmentally damaging aspects of the 22-acre Los Angeles River Platform Park and the 11-acre Rio Hondo Platform Park.</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). The PEIR is a programmatic document and does not include project-specific or site-specific analysis. Additionally, with respect to the portion of this comment about a defined project description, please refer to response to comment O17-7</p> <p>All future specific projects would be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168. Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance.</p> <p>With respect to the portion of this comment referring to analyzing defined projects under consideration for the LA River, and, consequently, the lack of mitigation formulated to address the environmentally damaging aspects of the 22-acre Los Angeles River Platform Park and the 11-acre Rio Hondo Platform Park, please see the response to comment O17-16.</p>
O17-40	<p>Finally, many of the Project’s Design Guidelines are not explicitly mandatory, yet the DPEIR assumes they will be followed. (DPEIR p. 2-16.) Thus, to the extent they are relied upon to mitigate significant environmental impacts or they are relied upon as to conclude the project that will not have environmental impacts in the first instance, these Guidelines fail to reduce relevant impacts below a level of significance. Owing to these deficiencies in mitigation, the County lacks substantial evidence supporting the DPEIR’s claims that impacts have been mitigated below a level of significance.</p>	<p>The <i>2020 LA River Master Plan Design Guidelines</i> (Design Guidelines) have been evaluated as part of the proposed Project to the extent that they are required. For future projects carried out by the County, the County would incorporate Design Guidelines and mitigation measures as required to reduce impacts to less-than-significant levels.</p> <p>Please refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR, which states that while a majority of the proposed Design Guidelines are not described as mandatory requirements, select Design Guidelines (such as those related to access points,</p>

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		<p>gateways, maintenance buffers and clearances, emergency access, lighting, and monitoring and maintenance plans) are described as requirements (through the use of “must” and “shall”) rather than recommendations under the <i>2020 LA River Master Plan</i>. Accordingly, the PEIR assumes that the <i>2020 LA River Master Plan</i> will be implemented consistent with these required Design Guidelines. Similarly, it is assumed that all subsequent projects under the <i>2020 LA River Master Plan</i> would be implemented in accordance with the required Design Guidelines by implementing agencies (1 county and 17 cities). For the purposes of the impact analysis presented in Chapter 3, <i>CEQA Environmental Impact Assessment</i>, of the Draft PEIR, compliance with these required Design Guidelines is assumed and factored into the impact analysis and CEQA determination for the <i>2020 LA River Master Plan</i>.</p> <p>In addition, as this is a program-level EIR, the analysis presented is conservative in nature. Under State CEQA Guidelines Section 15168, where the later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the PEIR. The <i>2020 LA River Master Plan</i> is a conceptual plan. All future specific projects would be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168.</p> <p>At the time of project-level CEQA compliance, if there are changes proposed to the manner in which Design Guidelines will be included in a project, additional impact analysis and significant conclusions should be analyzed and disclosed.</p>
O17-41	<p>IX. The County’s CEQA Process Did Not Maximize Public Participation.</p> <p>The people of Los Angeles County speak 185 different languages at home. (https://la.curbed.com/2015/11/4/9904020/los-angeles-languages.) It is well established the Los Angeles River flows through some of the most diverse communities in Los</p>	<p>Please see Master Response MR-3 (Public Outreach for the Draft PEIR) for information about the extensive public outreach program that was conducted. Additionally, per State CEQA Guidelines Section 21091, the public review period for a draft EIR submitted to the State Clearinghouse for review shall be at least 45 days. In response to comments received, the review</p>

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	<p>Angeles County, including many with a high percentage of non-English speakers. For this reason, important notices, such as those concerning voting, are provided in up to 12 languages by the County. Waterkeeper appreciates the County’s efforts to include CEQA Notices and Power Point presentations in Spanish. However, neither the DEIR nor its Appendices have been made available to the public in Spanish, or any language other than English.</p> <p>It is well established that an EIR is “a document of accountability.” (Laurel Heights Improvement Assn. v. Regents of the University of California (1988) 47 Cal.3d 376, 392. It is essential to the functioning of CEQA that the public be informed about and involved in decisions made by their public officials that affect the environment in which they live and raise their children. The CEQA Guidelines, at section 15201, provide: “Public participation is an essential part of the CEQA process. Each public agency should include provisions in its CEQA procedures for wide public involvement. . . .” (See also CEQA Guidelines sections 15002(a)(1) [“The basic purposes of CEQA are to [i]nform decisionmakers and the public about the potential significant environmental effects of proposed actions]; 15003(c) [“The EIR is to inform other governmental agencies and the public generally of the environmental impact of a proposed project[.]”]) Analogous state Office of Planning and Research Guidelines recommend that: “All communication ... should be done in the major languages spoken in the community.</p> <p>This includes any advertising and written background materials as well as live interpretation at key public events.” (OPR, “General Plan Guidelines,” p. 32.) Failure to provide the DPEIR in Spanish has violated this policy, which is central to CEQA and Planning and Zoning Law. The US Census Bureau reports that in Los Angeles County, an estimated 56.6% of households speak a language other than English at home (https://www.census.gov/quickfacts/losangelescountycalifornia; visited 5/5/21), and about 48.6% of the County’s population is Hispanic or Latino. Nearly forty percent of Los Angeles County</p>	<p>period was extended from March 4, 2021, to April 2, 2021 (60 days), and was extended a second time to May 13, 2021, to provide additional review time to all interested parties. In total, the review period extended from February 1, 2021, to May 13, 2021, for a total of 101 days.</p> <p>The County was unable to accommodate translation of the <i>2020 LA River Master Plan</i> Draft PEIR during the comment period due to schedule and budget constraints. However, notices for the Draft PEIR—including the Notice of Availability and flyers announcing the March 3, 2021, Draft PEIR public meeting—were provided in Spanish and published in the following Spanish newspapers in Los Angeles County serving the project area:</p> <ul style="list-style-type: none"> • <i>La Opinión</i> • <i>Excélsior</i> • <i>LA Times en Español (Hoy Los Angeles)</i> <p>Spanish translators were available during the July 29, 2020, scoping meeting and March 3, 2021, Draft PEIR public meeting. Spanish translations for both meeting presentations were also made available online at pw.lacounty.gov/go/larmpceqa and are still available to the public. In addition, a Spanish translation of the Draft <i>2020 LA River Master Plan</i> was available for public review.</p>

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	households speak primarily Spanish at home. (https://www.first5la.org/files/CommunityProfileForLACounty.pdf .)	
O17-42	Where a public agency does not make documents available in the language spoken by people likely affected by the project, it fails to comply with CEQA's public participation policies, as described above. We request the County recirculate the Draft PEIR in Spanish to enable the necessary public participation. Additionally, the Los Angeles River passes through areas where languages beyond English and Spanish predominate. For this reason, we request that CEQA notices be made available to residents speaking Chinese (Cantonese and Mandarin), as well as the other major languages spoken by river-adjacent communities.	Please see the response to comment O17-40.
O17-43	Waterkeeper also notes the lack of outreach to important communities residing along the River. Meetings were held in some River communities, but not in Atwater Village, Boyle Heights, Huntington Park, and Maywood. The Tongva and other Indigenous Peoples were also left largely out of the Master Plan process. Indigenous People have lived in the Los Angeles Basin for thousands of years, and have some of the longest relationships with the River. Their experience, knowledge, and priorities should have been represented on the Steering Committee. One tribal representative, but zero Tongva representatives, was insufficient. The Master Plan process must be repeated to incorporate important information about traditional cultural spaces, ceremonial spaces, and Traditional Ecological Knowledge.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed. It should be noted that two meetings were held near Atwater Village (Friendship Auditorium on November 13, 2018, and Glendale June 12, 2019), one meeting was held in Central Los Angeles (Felicitas & Gonzalo Mendez High School on October 17, 2019), and two meetings were held near Huntington Park/Maywood (South Gate on March 28, 2019, and Cudahy on August 22, 2018).
O17-44	Finally, Waterkeeper understands the difficulties presented by the COVID-19 crisis with regard to convening public hearings and meetings. Waterkeeper appreciates the County's embrace of Zoom and online formats that enabled some participation during a period that otherwise would have recorded zero public participation. However, Waterkeeper notes that Zoom and	Following Governor Newsom's Executive Order N-28-20 relating to the threat of COVID-19, the Los Angeles County Board of Supervisors announced that all County facilities would be closed to members of the public beginning March 16, 2020, and the closing of buildings and facilities was indefinitely extended.

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	<p>online meetings resulted in barring access to the CEQA process for the Master Plan Update for community members lacking at-home computer or internet access and/or sufficient technological experience. These barred residents are already those most likely to be adversely impacted by developments in their neighborhoods. Even for community members with the computers and adequate internet access, participation was tricky. For example, during the March 3, 2021 public meeting, it became clear that many members of the public who signed up to speak were unable to connect their audio or video to provide comments. Others may have been able to share their comments, but meeting facilitators could only find participants by the exact names entered into the Eventbrite preregistration. If a community member was using a Zoom account on a device with a name that did not match, if a community member borrowed a device, they were often unable to speak. Thus, the County’s process placed great barriers to public participation for a project that will impact up to 200 square miles of the County, and the entire LA River. Environmental review derives its vitality from public participation. (Ocean View Estates Homeowners Ass’n, Inc. v. Montecito Water Dist. (2004) 116 Cal.App.4th 396, 400.)</p>	<p>Public Works facilities have only recently reopened on October 1, 2021.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for information about the extensive public outreach program that was conducted for the Draft PEIR. Additionally, the review period for the Draft PEIR was extended from a 45-day review (per State CEQA Guidelines Section 21091) from March 4, 2021, to April 2, 2021 (60 days), and was extended a second time to May 13, 2021, for a total of 101 days; written comments submitted via mail or email were accepted during this time; and a hotline number was provided. During the public meeting on March 3, 2021, participants were able to submit comments in a chat box to the moderator during the meeting if they had technical issues, and extra time was available for additional participants who did not register to provide an oral comment. At the end of the presentation, slides with information on how to provide written comments was also provided, and the period for accepting written comments lasted until May 13, 2021. For participants who were unable to call in or join the public meeting, the slideshow and recording of the meeting were provided on the Draft PEIR’s website at pw.lacounty.gov/go/larmpeqa.</p>
017-45	<p>Conclusion</p> <p>While the DPEIR may be a useful organization of the generalized and differing visions of River stakeholders, it is not a defined “project” for purposes of CEQA, even at the programmatic level. As currently written, the document hinders CEQA’s purposes of providing informed decision making and informed public review. Neither the decision makers nor the public know what the Project is meant to achieve or the environmental consequences of project approval. Like the Master Plan itself, the DPEIR must be revised to clarify actual plans for the River and to provide organization and prioritization of project objectives that compete with one another. Once the County has settled on an actual plan, the County and its team must perform the studies</p>	<p>The PEIR is not a project; it is an environmental document examining, disclosing, and, where feasible, mitigating the potential environmental effects of the <i>proposed 2020 LA River Master Plan</i>. The <i>2020 LA River Master Plan</i> is a conceptual plan and is not intended to contain the level of detail the commenter would prefer.</p> <p>Please see the response to comment O17-4 and refer to Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>There are no public agencies identified that have discretionary approval power over the Master Plan itself (State CEQA Guidelines section 15381 definition). As explained in PEIR Section 1.3.1.1, <i>Enforceability of Mitigation Measures</i>, the County has adopted dual impact conclusions for projects implemented</p>

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	<p>and analysis needed to adequately disclose, analyze, and mitigate the Project’s likely environmental impacts – information that, thus far, has been deferred to future processes. The County must also investigate methods of ensuring the mitigation measures it devises are incorporated by all agencies that may become responsible agencies under CEQA as Master Plan projects are implemented. This information must be included in a revised DPEIR and recirculated for public comment.</p>	<p>by the County versus those which are implemented by one of the other 17 agencies with jurisdiction over the Master Plan area. As discussed, the County cannot enforce or guarantee that the mitigation measures in the PEIR will be implemented by the other agencies, which is why the County provided two separate impact conclusions: County and non-County. Such changes or alterations to a project are within the responsibility and jurisdiction of other public agencies and not the agency making the finding. However, if the mitigation measures identified throughout Chapter 3, <i>CEQA Environmental Impact Assessment</i>, of the Draft PEIR are adopted by another agency for impacts that are considered less than significant after the mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for projects not carried out by the County, for the same reasons as discussed for later activities carried out by the County.</p>

2.3.2.36 Comment Letter O18: Heal the Bay, May 13, 2021

Comment#	Comment Text	Response
O18-1	<p>On behalf of Heal the Bay, we offer comments on the 2020 LA River Master Plan Draft Program Environmental Impact Report (DPEIR). Heal the Bay is an environmental organization with over 30 years of experience and 15,000 members dedicated to making the coastal waters and watersheds of greater Los Angeles safe, healthy, and clean. We would first like to recognize that we are on stolen Indigenous land.</p> <p>The main office of Heal the Bay in Santa Monica is on Tongva, Chumash, Kizh, and Acjachemen land. We acknowledge and respect Tongva, Chumash, Kizh, and Acjachemen elders past, present, and emerging. Heal the Bay appreciated the opportunity to serve on the Steering Committee for the LA River Master Plan (LARMP) Update process. Through this process we became quite familiar with the LARMP. Heal the Bay has submitted numerous comment letters on the Master Plan throughout the entire 2-plus year process as well as on the Notice of Preparation for the DPEIR in August 2020. We appreciate that the County extended the deadline for comments on the DPEIR. However, we are concerned that the DPEIR is too limited in its analysis of projects and impacts; that the alternatives analysis is inadequate; that mitigation is too vague; and that the public participation was limited.</p>	<p>The County appreciates Heal the Bay for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This is an introductory comment about Heal the Bay that precedes specific comments. No further response is required. No changes to the Draft PEIR are needed.</p>
O18-2	<p>The DPEIR needs to evaluate the impacts of all six elements in the Kit of Parts as possible projects. The DPEIR only analyzed two typical projects that are considered to be the most likely to be proposed throughout the 51-mile corridor. The two typical projects are: Common Elements Typical Project and Multi-Use Trails and Access Gateway Typical Project. These two projects are likely to be some of the least impactful of the six elements in the Kit of Parts (KOP). It is explicitly stated that "the analysis of these Typical Projects assumes that no in-channel disturbance would occur under these Typical Projects" (page ES-6). Completely excluding any project impacts of in-channel</p>	<p>As discussed in the comment's referenced passages of the Draft PEIR, the <i>2020 LA River Master Plan</i> is a conceptual project. Therefore, the environmental impact analysis is presented at a programmatic level and does not include project-specific or site-specific analysis. Also, project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. For subsequent project activities, site-specific CEQA compliance would be the responsibility of the implementing agency prior to proposed project implementation.</p>

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	<p>disturbance is worrisome. Further justification is needed for the selection of these two Typical Projects. We are also concerned with this limited analysis because the impacts of the four other KOP elements are not analyzed at all.</p>	<p>The PEIR reflects the County’s best good-faith effort to disclose the potential impacts of the <i>2020 LA River Master Plan</i>. The PEIR has taken a conservative approach to impact analysis and disclosure based on the program-level review of potential future, yet-to-be-designed and approved site-specific projects, considering the anticipated kit of parts (KOP). The impacts of the KOPs and the overall <i>2020 LA River Master Plan</i> are identified in the Draft PEIR in each respective resource topic.</p> <p>Typical Projects were selected because they are the most likely individual project identified. As described in Chapter 2, <i>Project Description</i>, Section 2.5.1, <i>Elements of the 2020 LA River Master Plan and their Organization for CEQA</i>, the two “Typical Projects” were identified based on the availability of construction and operations scenario assumptions from Public Works along with relatively detailed design concepts for these projects being described in the <i>2020 LA River Master Plan</i>. The Typical Projects could be sited between the top of levee and the fenceline at any location in the study area. The analysis of these Typical Projects assumes that no in-channel disturbance would occur under these Typical Projects.</p> <p>As discussed in the Draft PEIR, the wide-ranging functions, characteristics, and complexities of the KOP categories and their respective design components make it particularly challenging to make informed assumptions about reasonable operational scenarios for elements of the <i>2020 LA River Master Plan</i>. A more detailed consideration is not possible because it would require extensive speculation about the size, function, and location of facilities that have not been planned. Accordingly, the six KOP categories were qualitatively analyzed.</p> <p>The PEIR’s analysis undertakes a general examination of the potential impacts of these types of projects on the LA River and the adjoining study area. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River.</p>

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		Please see Master Response MR-2 (Program-Level Analysis in the PEIR).
018-3	<p>Heal the Bay, in addition to other groups, has routinely expressed concern over the platform parks KOP element and the potential for this design to have significant negative environmental impacts. Focusing the DPEIR on two projects that are considerably less impactful than other proposed project types is disingenuous and not representative of the actual Master Plan. We understand that specific projects will not be examined in the DPEIR but a range of potential impacts should be examined for each of the six project types in the KOP. We ask for a detailed evaluation of impacts for all six elements of the kit of the parts in the Final EIR, not merely a high-level analysis.</p>	<p>Please see Master Response MR-2 (Program-Level Analysis in the PEIR) for more details.</p> <p>With respect to the portion of this comment about the Gehry platform parks, please note that while the <i>2020 LA River Master Plan</i> does look at opportunity sites along the river, the PEIR is a programmatic document that did not include any site-specific or project-specific analysis. The County anticipates that future specific projects would require subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, “Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase.”</p> <p>This includes the Gehry platform parks, which would be considered subsequent projects subject to State CEQA Guidelines Section 15168. No changes to the Draft PEIR are needed.</p>
018-4	<p>The Alternatives Analysis is Inadequate. It is unclear why only two alternatives were analyzed and how the two alternatives were chosen. The alternatives are: A) No Project, such that projects would follow 1996 Master Plan or B) Channel Avoidance Alternative, which includes 5 of the 6 KOP options and excludes KOP 2, Channel Modifications. It is also stated that Alternative B would not include implementation of the channel access design component under KOP Category 1.</p>	<p>CEQA does not mandate that an EIR include a specific number of alternatives. Chapter 5, <i>Alternatives</i>, of the PEIR examines two alternatives and explains the reasons for rejecting other potential alternatives. This complies with State CEQA Guidelines Section 15126.6(c), which states: “The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination.”</p> <p>As discussed in Chapter 5, <i>Alternatives</i>, several alternatives were considered and eliminated from further evaluation either as part</p>

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		<p>of the initial screening or in consideration of the comments received during the extensive outreach and scoping process conducted by the County for the <i>2020 LA River Master Plan</i>. Please refer to 5.3 of Chapter 5, <i>Alternatives</i>.</p>
<p>018-5</p>	<p>Why does the DPEIR conduct an alternatives analysis on only some of the Master Plan? This is confusing and unclear. To go through the time and money intensive process of the Master Plan Update, only to conduct an alternatives analysis which does not include the whole LARMP is utterly confounding.</p> <p>It is also very concerning that the KOP that is excluded from Alternative B includes projects where concrete removal and terracing of banks could occur; these are the types of projects that Heal the Bay is supportive of and that we would like to be included in the DPEIR, especially since they are considered in the Master Plan. We request that an additional alternative be analyzed which includes all elements of the Master Plan, including all six KOP options and all components of the six KOP options.</p>	<p>Please see response to comment 018-3.</p> <p>As identified in Chapter 5, <i>Alternatives</i>, of the Draft PEIR, alternatives must reduce or avoid one or more impacts of the Project, meet the basic project objectives, and be feasible. Therefore, pursuant to the State CEQA Guidelines Section 15126.6, the County considered the <i>2020 LA River Master Plan</i> objectives (see Chapter 2, <i>Project Description</i>, of the Draft PEIR) and feasibility with respect to developing alternatives to the proposed Project. The County considered and evaluated the feasibility of alternatives that had the potential to avoid or substantially lessen significant adverse environmental impacts of the proposed <i>2020 LA River Master Plan</i>. Chapter 5, <i>Alternatives</i>, of the Draft PEIR identifies the project objectives, alternatives considered, and the alternatives that were considered but eliminated from detailed consideration.</p> <p>The County did consider alternatives to the <i>2020 LA River Master Plan</i> in the Draft PEIR. For example, the Watershed Restoration Alternative (Section 5.3.4 of the Draft PEIR), which included all elements of the <i>2020 LA River Master Plan</i>, including all six KOP options, was considered. However, this alternative would not reduce or avoid the impacts of the proposed Project given that all KOP categories would be implemented throughout the watershed. Specifically, it would not reduce or avoid significant impacts for these environmental resources: aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas (GHG) emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, public services, recreation, transportation, tribal cultural resources (TCRs), utilities and service systems, and wildfire. Therefore, this alternative was removed from further consideration.</p>

Comment#	Comment Text	Response
		<p>The County also considered another alternative to the <i>2020 LA River Master Plan</i>: the <i>Reduced 2020 LA River Master Plan</i> Project Study Area Alternative (Section 5.3.8 of the Draft PEIR), which included all elements of the <i>2020 LA River Master Plan</i>, including all six KOP options. This alternative could avoid impacts in areas identified under the <i>2020 LA River Master Plan</i>; however, considering the LA River is one continuous channel from its headwaters to the mouth of the river in Long Beach, focused improvements in a shorter segment of the river with fewer frames would not adequately meet the basic objectives of the proposed Project that are focused on providing connected open space, trails, and healthy connected ecosystems and improved flood management and resiliency along the entire 51-mile LA River. Therefore, this alternative was eliminated from further consideration.</p> <p>In addition to alternatives to the <i>2020 LA River Master Plan</i>, the County considered Single and Combined Kit of Parts Alternatives (Section 5.3.5 of the Draft PEIR). However, depending on the KOP categories implemented, these alternatives would meet only a subset of the nine project objectives. Therefore, this alternative was eliminated from further consideration.</p> <p>Regarding the comment on the exclusion of projects where concrete removal and terracing of banks can occur from Alternative B, the County considered a Naturalize the LA River Alternative (Section 5.3.3 of the Draft PEIR), and additional discussion is available in Master Response MR-5 (Naturalization of the LA River) about why it was eliminated from further evaluation.</p> <p>The alternatives analysis is also in keeping with State CEQA Guidelines Section 15126.6(a), which states, in part: “An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and</p>

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		<p>must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.” The analysis of alternatives is not required to be as detailed as the analysis of the Project. State CEQA Guidelines Section 15126.6(d) states: “The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.” Chapter 5, <i>Alternatives</i>, of the Draft PEIR fulfills these requirements. No changes to the Draft PEIR are needed.</p>
018-6	<p>Mitigation measures are too vague and are inadequate. The DPEIR fails to adequately disclose, analyze, and mitigate the Project’s significant adverse environmental impacts. It is concerning that the County plans to “encourage” the 17 cities along the Los Angeles River to adopt the EIR. Unfortunately, if these cities do not adopt the PEIR, and implement projects along the River, there could be adverse environmental impacts that are not disclosed in this DPEIR. Mitigation measures must be concrete and enforceable and there is no enforceability to the mitigation measures contained in the DPEIR.</p>	<p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR), which discusses the programmatic nature of the PEIR. The County is the lead agency with respect to preparing the PEIR and will mitigate the impacts of <i>2020 LA River Master Plan</i> projects that are carried out by the County. However, the County is just one of 18 jurisdictions that lie along the LA River that have responsibility for implementing specific future projects. The County cannot determine whether other jurisdictions will adopt the PEIR, and cannot guarantee that other jurisdictions will implement the mitigation measures because those jurisdictions are outside of the County’s control.</p> <p>Additionally, please refer to Master Response MR-4 (Adherence to Local Jurisdictions’ Requirements), which discusses that any jurisdiction intending to tier from the PEIR (for subsequent projects) would need to consider project type, location, funding, permit requirements, and other agency jurisdiction in light of the findings identified for the PEIR. All future specific projects would</p>

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		<p>be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168.</p> <p>Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, “Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase.”</p>
018-7	<p>Public participation was limited. While we appreciate the extension of the comment period, the DPEIR document is incredibly lengthy and difficult for professionals, let alone the average lay person, to digest. Further, the overlap of the comment period with the comment period for the LA River Master Plan did not promote public participation. Many community members that we interacted with were confused about the two processes and many had to choose which document to focus their limited time on. The DPEIR was only provided in English, limiting the audience for participation. We appreciate that a public meeting was held when the NOP was released and after the DPEIR was released, but these meetings were highly technical and inaccessible to many people without technological skills, access to a computer, or access to adequate internet service.</p>	<p>Please see Master Response MR-3 (Public Outreach for the Draft PEIR) for information about the extensive public outreach program that was conducted. Additionally, per State CEQA Guidelines Section 21091, the public review period for a draft EIR submitted to the State Clearinghouse for review shall be at least 45 days. In response to comments received, the review period was extended from March 4, 2021, to April 2, 2021 (60 days), and was extended a second time to May 13, 2021, to provide additional review time to all interested parties. In total, the review period extended from February 1, 2021, to May 13, 2021, for a total of 101 days.</p> <p>The County was unable to accommodate translation of the <i>2020 LA River Master Plan</i> Draft PEIR; however, notices for the Draft PEIR—including the Notice of Availability and flyers announcing the March 3, 2021, Draft PEIR public meeting—were provided in Spanish and published in the following Spanish newspapers in Los Angeles County serving the project area:</p> <ul style="list-style-type: none"> • <i>La Opinión</i> • <i>Excélsior</i> • <i>LA Times en Español (Hoy Los Angeles)</i> <p>Spanish translators were available during the July 29, 2020, scoping meeting and March 3, 2021, Draft PEIR public meeting. Spanish translations for both meeting presentations were also</p>

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		<p>made available online at pw.lacounty.gov/go/larmpceqa and are still available to the public. In addition, a Spanish translation of the Draft <i>2020 LA River Master Plan</i> was available for public review.</p>

2.3.2.37 Comment Letter O19: Sacred Places Institute, May 13, 2021

Comment#	Comment Text	Response
O19-1	<p>Thank you for the opportunity to provide comments on the 2020 Los Angeles County River Master Plan and the Draft Programmatic Environmental Impact Report. Sacred Places Institute for Indigenous Peoples (SPI) is a California Indigenous-led, grassroots environmental justice organization based in the unceded ancestral homelands of the Tongva people in what is now known as Los Angeles. Founded in 2012, our mission is to build the capacity of Native Nations and Indigenous Peoples to protect sacred lands, waters, and cultures.</p> <p>Please note, these comments represent the perspective of Sacred Places Institute for Indigenous Peoples. While SPI has multiple staff and board members from the Native Nations through whose homelands the L.A. River flows and we strive to honor and respect and uplift the perspectives of the Native Nations on whose lands we live and work, we are a California-Indigenous led organization and not a sovereign Native American Tribe. To the extent that any of our comments are in conflict with the goals and desires of the California Native American Tribes through whose territories the River flows we defer to those Tribes as should the LA River Steering Committee and all decision-makers for the LA River.</p> <p>While we acknowledge and appreciate all of the time and effort that went into facilitating the Steering Committee and drafting this plan, we encourage the County and associated consultants Geosyntec, OLIN, Gehry Partners Architects, Street Level Advisors, and River LA to reflect on opportunities to uplift, rather than inadvertently perpetuate the erasure, of the first people to be in relationship with the Paayme Paxaayt/Orit/Wanüt and its tributaries (Los Angeles River in Tongva, Tataviam, and Tataviam Serano dialect)--the Tongva, Tataviam, Serrano, and Chumash Peoples.</p> <p>We applaud the inclusion of Tataviam representation on the Steering Committee. However, we remain disappointed with the</p>	<p>The County appreciates Sacred Places for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR.</p> <p>With respect to the portion of this comment stating that there are shortcomings in the current <i>2020 LA River Master Plan</i>, it appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Note that Objective 7 of the <i>2020 LA River Master Plan</i> is Foster Opportunities for Continued Community Engagement, Development, and Education; Action 7.2.6 is Consult with Local Native American Tribal Governments and Work with Native American Communities; and Action 7.3 is Engage the Indigenous Peoples of the Region.</p> <p>The rest of this comment is an introductory comment that precedes specific comments.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for information about the public outreach program that was conducted. No further response is required.</p>

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	<p>failure to include Tongva representation on the Committee. Furthermore, knowledge of the lack of sufficient tribal representation was brought to our attention by BIPOC EJ allies alerting us to the existence of the Steering Committee meetings and was not initiated by the County or its consultants. As far as we are aware, aside from the appointment of a single Native American to the Steering Committee after the first round of Committee appointees and only as a result of tribal and ally demands that Indigenous voices be included, and a single two-hour event uplifting local tribal perspectives on the River in collaboration with the Autry and the Los Angeles City County Native American Commission in June 2019, little to no outreach, or engagement with, tribal governments, California Native Americans, or Indigenous community members occurred.</p> <p>We call upon you to fund and support a continued planning effort that meaningfully addresses the significant shortcomings of the current LARMP, including developing a true plan that prioritizes California Native American tribal land return and access, uplifts the languages and place names designated by the California Native American Tribes with territories along the River, recognizes the River as a living being, outlines a clear vision and prioritized goals and metrics for the River; tackling issues that are critical for the implementation of such a plan, including a holistic governance structure; and reflects meaningful community engagement and input. Such an implementation plan could even be in the form of the County funding a People’s Plan for the LA River that takes a more community-oriented approach to ensure that ecological and neighborhood health and resiliency are protected.</p> <p>Finally, we support the call of our colleagues on the LA River Steering Committee:</p> <p>Rather than trying to correct the existing plan to make it something it clearly is not, we renew our call for Los Angeles County to build upon the excellent compilation of information included in the current Plan, and commit to fund, support and immediately embark on a continued planning effort that</p>	

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	<p>meaningfully addresses the significant shortcomings of the current LARMP</p> <p>Please see below for SPI’s substantive comments on the 4,000 pages that make up the LARMP and the DEIR. Our comments include a summary of recommendations, reflections on particular overarching themes of importance, and more specific comments on various sections and appendices.</p> <p>Thank you for the opportunity to provide our more detailed comments on the PEIR and the public draft of the LARMP. We look forward to working with the County to move forward with a Plan that prevents rather than perpetuates the erasure of California Native American Tribes and presents a clear and compelling vision for the River that will help safeguard our environment and communities.</p>	
O19-2	<p>Introduction--Native Nations and Paayme Paxaayt/Orit/Wanüt</p> <p>Please note, these comments represent the perspective of Sacred Places Institute for Indigenous Peoples. While SPI has multiple staff and board members from the Native Nations through whose homelands the L.A. River flows and we strive to honor and respect and uplift the perspectives of the Native Nations on whose lands we live and work, we are a California-Indigenous led organization and not a sovereign Native American Tribe. To the extent that any of our comments are in conflict with the goals and desires of the California Native American Tribes through whose territories the River flows we defer to those Tribes as should the LA River Steering Committee and all decision-makers for the LA River.</p> <p>California Native American Tribes are sovereign nations and there are multiple scenarios, including related to watershed management and river restoration, which require state and local agencies to engage in government-to-government consultation with Native American Tribes as part of the planning process. As a general comment, the LARMP should acknowledge and uplift this perspective on tribal sovereignty as it relates to urban</p>	<p>This comment is acknowledged. Tribal consultation was conducted as part of the efforts to prepare the <i>2020 LA River Master Plan</i> Draft PEIR. Please refer to Section 3.17, <i>Tribal Cultural Resources</i>, of the Draft PEIR, which addresses tribal cultural resources. It provides an analysis of potential impacts based on consultation with Native American tribes traditionally and culturally affiliated with the proposed project area and identified through a Sacred Lands File search conducted through the Native American Heritage Commission (NAHC). Specifically, page 3.17-11 of the Draft PEIR states:</p> <p>On May 20, 2020, the County sent out letters via certified mail to five Native American tribes who have previously requested notification under [Assembly Bill] 52 to seek recommendations or concerns regarding the proposed Project. Letters were sent to Mr. Jairo Avila, Tribal Historic and Cultural Preservation Officer of the Fernandeño Tataviam Band of Mission Indians; Mr. Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians—Kizh Nation; Mr. Anthony Morales, Chief of the Gabrieleño/Tongva San Gabriel Band of Mission Indians; Mr. Lee Clauss, representing the San Manuel Band of</p>

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	<p>planning and watershed management whenever possible throughout this document and all future related planning and implementation documents.</p>	<p>Mission Indians; and Mr. Octavio Escobedo, Tribal Chair of the Tejon Indian Tribe.</p> <p>To date, written responses have been received from Alexandria McCleary, Tribal Archaeologist, who responded for the San Manuel Band of Mission Indians; Mr. Jairo Avila, Tribal and Historic and Cultural Preservation Officer of the Fernandeño Tataviam Band of Mission Indians; and Chairman Andrew Salas of the Gabrieleño Band of Mission Indians—Kizh Nation. The San Manuel Band of Mission Indians declined consultation in an email dated June 10, 2020, and the Fernandeño Tataviam Band of Mission Indians and Gabrieleño Band of Mission Indians—Kizh Nation have requested formal consultation.</p>
<p>019-3</p>	<p>Recognize the River as a Living Being--Incorporate local Indigenous languages, theories and practices throughout the document to carry out the true spirit of revitalization. Native American Tribes and Indigenous Peoples around the world have adopted similar stances regarding Rivers, Mountains and other land and water entities within their ancestral homelands. Most recently the Yurok Tribe in California adopted a resolution recognizing legal rights for the river.⁵</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>019-4</p>	<p>Prioritize Health of the River--The LARMP and associated PEIR appear to be based on a model of economic restoration rather than ecological restoration. Tribal citizens and Indigenous community members who spoke at the June 2019 Native American Community event spoke clearly about the importance of prioritizing the health of the river. This is not reflected in either document. SPI recommends utilizing the standards set by the State Water Resources Control Board in the Tribal Beneficial Uses-Cultural Uses of Water report as a baseline for the health and cleanliness of the water.⁶</p>	<p>While the commenter mentions the “associated PEIR,” it appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>In Section 3.17, <i>Tribal Cultural Resources</i>, of the Draft PEIR, the County acknowledges the <i>2020 LA River Master Plan</i> study area encompasses the ethnographic territory of the Gabrieleño. The Tataviam and Chumash traditionally occupied the areas just to the north (San Fernando Valley) and coastal areas to the west of the project study area; however, interaction within the Los</p>

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		<p>Angeles Plain and Basin occurred. Additionally, the Serrano, traditionally located to the east of the Los Angeles Plain, interacted with and accessed the areas, resources, and other tribes of the Los Angeles Basin. As described in the <i>Ethnographic Setting</i>, the County acknowledges the Native American tribes' and indigenous peoples' use of the LA River and presence in the study area.</p> <p>The beneficial use definitions established by the State Water Resources Control Board in 2017 are the following:</p> <p style="padding-left: 40px;">Tribal Tradition and Culture (CUL): Uses of water that support the cultural, spiritual, ceremonial, or traditional rights or lifeways of California Native American Tribes, including, but not limited to: navigation, ceremonies, or fishing, gathering, or consumption of natural aquatic resources, including fish, shellfish, vegetation, and materials.</p> <p style="padding-left: 40px;">Tribal Subsistence Fishing (T-SUB): Uses of water involving the non-commercial catching or gathering of natural aquatic resources, including fish and shellfish, for consumption by individuals, households, or communities of California Native American Tribes to meet needs for sustenance.</p> <p style="padding-left: 40px;">Subsistence Fishing (SUB): Uses of water involving the non-commercial catching or gathering of natural aquatic resources, including fish and shellfish, for consumption by individuals, households, or communities, to meet needs for sustenance.</p> <p>Objectives of the 2020 LA River Master Plan consistent with these beneficial uses include reducing flood risk and improving resiliency (Objective 1), supporting healthy connected ecosystems (Objective 3), and promoting healthy, safe, clean water (Objective 9). This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the 2020 LA River Master Plan team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

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019-5	<p>Land and Water Return: Indigenous Access for Cultural and Ceremonial Purposes--the Plan should articulate the importance of prioritizing spaces for tribal cultural and ceremonial use along the River and Tributaries in all future projects. Consultation with Native American Tribes to determine preferred places for cultural and ceremonial use should be mandated prior to any project approval.</p> <p>Various State and International agencies have begun to take seriously the notion of Indigenous land return. The LARMP and associated PEIR should aim to be in alignment with state, federal and international efforts to return Indigenous lands and waters and therefore list land and water return and tribal co-management as viable options for future projects along the River.</p> <p>Multiple types of access, including trails accessible by Elders and differently abled community members, plans for spaces that are accessible by public transportation, and plans for spaces where tribal community members can gather clean, safe, pesticide-free plant materials without fear of harassment from private security, local homeowners or police should be included.</p>	<p>While the commenter mentions the “associated PEIR,” this comment about returning land to indigenous tribes appears to be related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>However, to the extent that this comment applies to the Draft PEIR, please see the response to comment 019-2 and refer to Section 3.17, <i>Tribal Cultural Resources</i>, of the Draft PEIR for information about consultation completed for the Draft PEIR. Additionally, please refer to Section 3.8, <i>Hazards and Hazardous Materials</i>, of the Draft PEIR for information regarding the use of pesticides and the safety requirements/regulations associated with that use.</p> <p>It should be noted that, on September 29, 2020, the Board of Supervisors adopted a motion (Indigenous Peoples Day 2020) that directed the County of Los Angeles Chief Sustainability Office, in coordination with the Los Angeles City/County NAHC and County of Los Angeles Departments of Park and Recreation, Beaches and Harbors, and Public Works to convene local tribal and urban American Indian and Alaska Native stakeholders to identify barriers to the observance by tribal and Native communities of religious and cultural practices on County-owned lands resulting from County, State, or Federal policies. Since adoption of the motion, the Board adopted additional motions on June 22, 2021, and July 13, 2021, that initiated work related to the recommendations on the Dialogue series, the Tribal Relations Office, a tribal consultation policy, and a formal acknowledgement of harm.</p>
019-6	<p>Tribal Sovereignty, Free, Prior Informed Consent, and Meaningful Relationship-Building--The final plan should include a list of all the relevant state, federal, and international laws related to tribal self determination, sovereignty, and</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This</p>

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	<p>government-to-government consultation that may be relevant in future planning for the River. California Native American Tribes are sovereign nations and there are multiple scenarios, including related to watershed management and river restoration, which require state and local agencies to engage in government-to-government consultation with Native American Tribes as part of the planning process. It is critical that local governments and agencies include government-to-government consultation as a highest priority for all projects proposed and implemented along the River.</p> <p>Tribal Territories and Indigenous Language Place Names--Tribal territories should be visibly demonstrated on all maps and associated materials so that agencies, organizations, and individuals utilizing the Plan in the future all have a shared understanding of the lands and waters within the Plan's boundaries as within the ancestral homelands of the Tongva and Tataviam Tribes. Proposed projects that include the use of Indigenous Place Names should be prioritized. The Tongva and Tataviam Tribes should be consulted directly for recommendations regarding, and consent to use, specific territorial maps and Indigenous place names within the Plan.</p>	<p>comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>However, to the extent that this comment may apply to the Draft PEIR, please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for a discussion of the extensive public outreach program that was conducted and to Section 3.17, <i>Tribal Cultural Resources</i>, of the Draft PEIR for an analysis of the Project's potential impacts on tribal cultural resources.</p>
019-7	<p>California Native American Tribes and Traditional Ecological Knowledge (TEK)--the value of TEK in land and watershed planning should be uplifted in the Plan. "Traditional Ecological Knowledge (or TEK) refers to the evolving knowledge acquired by indigenous and local peoples over hundreds or thousands of years through direct contact with the environment....TEK is an accumulating body of knowledge, practice, and belief, that encompasses the world view of indigenous people which includes ecology, spirituality, human and animal relationships, and more." The Plan should cite California Landscape Conservation Partnerships Traditional Ecological Knowledge Resources page for additional information related to California Native American Tribes and TEK.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

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019-8	<p>Include Tribal Representation on all Governance and Advisory Bodies--Representation from all tribes along the River and on all future governance and advisory bodies created as a result of the Plan should be mandatory.</p>	<p>Please see the responses to comments 019-5 and 019-6.</p>
019-9	<p>Recognize the River as a Living Being</p> <p>SPI strongly recommends that L.A County Public Works acknowledges that the L.A. River watershed (with all its tributaries, channels and streams) is a living entity with legal rights and that it be governed, protected and shepherded by either a local Indigenous led council, advisory committee, or both. The mission, scope, and powers of this Advisory Council or Committee should be determined and defined by the California Native American Tribes with territories along the River. The council or advisory committee should have full decision-making authority on any and all matters related to the L.A. River Master Plan and any projects related to it.</p> <p>“... treating the river as a living entity is the correct way to approach it, as in indivisible whole, instead of the traditional model for the last 100 years of treating it from a perspective of ownership and management.”</p> <p>Since time immemorial Indigenous communities throughout the world have cared for the land and water and continue to share and practice a common fundamental principle that Indigenous lives are inextricably tied to the land and water and that it is our responsibility to continue to nurture a symbiotic relationship with the land and water. Recognizing the significance of these ties, Indigenous communities have been at the forefront of advocating for land and water to be recognized as a living entity. Recent examples include the Mauri people of New Zealand, who in 2017 adopted a national-level legislation granting legal personality to specific areas of cultural and environmental significance : Te Urewera, comprising Lake Waikaremoana and surrounding land and forests, as can be inferred from the Te Urewera Act (New Zealand, 2014); and Te Awa Tupua, which</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>With respect to the comment about ecological restoration versus economic restoration, the objectives of the <i>2020 LA River Master Plan</i> include reducing flood risk and improving resiliency (Objective 1), supporting healthy connected ecosystems (Objective 3), and promoting healthy, safe, clean water (Objective 9). Additionally, please see the response to comment 019-4. No changes to the Draft PEIR are needed.</p>

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	<p>encompasses ‘the Whanganui River from the mountains to the sea, incorporating all its physical and metaphysical elements’ (New Zealand, 2017, Section 12). While varying examples exist of Governance of the river, based on the specificities of local and historical context, generally rivers as a living entity are cared for by either councils or advisories that are represented by the Te Urewera Board and two guardians known as Te You Tupua, respectively. Both acts implement the deeds of settlement of historical claims by the Mauri people.</p> <p>Countless examples exist of Indigenous communities spearheading efforts to grant rivers as living entities, many of which work off of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) universal framework that was adopted in 2007 at the 107th Plenary Meeting by General Assembly on 9/13/2007. Due to the collective efforts of concerned Indigenous communities from throughout the world regarding the intersections between human rights and climate change, the UNDRIP provides a universal framework “for the survival, dignity and well-being of the indigenous peoples of the world”. This comprehensive framework is a key tool that is utilized to help mitigate the impact of climate change on Indigenous communities.</p> <p>In addition, recognizing the detrimental impacts that U.S. agricultural business and hyper-industrialization has had on the natural environment and surrounding communities, since 2006 over 40 states have either introduced or adopted municipal ordinances granting personhood to rivers or nature. Despite the extreme environmental devastation caused by irresponsible land stewardship, still some states and local municipalities unabashedly choose to pushback against these transformative measures to grant and treat the rivers as living entities as is the 2017 case (2017-Colorado River Ecosystem/Deep Green Resistance et al.v. State of Colorado) in Colorado where the Attorney General considered the request “frivolous”. Our vision is that LA County prioritize adopting such transformative</p>	

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	<p>measures as a critical step to addressing the ecological health of the LA River.⁷</p> <p>Prioritize Health of the River--The LARMP and associated PEIR appear to be based on a model of economic restoration rather than ecological restoration. Tribal citizens and Indigenous community members who spoke at the June 2019 Native American Community event, the April 28 Tribal Listening Session, the ULART Revitalization Plan Tribal Listening session, and in other venues, spoke clearly about the importance of prioritizing the health of the river. This is not reflected in either document. SPI recommends utilizing the standards set by the State Water Resources Control Board in the Tribal Beneficial Uses-Cultural Uses of Water report as a baseline for the health and cleanliness of the water.</p>	
<p>O19-10</p>	<p>“California Native American Tribes use California’s surface waters in a manner unique to tribal culture, tradition, ceremonies, and lifeways. Tribal Beneficial Uses provide a way to adequately protect certain uses of water that directly relate to Native American cultures. In some cases, the levels of waste allowed to be released into California waters (discharge requirements) or existing water quality standards may not adequately protect Tribal Beneficial Uses. To account for this, in 2017 the State Water Board identified and described beneficial uses unique to California Native American Tribes, in addition to subsistence fishing by other cultures or individuals.”</p> <p>While the Plan states that it utilizes a watershed approach in its research and analysis, the focus on the main stem of the LA River precludes the inclusion of systematic, nature-based and Indigenous knowledge-based¹⁰ solutions that would allow for a more naturalized, resilient, and multi-beneficial River. If we do not look at the entire watershed, tributaries included, we cannot make informed decisions about how best to protect residents from flooding and where a more naturalized River may be possible. Only by examining the entire watershed will we be able</p>	<p>While the commenter mentions the “associated PEIR,” it appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>With respect to the portion of this comment about a watershed-based approach, please refer to Master Response MR-7 (Master Plan Area/PEIR Study Area and Addressing the LA River in a Comprehensive Manner) for more information.</p>

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	to understand where we can make targeted and strategic improvements that will support all communities.	
019-11	<p>Land and Water Return: Indigenous Access for Cultural and Ceremonial Purposes--the Plan should articulate the importance of prioritizing spaces for tribal cultural and ceremonial use along the River and Tributaries in all future projects. Consultation with Native American Tribes to determine preferred places for cultural and ceremonial use should be mandated prior to any project approval.</p> <p>Various State and International agencies have begun to take seriously the notion of Indigenous land return. The LARMP and associated PEIR should aim to be in alignment with state, federal and international efforts to return Indigenous lands and waters and therefore list land and water return and tribal co-management as viable options for future projects along the River.</p> <p>UNDRIP LAND BACK PROVISIONS</p> <p>Article 10</p> <p>Indigenous peoples shall not be forcibly removed from their lands or territories. No relocation shall take place without the free, prior and informed consent of the indigenous peoples concerned and after agreement on just and fair compensation and, where possible, with the option of return.</p> <p>Article 11, Section 2</p> <p>States shall provide redress through effective mechanisms, which may include restitution, developed in conjunction with indigenous peoples, with respect to their cultural, intellectual, religious and spiritual property taken without their free, prior and informed consent or in violation of their laws, traditions and customs.</p> <p>Article 25</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Please refer to Section 3.17, <i>Tribal Cultural Resources</i>, of the Draft PEIR, which describes how multiple paths of consultation were undertaken during preparation of the PEIR. Firstly, the NAHC was consulted on March 5, 2020, and subsequently responded stating that a search of the Sacred Lands File was positive for sacred lands or traditional cultural properties within two quadrangles in the study area. Secondly, the County sent letters via certified mail to five Native American tribes who had previously requested notification under Assembly Bill 52 to seek recommendations or concerns regarding the proposed Project. Letters were sent to Mr. Jairo Avila, Tribal Historic and Cultural Preservation Officer of the Fernandeño Tataviam Band of Mission Indians; Mr. Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians—Kizh Nation; Mr. Anthony Morales, Chief of the Gabrieleño/Tongva San Gabriel Band of Mission Indians; Mr. Lee Clauss, representing the San Manuel Band of Mission Indians; and Mr. Octavio Escobedo, Tribal Chair of the Tejon Indian Tribe. Written responses were received from the San Manuel Band of Mission Indians, the Fernandeño Tataviam Band of Mission Indians, and the Gabrieleño Band of Mission Indians—Kizh Nation. The San Manuel Band of Mission Indians declined consultation in an email dated June 10, 2020, and the Fernandeño Tataviam Band of Mission Indians and Gabrieleño Band of Mission Indians—Kizh Nation requested formal consultation. Pursuant to those two requests, the County formally initiated consultation with the Fernandeño Tataviam Band of Mission Indians via a teleconference on July 8, 2020, and</p>

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	<p>Indigenous peoples have the right to maintain and strengthen their distinctive spiritual relationship with their traditionally owned or otherwise occupied and used lands, territories, waters and coastal seas and other resources and to uphold their responsibilities to future generations in this regard.</p> <p>CA LAND BACK PROVISIONS--In 2020, Governor Newsom memorialized his administration’s commitment to ancestral land return via the Statement of Administrative Policy adopted on September 25, 2020:</p> <p>Consistent with the goals of such Executive Orders, and in the spirit of truth and healing in recognition of past harms done to California Native American communities, it is the policy of this administration to encourage every State agency, department, board and commission (collectively, “entities”) subject to my executive control to seek opportunities to support California tribes’ co-management of and access to natural lands that are within a California tribe’s ancestral land and under the ownership or control of the State of California, and to work cooperatively with California tribes that are interested in acquiring natural lands in excess of State needs.</p> <p>Finally, multiple types of access, including trails accessible by Elders and differently abled community members, plans for spaces that are accessible by public transportation, and plans for spaces where tribal community members can gather clean, safe, pesticide-free plant materials without fear of harassment from private security, local homeowners or police should be included.</p>	<p>with the Gabrieleño Band of Mission Indians—Kizh Nation via a teleconference on August 19, 2020. At these confidential meetings, the County and the tribal representatives discussed the proposed Project and the Draft PEIR’s analytical approach, as well as the tribes’ initial input on the proposed Project and suggestions for potential mitigation measures. As a result of the consultation, the tribes’ comments regarding mitigation measures on the enclosed were incorporated into the Draft PEIR.</p> <p>It should be noted that, as future projects are proposed for implementation under the <i>2020 LA River Master Plan</i>, implementing agencies will need to comply with tribal outreach/consultation requirements under CEQA.</p> <p>Also, please see the response to comment O19-5, which discusses the actions being taken by the County through the Chief Sustainability Office.</p>
O19-12	<p>Tribal Sovereignty, Free, Prior Informed Consent, and Meaningful Relationship-Building--The final plan should include a list of all the relevant state, federal, and international laws related to tribal self determination, sovereignty, and government-to-government consultation that may be relevant in future planning for the River. California Native American Tribes are sovereign nations and there are multiple scenarios, including related to watershed management and river restoration, which require state and local agencies to engage in government-to-</p>	<p>In the first part of this comment, it appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Comment#	Comment Text	Response
	<p>government consultation with Native American Tribes as part of the planning process. It is critical that local governments and agencies include government-to-government consultation as a highest priority for all projects proposed and implemented along the River.</p> <p>The United Nations Declaration on the Rights of Indigenous Peoples, adopted by the UN General Assembly in 2007, supported by the United States in 2010, adopted by California Assembly Joint Resolution 42 in 2014, and ratified by the Organization of American States in 2016, uplifts the concept of Free, Prior and Informed Consent in Article 3211, Section 2:</p> <p>“States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.”</p> <p>Future decision-making and planning for the LA River should adopt a consent-based model of engagement with the California Native American Tribes through whose ancestral lands the River flows to better align with state, federal and international standards of engagement with Indigenous Peoples.</p> <p>We would also like to highlight that the PEIR’s analysis of due diligence regarding invitations to California Native American tribes with territories along the river to engage in government-to-government consultation is likely inadequate and may not be in compliance with E.O. N-54-20 which was extended by E.O. N-80-20. Due to the recognized heightened impacts of the Covid-19 pandemic on Native American communities, Executive Order N-54-20 Covid-19 4-22-2012 temporarily suspended the timeframes set forth in Public Resources Code sections 21080.3.1 and 21082.3, within which a California Native American tribe must request consultation and the lead agency must begin the consultation process relating to an</p>	<p>With respect to the second part of this comment about the PEIR’s due diligence toward California Native American tribal consultation, please see the response to comment O19-2 for details on the tribal consultation that was conducted and refer to Section 3.17, <i>Tribal Cultural Resources</i>, of the Draft PEIR for details about the analysis of the Project’s potential impacts on tribal cultural resources.</p> <p>With respect to the comment about COVID-19, it should be noted that the ability to provide comment was not limited to the public meeting. Comments were accepted by mail if internet was an issue for the commenter, and a telephone hotline number was also provided for further assistance. The County also provided the executive summary of the Draft PEIR to those who requested hard copies, and made the document available at libraries along the river that were open during the comment period.</p>

Comment#	Comment Text	Response
	<p>Environmental Impact Report, Negative Declaration, or Mitigated Negative Declaration under the California Environmental Quality Act. Although E.O. N-54-20 only suspended the comment deadline for 60 days, it was extended by E.O. N-80-20 in September 2020. Given the State’s recognition of the extreme harms wrought by this pandemic on California Native American Tribes, it is highly unlikely that the efforts made by the lead agency to engage with California Native American Tribes rise to the level of meaningful engagement from either a legal or ethical perspective.</p> <p>The LA Watershed abides by geography, not governance. Recognizing that the River is part of a larger system, the Plan should consider more creative governance models that include representation from all of the California Native American Tribes¹³ with territories along the river to establish cohesive management over the watershed.</p>	
019-13	<p>Additional Recommendations Articulated at the LA River Native Community Discussion June 1, 2019:</p> <ul style="list-style-type: none"> • Think of the River as a relative • Heal the River and work together to heal the water and the land. The River is a reflection of who we are. • Without the River there is no Los Angeles • We need to live in a symbiotic relationship with water and ask how are you serving that river when it serves you • Land Back along the River • Healthy and Accessible Waters • Harvesting permits for tribal citizens • Think bigger about the concept of access--our cultures and ceremonies have been and continue to be fed and 	<p>This comment summarizes recommendations that were expressed at the Native Community discussion that occurred on June 1, 2019. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Please note that Mitigation Measure BIO-19, Implement Habitat Reclamation Efforts, states, “Where habitat reclamation opportunities exist (e.g. floodplain reclamation, creation of naturalized banks, braided channels, habitat blocks for crossing and platforms, wetlands through diversions, wetland terraces and planting trays), restoration [best management practices] will be used. These will include the following:</p>

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	<p>nourished by the LA River. Stop thinking of us as separate entities.</p> <ul style="list-style-type: none"> • Three Rs--Respect, Responsibility and Recognition • Meaningful Access is Dependent on a Healthy River and Healthy Ecosystems • California Native American Tribes with cultural ties to the River need places to create, store, and launch tule boats. • Bring Back Native Plants • Provide support for local tribes to develop curriculum about the River for use in Los Angeles schools. • Don't criminalize cultural practices such as gathering and harvesting. • Reconnect the River to the Wetlands as a mechanism to combat climate change • Commit to making the River navigable for tule boats and tribal community member use • Recognize the River as a living being 	<ul style="list-style-type: none"> • Planting of invasive species will be prohibited, as specified in Mitigation Measure BIO-18, Invasive Species, Operations. • The plant palette for restoration will be composed of native species that will be expected within the project area.”

2.3.2.38 Comment Letter O20: Resource Conservation District of the Santa Monica Mountains, May 13, 2021

Comment#	Comment Text	Response
O20-1	<p>The approach to understanding the River, and coordinating a language for a consistent and actionable implementation is sophisticated and beautifully presented. In particular, the use of Kit of parts (KOP) to standardize design components for trails and access gateways, channel modifications, crossings and platforms, diversions, floodplain reclamation and off-channel land assets provides opportunity for greater coordination of river enhancements. Nevertheless, the application of any given element needs not only careful site-specific evaluation in a manner that has not yet been as fully defined in the plan as the “Parts” themselves, but also and more importantly a fuller consideration of the “Whole” that these Parts are intended to catalyze. So, while we acknowledge that much is to be applauded in the PEIR, our task here is to offer recommendations for revisions, rather than to list all that is worthy in the documents. So we ask that a revision be undertaken to address some important missed opportunities and gaps in the approach.</p>	<p>The County appreciates the Resource Conservation District of the Santa Monica Mountains for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project. Additionally, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR) for a discussion on the program-level analysis that was completed for the whole of the Project, which is the <i>2020 LA River Master Plan</i>, in the Draft PEIR.</p> <p>This is an introductory comment about the PEIR project description that precedes specific comments. No further response is required.</p>
O20-2	<p>In particular, we are concerned about the potential impacts of implementing some of these design elements, particularly those that add more concrete (e.g.: channel modifications, crossings and platforms) in or adjacent to the existing river channel. In order to achieve the nine objectives, especially objective #3 (Support healthy connected ecosystems), replacement of concrete and other built elements should prioritize implementation of green solutions that minimize hardscape and maximize more nature-based and multi-functional landscape designs.</p> <p>Beyond the importance of increasing permeability in the watershed, the amount of hardscape generally correlates inversely with functional habitat value. We also propose that in the compendium of urban greening approaches, we can locate “Park” with lesser habitat value at one end, and true “Habitat”</p>	<p>Regarding the first part of this comment, it appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>To the extent that the commenter is referring to the Draft PEIR, it appears that they are concerned about reducing hardscape, increasing permeability in the watershed, and increasing natural habitat. Please refer to Master Response MR-5 (Naturalization of</p>

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	<p>emphasis at the other. At the KOP level, a Habitat Part would be designed differently than a Park Part. We would like to see Habitat Parts developed and included in a Master Plan revision, but more importantly an expanded investigation of the conditions outside of the “Frames” that could enhance not only the ecological functionality of the River parts addressed in this plan, but the functionality of the greater local and regional ecosystems of which they are a part.</p>	<p>the LA River) for a discussion of naturalization of the river and the broad issue of flood control.</p>
O20-3	<p>While at one level it is only a name, the “Kit of Parts” in some ways acknowledges a fragmented approach- the “Part” after all is a fragment of a Whole. The Master Plan as written has not defined the greater potential Whole, other than by naming the Whole as the “LA River”. We ask the Parts be at service to a new Whole that we would like to see better defined and envisioned; we propose that this Whole should be defined by collective local and regional habitat potential and goals. Not only would achieving the maximum possible overall habitat value in the Master Plan require the design of some new Parts, the method and pattern of assembly would also necessarily change- as would the “nature” of the resulting (or required) community and recreational use- from place to place.</p>	<p>With respect to the first part of this comment, please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements), which discuss the programmatic nature of the Draft PEIR and the fact that the Draft PEIR analyzes two Typical Projects and six kit of parts (KOP) categories but does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The “whole” of the project is the proposed <i>2020 LA River Master Plan</i>. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River.</p>
O20-4	<p>Achieving the greatest potential Habitat enhancement would be determined not only by the potential of the immediate location, but also in composition or pattern with other nearby River and Non-River habitat elements- such as other regional parks, school yards, golf courses, current or future street trees with enhanced insect support capacity (see the work of the RCD and Travis Longcore here). Consideration of the Whole would suggest assembly of and creation of new KOPs in a different manner than the Master Plan describes.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
O20-5	<p>The design approach, site selection, and phasing of the LA River Master Plan provides an opportunity to link disparate and discontinuous habitats to enhance species richness despite physical discontinuity, particularly bird and pollinator species.</p>	<p>While the commenter is using the term “KOP” from the PEIR in the context of the <i>2020 LA River Master Plan</i>, it appears that this comment is directed toward the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific</p>

Comment#	Comment Text	Response
	<p>However, this can only happen if this patchwork of greening opportunities within the river and its larger ecological-context is viewed as a potential interconnected habitat system, and understood in an overall composition that includes other River and non-river habitat potentials. While the KOP approach does not in and of itself guarantee that the Habitat Whole will in the end be greater than the sum of its Parts.</p>	<p>significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>O20-6</p>	<p>To create the greater Whole, we would like to see a greater emphasis in a revised Master Plan on the potential of the overall composition of habitats. We note that although listed as Objective 3, over 50% of community participants identified protection of vulnerable plants and animals as the most important issue (pg 1-5). While it can be very challenging to integrate natural processes, the long term benefits of such efforts to improve ecological function, as well as address aesthetic, accessibility, flood control and water quality concerns warrants a more robust role in the design palette. This could substantially reduce the potential for significant impacts and need for extensive mitigation measures as listed in table ES-2.</p>	<p>The part of this comment regarding the composition of habitats that the commenter is raising is an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Please refer to Chapter 8, <i>Design Components, Kit of Parts: Biodiversity Profiles</i>, found on page 262 of the <i>2020 LA River Master Plan</i> for additional details regarding biodiversity profiles. Opportunities for biodiversity and the creation of functioning ecosystems should be considered across all of the design components in the KOP categories. Each project should create its own biodiversity profile of existing and goal key indicator wildlife species. Biodiversity profiles illustrate the plant communities, mammals, birds, reptiles, amphibians, and insects that can be sustained through the range of built conditions along the LA River. These profiles can be used to describe both existing and proposed future conditions, from algae mats in the concrete channel to a riparian soft-bottom basin, and are examples of how biodiversity must be present throughout all proposed projects. The biodiversity profiles are a useful tool for project implementers to assess whether a proposed project supports a diverse ecological community. The use of these profiles can also</p>

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		<p>help to add ecological data on a project-by-project basis that can result in long-term benefits.</p> <p>With respect to the reduction of significant impacts using the commenter’s recommendations, please refer to Table ES-2. As shown, if a future project or action is carried out by the County, Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys, through BIO-24, Implement Avoidance, Transplantation, and Compensatory Mitigation Measures for Protected Trees, would reduce all biological impacts to less-than-significant levels. This topic is discussed in Chapter 1, <i>Introduction</i>, Section 1.3.1.1, <i>Enforceability of Mitigation Measures</i>; Section 1.3.1.2, <i>PEIR and Later Activities</i>; and Section 1.4.2, <i>Later Activities</i>, of the Draft PEIR. The County would commit to the mitigation proposed in the PEIR, if approved as recommended, and the County believes that other entities that propose projects under the <i>2020 LA River Master Plan</i> and PEIR similarly can and should adopt the proposed mitigation. However, the County cannot enforce or guarantee that the mitigation measures in the PEIR will be implemented by the other agencies, which is why the County provided two separate impact conclusions: County and non-County. Such changes or alterations to a project are within the responsibility and jurisdiction of other public agencies and not the agency making the finding. However, if the mitigation measures identified in the Draft PEIR are adopted by another agency for impacts that are considered less than significant after the mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for projects not carried out by the County, for the same reasons as discussed for later activities carried out by the County.</p> <p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River.</p>

Comment#	Comment Text	Response
O20-7	<p>We are concerned that the environmental impact 3.13(b) identifies all Plan elements as having less than significant impacts on number of existing people or housing, with no mitigation required. One of the major concerns about the implementation of this Plan expressed by conservation agencies involved in river restoration planning and acquisition is the evident upward pressure on perceived land values underlying existing low cost housing adjacent to the River. Already, we understand that speculative private purchases are driving up costs. The probability of resulting gentrification and displacement of these communities is in direct contrast to Plan Objectives 2, 4, 5, 6, and 7. A clear program to prevent this type of community conversion should be incorporated into the plan as is noted on pg 1-6. Investment in river adjacent parcels could be tied to local community protection measures, perhaps including incentives and or prioritization of public investment for landowners whose future plans to redevelop are then incentivized to address community displacement.</p>	<p>CEQA does not require consideration of social impacts other than as they may relate to adverse physical changes in the environment (State CEQA Guidelines Section 15131). Please refer to Master Response MR-6 (Gentrification and Housing Affordability) for a discussion about gentrification and displacement in the context of the <i>2020 LA River Master Plan</i>.</p>
O20-8	<p>While the mitigation measures identified for impact 3.16(b) (pg ES-126) appear to address VMT, that is the only metric described, and assumes therefore that community dislocation is a potential outcome.</p>	<p>The Draft PEIR concludes that Impact 3.16(b) is significant and unavoidable because while the trend is that vehicle miles traveled (VMT) are decreasing in general, 11 project elements were not screened from being required to conduct a VMT analysis and would potentially generate VMT. The Draft PEIR therefore concludes that, “while the likelihood of an impact arising from implementation of the full <i>2020 LA River Master Plan</i> decreases over time, the impact on VMT is determined to be potentially significant.”</p>

Comment#	Comment Text	Response
O20-9	<p>The notoriety the LA River Master Plan generated by its successful marketing has raised awareness not only among real estate speculators, but also among new and historically ecologically underserved communities. Therefore the opportunity is great to generate widespread support for future urban habitat enhancement. However, the support of these communities and their elected representatives may be limited at present by concern for the potential impacts in cost of living and potential economic displacement. So it is critical not only to the LA River and its communities that social enhancement be achieved along with the ecological, but also to any and all future urban habitat restoration projects. If post-project analysis of the LA River work results in a widespread belief that urban ecological enhancement is necessarily in competition with community stability and enhancement, then all such projects will be more difficult to accomplish in the future. So we would like to see these valid community concerns better addressed in a revised document.</p> <p>The Resource Conservation District of the Santa Monica Mountains shares similar concerns with other local resource agencies, and we ask that the LA River Master Plan be revised to incorporate the most up-to-date, science-based, and data-driven guidelines. We ask that as a similar level of creative energy and talent that created the Parts of the LA River Master Plan, be engaged to incorporate the watershed’s critical ecological and social contexts within a better defined and more inclusive Whole.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Please refer to response to comment O20-7.</p>

2.3.2.39 Comment Letter O21: Center for Biological Diversity, March 1, 2021

Comment#	Comment	Response
021-1	<p>The Center for Biological Diversity respectfully requests an extension of the comment period for the Draft Environmental Impact Report for the 2021 LA River Master Plan Draft Program Environmental Impact Report. The current 45-day comment period imposes a deadline of March 18, 2021, and is inadequate to allow full review of (1) the Draft EIR which covers complex issues in its 1992 pages plus nineteen appendices and (2) the Public Review Draft of the Master Plan, which is 494 pages and includes a technical appendix.</p> <p>It is simply not possible for the public to meaningfully review and comment on these documents in such a short timeframe. Due to the sheer volume and complexity of the materials, we believe an additional 60 days is required. Extending the deadline to May 17, 2021 would allow for a more comprehensive review and more useful comments. We therefore respectfully request that you consider extending the comment period an additional 60 days.</p>	<p>The County appreciates the Center for Biological Diversity for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR). In response to this comment and others initially received, on March 4, 2021, the review period was extended to April 2, 2021 (60 days). The review period was then extended a second time to May 13, 2021, to provide additional review time to all interested parties. In total, the review period was open from February 1, 2021, to May 13, 2021, for a total of 101 days, which is more than twice the 45-day minimum required by CEQA (State CEQA Guidelines Section 15105).</p>

2.3.2.40 Comment Letter O22: Center for Biological Diversity, May 13, 2021

Comment #	Comment	Response
O22-1	As the EIR acknowledges, the Project covers the 51-mile-long, 2-mile-wide corridor of the LA River in Los Angeles County and spans through 18 total jurisdictions. Today, 1 million people live within 1 mile of the river. The Center requests that special consideration be placed on the biological resources, hydrology and water quality, gentrification and homelessness, and equitable access.	<p>The County appreciates the Center for Biological Diversity for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This is an introductory comment that precedes specific comments. No further response is required. No changes to the Draft PEIR are needed.</p>
O22-2	<p>I. Background on the Center</p> <p>The Center is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States, including residents of Los Angeles County. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life.</p>	<p>This comment is acknowledged. This is an introductory comment that summarizes the background of the Center for Biological Diversity and precedes specific comments. No further response is required. No changes to the Draft PEIR are needed.</p>
O22-3	<p>II. Background on the EIR Process</p> <p>An EIR is a detailed statement, prepared under the California Environmental Quality Act, Public Resources Code §§ 21000-21178 (“CEQA”), describing and analyzing all significant impacts on the environment of a proposed project and discussing ways of mitigating or avoiding those effects. (Pub. Res. Code §21100; Cal. Code Regs. tit. 14, § 15362.) The purpose of an EIR “is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made.” (Laurel Heights Improvement Association v. Regents of University of California (1993) 6 Cal.4th 1112, 1123 [emphasis in original and citations omitted].) An EIR should provide decision making bodies and the public with detailed information about the effect a proposed project is likely to have on the environment, to list</p>	<p>This is an introductory comment that discusses the CEQA process as a whole and precedes specific comments. No further response is required. No changes to the Draft PEIR are needed.</p>

Comment #	Comment	Response
	<p>ways in which the significant effects of a project might be avoided or minimized, and to indicate alternatives to the project. (Pub. Res. Code § 21061; Cal. Code Regs. tit. 14, § 15002.) California courts have emphasized that an EIR should: disclose all relevant facts; provide a balancing mechanism whereby decision makers and the public can weigh the costs and benefits of a project; provide a means for public participation; provide increased public awareness of environmental issues; provide for agency accountability; and provide substantive environmental protection.</p> <p>CEQA compels agencies to refrain from approving projects with significant environmental impacts if feasible mitigation measures or alternatives exists that can alleviate or avoid such adverse effects. (Mountain Lion Foundation v. Fish & Game Com. (1997) 16 Cal.4th 105, 134.) Pursuant to this substantive mandate, the DPW should consider all feasible mitigation measures and alternatives in its EIR analysis, which should be quantitative, objective, rigorous, and most of all, complete.</p>	
O22-4	<p>The Center is supportive of the 2020 LA River Master Plan nine objectives that promote the protection and enhancement of the river’s natural and cultural resources. These goals reflect the multi-benefit opportunities that exist along the river and if achieved, could transform this central area into a community hub for both people and wildlife. However, achieving these goals will require a clearly defined and articulated vision that includes specific guidelines for all future projects. Unfortunately, the DEIR does not provide that framework.</p> <p>Below we outline the inconsistencies present in the DEIR as compared with the stated objectives and we provide additions that we believe will make the Master Plan significantly more successful at achieving ecosystem and community health for all Angelinos. A summary of our recommendations for the DEIR are as follows:</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Comment #	Comment	Response
022-5	<p>3.3.2.1 Geography:</p> <p>Enhance habitat connectivity for both large ranging and small ranging species in the San Gabriel, Santa Monica, and Santa Susana Mountains at the headwaters near Canoga Park, as well as the stated corridor between Griffith Park and the Verdugo Mountains at the Glendale Narrows [Figure 3.3-25; Wildlife Movement and Connectivity 3.3-36].</p>	<p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>Objective 3 of the <i>2020 LA River Master Plan</i> is to “Support healthy connected ecosystems” Pursuant to State CEQA Guidelines Section 15204, the lead agency’s responsibility is to respond to significant environmental issues raised. Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR for Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys, through BIO-24, Implement Avoidance, Transplantation, and Compensatory Mitigation Measures for Protected Trees, which contain information regarding the mitigation measures proposed to address impacts on biological resources. No further response is required.</p>
022-6	<p>3.3.3.3 Impacts and Mitigation Measures:</p> <p>Implement a minimum 300-foot setback from all perennial and intermittent streams and wetlands (including vernal pools) [Mitigation Measure BIO-4: Identify Work Areas and Environmentally Sensitive Areas].</p>	<p>Mitigation Measure BIO-4, Identify Work Areas and Environmentally Sensitive Areas, in Section 3.3, <i>Biological Resources</i>, of the Draft PEIR does not mention a 300-foot setback. If the intent of this comment is to request that additional setbacks be added to perennial and intermittent streams and wetlands (including vernal pools), setbacks would be identified as needed for the environmentally sensitive areas and would be included as required by the resource, and as specified in permits. Establishing the setback area at 300 feet is not effective due to the variation of project scope, location, and habitats along the LA River. Prior to any ground-disturbing activity, the implementing agency will require the construction area, including access roads and staging areas, to be delineated through the use of construction flagging and signage under the supervision of a qualified biologist.</p>
022-7	<p>Develop a comprehensive invasive plant, insect and animal management plan that includes non-toxic methods of control [Mitigation Measure BIO-5: Prepare and Implement Weed Abatement Plan].</p>	<p>The impact of invasive plant species on wildlife can be significant. While any invasive plant removal control method can result in impacts on wildlife, the use of herbicides to control invasive plant species is an important tool for controlling these species.</p>

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		<p>The Draft PEIR has been revised to clarify the methods for the use of herbicides in the control of invasive plants under Mitigation Measure BIO-5, Prepare and Implement Weed Abatement Plan. See Chapter 3, <i>Clarifications and Modifications to the Draft PEIR</i>, of the Final PEIR. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>Other measures within the Draft PEIR specify methods of control. Mitigation Measure BIO-17, Prepare and Implement Pest Management Plan, prohibits the use of rodenticides and neonicotinoid pesticides and requires the preparation of a pesticide plan by a qualified biologist. The purpose of the preparation of the pesticide plan is to incorporate any new research information into pest management actions.</p>
O22-8	<p>Re-assess the cumulative effects analysis of the proposed kits of parts for biological resources, as described under CEQA Guidelines section 15130.</p>	<p>Please refer to Section 3.0.2, <i>Cumulative Impacts</i>, on pages 3-3 through 3-10 of the Draft PEIR for a detailed description of how the cumulative impacts were developed for the PEIR; the discussion also identifies the specific State CEQA Guidelines Sections that were used in defining the terms (e.g., Section 15130(b)). Section 3.0.2 is also referenced in the discussion of cumulative impacts for each resource topic analyzed in Chapter 3, <i>CEQA Environmental Impact Assessment</i>, of the Draft PEIR.</p>
O22-9	<p>In addition to the amendments listed above, these additional analyses should be added to the Impacts and Mitigation Measures Section of the EIR.</p> <p>*Replace all non-native trees removed as a result of the proposed work activities with at least a 1:1 ratio with native trees and replacing native trees at least a 3:1 ratio with a combination of native trees and/or appropriate understory and lower canopy plantings.</p>	<p>Please refer to Mitigation Measure BIO-24, Implement Avoidance, Transplantation, and Compensatory Mitigation Measures for Protected Trees, which provides mitigation for the loss of protected trees. As specified in Mitigation Measure BIO-24, avoidance is the preferred method of mitigation; but if compensatory mitigation for impacts on protected trees is required, the mitigation ratios would be consistent with the applicable local government ordinances, policies, and regulations. Because there are 18 separate agencies with jurisdiction over the 51-mile river corridor, it is not possible to provide a specific ratio for the entirety of the project area.</p>

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		Rather, the ratio would be determined by the agency with jurisdiction at such time as a specific project is proposed.
O22-10	*Conduct an analysis of impacts from land use designations and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions and discuss possible conflicts and mitigation measures to reduce these conflicts.	Please refer to Mitigation Measure BIO-23, Maintain Connectivity in Subsequent Project Design, Construction, and Operation , which specifies that all projects will be planned in coordination with a qualified biologist who will provide recommendations and design alternatives that can be implemented to prevent various impacts on wildlife, including preventing wildlife-human conflicts. For additional information about the land use designations and zoning, please refer to Section 3.10, <i>Land Use and Planning</i> , of the Draft PEIR.
O22-11	<p>Overall, the project, as described in the DEIR, does not provide the specifics necessary to accurately assess impacts. The project description includes a menu of options, but no clear definition or even priority of how these options would be implemented. In addition, there is no project or location-specific information when we know that location, type and number of projects greatly influences environmental impact, and with no specifics, the project scope is incomplete.</p> <p>The Department of Public Work’s use of a program EIR, as opposed to a project-specific EIR, does not excuse the obligation to provide clear and detailed information to the public. “The ultimate inquiry . . . is whether the EIR includes enough detail ‘to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.’” (Sierra Club v. County of Fresno (2018) 6 Cal.5th 502, 516.) As circulated, the DEIR does not include the requisite detail.</p> <p>The Court of Appeal has provided guidance about the distinctions between program and project EIRs:</p> <p>Designating an EIR as a program EIR . . . does not by itself decrease the level of analysis otherwise required in the EIR. [I]n considering a challenge to a program EIR, ‘it is unconstructive to ask whether the EIR provided ~project-level™ as opposed to</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements).</p> <p>The PEIR is a programmatic document and does not include project-specific or site-specific analysis. In the <i>2020 LA River Master Plan</i>, the projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River.</p> <p>Accordingly, the Draft PEIR did not include any site-specific or project-specific analysis and instead presented a program-level analysis of the <i>2020 LA River Master Plan</i>. Because the <i>2020 LA River Master Plan</i> is conceptual in nature, the PEIR does not provide additional specific detail about potential impacts; to do so would be speculative.</p>

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	<p>~program-level™ detail and analysis. Instead, we focus on whether the EIR provided decisionmakers with sufficient analysis to intelligently consider the environmental consequences of [the] project.™ (Cleveland National Forest Foundation v. SANDAG (2017) 17 Cal.App.5th 413, 426.). Even if more precise information may be available during project-specific review, the DPW “must still provide reasonably obtainable information, or explain (supported by substantial evidence) why it cannot do so. ‘[I]f known impacts are not analyzed and addressed in a program EIR, they may potentially escape analysis in a later-tier EIR.’ (17 Cal.App.5th at p. 440.) The menu based approach that the DEIR takes in its description of the program does not lend itself to accurate assessment and threatens to not account for significant environmental impacts by relying on later-tier EIR analysis. This oversight could be detrimental to the region as this program is described as covering the entire 51-miles of the Los Angeles River. To not accurately assess the potential impacts and provide clear and specific guidance to all future projects upfront ensures that the nine objectives will not be met.</p> <p>An example of this conflict appears in the description of the platform parks (22 acres decked at Rio Hondo confluence), which is language obviously informed by Gehry programming and planning, but the Gehry-proposed projects are absent from the analysis. If the DPW is serious about meeting its objectives, this DEIR needs to be significantly revised to direct all future projects to ensure that their individual and cumulative impact not only does “not significantly impact the environment,” but that their project positively contributes to the achievement of one or more of the stated objectives and has an at least neutral impact to all other objectives.</p>	<p>The PEIR is consistent with the direction of State CEQA Guidelines Section 15146, which states:</p> <p>“The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR. “(a) An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy.”</p> <p>Other agencies may use the PEIR as the basis upon which to tier future project environmental analyses under CEQA. Under State CEQA Guidelines Section 15168, where the later activities involve site-specific operations, the implementing agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the PEIR. All future specific projects would be subject to subsequent CEQA compliance under State CEQA Guidelines Section 15168.</p> <p>Individual entities with jurisdiction along the river corridor—including Los Angeles County Flood Control District, U.S. Army Corps of Engineers, and the cities—will continue having decision-making authority associated with any <i>2020 LA River Master Plan</i> implementation activities affecting their respective jurisdictions.</p> <p>With respect to the portion of this comment about the Gehry platform parks, please note that while the <i>2020 LA River Master Plan</i> does look at opportunity sites along the river, the PEIR is a programmatic document that did not include any site-specific or project-specific analysis. The County anticipates that future specific projects would require subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, “Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document</p>

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		<p>must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase.”</p> <p>This includes the Gehry platform parks, which would be considered subsequent projects subject to State CEQA Guidelines Section 15168.</p>
022-12	<p>Roads and development create barriers that lead to habitat loss and fragmentation, which harms native wildlife, plants, and people. As barriers to wildlife movement, poorly-planned development and roads can affect an animal’s behavior, movement patterns, reproductive success, and physiological state, which can lead to significant impacts on individual wildlife, populations, communities, landscapes, and ecosystem function (Mitsch and Wilson 1996; Trombulak and Frissell 2000; van der Ree et al. 2011; Brehme et al. 2013; Haddad et al. 2015; Marsh and Jaeger 2015; Ceia-Hasse et al. 2018).</p> <p>Habitat fragmentation from roads and development has been shown to cause mortalities and harmful genetic isolation in mountain lions in southern California (Ernest et al. 2014; Riley et al. 2014; Vickers et al. 2015), increase local extinction risk in amphibians and reptiles (Cushman 2006; Brehme et al. 2018), cause high levels of avoidance behavior and mortality in birds and insects (Benítez-López et al. 2010; Loss et al. 2014; Kantola et al. 2019), and alter pollinator behavior and degrade habitats (Trombulak and Frissell 2000; Goverde et al. 2002; Aguilar et al. 2008).</p>	<p>This comment restates information contained in the Draft PEIR, but it does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR.</p> <p>Furthermore, Objective 3 of the <i>2020 LA River Master Plan</i> is to “Support healthy connected ecosystems.” Pursuant to State CEQA Guidelines Section 15204, the lead agency’s responsibility is to respond to significant environmental issues raised.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR for Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys, through BIO-24, Implement Avoidance, Transplantation, and Compensatory Mitigation Measures for Protected Trees, which contain information regarding the mitigation measures proposed to address impacts on biological resources.</p> <p>No further response is required.</p>
022-13	<p>Habitat fragmentation also severely impacts plant communities. An 18-year study found that reconnected landscapes had nearly 14% more plant species compared to fragmented habitats, and that number is likely to continue to rise as time passes (Damschen et al. 2019). The authors conclude that efforts to preserve and enhance connectivity will pay off over the long-term (Damschen et al. 2019). In addition, connectivity between high quality habitat areas in heterogeneous landscapes is important to allow for range shifts and species migrations as</p>	<p>This comment restates information contained in the Draft PEIR, but it does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR.</p> <p>Furthermore, Objective 3 of the <i>2020 LA River Master Plan</i> is to “Support healthy connected ecosystems.” Pursuant to State CEQA Guidelines Section 15204, the lead agency’s responsibility is to respond to significant environmental issues raised. No further response is required.</p>

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	<p>climate changes (Heller and Zavaleta 2009; Cushman et al. 2013; Krosby et al. 2018). Loss of wildlife connectivity decreases biodiversity and degrades ecosystems.</p>	
<p>022-14</p>	<p>Edge effects of development in and adjacent to open space will likely impact key, wide-ranging predators, such as mountain lions and bobcats (Crooks 2002; Riley et al. 2006; Delaney et al. 2010; Lee et al. 2012; Smith et al. 2015; Vickers et al. 2015; Smith et al. 2017; Wang et al. 2017), as well as smaller species with poor dispersal abilities, such as song birds, small mammals, and herpetofauna (Cushman 2006; Slabbekoorn and Ripmeester 2008; Benítez-López et al. 2010; Kociolek et al. 2011). Limiting movement and dispersal can affect species’ ability to find food, shelter, mates, and refugia after disturbances like fires or floods. Individuals can die off, populations can become isolated, sensitive species can become locally extinct, and important ecological processes like plant pollination and nutrient cycling can be lost. Negative edge effects from human activity, such as traffic, lighting, noise, domestic pets, pollutants, invasive weeds, and increased fire frequency, have been found to be biologically significant up to 300 meters (~1000 feet) away from anthropogenic features in terrestrial systems (Environmental Law Institute 2003)</p>	<p>This comment restates information contained in the Draft PEIR, but it does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR.</p> <p>Furthermore, Objective 3 of the <i>2020 LA River Master Plan</i> is to “Support healthy connected ecosystems.” No further response is required.</p>
<p>022-15</p>	<p>It is important that the EIR consider corridor redundancy (i.e. the availability of alternative pathways for movement) because it allows for improved functional connectivity and resilience. Compared to a single pathway, multiple connections between habitat patches increase the probability of movement across landscapes by a wider variety of species, and they provide more habitat for low-mobility species while still allowing for their dispersal (Mcrae et al., 2012; Olson & Burnett, 2008; Pinto & Keitt, 2008). In addition, corridor redundancy provides resilience to uncertainty, impacts of climate change, and extreme events, like flooding or wildfires, by providing alternate escape routes or refugia for animals seeking safety (Cushman et al., 2013; Mcrae et al., 2008; Mcrae et al., 2012; Olson & Burnett,</p>	<p>This comment is acknowledged.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses impacts on wildlife movement and habitat connectivity. Please refer to Mitigation Measure BIO-23, Maintain Connectivity in Subsequent Project Design, Construction, and Operation, which specifies that all projects will be planned in coordination with a qualified biologist with demonstrated expertise in wildlife connectivity and wildlife crossing design. Furthermore, Objective 3 of the <i>2020 LA River Master Plan</i> is to “Support healthy connected ecosystems.”</p>

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	<p>2008; Pinto & Keitt, 2008). It is widely recognized that the continuing fragmentation of habitat by humans threatens biodiversity and diminishes our (humans, plants, and animals) ability to adapt to climate change. Genes are changing, species' physiology and physical features such as body size are changing, species are moving to try to keep pace with suitable climate space, species are shifting their timing of breeding and migration, and entire ecosystems are under stress (Parmesan and Yohe 2003; Root et al. 2003; Parmesan 2006; Chen et al. 2011; Maclean and Wilson 2011; Warren et al. 2011; Cahill et al. 2012). In a report for the International Union for Conservation of Nature (IUCN), world-renown scientists from around the world stated that "[s]cience overwhelmingly shows that interconnected protected areas and other areas for biological diversity conservation are much more effective than disconnected areas in human-dominated systems, especially in the face of climate change" and "[i]t is imperative that the world moves toward a coherent global approach for ecological connectivity conservation, and begins to measure and monitor the effectiveness of efforts to protect connectivity and thereby achieve functional ecological networks" (Hilty et al. 2020).</p>	
022-16	<p>When assessing impacts to wildlife movement and habitat connectivity, DPW must analyze the Project's potential impacts to riparian corridors. Riparian ecosystems have long been recognized as biodiversity hotspots performing important ecological functions in a transition zone between freshwater systems and upland habitats. Many species that rely on these aquatic habitats also rely on the adjacent upland habitats (e.g., riparian areas along streams, and grassland habitat adjacent to wetlands). In fact, 60% of amphibian species, 16% of reptiles, 34% of birds and 12% of mammals in the Pacific Coast ecoregion depend on riparian-stream systems for survival (Kelsey and West 1998). Many other species, including mountain lions and bobcats, often use riparian areas and natural ridgelines as migration corridors or foraging habitat (Dickson et al, 2005; Hilty & Merenlender, 2004; Jennings & Lewison, 2013; Jennings</p>	<p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses impacts on wildlife movement and habitat connectivity. This comment does not provide any specific information about deficiencies or address the adequacy of the In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. No further response is required.</p>

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	<p>& Zeller, 2017). Additionally, fish rely on healthy upland areas to influence suitable spawning habitat (Lohse et al. 2008), and agricultural encroachment on these habitats and over-aggressive removal of riparian areas have been identified as a major driver of declines in freshwater and anadromous fish (e.g., Stillwater Sciences 2002; Lohse et al. 2008; Moyle et al. 2011). Therefore, buffers that allow for connectivity between the aquatic resource and upland habitat is vital for many species to persist.</p>	
<p>022-17</p>	<p>In order to preserve and protect Los Angeles’ native wildlife against climate change and development, the Kit of Parts should also be implemented with an eye towards enhancing and interconnecting larger habitat areas in the San Gabriel, Santa Monica, and Santa Susana Mountains at the headwaters near Canoga Park, as well as the stated corridor between Griffith Park and the Verdugo Mountains at the Glendale Narrows, so that plant and animal species endemic to the River are more likely to survive and thrive.</p>	<p>This comment is acknowledged. However, addressing habitat outside the 1-mile-radius study area is beyond the scope of this PEIR. Please refer to Master Response MR-7 (Master Plan Area/PEIR Study Area and Addressing the LA River in a Comprehensive Manner) for more information regarding the reasons the 2-mile-wide corridor was chosen for the PEIR’s study area.</p>
<p>022-18</p>	<p>In addition to these known habitat corridors, it is imperative that standards are set across all projects to ensure wildlife movement is possible, even in the more urbanized areas. These standards should include best practices for different taxa, such as mammals (large, medium and small), reptiles and amphibians, birds, insects and fish. Smaller species with poor dispersal abilities, like rodents and herpetofauna, would require more frequent intervals of crossings compared to larger wide-ranging species, like mountain lions or coyotes, to increase their chances of finding a crossing. Gunson et al. (2016) recommend that crossing structures generally be spaced about 300m (~0.19mi) apart for small animals when transportation infrastructure bisects large expanses of continuous habitat, though they recognize that some amphibians may need more frequent crossings no more than 50m (~0.03mi) apart. And for many amphibian and reptile species, undercrossings should have grated tops so that the light and moisture inside the crossings are similar to that of the ambient environment. Therefore,</p>	<p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses wildlife movement and habitat connectivity. Please refer to the discussions, analyses, and findings in that section. As discussed in Section 3.3, addressing biodiversity would be most appropriate for project-level planning, and it has been referenced in Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys.</p>

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	<p>multiple crossings designed for different target species may be required. In-depth analyses that include on-the-ground movement studies of which species are moving in the area and their home range area, habitat use, and patterns of movement are needed to determine how to best implement such crossings. In addition, associated crossing infrastructure (e.g., exclusionary fencing appropriate for target species, berms to buffer crossings from sound and light) should be included to improve chances of wildlife using crossings, and such crossings and associated infrastructure should be designed and built in consultation with local and regional experts, including agency biologists (Shilling 2020; Vickers 2020).</p>	
<p>022-19</p>	<p>The LA River watershed sits within one of the world’s most diverse Mediterranean biodiversity hotspots. Today, the entire 52-mile river is designated as warm freshwater habitat, while the upper portion of the river and mouth are designated as wildlife habitat, used by rare, threatened, or endangered species. These species range from large mammals to small reptiles and fish as well as important pollinators, all with different habitat and environmental needs. To preserve the native biodiversity that for so long has defined our region, comprehensive assessment and strategic restoration plans have to be implemented that reflect the diverse needs of our native species.</p>	<p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses biodiversity. As discussed in Section 3.3, addressing biodiversity would be most appropriate for project-level planning, and it has been referenced in Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>022-20</p>	<p>For those species with the largest ranges and least tolerance for urban development, such as the mountain lion (<i>Puma concolor</i>), conservation depends on maintenance of the connections between and within the regional system of large reserves. Use of such wildlife corridors through the urban-wildland interface may depend on the quality of the habitat in the linkage, but also on the absence of artificial lighting. Pumas will avoid nocturnal movement through lighted areas and may miss landscape linkages because of this tendency. Conservation strategies for native small mammal diversity on the other hand, should</p>	<p>Please see the response to comment 022-16.</p>

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	concentrate less on connectivity across marginal habitats and more on habitat quality and size as well as exotic species (Longcore 2006).	
022-21	For birds, providing habitat blocks with minimized edge effects as well as habitat blocks for human-intolerant species is essential. Raptors can accommodate dispersed habitat elements that cumulatively support their needs within an urban matrix as long as there are trees to connect reserve areas. However, for more sensitive species, specialized habitats, such as wetlands, oak woodlands, grasslands, and sage scrub are critical and minimizing human recreation these parts of natural areas will allow disturbance-intolerant species to persist. Finally, songbird biodiversity is dependent on the effective management of populations of feral cats as well as programs to minimize bird collisions with windows and vehicles. In order to minimize impact, proposed project activities including (but not limited to) staging and disturbances to native and non-native vegetation, structures, and substrates should occur outside of the avian breeding season which generally runs from February 1 through September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs (Longcore 2006).	<p>For the reduction of impacts associated with recreational uses, please refer to Mitigation Measure BIO-9, Prepare and Implement Construction Best Management Practices and Operations Recreation Plan. Included within this plan is the requirement for wildlife-proof waste bins (which will prevent the inadvertent feeding of feral cats). For the reduction of avian mortality due to impacts with glass, please refer to Mitigation Measure BIO-16, Use Wildlife Safety Glass.</p> <p>The disturbance of active avian nests has been addressed in Mitigation Measures BIO-3a, Conduct Preconstruction Nesting Bird Surveys; BIO-3b, Conduct Preconstruction Raptor Nest Surveys; BIO-3c, Active Eagle Nest Avoidance Measures; BIO-3d(i), Conduct Burrowing Owl Preconstruction Surveys; BIO-3d(ii), Implement Burrowing Owl Avoidance and Relocation Measures; and BIO-3d(iii), Implement Burrowing Owl Mitigation Management Plan.</p>
022-22	Reptiles and amphibians often require corridors between different habitat types because of their different life cycles. Specifically, wide corridors are needed around riparian zones for species like turtles, that have nest sites up to 400m away from streams (Spinks et al. 2003). While alligator lizards and fence lizards are considered urban tolerant species, most snakes, legless lizards, and horned lizards, are urban intolerant and have been impacted by a combination of direct habitat destruction and edge effects. For example, horned lizards, which once were common in the San Fernando Valley, have all but disappeared because of the loss of their preferred prey item, harvester ants (Suarez et al. 2000) that were displaced by invasive Argentine ants (Erickson 1971; Holway 1998a, 1998b; Human et al. 1998).	Please refer to Section 3.3, <i>Biological Resources</i> , of the Draft PEIR, which addresses wildlife movement and habitat connectivity for native species, including reptiles and amphibians. Please refer to the discussions, analyses, and findings in this section.

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	Finally, native soils should be protected for burrowing species (e.g., legless lizard) (Longcore 2006).	
O22-23	Virtually no native fish remain in the upper Los Angeles River watershed. Speckled dace, arroyo chub, Pacific lamprey, unarmored threespine stickleback, Santa Ana sucker, and southern steelhead have all been extirpated. Restoration of elements of the former hydrology of the Los Angeles River and its tributaries, combined with massive pollution control, would be necessary for recovery of these species. A conservation strategy leading in that direction under current conditions would be to increase infiltration in the watershed so that peak flows in the main stem are reduced and future projects will have a margin of safety to engineer a solution (Longcore 2006).	The proposed Project has not contributed to the loss of fish habitat or infiltration. As such, it is not required to minimize impacts or provide mitigation for such impacts. Should subsequent individual projects result in impacts on infiltration or other watershed conditions, then, per Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys , the subsequent project would be reviewed for impacts as appropriate.
O22-24	Insects and other arthropods constitute the majority of earth's biodiversity and exist across many different habitat types. Thus, protecting diverse ecosystems, especially encompassing diversity in soil and natural disturbance regimes is critical to maintaining insect diversity. Insects also benefit from networks of small reserves in urban areas to complement large reserves in the urban wildland area. Such small habitats, while fragmented, help support rare butterflies move through the urban core. However, it should be noted that more species are found in large fragments than small, so protecting both is critical. Finally, providing suitable habitat elements outside of reserves through the use of native landscaping provides stepping-stones for these species to move between the larger reserves (Longcore 2006).	The <i>2020 LA River Master Plan</i> includes nine objectives. Objective 3 is "Support healthy connected ecosystems." The <i>2020 LA River Master Plan</i> balances the need for flood control with opportunities to improve natural functions along portions of the river when flood control would not be jeopardized.
O22-25	Plant communities have been heavily degraded from development and invasion of non-native species. Research on the vegetation condition of remnant urban vegetation in a similar environment to Los Angeles (Perth, Australia) showed that small reserves were highly fragmented and infested by exotic weeds, but that these reserves should be preserved and managed because "they are highly valuable for representing the vegetation types that once occurred there" (Longcore 2006).	Please refer to Section 3.3, <i>Biological Resources</i> , of the Draft PEIR, which addresses invasive species. Also, please see the response to comment response O22-6, and Mitigation Measure BIO-24, Implement Avoidance, Transplantation, and Compensatory Mitigation Measures for Protected Trees , which provides mitigation for the loss of protected trees. Mitigation Measure BIO-5, Prepare and Implement Weed Abatement Plan , has been revised to clarify the methods for the

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	<p>Thus, native plant communities require a heavy investment in management, but that this investment is worth it for the long-term preservation of these native ecosystems. To address these issues, the DEIR should include a comprehensive invasive plant, insect and animal management plan that includes non-toxic methods of control in the Mitigation Measure BIO-5: Prepare and Implement Weed Abatement Plan section. In addition, we recommend replacing all non-native trees removed as a result of the proposed work activities with at least a 1:1 ratio with native trees and replacing native trees at least a 3:1 ratio with a combination of native trees and/or appropriate understory and lower canopy plantings.</p>	<p>use of herbicides in the control of invasive plants. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
<p>O22-26</p>	<p>Plants also depend on mutualisms wherein animals disperse and “plant” seeds. These relationships range from ants to scrub jays. Elimination of large seed dispersing ants by invasive Argentine ants has negative consequences for those plants whose seeds are dispersed by the native ants. Invasion of exotic insects can alter the dominance of the plant community away from large-seeded species favored by ants. Vegetation communities, therefore, depend on protection of the wildlife communities that inhabit them for well known services such as pollination, and lesser known functions such as seed dispersal (Longcore 2006).</p>	<p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses invasive species.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>O22-27</p>	<p>Effective conservation efforts must account for the interdependencies between and within species in these groups. Ecosystems are characterized by complex food webs, which are networks of energy transfer that connect even peripherally related species. They are also characterized by many groups not discussed here that play integral roles in ecosystem function — lichens, mosses, soil microorganisms, bacteria, algae, viruses, and an almost incomprehensible array of other species. Urban conservation must strike a balance between the desire to protect intact ecosystems and the demonstrated benefits of smaller</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

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	fragments to the overall maintenance of biodiversity (Longcore 2006).	
022-28	<p>As of 1989 (over 30 years ago), Southern California had already lost between 95 and 97 percent of riparian habitat in floodplain areas (Faber, et al. 1989). These areas that have historically defined our region, continue to provide habitat for a variety of native species as well as support the health and resilience of our local water supply.</p> <p>To protect what remains of these important habitats adequate buffers throughout the watershed is the most effective strategy to reducing pollutants and sedimentation (Norris 1993). Larger buffer zones along streams and wetlands can provide more stream bank stabilization, water quality protection, groundwater recharge, and flood control both locally and throughout the watershed (Sabater et al. 2000). They would also protect surrounding communities from impacts due to climate change by buffering them from storms, minimizing impacts of floods, and providing water storage during drought.</p>	<p>Through implementation of Mitigation Measure BIO-21c, Obtain Wetland Permits, the resource agencies will require appropriate avoidance measures associated with streams and wetlands. If federally or state-listed species are present within any of these habitats, appropriate avoidance measures would be implemented (Mitigation Measure BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements).</p>
022-29	<p>Because of these benefits to ecosystem and community health, other municipalities have implemented setback requirements, including in the San Francisco Bay Area, where stream setbacks range between 30 – 200 feet, depending on the type of land use (i.e., urban versus rural), or the quality or type of existing habitat. For example, Sonoma County implements some of the more stringent setbacks, with requirements for a 200-foot buffer in the Russian River Riparian Corridor, a 100-foot buffer for flatland riparian stream corridors, and a 50-foot buffer for other riparian stream corridors.</p>	<p>The loss of riparian habitat occupied by federally or state-listed species requires consultation with the wildlife agencies and implementation of permit conditions (Mitigation Measure BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements). Impacts on riparian habitat will be avoided if possible. If avoidance is not possible, impacts on riparian habitat will be replaced at a ratio of 3:1. Through implementation of Mitigation Measure BIO-21c, Obtain Wetland Permits, the resource agencies will require appropriate avoidance measures associated with streams and wetlands.</p>
022-30	<p>Although smaller buffers may be locally adequate to alleviate water quality concerns in the short-term, they are often insufficient for wildlife (Kilgo et al. 1998). Streams (perennial and intermittent), wetlands (including vernal pools and salt</p>	<p>Please see the response to comment 022-29, as buffers for impacts on wetlands and riparian species will be required for permitting.</p>

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	<p>marshes), and reservoirs throughout the County support numerous special-status flora and fauna, including Southern California steelhead and California red-legged frog. Many species that rely on these aquatic habitats also rely on the adjacent upland habitats (e.g., riparian areas along streams, and grassland habitat adjacent to wetlands). In fact, 60% of amphibian species, 16% of reptiles, 34% of birds and 12% of mammals in the Pacific Coast ecoregion depend on riparian-stream systems for survival. Many other species, including mountain lions and bobcats, often use riparian areas and natural ridgelines as migration corridors or foraging habitat (Dickson et al. 2005). Additionally, fish rely on healthy upland areas to influence suitable spawning habitat, and agricultural encroachment on these habitats and over-aggressive removal of riparian areas have been identified as a major driver of declines in freshwater and anadromous fish (Moyle et al. 2011). Loss of biodiversity due to lack of habitat contributes to ecosystem degradation, which will diminish a multitude of ecosystem services in the long-term. Thus, to preserve Los Angeles County’s valuable biodiversity in these habitats, it is important to develop and implement effective buffer widths informed by the best available science.</p>	
022-31	<p>A literature review found that recommended buffers for wildlife often far exceeded 100 meters (~325 feet), well beyond the largest buffers implemented in practice. For example, Kilgo et al. (1998) recommend more than 1,600 feet of riparian buffer to sustain bird diversity. In addition, amphibians, which are considered environmental health indicators, have been found to migrate over 1,000 feet between aquatic and terrestrial habitats through multiple life stages (Semlitsch and Bodie 2003). Specifically, the California red-legged frog, a threatened species that occurs and has designated critical habitat within Los Angeles County, was found to migrate about 600 feet between breeding ponds and non-breeding upland habitat and streams, with some individuals roaming over 4,500 feet from the water (Fellers and Kleeman 2007). Other sensitive species known to occur in Los Angeles County, such as western pond turtles</p>	<p>Should subsequent individual projects result in impacts on any special-status species, those projects would be reviewed for impacts as appropriate, per Mitigation Measure BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys. In addition, if federally or state-listed species are present within any of the mentioned habitats, appropriate avoidance measures would be implemented (Mitigation Measure BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements). A qualified biologist will review appropriate measures with respect to the species present, impacts proposed, and known scientific research, and will determine appropriate buffers based on this information.</p>

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	<p>(<i>Actinemys marmorata</i>, a candidate species under the Endangered Species Act) have been found to migrate over 1,300 feet from breeding ponds and streams (Trenham and Shaffer 2005). Accommodating the more long-range dispersers is vital for continued survival of species populations and/or recolonization following a local extinction (Cushman 2006). In addition, more extensive buffers provide resiliency in the face of climate change-driven alterations to these habitats, which will cause shifts in species ranges and distributions (Cushman et al. 2013). This emphasizes the need for sizeable riparian and upland buffers around streams and wetlands in Los Angeles County, as well as connectivity corridors between heterogeneous habitats.</p>	<p>Western pond turtle is not currently a candidate species under the California and federal Endangered Species Acts.</p>
<p>O22-32</p>	<p>To protect Los Angeles County’s highly diverse ecosystems and the services they provide, the LA River Master Plan EIR should implement a minimum 300-foot setback from all perennial and intermittent streams and wetlands (including vernal pools) that are within designated critical habitat, support or have the potential to support special-status and/or sensitive species, or provide connectivity and linkages to support multiple species. If the streams or wetlands are not located within designated critical habitat, do not support or have the potential to support special-status or sensitive species, and do not provide essential habitat connectivity, as determined by a qualified biologist, then a minimum 200-foot buffer should be required. The EIR should also include measures to protect these riparian areas from direct and indirect negative impacts in perpetuity.</p>	<p>Please see the response to comment O22-29, as buffers for impacts on wetlands and riparian species will be as required for permitting.</p>
<p>O22-33</p>	<p>The cumulative effects analysis, as described under CEQA Guidelines section 15130, needs to be re-assessed. The conclusion stated in the DEIR that “implementation of the 2020 LA River Master Plan would not result in a cumulatively considerable contribution to biological impacts,” but rather “would increase habitat” assumes that because preserving biological resources is a listed objective, that the net impact across all projects and project areas will be positive. However, of</p>	<p>While the Draft PEIR states that the proposed Project would increase habitat overall, that is not the basis for the conclusion that the cumulative effect is less than significant. The basis for this finding is that the biological impacts have been reduced to less-than-significant levels through the required mitigation.</p>

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	<p>the listed project potentials in the kit of parts, only nine out of 68 would prioritize biological resources and given that this is a menu based approach, there is no guarantee that those nine will all be implemented.</p>	
<p>022-34</p>	<p>Ecological systems have tipping points and when there are multiple affronts from multiple projects, the cumulative effect can be significantly greater than expected, unless the interactions of such projects are accounted for beforehand. To meet the stated goal of healthy connected ecosystems, the EIR must conduct a cumulative effects analysis that considers the possible impact of all kit of parts that do not prioritize biological resources. This would determine the true scope and scale of significant environmental impact on the biological resources of the region and provide an avenue for implementation of the common elements and kit of parts that maximizes benefits for biological resources.</p>	<p>The majority of the proposed Project occurs in an urban landscape and, as such, the majority of the proposed subsequent projects would occur within the urban landscape. Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which describes that where impacts on biological resources would occur—such as streams, wetlands, and habitat occupied by threatened or endangered species—then appropriate minimization and mitigation measures would be implemented to avoid and minimize impacts on biological resources. The cumulative impact of the overall contribution of each subsequent project of the PEIR has been adequately addressed through mitigation measures. However, it should be noted that cumulative impacts on biological resources would be significant and unavoidable for later activities that are <i>not</i> carried out by the County. However, the County believes that other entities that propose projects under the <i>2020 LA River Master Plan</i> and PEIR similarly can and should adopt the proposed mitigation, and if the mitigation measures identified in the Draft PEIR are adopted by another agency for impacts that are considered less than significant after the mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for projects not carried out by the County, for the same reasons as discussed for later activities carried out by the County.</p>
<p>022-35</p>	<p>In addition to the recommendations listed above, we urge the county to complete an analysis of impacts from land use designations and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the EIR.</p>	<p>Although there is a cumulative effects discussion in Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, please refer to Section 3.0.2, <i>Cumulative Impacts</i>, of the Draft PEIR, which provides a broader overview of the approach taken in the Draft PEIR. As described therein, an EIR may use two approaches for addressing the question of which related actions should be considered in the context of past, present, and reasonably</p>

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		<p>foreseeable actions when considered with the proposed Project. State CEQA Guidelines Section 15130(b) specifically identifies the following methodologies:</p> <ol style="list-style-type: none"> 1. A “list of past, present, and probable future projects producing related or cumulative impacts,” or 2. A “summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative impact. Such plans may include: a general plan, regional transportation plan or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified environmental document for such a plan.” <p>For the Draft PEIR, related plans and programs with a potential to contribute to cumulative impacts were analyzed using the “projection” methodology (i.e., the second methodology identified above).</p> <p>Through a literature review and contribution from Steering Committee members, Chapter 7, <i>Sites</i>, of the <i>2020 LA River Master Plan</i> identifies more than 1,800 LA River Watershed enhancement projects that stakeholders have proposed currently or planned within the watershed. These projects have been identified for the entire LA River Watershed. Some of these projects are within the <i>2020 LA River Master Plan</i> study area, whereas others are outside that geographic context and cover a much larger geographic area.</p> <p>Therefore, the PEIR makes a good-faith effort of analyzing and discussing the cumulative impacts associated with implementation of the <i>2020 LA River Master Plan</i>.</p> <p>Please refer to Section 3.10, <i>Land Use and Planning</i>, of the Draft PEIR, for additional information about the land use designations and zoning,</p>

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022-36	<p>Preserving regional water quality is essential to environmental and public health, especially as the City and County pivot towards 100% local water supply. To ensure this natural resource is protected, the DEIR should clearly articulate the environmental benefits of increasing enforcement of water permit violations and remediating industrial and commercial contamination as part of the Master Plan. The DEIR should also assess and mitigate the potential impacts the Master Plan could have on the River’s ability to maintain its original “Rec 1” beneficial use designation. Common elements and Kit of Parts should be implemented in a manner that will someday restore the River to a fishable and swimmable river again.</p>	<p>This comment is acknowledged. The commenter is requesting that the Draft PEIR discuss and analyze the benefits of enforcing water permit violations. It is not the purpose of the Draft PEIR to analyze enforcement of water permit violations, and this is not a CEQA threshold. The Draft PEIR articulates the permits that are required but not the enforcement of permits. Permit enforcement is enacted by the State Regional Water Quality Control Board.</p> <p>Additionally, please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, which notes that the proposed Project would comply with the National Pollutant Discharge Elimination System Construction General Permit, County Municipal Separate Storm Sewer System Permit, Public Works Low-Impact Development Standards Manual, and other local water quality requirements and stormwater ordinances; would be consistent with provisions in the Basin Plan; and would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.</p> <p>The Draft PEIR has been revised to include a table for beneficial uses of waterbodies with potential to be affected by the proposed Project. See Chapter 3 of the Final PEIR, <i>Clarifications and Modifications to the Draft PEIR</i>, of the Final PEIR. These are clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p>
022-37	<p>The DEIR should also assess the prioritization of regional water quality improvement projects in areas of greatest need and should clearly state the increasing environmental benefits that would result from the most restorative actions that remove impervious surfaces and restore wetlands and green spaces.</p>	<p>Please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, which notes that the <i>2020 LA River Master Plan</i> includes structural and non-structural best management practices (BMPs) that would be implemented to capture, convey, and control pollutant discharge, and infiltrate stormwater. The <i>2020 LA River Master Plan Design Guidelines</i> (as described in Chapter 2, <i>Project Description</i>, and included in Appendix B, of the Draft PEIR) include a variety of recommended stormwater BMPs and related site improvements that would be required to manage drainage and stormwater.</p>

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		Overall, Objective 9 of the <i>2020 LA River Master Plan</i> is to promote healthy, safe, and clean water. Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR) regarding the program-level analysis.
O22-38	Understanding the impacts of the LARMP on the region's water supply must be a priority, as it needs to be integrated into planning policies before implementation to ensure that the cumulative impact does not threaten our region's ability to achieve water independence from external sources. The EIR should consider the benefits from increased groundwater replenishment and efforts to capture flows in the Upper and Lower LA River watershed for groundwater discharge in the San Fernando Basin and Central Basin must be prioritized.	<p>With respect to the regional water supply, this comment is acknowledged. Please refer to Section 3.18, <i>Utilities/Service Systems</i>, of the Draft PEIR for more information on how the Draft PEIR analyzed potential impacts on water supply.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Regarding the groundwater replenishment portion of this comment, groundwater replenishment is outside the scope of the PEIR. No further response is required.</p>
O22-39	Project-related changes in drainage patterns, runoff, and sedimentation should be included and evaluated in the EIR as well. As part of the LSA Notification process, CDFW requests a hydrological evaluation of the 100-, 50-, 25-, 10-, 5-, and 2-year frequency storm event for existing and proposed conditions. CDFW recommends the DEIR evaluate the results and address avoidance, minimization, and/or mitigation measures that may be necessary to reduce potential significant impacts.	<p>Please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, which discusses project-related changes in drainage patterns, runoff, and sedimentation.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
O22-40	CEQA requires an EIR to discuss any inconsistencies with applicable land use plans, not just whether it is generally consistent with these plans. (Guidelines § 15125, subd. (d); <i>Napa Citizens for Honest Government v. Napa County Bd. Of Supervisors</i> (2001) 91 Cal.App.4 th 342, 356 [“Napa Citizens”].)	Please refer to Section 3.10, <i>Land Use and Planning</i> , of the Draft PEIR, which states “the LA River passes through numerous different municipalities over its 51 miles. While each of the 18 jurisdictions along the study area (17 cities in addition to unincorporated County areas) contain discrete adopted land use

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	<p>Failure to disclose any such inconsistencies violates CEQA’s information disclosure mandate, constituting a failure to “proceed in ‘a manner required by law’.” (Napa Citizens, supra, 91 Cal.App.4th at 386; Sierra Club v. County of Fresno (2018) 6 Cal.5th 502, 510, 514–16.)</p> <p>Here, the DEIR fails to provide any analysis of the 2020 LA River Master Plan’s consistency or lack of consistency with a number of relevant and applicable land use plans. The DEIR includes a section entitled “Relevant Land Use Plans and Policies (Non-Regulatory)” that only briefly summarizes these relevant plans, but does not provide any analysis of the Project’s consistency or inconsistency with these plans and their respective goals and policies. (See DEIR at 3.10-2.) This is impermissible under CEQA, which does not contain an exemption from this requirement for “non-regulatory” but nonetheless “relevant” plans. Instead, the Guidelines specifically note that this requirement extends to regional transportation plans, habitat conservation plans, and plans for the reduction of greenhouse gases, among others.</p> <p>For instance, the DEIR must include a detailed analysis of any inconsistencies with the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (“RTP/SCS”) adopted by the Southern California Association of Governments’ (“SCAG”). Currently, the EIR includes only a single half-page chart that concludes without analysis that the Project is consistent with ten broad goals in the RTP/SCS. Here, it is unclear how the Plan will “[p]romote conservation of natural and agricultural lands and restoration of habitats” (see DEIR at 3.10-50) when the Project proposes to simply leave-in place the channelization that has degraded the LA River, and the Project fails to adopt a broader watershed restoration approach</p>	<p>policies, these policies are similar across all applicable land use plans and generally pertain to ensuring compatible uses for all development and redevelopment within the jurisdiction as well as avoiding out-of-scale development and protecting existing residential neighborhoods from encroachment by incompatible uses. These goals and policies also promote a diversity of land uses, including increased opportunities for open space and recreation. There are no land use policies that are substantially different for each frame along the river’s extent; therefore, the analysis [contained within Section 3.10(b)] applies to all nine frames.”</p> <p>In addition, please see the responses to comments O22-9 and O22-34 and refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). The PEIR is a programmatic document and does not include project-specific or site-specific analysis. Because the PEIR does not examine specific projects, the County anticipates that future specific projects would require subsequent CEQA compliance. State CEQA Guidelines Section 15168(c) states, “Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. The level of the environmental document, if required, will be identified at this subsequent phase.”</p>
O22-41	<p>Moreover, the RTP/SCS has numerous other goals that are not discussed at all in the DEIR, with which the Project is likely inconsistent. The RTP/SCS includes goals to “Preserve, enhance and restore regional wildlife connectivity . . .”⁴ (RTP/SCS at 49.) As discussed above, the Project will not promote this goal, and</p>	<p>The <i>2020 LA River Master Plan</i> and PEIR are consistent with the mitigation measures as outlined in Connect SoCal (SCAG 2020). The Draft PEIR has been revised to include text regarding this plan in the biological section. See Chapter 3, <i>Clarifications and Modifications to the Draft PEIR</i>, of the Final PEIR. These are</p>

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	<p>potentially will undermine it through new development in sensitive areas. Moreover, the Program EIR Addendums for the RTP/SCS contains numerous proposed mitigation measures to reduce impacts on wildlife movement. (See PMM Bio-4 at 4.0-15). The EIR should analyze consistency with these measures and require them as mitigation measures for the Project.</p>	<p>clarifying changes only, and no changes to the conclusions in the Draft PEIR are needed.</p> <p>Please see Mitigation Measure BIO-23, Maintain Connectivity in Subsequent Project Design, Construction, and Operation, which specifies that all projects will be planned in coordination with a qualified biologist with demonstrated expertise in wildlife connectivity and wildlife crossing design regarding the promotion of the goal of the preservation, enhancement, and restoration of regional wildlife connectivity.</p> <p>See Mitigation Measure BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements, regarding the reduction of impacts on wildlife.</p>
<p>O22-42</p>	<p>Likewise, the DEIR contains virtually no analysis of the Project’s consistency with the Los Angeles River Revitalization Master Plan, or Lower Los Angeles River Revitalization Plan (see DEIR at 3.10-50.) Nor does the DEIR contain any analysis of whether the Project is consistent with the goals and policies of applicable climate action plans, including the Los Angeles County Community Climate Action Plan and L.A.’s Green New Deal Sustainability Plan, among others.</p>	<p>Please see the response to comment O22-40.</p> <p>Additionally, as described in the <i>2020 LA River Master Plan</i>, the County has a rich tradition of planning, as evidenced by the over 140 relevant adopted plans (see the Appendix Volume II: Technical Backup Document), including the Los Angeles River Revitalization Master Plan, or Lower Los Angeles River Revitalization Plan, that were reviewed as context for updating the <i>2020 LA River Master Plan</i>. These plans span different geographic scales and topics and are the result of community-influenced processes. The County leveraged the information from these plans as a foundation for the <i>2020 LA River Master Plan</i>.</p> <p>As described in Section 3.10, <i>Land Use and Planning</i>, the analysis consisted of a two-step process: consistent with the program-level approach of this PEIR, rather than addressing each individual policy of the local jurisdictions’ general plans, similar policies are grouped and analyzed against the Project for consistency. The groupings include: (1) compatibility with adjacent land uses; (2) avoidance of out-of-scale development; (3) ensuring diversity of land uses; (4) protection of existing residential neighborhoods from encroachment; (5) enhanced</p>

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		active and passive park and recreation opportunities for all users; and (6) improved accessibility and connectivity to a comprehensive trail system including rivers, greenways, and community linkages. Consistency with regional plan policies is addressed individually in tabular format in the Draft PEIR.
O22-43	Perhaps most unfortunately, the DEIR does not even mention, let alone analyze consistency with, the Los Angeles Countywide Sustainability Plan. The Sustainability Plan contains numerous policies that should be applied to the Project, but are not even considered in the DEIR. For instance, Action 36 in the Sustainability Plan states “Evaluate and implement mechanisms, such as a stream protection ordinance, for the protection, preservation, and restoration of natural buffers to waterbodies, such as floodplains, streams, and wetlands” and “PW” or “Public Works” is listed as a partner. (Sustainability Plan at 58.) In order to be consistent with the Sustainability Plan, the DEIR must disclose whether and/or how the Project is meeting these goals. Action 73 contains similar requirements of “implementing a strategy to preserve and protect priority ecological sites . . . [including but not limited to . . . terrestrial streams, wetlands, and aquatic habitats.” (Sustainability Plan at 92.) It is also unclear how the Project meets Goal 6 of the Sustainability Plan: “Accessible parks, beaches, recreational waters, public lands, and public spaces that create opportunities for respite, recreation, ecological discovery, and cultural activities.”	Please see the response to comment O22-40.
O22-44	Impact 3.10(b) in the DEIR considers whether the Project would cause a significant environmental impact due to a conflict with any applicable land use plan or policy. (DEIR at 3.10-35.) The DEIR concludes that impacts would be less than significant and that no mitigation is required for most of the “Kit of Part” categories. However, because the DEIR fails to include adequate analysis of the Project’s consistency or lack of consistency with various plans, it cannot credibly reach a conclusion on Impact 3.10(b). (See Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn. (1986) 42 Cal.3d 929, 935 [conclusory claims	Please see the response to comment O22-40.

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	are insufficient under CEQA’s informational mandate, which requires an EIR to “contain facts and analysis, not just the agency’s bare conclusions or opinions[.]”	
O22-45	For other areas of the “Kit of Parts” such as “KOP Category 6,” the DEIR concludes that impacts would be significant and unavoidable. (DEIR at 3.10-44.) The DEIR also quite confusingly compares the Project to the goals of the Project in its land use plan analysis, and concludes that projects under KOP Category 6 “could encroach on existing residential neighborhoods and result in a significant environmental impact.” (DEIR at 3.10-45.) The DEIR then states that the Project “potentially” is not consistent with the Project’s goal of “protection of existing residential neighborhoods from encroachment.” (Id.) At a minimum it is extremely confusing that the DEIR suggests that the Project is inconsistent with itself. The DEIR’s confusing analysis does not contribute to informed decision-making and public participation.	The <i>2020 LA River Master Plan</i> does not include any condemnation or eminent domain. As this is a program-level EIR, the analysis presented is conservative in nature. In the <i>2020 LA River Master Plan</i> , these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i> . There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River. Please see Master Response MR-2 (Program-Level Analysis in the PEIR).
O22-46	In addition, it is difficult to even assess whether the Project is consistent or inconsistent with the above-mentioned land use plans and their goals and policies because what actually constitutes the Project is extremely confusing and not properly described in the EIR.	Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR) and see the response to comment O22-45.
O22-47	The DEIR should place special emphasis on the environmental and societal benefits of increasing the extent of multi-use trails that connect to the River and prioritize access near major destinations or areas that need improvements to existing access points. This should include connecting major regional trails, tributary trails and expanding regional loops primarily in the Lower LA River. The communities of highest park need along the LA River include Downtown LA, Bell Gardens, South Gate, Compton, and Long Beach. (Steering Committee Meeting #8 Summary 2019.) ⁷ Increasing public access to the River should	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed. Objective 2 of the <i>2020 LA River Master Plan</i> is to “Provide equitable, inclusive, and safe parks, open space, and trails,” and

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	also include common elements, such as street lighting and emergency call boxes, to increase public safety along and within the River.	Objective 4 is to “Enhance opportunities for equitable access to the river corridor.”
022-48	<p>CEQA requires that an EIR adequately analyze alternatives to the proposed project. The alternatives analysis is the “core of an EIR.” (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal. 3d 553, 564 (“Citizens II”).) An EIR is required to analyze a range of alternatives that “would avoid or substantially lessen” any of the significant effects of the project in order to “ensure that all reasonable alternatives to proposed projects are thoroughly assessed by the responsible official.” (Pub. Resources Code § 21002, 21002.1; CEQA Guidelines § 15126.6, subd. (a).) Reasonable alternatives are feasible and must “attain most of the basic objectives” of the Project. (Pub. Resources Code § 21061.1; Guidelines § 15126.6 (a).) The reasonableness of alternatives is considered in light of the nature of the project and the nature and extent of the project’s impacts. (San Bernardino Valley Audubon Society v. County of San Bernardino (1984) 155 Cal.App.3d 738, 750–51.) Reasonable alternatives should only be eliminated from consideration in the EIR if the alternative would not meet most of the basic project objectives, is infeasible, or would not reduce significant environmental impacts. (Guidelines § 15126.6(c); Save Round Valley Alliance v. County of Inyo (2007) 157 Cal.App.4th 1437, 1457.)</p> <p>Prior to release of the DEIR, numerous groups including the Center urged DPW to consider and adopt a Watershed Restoration Alternative. (See e.g., letter of August 4, 2020 from Los Angeles Waterkeeper, Center for Biological Diversity, Friends of the LA River, and Heal the Bay.) The letter explained that such an alternative would expand the scope of the project to include the LA River watershed more formally because in order to achieve the goals of the LARMPU (including “reduce flood risk and improve resiliency,” “support healthy, connected ecosystems” and “promote healthy, safe, clean water”) a system-wide approach is critical. The Center also submitted a separate</p>	<p>Please refer to Master Response MR-7 (Master Plan Area/PEIR Study Area and Addressing the LA River in a Comprehensive Manner).</p> <p>CEQA does not mandate that an EIR include a specific number of alternatives. Please refer to Chapter 5, <i>Alternatives</i>, of the Draft PEIR, which examines two alternatives and explains the reasons for rejecting other potential alternatives. This complies with State CEQA Guidelines Section 15126.6(c): “[t]he range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination.”</p> <p>The alternatives analysis is also in keeping with State CEQA Guidelines Section 15126.6(a), which states in part: “[a]n EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”</p> <p>The analysis of alternatives is not required to be as detailed as the analysis of the project. State CEQA Guidelines Section 15126.6(d) says: “[t]he EIR shall include sufficient information</p>

Comment #	Comment	Response
	<p>letter urging adoption of the Watershed Restoration Alternative. (See letter of August 6, 2020.)</p> <p>Nonetheless, the DEIR summarily dismisses the Watershed Restoration Alternative, claiming that “none of the impacts of the proposed Project would be reduced or avoided” with this alternative. (DEIR at 5-9.) This is false. The whole purpose of this alternative would be to restore the watershed and river, thus minimizing impacts and actually providing a net benefit to the watershed and environment. The DEIR does, however, acknowledge that the Watershed Restoration Alternative “would help meet many of the objectives of the proposed Project and specifically further the objectives of connected ecosystems and provision of equitable, inclusive, and safe parks, open space, and trails.” (Id.) Indeed, the DEIR fails to mention a single project objective that the Watershed Restoration Alternative would not further. Because the Watershed Restoration Alternative would reduce impacts and further the project’s objectives, it should have been considered and adopted by the DEIR as the preferred alternative. Based on the authorities cited above, the DEIR’s failure to even consider this alternative violates CEQA.</p>	<p>about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”</p> <p>As discussed in Chapter 5, <i>Alternatives</i>, the Watershed Restoration Alternative would include implementation of the <i>2020 LA River Master Plan</i> and its proposed six KOP categories that include restoration, and would expand the Project beyond the 2-mile-wide (1 mile on each side of the river) study area along the 51-mile river channel, to include the entire river watershed that covers a land area of up to 834 square miles, encompasses two counties, and has approximately 5 million inhabitants. This alternative would help meet many of the objectives of the proposed Project and specifically further the objectives of connected ecosystems and the provision of equitable, inclusive, and safe parks, open space, and trails. However, none of the impacts of the proposed Project would be reduced or avoided given all KOP categories would be implemented throughout the watershed. Specifically, it would not reduce or avoid significant impacts for these environmental resources: aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire. Therefore, this alternative was removed from further consideration.</p>

2.3.2.41 Comment Letter EO1: Representative Lucille Roybal-Allard

Comment#	Comment Text	Response
EO1-1	<p>First, ensuring that the community has access to the river and river-related sites such as parks is important. As projects are being created, designs and plans should always be done with the thought of how people can enter the site, bike path and other Los Angeles River-related locations. Good signage should also be included in all plans.</p>	<p>Thank you for your comments. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears that the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>The <i>2020 LA River Master Plan</i> builds on the adopted 1996 <i>Los Angeles River Master Plan</i> and other subsequent regional planning studies. It is intended to improve 51 miles of connected open space along the LA River to improve health, equity, access, mobility, and economic opportunity for the diverse communities of the County, while still providing flood risk management.</p> <p>Rather than requiring one set of fixed solutions for all 51 miles, the <i>2020 LA River Master Plan</i> allows for a consistent approach throughout the study area, but with frame-specific identity within the greater whole. Ecology, habitat, and art reflect the physiography and culture of an individual frame of the river. Other elements, such as signage, access points, and lighting, were developed to ensure a consistent approach to connectivity, wayfinding, and equitable access.</p> <p>The proposed Environmental Graphics Guidelines for the <i>2020 LA River Master Plan</i> have been developed with a common set of values for their design and proposed use. The intention is that</p>

Comment#	Comment Text	Response
		<p>these guidelines will ensure that future projects will convey information through environmental graphics and be deliberately curated so as that pedestrians or cyclists who approach and enter the LA River right-of-way can view them. See Chapter 2, <i>Project Description</i>, of the Draft PEIR for more information about this.</p>
E01-2	<p>Community meeting centers should also be considered as part of the master plan. I am aware that there is support for the South East Los Angeles (SELA) Cultural Center; we should consider similar centers in other communities so that people in other areas have access to like facilities. The centers could even be smaller versions of the SELA Cultural Center. Regardless, there should be public buildings where the public can meet and/or have a variety of classes. The buildings could be run and maintained by local governments or perhaps an educational institution.</p>	<p>It appears that the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>The LA River has long been at the cultural and historical heart of Los Angeles. The <i>2020 LA River Master Plan's</i> framework begins with community needs and aims to provide guidance and resources for jurisdictions to implement subsequent projects in the study area.</p> <p>As described in Chapter 2, <i>Project Description</i>, of the Draft PEIR, <i>Project Description</i> of the Draft PEIR, The <i>2020 LA River Master Plan</i> includes up to 107 potential project sites ranging in size from extra-small (less than 1 acre) to extra-large (150+ acres/10+ miles) that would be implemented over the 25-year horizon period to meet the <i>2020 LA River Master Plan's</i> nine objectives. These 107 potential project sites are identified in the <i>2020 LA River Master Plan</i>, in addition to several other planned proposed projects included in other LA River published plans (such as the <i>2007 LA River Revitalization Master Plan</i>, the <i>LA River Ecosystem Restoration Integrated Feasibility Report</i> and its <i>Recommended Plan – ARBOR Study</i>, and the <i>2017 Lower LA River Revitalization Plan</i>).</p>

Comment#	Comment Text	Response
		<p>That being said, Kit of Parts (KOP) Category 6: Off-Channel Land Assets includes off-channel land assets, which could include an arts and culture facility, combined with right-of-way improvements, and can further ensure that projects are multi-benefit, addressing multiple needs. Off-channel land assets could also include a range of other functions, such as flood management, recreational uses, ecological uses, and community uses (e.g., affordable housing, cultural centers, urban agriculture/composting).</p>
<p>E01-3</p>	<p>As we all know, Southeast Los Angeles is one of the most densely populated areas in Los Angeles County and the state of California. Due to the many freeways that run through the region, residents also live in an area that has some of the highest rates of vehicle exhaust pollution resulting in very poor air quality year round, often with summer air quality being the worst in the nation.</p> <p>Given these logistics, local Southeast Los Angeles residents would benefit greatly from the creation of well-maintained open space (i.e. hiking, biking and horse trails) and open green space as much as possible. According to the U.S. Environmental Protection Agency, “Community open, green space is socially valuable. Walkable neighborhoods, parks, and open green spaces draw people outside and foster social interactions. Green streets integrate nature into the urban environment and provide a revitalizing contrast to the harsh shape, color, and texture of buildings, and stimulate the senses with their simple color, sound, smell, and motions.”</p>	<p>Section 3.2, <i>Air Quality</i>, of the Draft PEIR, describes the regulatory and environmental setting for air quality, discusses local and regional air quality impacts that would result from the <i>2020 LA River Master Plan</i> and its elements, determines if there are significant impacts, and provides mitigation measures that would avoid or reduce these impacts to less-than-significant levels, where feasible. Additionally, the commenter’s concern regarding open space is noted. As described in Chapter 2, <i>Project Description</i>, of the Draft PEIR, objectives of the <i>2020 LA River Master Plan</i> include Objective 2, providing equitable, inclusive, and safe parks, open space, and trails as well as Objective 4, enhancing opportunities for enhancing equitable access to the river corridor.</p> <p>The residents citizens identified by the commenter as “local Southeast Los Angeles residents” appear to be in Frames 3 and 4 of the Draft PEIR study area. Figure 3.15-1 (Figures 3.15-1.1 through Figure 3.15-1.9) in Section 3.15, <i>Recreation</i>, of the Draft PEIR shows the parks, open space, and recreational facilities throughout the study area by frame for Frames 1 through 9, as discussed in detail in Section 3.15, <i>Recreation</i>, of the Draft PEIR.</p>
<p>E01-4</p>	<p>I am also concerned about housing, and in particular, affordable housing, including housing for people who meet the moderate-income standards. Housing costs are currently a problem for many residents in Southeast Los Angeles. Unless we develop a comprehensive plan to deal with this situation, when individual LAR projects become a reality, and as other projects such as the</p>	<p>The commenter’s concern regarding affordable housing is noted. The <i>2020 LA River Master Plan</i> includes Objective 6, which addresses potential adverse impacts on housing affordability and people experiencing homelessness. Please see Master Response MR-6 (Gentrification and Housing Affordability) for information about local efforts to address gentrification and</p>

Comment#	Comment Text	Response
	<p>Rail to River, and West Santa Ana Branch (WSAB) light rail line come online housing costs will rise as it has with other similar projects in other transit oriented developments. This will have the result of many current and future residents who grew in the area being priced out of the market.</p>	<p>housing affordability beyond the proposed Project. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p>
<p>EO1-5</p>	<p>While the Southern California Association of Governments (SCAG) has their regional housing plan, and there have been discussions on matters such as land banking and community benefits agreements, we must develop a more comprehensive and detailed plan with all community stakeholders. In addition to the strategies mentioned in the Lower LA River Revitalization Plan and the transit-oriented development included in the WSAB project, the comprehensive affordable housing plan should also include more programs for individuals to address financial literacy, first time homebuyers, HUD certifications, and consumer awareness among others. Ideally, to minimize the number of people being defrauded, there should be one agency or a clearing house that can serve as an educational resource and a central point of contact.</p>	<p>It appears that the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Furthermore, please see response to EO1-4 for more information about affordable housing. This comment does not identify specific significant environmental issues and was shared with the <i>2020 LA River Master Plan</i> team.</p>

2.3.2.42 Comment Letters I1–I104: Individuals

Commenter	Comment#	Comment	Response
I1 Paul Rabinov	I1-1	In reviewing the DEIR, it does not appear to include any of the proposed study areas recommended by the Upper LA River and Tributaries Working Group. When will these be added?	<p>The County appreciates Paul Rabinov for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Although the LA River right-of-way is confined to its channel, top of levee, and immediately adjacent landside areas (within the fenceline), a larger study area was identified to consider current conditions and potential opportunities up to 1 mile on each side of the river centerline to allow for overall improved access to the river from nearby communities. Therefore, for the purposes of CEQA and consistency with the <i>2020 LA River Master Plan</i>, the study area is defined as a 2-mile-wide corridor—1 mile on each side of the river—that follows the centerline of the LA River for its entire 51 miles. This defined PEIR study area is consistent with the study area identified for the <i>2020 LA River Master Plan</i>, which does not include any tributaries of the LA River but instead focuses only on the main river stem.</p> <p>Although the <i>2020 LA River Master Plan</i> research includes all the tributaries and the full watershed, specific design ideas were not developed for the tributaries because separate plans and planning efforts encompass these areas.</p> <p>The Upper LA River and Tributaries Working Group recommendations that could overlap with the <i>2020 LA River Master Plan</i> study area are included in the <i>2020 LA River Master Plan</i>, including opportunity areas that are outlined in Chapter 7 of the plan.</p>

Commenter	Comment#	Comment	Response
I2 Connie Elliot	I2-1	However, I keep seeing something that should be discarded in my neighborhood. I would be willing to meet with someone with masks and social distancing outdoors next to South Weddington Park to show you that connecting South and North Weddington parks with a bridge over the river would be folly.	<p>The County appreciates Connie Elliot for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
I2 Connie Elliot	I2-2	Fire trucks would not be able to get down that street.	<p>Please refer to Section 3.14, <i>Public Services</i>, of the Draft PEIR for a discussion of Mitigation Measure PS-1, Ensure Police and Fire Service Providers Have Adequate Resources, which ensures police and fire service providers have adequate resources to continue to serve the proposed project area within their respective required levels of service and response times once the subsequent project is constructed. With implementation of Mitigation Measure PS-1, during subsequent project design and development, the implementing agency would regularly notify and coordinate with police and fire service providers that have jurisdiction over subsequent project sites on project construction design, activities, and scheduling—including any street or lane closures related to subsequent projects—to ensure police and fire service providers have adequate resources to continue to serve the project area within their respective required levels of service and response times once the subsequent project is constructed.</p>

Commenter	Comment#	Comment	Response
I2 Connie Elliot	I2-3	Also, Valleyheart, which is the only street out of this cul de sac, is very narrow and could not support a bike path along with two way traffic and parking. Taking park land from such a small park would be political folly. Please discard any idea like this. Vineland is the best and widest street to use for a bike path connecting to the river.	Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements), which discuss the programmatic nature of the Draft PEIR and the fact that the Draft PEIR analyzes two Typical Projects and six kit of parts categories but does not analyze specific projects. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River.
I3 Julia Borovay	I3-1	I support returning as much as possible of the Los Angeles River to its natural state.	The County appreciates Julia Borovay for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project. This comment is acknowledged. Please refer to Master Response MR-5 (Naturalization of the LA River).
I3 Julia Borovay	I3-2	Making the river more accessible for recreation, while maintaining flood control capabilities, is a good idea.	This comment is acknowledged and is consistent with the proposed project objectives. Please refer to Chapter 2, <i>Project Description</i> , of the Draft PEIR, which describes how the <i>2020 LA River Master Plan</i> has objectives to provide equitable, inclusive, and safe parks, open space, and trails, while reducing flood risk and improving resiliency.
I3 Julia Borovay	I3-3	I am not in favor of building concrete superstructures over the river channel to try to increase public space. Imposing more concrete over the already heavily cemented riverbed would be both unsightly and contrary to the spirit of restoring the river to ecological health.	This comment is acknowledged. Please refer to Chapter 2, <i>Project Description</i> , of the Draft PEIR, which describes how, given its width and length, the LA River channel can separate communities and be an obstacle for connectivity. Crossings can connect existing or proposed communities or assets on one side of the river with existing or proposed communities or assets on the other side of the river. Crossings and platforms would typically

Commenter	Comment#	Comment	Response
			<p>include multi-use bridges for pedestrian, bike, and equestrian access, and they would connect communities to nearby parks and community facilities. Platforms are wider than crossings and can create space for parks, recreation, and habitats above the channel in addition to providing cross-river connectivity. Platforms can also host a range of habitat typologies, including riparian and upland conditions, and can allow for wildlife migration. Crossings and platforms can connect people to the river, creating new spaces for gathering and panoramic views of the river and surroundings. It is also relevant to note that large platforms are not appropriate for soft-bottom reaches of the river. However, bridges and smaller platforms that promote habitat connectivity may be considered under the <i>2020 LA River Master Plan</i>. Any channel modifications required for crossing and platforms would require hydraulic analysis to ensure flood risk is not increased. Please refer to Section 3.1.3.3, <i>Impacts and Mitigation Measures</i>, of the Draft PEIR, which describes how, once constructed, above-ground structures related to kit of parts (KOP) Category 3: Crossings and Platforms, which include multi-use bridges, would not result in substantial adverse effects on a scenic vista or obscure a panoramic view but would instead contribute to enhanced viewing opportunities for users to experience the vistas. Please refer to Table 3.1-14 in Section 3.1, <i>Aesthetics</i>, of the Draft PEIR, which outlines how KOP Category 3 components are consistent with policies and goals, would be visually compatible with adjacent land uses, and would not result in conflicts with regulations governing scenic quality. Additionally, please refer to Section 3.3.3.3 in Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which discusses how construction and operation of KOP Category 3: Crossings and Platforms would have less-than-significant impacts with implementation of the mitigation measures identified for biological resources in the Draft PEIR,</p>

Commenter	Comment#	Comment	Response
			<p>including Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-4, Identify Work Areas and Environmentally Sensitive Areas; BIO-5, Prepare and Implement Weed Abatement Plan; BIO-6, Conduct Biological Monitoring During Construction; BIO-9, Prepare and Implement Construction Best Management Practices and Operations Recreation Plan; BIO-20a, Avoid Riparian and Sensitive Natural Communities; BIO-20b, Implement Riparian Mitigation and Restoration and BIO-20c, Protect Against Tree Diseases, Pests, and Pathogens.</p>
I4 David Swanson	I4-1	Bureaucrats want money to play with. Cancel the EIR and leave the river alone.	<p>The County appreciates David Swanson for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This comment is acknowledged. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
I5 Alina Zehnali	I5-1	<p>I apologize as I mixed the dates. Now these days months fly by. The meeting is in a month therefore we are give advance notice, however I would appreciate if you can tell me how this is going to affect residence on Markridge Rd in La Crescenta.</p> <p>Thank you, Alina</p>	<p>The County appreciates Alina Zehnali for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Public Works projects should be uploaded to and available on the Public Works website (https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=233aec4ded394974a7f6c)</p>

Commenter	Comment#	Comment	Response
		<p>I received a notice in mail regarding the Draft Program EIR and the meeting held online on March 3rd. I received this notice in the mail on March 3rd when I got home which was past the meeting time. I don't understand why with something important like this, the public is not given an advance notice to understand what is impacting their everyday life. How do we go about getting information about this project. We live on Markridge Rd in La Crescenta where in past may la county public work above Dukmejian Wilderness has impacted our everyday life. I like to find out what this project intales and how much more dust, noise and possibly an environmental affect is going to impact the citizens. This may impact our decision to live in this area and I like to find out as soon as possible.</p>	<p>37248ba1ffa), and Los Angeles County Department of Regional Planning also updates projects on its website.</p>
<p>I6 Margaret Darret-Quiroz</p>	<p>I6-1</p>	<p>Thank you for the information.</p>	<p>The County appreciates Margaret Darret-Quiroz for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>The commenter spoke with Ariana Villanueva, the Deputy Project Manager from Public Works, regarding the public meeting for the Draft PEIR. Information provided included where to register for the public meeting, how to make an oral comment, how to make a written comment, and additional information on where to find the Draft PEIR online.</p>
<p>I7 Naomi Turner</p>	<p>I7-1</p>	<p>The 2020 LA River Master Plan must include bike paths so you can walk or ride all the way from Canoga Park to Long Beach along the LA River.</p>	<p>The County appreciates Naomi Turner for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR.</p>

Commenter	Comment#	Comment	Response
			<p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>However, one of the objectives of the <i>2020 LA River Master Plan</i> would connect trails and paths along the length of the river to create a mobility network across Los Angeles County for cyclists, pedestrians, and equestrians, and to accommodate as many user types as safely as possible. Additionally, please refer to Section 3.16, <i>Transportation</i>, of the Draft PEIR for a discussion of how one of the objectives of the <i>2020 LA River Master Plan</i> is to complete the LA River Trail so that there is a continuous route along the entire river and so future routes on both sides of the river are encouraged, where feasible.</p>
17 Naomi Turner	17-2	Also a comprehensive plan to address homelessness/trash cleanup along the LA River. These things need to happen as soon as possible.	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please refer to Master Response MR-1 (Homelessness along the LA River). Please also refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR, which discusses how one of the objectives of the <i>2020 LA River Master Plan</i> is to address potential adverse impacts on housing affordability and people experiencing homelessness.</p>
18 Peter Cardenas	18-1	I am a sanitation worker for the city of L.A . while I was working for the city we began using reclaimed water in our sewer cleaning hydro units . I am not sure what was in the water . but the hydrogen sulfide level was very high while we were filling our trucks . we would use the water to clean the sewers and storm drains .	The County appreciates Peter Cardenas for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.

Commenter	Comment#	Comment	Response
		<p>when I checked to see where to water was coming from . the site stated a person only needed training to acquire the water . the training was on how to use the water . it was for irrigation only . the water could not be spilled on the sidewalk or run down the street and if you splashed the water the fines would be doubled when I found out I attempted to stop my management. I called the EPA, county health board, state water board, fish and game and CWEA which I was a member of. We had also been using our sewer cleaning equipment in the storm drains and I asked if we could stop cross contamination of the storm system. We had been using the water to clean skid row . I have been trying to stop these practices I think this might be the origin of Covid-19 or at least .the spreading of the illness.</p>	<p>This comment is acknowledged. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>I9 Carrie Sutkin</p>	<p>I9-1</p>	<p>please send me an electronic version to post on my neighborhood council webpage and on the Alliance of River Communitie’s facebook.</p>	<p>The County appreciates Carrie Sutkin for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Public Works responded to the request on February 3, 2021. Public Works provided the commenter a portable document format (PDF) version of the Draft PEIR public meeting flyer.</p>
<p>I10 Kevin Greuter</p>	<p>I10-1</p>	<p>Regarding the LA River master plan, I would strongly urge the county to focusing first on completing the section of the bike path that is currently blocked by Downtown Los Angeles. I believe this would be tremendously helpful to commuters and cyclists both north and south of Downtown, and would noticeably reduce commuter traffic going into the city. It is currently impossible to safely bike from the Valley to the lower portion of the LA River bike path.</p>	<p>The County appreciates Kevin Greuter for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>One of the objectives of the <i>2020 LA River Master Plan</i> is to connect trails and paths along the length of the river to create a mobility network across Los Angeles County for cyclists, pedestrians, and equestrians, and to</p>

Commenter	Comment#	Comment	Response
			<p>accommodate as many user types as safely as possible. Additionally, please refer to Section 3.16, <i>Transportation</i>, of the Draft PEIR for a discussion of how one of the objectives of the <i>2020 LA River Master Plan</i> is to complete the LA River Trail so that there is a continuous route along the entire river and so future routes on both sides of the river are encouraged, where feasible.</p>
I11 Brent Fischer	I11-1	<p>If you're going to do anything along the river, the tent cities need to be cleared first. It's time for the county to insist that public lands be for the tax paying public, not squatters, many of whom are with drug and alcohol problems. If any of them are truly homeless, meaning they want to be back in a home, there are plenty of social services and nonprofits that can help them relocate to approved housing. Don't beautify the river just so vagrants can proliferate there.</p>	<p>The County appreciates Brent Fischer for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-1 (Homelessness along the LA River). Please also refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR, which discusses how one of the objectives of the <i>2020 LA River Master Plan</i> is to address potential adverse impacts on housing affordability and people experiencing homelessness.</p>
I12 Allen Escobedo	I12-1	<p>The LA River Master Plan shows minor improvements in Frame 4, Bell, Maywood, Bell Gardens while much more significant improvements in other areas. Despite the densely populated residential areas of Frame 4, it appears that these gateway cities will once again be marginalized.</p>	<p>The County appreciates Allen Escobedo for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR) for reference to improvements being shown in a given frame. As identified in Chapter 1, <i>Introduction</i>, of the Draft PEIR, the <i>2020 LA River Master Plan</i> is at a conceptual level; project-level approvals are</p>

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			<p>not part of the <i>2020 LA River Master Plan</i> approval. Implementation of the 107 subsequent projects would depend on many factors, including, but not limited to, the location, agency oversight, and jurisdiction; proponent of subsequent projects; implementing party; local community needs; policy decisions; timing of implementation; and availability of funding. Because of these factors, the Draft PEIR did not include any site-specific or project-specific analysis and instead presented a program-level analysis of the <i>2020 LA River Master Plan</i>. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River.</p> <p>Please refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR for discussion of Objectives 2 and 4 of the <i>2020 LA River Master Plan</i>, which address enhancing opportunities for equitable access to safe parks, green space, and the river corridor. The Common Elements Typical Project includes pavilions, cafés, hygiene facilities, restrooms, benches, emergency call boxes, water fountains, trash and recycling, bike racks, environmental graphics, lighting, planting, stairs/ramps, guardrails, fences and gates, stormwater best management practices, and art/performance spaces that would be constructed at a set cadence along the LA River. It is anticipated that the Tier III pavilions would occur every 2 to 3 miles along the river. The Tier I and Tier II pavilions would potentially be placed every 0.5 mile while being spaced to optimize distance.</p>
I12 Allen Escobedo	I12-2	Is it the intention of the County to again continue to under represent these communities? These are the areas in most need of parks and open areas, pavilions,	This comment is acknowledged. Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR), which discusses the Project’s public outreach program. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This

Commenter	Comment#	Comment	Response
		cafes. It seems they will be lucky to get a lower tier shade pavilion.	comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. Objective 2 of the <i>2020 LA River Master Plan</i> aims to provide equitable, inclusive, and safe parks, open space, and trails.
I13 Dean Scalia	I13-1	Hello - we offer the attached for consideration on the 2020 LA River Master Plan. Originally conceived in 1984, it was sent then to a number of local officials and acknowledged by some of them, but no action was taken. Most recently, as noted in the enclosed file, we pitched it to Elon Musk, but haven't heard from him, either. We welcome your questions and comments. Thank you for your consideration.	<p>The County appreciates Dean Scalia for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This comment is acknowledged. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
I14 Veta Gashgai	I14-1	The LA River flowing again by our homes will be amazing please view this power point and help us with our trash issue and overflowing storm drains here In Boyle Heights. Please help us clean our storm drains be aware of our problem here in BH. How can we create some TV big new when we don't maintain basic city services here.	<p>The County appreciates Veta Gashgai for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This comment is acknowledged. Please refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR, which describes how Common Elements Typical Projects will be constructed at a cadence along the LA River. Common Elements Typical Projects include trash and recycling receptacles. Furthermore, the <i>2020 LA River Master Plan</i> includes constructing kit of parts (KOP) Category 4: Diversions, including storm drain interceptors.</p>

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I15 Armando Simental	I15-1	I Armando Simental where to sign up for Wednesday, March 3 2021 Time; 6pm to 8pm. 2010 LA River MasterPlan Not to sabi on computer knowledge, website unable to find registration site.	<p>The County appreciates Armando Simental for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>The link to register on Eventbrite and information on how to register for the March 3, 2021 public meeting on the Draft PEIR was provided to the commenter. The commenter was directed to the Draft PEIR website and <i>2020 LA River Master Plan</i> website for more information. The commenter was also provided links on how to watch the public meeting, how to submit a comment, and how to read the <i>2020 LA River Master Plan</i>.</p> <p>A follow-up email with an attached portable document format (PDF) of a step-by-step guide on how to register on Eventbrite was also sent to the commenter.</p>
I16 Ricardo Morelli	I16-1	Subject: Homelessness and the LA River Is this elephant in the room being addressed?	<p>The County appreciates Ricardo Morelli for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-1 (Homelessness along the LA River). Please also refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR, which discusses how one of the objectives of the <i>2020 LA River Master Plan</i> is to address potential adverse impacts on housing affordability and people experiencing homelessness.</p>
I17 Jacqueline Teeter	I17-1	Multiple departments in the City of Burbank are reviewing the DEIR for the L .A .River Master Plan. I am emailing to request two additional weeks to review the DEIR .	<p>The County appreciates Jacqueline Teeter for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p>

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			<p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR). In response to this comment and others initially received, on March 4, 2021, the review period was extended to April 2, 2021 (60 days). The review period was then extended a second time to May 13, 2021, to provide additional review time to all interested parties. In total, the review period was open from February 1, 2021, to May 13, 2021, for 101 days, which is more than twice the 45-day minimum required by CEQA (State CEQA Guidelines Section 15105).</p>
<p>I18 Flor Burrola</p>	<p>I18-1</p>	<p>Will this session be recorded and available to view after the meeting for those who are unable to attend? If so, where will the video be located and when will it be available?</p>	<p>The County appreciates Flor Burrola for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>A recording of the online meeting was made available on the <i>2020 LA River Master Plan</i> CEQA website (https://pw.lacounty.gov/go/larmpceqa) after the public meeting.</p>
<p>I19 Gloriar Evive</p>	<p>I19-1</p>	<p>I am a resident of Long Beach and I was reviewing the project plans. However I did not find the information pertaining to which properties along the river would be taken by eminent domain for the project. Would you please provide me with that information?</p>	<p>The County appreciates Gloriar Evive for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). The <i>2020 LA River Master Plan</i> does not include any condemnation or eminent domain. As this is a program-level EIR, the analysis presented is conservative in nature.</p> <p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a</p>

Commenter	Comment#	Comment	Response
			<p>conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River. Please see Master Response MR-2 (Program-Level Analysis in the PEIR).</p>
I20 Donna Thomas	I20-1	I'm not for the river project. more Trash will be put in the river and it won't become better for wild Things or humans.	<p>The County appreciates Donna Thomas for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>The comment is acknowledged. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No changes to the Draft PEIR are needed.</p> <p>Objective 3 of the <i>2020 LA River Master Plan</i> is to Support Healthy and Connected Ecosystems, which aims to protect vulnerable plants and animals. Additionally, please refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR, which discusses how Common Elements Typical Projects would be constructed at a cadence along the LA River and would include trash and recycling receptacles.</p>

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I21 Vasken Hagopian	I21-1	<p>Are you people on crack??? The City and the State is taxing us to death, and you want to spend millions of dollars of our hard earned tax {{unable to see text here}}....LA. River is contaminated waters, so you really think the river is a good investment of the tax payors??? How many will get sick, and go to the hospitals??? How about that stupid Biden and Gruesome Newsom? Lower out taxes and stop waisting our money. Wow, it sure looks good in the picture and these idot menials will fall for it. From a hard working, heavy tax paying citizen.</p>	<p>The County appreciates Vasken Hagopian for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This comment is acknowledged. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
I22 Bruce Boyer	I22-1	<p>I am objecting to the "online" - I wish to attend in person please make that accommodation.</p>	<p>The County appreciates Bruce Boyer for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This comment is acknowledged. Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for a summary of outreach measures taken for the Draft PEIR. Due to COVID and Los Angeles County Health mandates, all meetings were hosted virtually.</p>
I23 Robert Fox	I23-1	<p>I live in Frame 8, right on the river in Vallheart Dr. in Studio City. In Frame 8 I am concerned about the phrasing:</p> <p>The sections of the frame with a narrower right-of-way may require using the width of the channel or external land acquisition for projects of larger impact.</p> <p>What does "external land acquisition" really mean?</p>	<p>The County appreciates Robert Fox for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions' Requirements). The <i>2020 LA River Master Plan</i> does not include any condemnation or eminent domain. As this is a program-level EIR, the analysis</p>

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		<p>Is LA County talking about eminent domain and purchasing people's homes to widen access to the river?</p>	<p>presented is conservative in nature. In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River.</p> <p>Please refer to Section 3.13.3.3, <i>Population and Housing</i>, of the Draft PEIR, which states that no permanent housing will be affected or removed as a result of either construction or operation of the <i>2020 LA River Master Plan</i>. Any land acquisitions would be from the right-of-way on County-owned land.</p>
<p>I24 Brent Fischer</p>	<p>I24-1</p>	<p>There's no sense on developing any part of the river if you don't remove vagrant tent cities first.</p> <p>I live a half mile from the river and no one goes there because of the criminal element—these are not homeless, they are addicts who choose to take the supplies a gullible public gives to them, thinking they are helping get people back on their feet.</p> <p>These tent cities are not going anywhere unless the city acts. Fail to act, and the number of tents will multiply exponentially.</p>	<p>The County appreciates Brent Fischer for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-1 (Homelessness along the LA River) for additional information regarding homelessness along the LA River and efforts that will be (and are currently being) undertaken by the County and cities involving the relocation of transient populations to safer, more sanitary shelters or more permanent residences. Please also refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR, which discusses how one of the objectives of the <i>2020 LA River Master Plan</i> is to</p>

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			address potential adverse impacts on housing affordability and people experiencing homelessness.
I25 Sheryl Avery	I25-1	My name is Sheryl Avery and I live at 18109 Jaguar Court, Tarzana, CA 91335. My master bedroom and bathroom face city property, the Lindley Transfer Site, which is on the west side of Lindley Ave., about a block south of Victory Blvd. The LA River is immediately north of the Site. I am requesting that there be no changes to the area of the Site and wash, because any improvements would result in increased traffic on Lindley Ave., which is already extremely busy.	<p>The County appreciates Sheryl Avery for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements), which discuss the programmatic nature of the Draft PEIR and the fact that the Draft PEIR analyzes two Typical Projects and six kit of parts categories but does not analyze specific projects.</p> <p>The comment regarding increased traffic is acknowledged. Implementation of Mitigation Measure TRA-1b, Implement TDM Strategies and/or Enhancements to Reduce VMT, would help reduce impacts related to increased traffic by implementing a subsequent project-specific program using transportation demand management.</p>
I25 Sheryl Avery	I25-2	In addition, there would be considerably more crime, debris, and noise for me and my neighbors.	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team.</p> <p>Please refer to Chapter 1, <i>Introduction</i>, of the Draft PEIR, which states that one of the nine objectives of the <i>2020 LA River Master Plan</i> is to provide equitable, inclusive, and safe parks, open space, and trails. The <i>2020 LA River Master Plan</i> addresses safety concerns along the river, the installation of trash receptacles, the use of sound barriers to mitigate noise of freeways, and removal of hazardous debris. Additionally, please refer to Section</p>

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			<p>3.12, <i>Noise</i>, of the Draft PEIR, which discloses the potential construction- and operations-related noise impacts resulting from implementation of the <i>2020 LA River Master Plan</i> along the entire 51-mile length and proposes mitigation measures to reduce the impacts.</p>
<p>I26 Tilly Hinton</p>	<p>I26-1</p>	<p>Can you please explain the differences between commenting on the Master Plan in general and commenting on the PEIR? Who is the audience for each type of feedback? What are the consequence pathways for each? Which agencies/departments are responsible for each? What other comparisons/similarities are important for me to be aware of?</p>	<p>The County appreciates Tilly Hinton for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR). The purpose of the CEQA process is to receive comments on the Draft PEIR, not the <i>2020 LA River Master Plan</i>. The County is the lead agency for the PEIR and is responsible for addressing comments for the PEIR. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the 18 total jurisdictions (i.e., the County and 17 cities) along the LA River.</p>
<p>I27 Sheryl Avery</p>	<p>I27-1</p>	<p>I’ve been on the virtual meeting, but I don’t think I’ll get a chance to speak. In addition to my comments below, I would like to see something done to reduce the flood risk from the LA River that’s just north of my house. I’ve had to buy flood insurance for the 22 years that I’ve owned this house, because when it rains, the river sometimes fills up to the sides of the embankments. I’m sure that one of these days, it will overflow to my house.</p>	<p>The County appreciates Sheryl Avery for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, which discusses flood control. The flooding and flood control-related impacts associated with implementation of the <i>2020 LA River Master Plan</i> are disclosed, and mitigation measures required to mitigate impacts to the extent feasible are described.</p>

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I28 Greg Linton	I28-1	This comment is to voice support for returning the LA River area to a natural area. Simply put, we all want more plants and nature and less concrete.	<p>The County appreciates Greg Linton for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This comment is acknowledged. Please refer to Master Response MR-5 (Naturalization of the LA River) regarding the potential for naturalization of the LA River and flood control.</p>
I29 Jessie Cowley	I29-1	My other priority is to see you take action to prevent low-income families from being displaced. Can you do something to prevent high-priced apartment buildings from going up all along the river? Can the river be made beautiful and accessible for the sake of the existing communities who live there? Don't let us be pushed out of our homes and communities by an over-abundance high-priced luxury housing, please.	<p>The County appreciates Jessie Cowley for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-6 (Gentrification and Housing Affordability) regarding gentrification. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
I30 Keshav Boddula	I30-1	<p>Great to see efforts to be more water independent, environmentally sustainable, etc. through storm water recapture, etc.</p> <p>1 - ecological understanding of carrying capacity of good people to water ratio. I heard from YouTube video that LA is not just AT it's maximum hydrologic carrying capacity, but 1000% beyond!</p> <p>2 - From E.S. 1.1.1 at the end regarding channelization, could include how the initial developments/properties</p>	<p>The County appreciates Keshav Boddula for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or</p>

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		<p>were IN THE FLOODPLAIN to begin with, which is of course unfortunate and short-sighted. I'm not saying we can or should always predict Mother Nature's potentially undesirable actions on us, but when we CAN, like with better knowledge, right?</p> <p>Also, there's such an emphasis on indigenous voices being heard, which could effectively exclude technically/racially non- "indigenous", yet good, voices from being heard even though the latter voices are sometimes aligned with good (like environmentally sustainable) actions, which our collective consciousness tends to equate as always with "indigenous".</p> <p>The FOLR website is a great resource, to learn more.</p> <p>Good luck, in your challenging, often thankless position I imagine. Thank you.</p>	<p>accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>I31 Ryan Conroy</p>	<p>I31-1</p>	<p>My name is Ryan Conroy, I am a resident of Los Angeles, near the Glendale Narrows portion of the Los Angeles River. I write in enthusiastic support of this Master Plan.</p> <p>In my neighborhood, small interventions like benches, bike paths, and pedestrian bridges have allowed residents to appreciate the unique ecology of the Los Angeles River. Sunnynook Park, for example, is not a terribly large or expensive endeavor, but a treasured community resource nonetheless.</p> <p>I am pleased to see that this proposal similarly celebrates the river for what it is today, and moves forward without attempting to undo the past. The platform parks, extending the usable recreation space over the channel itself, are an intelligent and efficient mode of natural engagement.</p>	<p>The County appreciates Ryan Conroy for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This comment is acknowledged.</p>

Commenter	Comment#	Comment	Response
		<p>I applaud the restraint this team has shown in its design proposals, and the continual focus on the South LA community themselves. I look forward to the adoption of this Master Plan and hope for its widespread implementation.</p>	
<p>I32 Sallie Neubauer</p>	<p>I32-1</p>	<p>I want to complain about the Public Meeting held last night. I can't believe that many people who signed up did not show up to participate. I was among the many who the moderator said was not there, when I WAS!! I signed in as instructed, Neither my husband or I could even FIND a mute button. I could not get the attention of the moderator to let her know I was there and wanted to speak. I could not Raise My Hand! There were countless names that were dismissed as I was- some Public Meeting It was not a matter of not having been to zoom meetings before- I have participated in many.</p>	<p>The County appreciates Sallie Neubauer for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan Project</i>.</p> <p>This comment is acknowledged and appears to be regarding the commenter's experience during the public meeting for the Draft PEIR held virtually on March 3, 2021. While the commenter had issues providing comments during the public meeting on March 3, 2021, the County provided notice about how to submit written comments, which were accepted from February 1, 2021, to May 13, 2021, for a total of 101 days. Additionally, participants during the public meeting on March 3, 2021, were able to submit comments in a chat box to the moderator during the meeting if they had technical issues, and extra time was available for additional participants to provide an oral comment. At the end of the presentation, slides with information on how to provide written comment was also provided. The PowerPoint slides and a recording of the meeting were available on the Draft PEIR's website at pw.lacounty.gov/go/larmpceqa. Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for more information on the extensive public outreach program that was completed for the Draft PEIR.</p>
<p>I33 Richard Niederberg</p>	<p>I33-1</p>	<p>The most important element of the plan should be: unfettered access to all persons, whether they are pedestrians, cyclists or the unsheltered, but no portable housing or commercial enterprises allowed of</p>	<p>The County appreciates Richard Niederberg for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of</p>

Commenter	Comment#	Comment	Response
		any kind that could block the paths. Safe access for unpowered watercraft is also desirable as long as LA Public Works receives a fee and develops rules similar to the watercraft concession in Echo Park' lake and every vessel has a CA DMV-issued 'CF' number. All structural work should be performed with the advice and consent of the US Army Corps of Engineers.	<p>Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Notwithstanding, it should be noted that Objectives 2, 3, 4, and 7 provide equitable, inclusive, and safe parks, open space, and trails; support healthy connected ecosystems; enhance opportunities for equitable access to the river corridor; and foster opportunities for continued community engagement, development, and education.</p>
I34 John Samore, Jr.	I34-1	Yesterday evening I spent two hours listening to the presentation and the comments. I found it most interesting. I raised my hand but was never selected. Therefore, near the end of the two hours I provided my comments via the "Chat". We were told by moderator that they would not be accepted. However, I left them anyway. She was super. I am glad we are being given this opportunity to provide our written comments.	<p>The County appreciates John Samore, Jr. for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This comment is acknowledged.</p>
I35 Patricia Frias	I35-1	Good afternoon. My name is Patricia Frias (pxf4986@lausd.net) and I am one of the homeowners that will be dramatically impacted by the expansion of the 5 FWY through the LA River Master Plan; my home is on the map to be demolished (8703 Tweedy Lane, Downey, CA 90240. I am not in favor of this plan for a majority of reasons, the most important one being that my house, that we have worked so hard to get, will be demolished!!!	<p>The County appreciates Patricia Frias for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue from a separate project that involves improvements to Interstate (I-) 5, which are not part of this proposed Project and are not analyzed in the Draft PEIR. This comment does not identify specific significant</p>

Commenter	Comment#	Comment	Response
			<p>environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>I35 Patricia Frias</p>	<p>I35-2</p>	<p>Secondly, I just previewed the "Environmental Report" and have many questions about it: 1) Why hasn't this report been sent out, emailed, and mailed to the homeowners that will be directly impacted by the expansion of the FWY 5 and FWY 605? Being on a website is NOT enough! This is not being transparent with the information and not equitable to the people that do not have Internet Access, technology skills, or do not speak English! How is this committee supposed to receive feedback from the people that this LA River Master Plan will be affected the most if information is not widely dispersed? But I guess that is the objective... to keep it in the down low so that people will not know about this. Do you believe that these residents are ignorant? Low to no education citizens? I will tell you right now, we are not! We are college level individuals who will fight for our home, our environment, and the air that we and our family's breath!</p>	<p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for a discussion regarding the extensive public outreach program that was conducted during development of the <i>2020 LA River Master Plan</i>. This comment appears to be discussing a separate project or projects that involve improvements to I-5 and I-605, which are not part of this proposed Project and are not analyzed in the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>I35 Patricia Frias</p>	<p>I35-3</p>	<p>Thirdly, the Environmental Report is incomplete! Where are the percentages of the scientists stating how much more air pollution will be added to the air with the expansion of the freeway? Where is the amount of greenhouse gas emissions that will be added to our community? The extra noise! And of course the most important topic of this report, "Land Use" and how many homes, including mine, will be destroyed in order to fulfill your objectives. Where was the information about all of this?</p>	<p>The proposed Project does not include widening the freeway. Additionally, please refer to Sections 3.2, <i>Air Quality</i>; 3.7, <i>Greenhouse Gas</i>; and 3.10, <i>Land Use</i>, in the Draft PEIR for further impact analysis. The Draft PEIR does not include project-specific or site-specific analysis. Subsequent projects and design details are not proposed at this time.</p>

Commenter	Comment#	Comment	Response
I35 Patricia Frias	I35-4	<p>Fourthly, the zoom ID and password were posted but not the day and time of the meeting? Was that just an oversight? C'mon! I'm sure that was not posted so that the community is not aware of this meeting. So when is the meeting? What time is the meeting? Why does Slide #6 say: "Involved Public Participation in the Planning Process" when you guys are not communicating to the community about these meetings? I would like responses to all of my questions, especially about the "land use" required to accomplish these objectives. People are angry, they are upset, and they confused because they are ill-informed! And I don't blame them! Do your job... have a conscience, and inform the community that will be directly impacted by this Master Plan!</p>	<p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for a discussion regarding public outreach conducted during the development of the <i>2020 LA River Master Plan</i>. Please refer to Section 3.10, <i>Land Use and Planning</i>, in the Draft PEIR for information and analysis regarding land use.</p>
I36 Eloise Hess	I36-1	<p>My name's Eloise Hess and I am a tenant in Atwater Village and a member of Street Watch, a volunteer organization that connects housed and unhoused neighbors. I've been doing once or twice weekly resource distribution (meals, tents, tarps, sleeping bags, hygiene kits, harm reduction kits) and community power building with my unhoused neighbors living along the river since June. I was recently made aware of the LA River Master Plan and would like to submit my comment as an advocate for the houseless community living along the LA River, in particular those living in the Atwater Village area with whom I have gotten to develop close relationships. I am concerned by some of the language of the proposal. For instance, on page 197 it states, "the provision of permanent sanitation and hygiene facilities, coupled with a centralized set of guidelines for the management and clearing of encampments based on compassionate practices, when necessary, will ensure that the river corridor is a space where all people feel safe, have access to basic needs such as restrooms, and are</p>	<p>The County appreciates Eloise Hess for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-1 (Homelessness along the LA River) for additional information regarding homelessness along the LA River and efforts that will be (and are currently being) undertaken by the County and cities involving the relocation of transient populations to safer, more sanitary shelters or more permanent residences. Please also refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR, which discusses how one of the objectives of the <i>2020 LA River Master Plan</i> is to address potential adverse impacts on housing affordability and people experiencing homelessness.</p>

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		<p>treated with dignity." While permanent sanitation and hygiene facilities, if made accessible to the houseless, could benefit the houseless, across other city projects, such facilities have become sites of excessive policing and overall neglect. More concerningly, clearing encampments cannot be a compassionate practice. The shelter that is offered when an encampment is "cleared" is often overcrowded, unsafe, unsanitary, unsupportive, and riddled with punitive practices. Many who have been unhoused for a long time know this through experience and therefore do not accept such inadequate shelter when offered. So, clearing encampments typically leads to the loss of belongings (often irreplaceable belongings), the loss of community, separation from resources, and ultimately displacement to another location where they face being displaced again. How can clearing encampments be a compassionate practice? Moreover, the Gathering Pavillions on Los Feliz Blvd would necessitate "clearing" encampments, as at least 4 houseless folks currently live on the proposed sites. While some of the resources proposed, like restrooms, waste receptacles, water fountains, and charging stations have the potential to make the lives of the houseless significantly easier, the city should not assume what might benefit the houseless, they should ask them what resources they could benefit from. That is if anyone remains after this proposed "clearing". I would like the following questions to be addressed:1. What does it mean to clear encampments based on compassionate practices?2. What kind of shelter would be offered to a "cleared" community? By whom? What would be the consequences if someone does not accept the shelter offered?3. What is your plan to seek public comment from the houseless community that would be affected? How will you implement their ideas and concerns? Will</p>	

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		you work with any partner organizations to assist in this outreach?	
I37 Lorna Paisley	I37-1	I would like to voice support for the people who want gardens and plants and all things green along the river. I have been an environmentalist for years and know the importance of greenery and how it helps the land, air, and soil. The plants should be native so we do not later have invasive species problems. There are plants that take contaminants out of the soil like sunflowers that can be grown not only to clean soil but feed and help birds and bees, and butterflies. The earth is in serious trouble and the LA County public works needs to do everything it can to help clean up and save the earth. I heard one caller speak about all the garbage going down the river and ending up in the ocean. This is a problem in the whole city and we need a new agency to catch those who litter/polluters and then fine them or better yet make them pick up litter. I have talked to police about this and they claim to be too busy. I do not believe that but arguing probably would get any of us no where. So make a new agency. I hear the fines for not obeying this ordinance are large. The fines could pay for the agency possible. Let's make LA County better. I came here from the Midwest 8 years ago and was amazed at the lack of care for the environment and all the waste of water.	<p>The County appreciates Lorna Paisley for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
I38 Tilly Hinton	I38-1	1.The hyperlinks don't work for me in the FAQ document: https://pw.lacounty.gov/swq/peir/doc/Updated-LARMP-PEIR-FAQs-en.pdf - could you send a version that has live links?	<p>The County appreciates Tilly Hinton for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>An email was sent from the <i>2020 LA River Master Plan</i> CEQA Team on March 11, 2021, with the updated FAQs</p>

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			<p>with live links and noting an update to the website was made.</p> <p>The email also noted that all comments submitted for the Draft PEIR whether in a letter or email, or during the public meeting on March 3, 2021, are weighted equally and comments germane to the environmental process will receive a formal response in the Final PEIR. Any comments submitted for the Draft PEIR that are pertinent to the <i>2020 LA River Master Plan</i> will be shared with the <i>2020 LA River Master Plan</i> team at the end of the public review process.</p>
I38 Tilly Hinton	I38-2	2.What is the relationship between the Mater Plan and ARBOR/Alt 20? Is ARBOR still happening? If so, is it separate from the Plan, or do the few mentions of ARBOR initiatives in the plan mean that those elements are all that will remain?	<p>The <i>2020 LA River Master Plan</i> builds on this history of planning and includes over two decades of planning and implementation efforts for the LA River, including efforts by the County, the City of Los Angeles, the LA River Ecosystem Restoration Feasibility Study (also known as the ARBOR Study, 2015), the Lower LA River Working Group (2018), and the Upper LA River and Tributaries Working Group (2019). The research and project database that form the foundation for this plan cover over 140 planning efforts along the LA River channel, across the LA River watershed, and throughout the region.</p> <p>The LA River Ecosystem Restoration Feasibility Study (also known as the ARBOR Study, 2015) was an effort by the City of Los Angeles, in conjunction with the U.S. Army Corps of Engineers, and is a separate plan from the <i>2020 LA River Master Plan</i>.</p>
I38 Tilly Hinton	I38-3	4.What is the connection between Master Planning and the FEMA re-mapping of Atwater Village and surrounds flood risk that was being discussed pre-pandemic?	<p>The <i>2020 LA River Master Plan</i> is intended to guide all County departments in decision making for LA River projects and facilities owned, operated, funded, permitted, and/or maintained by the County. The Federal Emergency Management Agency maintains and updates flood maps, and is separate from the County.</p>

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I38 Tilly Hinton	I38-4	<p>5.What procedural steps are followed for comments sent to the PEIR and the Master Plan? Does each written comment trigger a response from the County? Is this the case for both PEIR and the plan in general? Where are comments collated and are they public eventually? Is there any difference in the treatment by the County of Plan comments made via the website form, as compared to by email or letter or at one of the public meetings? 6.What happens if people submit the same comments to both comment processes (ie. or both the PEIR and the Plan itself)? 7.It seems unusual to have triggered the CEQA process when the Master Plan is still in draft form. Is it usual to run both in parallel, and what happens if community input prompts an aspect of the Master Plan being dramatically reshaped? Or is this parallel processing mean that there will be no major changes made to the Draft Plan? Are there examples of other County planning documents going through CEQA whilst still in draft form? 8.And, repeating my question from March 3: Can you please explain the differences between commenting on the Master Plan in general and commenting on the PEIR? Who is the audience for each type of feedback? What are the consequence pathways for each? Which agencies/departments are responsible for each? What other comparisons/similarities are important for me to be aware of?</p>	<p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR). Each comment addressing significant environmental issues in the Draft PEIR requires a response from the County. These comments will be included in the Final PEIR. The CEQA analysis is based on the proposed project description. The CEQA process is used to help inform the <i>2020 LA River Master Plan</i> and it allows opportunity for potential project changes to avoid significant environmental impacts. The PEIR and comments on the Draft PEIR inform the decisionmakers for the <i>2020 LA River Master Plan</i> and may lead to changes in that plan.</p> <p>The difference between commenting on the <i>2020 LA River Master Plan</i> and the Draft PEIR is that comments on the <i>2020 LA River Master Plan</i> are directed at the plan itself and comments on the Draft PEIR are directed at the environmental analysis of the proposed Project. Both comment processes are the responsibility of the proposed Project’s lead agency.</p>
I39 Stephen Jones		Nothing to address	<p>The County appreciates Stephen Jones for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This comment is acknowledged.</p>

Commenter	Comment#	Comment	Response
I40 George Rubio	I40-1	I hope that Frank Gehry doesn't have anything to do with buildings on the LA River. I dislike his work intensely. Please do not take decades complete the project.	<p>The County appreciates George Rubio for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This comment is acknowledged. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
I41 Avital Oehler	I41-1	HOWEVER, In a recent zoom talk, Gehry said: "So, we thought if we can't get rid of the concrete, maybe we can cover it." But what isn't clear is why we can't get rid of the concrete. Is it possible that if we got rid of the concrete we wouldn't need to hire his firm and instead be consulting solely with ecologists, geologists and conservationists rather than architects? Also, in his plan he describes building platform parks "constructed on hulking concrete planks and enormous girders..." basically building parks and other structures on top of the river. I don't understand why we need to BUILD on top of a structure whose built-environment is THE PROBLEM! This is NOT a proper solution. It is a very expensive band-aid, at most! We need, instead, to focus on what is already there, and what has been stunted and drowned and caged by the concrete. We need to focus on the River, the water, the birds, and all of the people who live around it. We don't need massive	<p>The County appreciates Avital Oehler for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-5 (Naturalization of the LA River) for an explanation as to why the LA River cannot be fully naturalized and to Master Response MR-6 (Gentrification and Housing Affordability) for information regarding the issue of gentrification. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further</p>

Commenter	Comment#	Comment	Response
		platform parks and cultural centers that will only serve as the first signifier of gentrification that is sure to come from real estate opportunists. If we work to re-wild the river in parts that need it, and keep it wild in parts that already are, we are ensuring a future where the ecology of the wildlife and surrounding communities is the focus.	response is necessary. No changes to the Draft PEIR are needed.
I42 Glenn Claycomb	I42-1	It appears that flood risk mapping has not been performed. The master plan and EIR cannot be considered complete until it has.	<p>The County appreciates Glenn Claycomb for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>The first objective of the <i>2020 LA River Master Plan</i> is to “Reduce flood risk and improve resiliency.” Please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, which addresses flood risk at a programmatic level. Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements), which discuss the programmatic nature of the Draft PEIR and the fact that the Draft PEIR analyzes two Typical Projects and six kit of parts categories but does not analyze specific projects. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River.</p>
I42 Glenn Claycomb	I42-2	It appears that serious consideration was not given to restoration of the floodplains through permeable surfaces, vegetation, and animal habitat.	Please refer to Master Response MR-5 (Naturalization of the LA River) for an explanation as to why the LA River cannot be fully naturalized due to flood-control considerations.

Commenter	Comment#	Comment	Response
I43 Schuyler Johnson	I43-1	<p>What I have seen with ALL projects around Los Angeles built to improve the lives of Angelinos and visitors is that they quickly become overrun by "the homeless". I live around the corner from the LA river bike path in Reseda. It is full of trash, broken glass, drug deals, and homeless people. I am a fit man and I feel nervous about being on the bike path because of the homeless. It's not surprising how few people in this densely populated area actually use this resource because of this. I would never allow any children or women in my family to traverse the area unaccompanied, even in the middle of the day. Venice beach is another perfect example of taxpayer money being spent on projects that are then taken over by the homeless. My friends and I used to go there regularly... now, never. It is just not enjoyable to deal with encampments, their garbage and other issues when I want to take my family or friends out for recreation. The LA River project has the potential to become the world's largest homeless encampment. It just doesn't make any sense to start a project of this type until we have figured out some way to deal with the homeless issue, which, right now, is just getting worse and worse despite massive amounts of money being thrown at it.</p>	<p>The County appreciates Schuyler Johnson for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-1 (Homelessness along the LA River) for additional information regarding homelessness along the LA River and efforts that will be (and are currently being) undertaken by the County and cities involving the relocation of transient populations to safer, more sanitary shelters or more permanent residences. Please also refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR, which discusses how one of the objectives of the <i>2020 LA River Master Plan</i> is to address potential adverse impacts on housing affordability and people experiencing homelessness.</p>
I44 Monica Wyatt	I44-1	<p>Thank you for the opportunity to comment on this LA River Master Plan. I would like to see the river left alone. It may be a concrete channel for much of its length, but it nourishes a whole lot of birds in the winter months. I birdwatch along the river from the 134 down to Fletcher; this has become a vibrant riparian area even if there is a lot of trash. I also birdwatch from Willow to 7th. The river is rather drab here, but there are lots and lots of birds. I'm not against park areas in the stretches where the birds don't congregate, but I don't want to see Frank Gehry anywhere near any LA River plan. I don't believe he has</p>	<p>The County appreciates Monica Wyatt for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further</p>

Commenter	Comment#	Comment	Response
		<p>any understanding of Nature or regular folk. And I don't want to hear anything about mitigation. Nature is way too complicated to mitigate. I challenge you to name one place that has been mitigated successfully. Take a look at Malibu Lagoon now; none of those so-called improvements are attractive now. And I don't think it's even been ten years since it was "restored." Estuaries are sort of mucky places; their job is to sustain wildlife not humans.</p>	<p>response is necessary. No changes to the Draft PEIR are needed.</p> <p>Regardless, it should be noted that Objectives 3 and 4 of the <i>2020 LA River Master Plan</i> are "Support healthy connected ecosystems" and "Enhance opportunities for equitable access to the river corridor," respectively.</p>
I45 Elizabeth L	I45-1	<p>Is there a way to find out if my home is in the area for the project? I've checked the map and it's not highlighted in color but is close to the small and big pink crosses.</p>	<p>The County appreciates Elizabeth L for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis.</p>
I46 Shirley Otis-Green	I46-1	<p>Attention to safely connecting the various existing bike paths and equestrian trails to create options for longer routes would seem especially important to encourage people to exercise and invite more usage. And ensuring equitable access with pocket parks and areas for families to gather under trees (with bike racks and perhaps areas to secure horses separately) with educational info-graphic signage that helps people understand the various flora and fauna of the area would be an added bonus. Creating these periodic oases within our city along the river would add much needed green-space to our region.</p>	<p>The County appreciates Shirley Otis-Green for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. In accordance with State CEQA Guidelines Section 15204(a), lead agencies need only respond to significant environmental issues when responding to comments and make a good-faith effort at full disclosure in the EIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Commenter	Comment#	Comment	Response
I47 Ashley Kramer	I47-1	<p>I am concerned with the claim that the proposed Project would have a less than significant impact on displacing a substantial number of existing people or housing. Impact 3.13(b): Would the proposed Project displace a substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere?</p> <p>Construction and Operation Typical Projects: Less than significant KOP Categories 1–6: Less than significant Overall 2020 LA River Master Plan Implementation: None required. Construction and Operation Typical Projects: Less than significant KOP Categories 1– 6: Less than significant Overall 2020 LA River Master Plan Implementation: Construction and Operation Typical Projects: Less than significant KOP Categories 1–6: Less than significant Overall 2020 LA River Master Plan Implementation: less than significant (Executive Summary, p 119) Currently, a substantial population of people live on the river, in the river, or adjacent to the river. It is simply incorrect to say that construction of new river projects would have less than a significant impact on the population already living there. I think it's crucial that part of the mitigation of these impacts be that housing is found and provided for the people displaced by the project, or that the project design include features that would allow the people already living in place to continue to live there with access to greater resources: water, restrooms, county-provided services. It is not enough to say "services were offered" to someone experiencing homelessness and then remove them from a project location; which is what we've seen happen over and over again. Given that you have noted that for objective 6 of the 2020 LA River Master Plan—Address potential adverse impacts on housing affordability and people experiencing homelessness—you are using a more capacious</p>	<p>The County appreciates Ashley Kramer for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Section 3.10, <i>Land Use and Planning</i>, of the Draft PEIR, which addresses displacements and indicates the <i>2020 LA River Master Plan</i> is consistent with policies concerning displacements. Please refer to Master Response MR-1 (Homelessness along the LA River) for information on homelessness along the LA River. Please also refer to Section 3.13, <i>Population and Housing</i>, of the Draft PEIR, which states that the issue of homeless encampments in LA River areas is complex and involves the coordination of multiple local agencies, and existing programs are implemented to relocate transient populations to safer, more sanitary shelters. The County provides outreach, programs, and resources to reduce homelessness by providing an array of housing options and programs based on community needs. The general plans of the 17 cities along the LA River also have various goals, policies, and programs to support housing and shelter needs, which are discussed under Section 3.13.2.2, <i>Regulatory</i>, of the Draft PEIR, and no additional mitigation measures are necessary. As part of the <i>2020 LA River Master Plan</i>, Common Elements Typical Projects may include drinking foundations, restrooms, or benches incorporated as part of the project.</p>

Commenter	Comment#	Comment	Response
		<p>definition of "impacts" ("the use of "impacts" in objective 6 is distinct from the use of "impacts" under CEQA where, per State CEQA Guidelines Section 15358 (b), impacts analyzed under CEQA must be related to a physical change in the environment.") I think it's important to consider the extent to which any project will impact the people who currently live on the site and offer humane mitigation techniques.</p>	
<p>I48 Jon Gerfen</p>	<p>I48-1</p>	<p>Your plan makes no consideration for the safety of our neighborhood (Corbin Ave to Tampa Ave). Now the county wants bring more homeless, more trash, and more crime into our neighborhood by connecting our neighborhood with known homeless population in the Sepulveda Basin.</p>	<p>The County appreciates Jon Gerfen for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Please refer to Master Response MR-1 (Homelessness along the LA River) for additional information regarding homelessness along the LA River and efforts that will be (and are currently being) undertaken by the County and cities involving the relocation of transient populations to safer, more sanitary shelters or more permanent residences. Please also refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR, which discusses how one of the objectives of the <i>2020 LA River Master Plan</i> is to address potential adverse impacts on housing affordability and people experiencing homelessness.</p>

Commenter	Comment#	Comment	Response
I49 Antonio Juan Gomez	I104-1	This comment will be included in an appendix.	<p>The County appreciates Antonio Juan Gomez for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This comment is acknowledged. This comment does not raise specific significant environmental issues for purposes of drafting a response or address the adequacy or accuracy of the Draft PEIR. No response is necessary.</p>
I50 Veronica Ann Villegas	I50-1	<p>Environmental Impact: As it stands many environmental impacts have been alluded to in the Environmental Impact Report, however it is still unknown the true effects of some of the proposed structures—such as platform parks. I cannot find any measurable research on platform parks, however the Environmental Impact Report named possible impacts on fish species and species who live in the river. This type of park will cut off the river from what little natural resources it has, particularly the sun. As an alternative, brown fields along the river can be transformed into parks and be a more environmentally and economically feasible solution.</p>	<p>The County appreciates Veronica Ann Villegas for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis.</p> <p>Please refer to Chapter 5, <i>Alternatives</i>, of the Draft PEIR, which provides discussion and analysis of project alternatives considered. As analyzed in Chapter 5, under the Channel Avoidance Alternative, no channel modification associated with the <i>2020 LA River Master Plan</i> would occur. Alternative B would include implementation of only five of the six kit of parts (KOP) categories in the <i>2020 LA River Master Plan</i>. These include KOP Category 1: Trails and Access Gateways; KOP Category 3: Crossings and Platforms; KOP Category 4: Diversions; KOP Category 5: Floodplain Reclamation; and KOP Category 6: Off-Channel Land Assets. These would be implemented only between top of levee and up to the boundary of the 1-mile study area on each side of the LA River, which could include transforming brown fields along the river into parks. However, Alternative B would</p>

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			not achieve the same level of project objectives, including reducing flood risk and improving resiliency, and improving local water supply reliability.
150 Veronica Ann Villegas	I50-2	Another solution to improving the environmental health of the river is to embrace a naturalized river. Bypass tunnels would help alleviate flooding, if that's the main deterrent to naturalization. We should not ignore the robust community outreach among plans before this one that demonstrate the feasibility and popularity of concrete removal, channel widening, and habitat restoration to foster a resilient Los Angeles. We can naturalize the LA River and mitigate flood risk. This Plan should seriously embrace these options instead of dismissing them.	Please refer to Master Response MR-5 (Naturalization of the LA River) for an explanation as to why the LA River cannot be fully naturalized due to flood-control considerations. Please also refer to Chapter 2, <i>Project Description</i> , of the Draft PEIR, which discusses how a naturalized river alternative was considered but removed from further consideration.
150 Veronica Ann Villegas	I50-3	The city is two years behind its proposed pollution goal. This is a prime opportunity to create projects to reach those goals, such as creating: wetlands, rain gardens and ponds. Measure W can fund these projects.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
150 Veronica Ann Villegas	I150-4	Social Impact: With creating attractive green space there increases the potential for gentrification. River-adjacent communities have long demanded community-driven restoration and park access to the LA River. Implementing major park construction in low and extremely low-income communities poses a threat that current residents will be displaced by new projects. The County must invest heavily in anti-displacement programs and policies, AND implement them before any project construction is underway.	Please refer to Master Response MR-6 (Gentrification and Housing Affordability) regarding gentrification. Multiple Housing and Land Use Elements for jurisdictions throughout the proposed project area include objectives and goals to minimize effects of gentrification. Please refer to Section 3.13, <i>Population and Housing</i> , of the Draft PEIR for a detailed description of objectives and goals by jurisdiction. The overall <i>2020 LA River Master Plan</i> implementation is not expected to displace any existing permanent housing but could affect individuals or families experiencing homelessness.

Commenter	Comment#	Comment	Response
I50 Veronica Ann Villegas	I150-5	Community Participation: I hope to see that the People drive this plan. Given the lack of clarity and prioritization in this plan, I hope the priorities listed above are seriously considered and a robust implementation plan is outlined that includes community involvement as projects roll out.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
I51 Albert Alfasso	I151-1	As a frequent bike rider, Safety and Security should be a priority. Increasingly, the bike paths are used as open space for the un-housed to live on. Those of us who want to use the paths for their intended purpose, feel unsafe and choose to go elsewhere, spending our dollars elsewhere.	<p>The County appreciates Albert Alfasso for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
I52 Theresa Hew	I152-1	The one I am most concerned about is the impact to the city residents as more wildlife habitat is expanded. As you probably know, the urban coyote is a big and growing problem for pet and public safety. Thousands of pets are killed each year in L.A. County due to lack of wildlife management. Bites on humans are on the rise also. I would like to see the Department of Fish and Wildlife weigh in on this PEIR more heavily. We need the wildlife biologists to tell us the whole picture of how habitat disruption will affect those in the cities that border the river and beyond. Has anyone on the river project considered this and what are their thoughts?	<p>The County appreciates Theresa Hew for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which details Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; and BIO-19, Implement Habitat Reclamation Efforts. Implementation of the proposed Project will involve</p>

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			habitat assessment and reclamation efforts at the project level.
I53 Rosemary Leibowitz	I153-1	I am very disappointed that the plan gives no opportunity to remove some concrete and allow water to soak into the soil. I have read the reasons but still feel that there could be more soft bottom. WE NEED THE WATER.	<p>The County appreciates Rosemary Leibowitz for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer Master Response MR-5 (Naturalization of the LA River) regarding naturalization of the LA River. Please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, where the discussion under <i>Project Study Area Setting</i> describes where there is earthen bottom or groundwater recharge basins. Furthermore, although the comment about removing concrete is acknowledged, implementation of the <i>2020 LA River Master Plan</i> would result in a net increase in groundwater recharge. Please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR for a more detailed description. The proposed Project will not increase demand for additional groundwater or decrease the size of groundwater recharge areas. Implementation of the proposed Project will include recommended stormwater best management practices (BMPs) and landscaped areas that promote infiltration. Common Elements Typical Projects would be designed to direct runoff toward landscaping, stormwater BMP areas, or other water collection and treatment areas, which will allow that stormwater to infiltrate and recharge groundwater basins.</p>
I54 Elizabeth L	I154-1	What is a PEIR study area and analysis mean? I've reached out to the below email address and they are not responding. Is there another party I should reach out to?	The County appreciates Elizabeth L for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.

Commenter	Comment#	Comment	Response
			<p>The PEIR study area is the 2-mile-wide corridor along the 51-mile-long river and includes the outer limits of the areas that will be used for project construction and a buffer. The buffer distance differs depending on what is being analyzed.</p>
<p>I55 Leslie Klein</p>	<p>I155-1</p>	<p>we need a plan for the LA river, that allows for more wilding, and air and water quality protections. doing so will support more birds, trees and protect monarchs and wildlife and not to pollute our waters.</p>	<p>The County appreciates Leslie Klein for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>However, please refer to Objective 3: Support Healthy, Connected Ecosystems of the <i>2020 LA River Master Plan</i>.</p>
<p>I56 Merryl Edelstein</p>	<p>I156-1</p>	<p>As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the fall migration.</p> <ul style="list-style-type: none"> · Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern such as Yellowbreasted Chat and Blue Grosbeak. 	<p>The County appreciates Merryl Edelstein for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat.</p>

Commenter	Comment#	Comment	Response
		<p>· Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway.</p> <p>· Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak.</p> <p>· South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration.</p> <p>· Long Beach; section from the pipebridge south of Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration. In addition there are shorebird species which breed in this stretch, notably Black-necked Stilt and American Avocet.</p> <p>I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species. In addition, there is an annual Shorebird Survey conducted by Point Blue that includes the Lower Los Angeles River.</p>	<p>Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>
157 Ron Cyger	1157-1	<p>As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird</p>	<p>The County appreciates Ron Cyger for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p>

Commenter	Comment#	Comment	Response
		<p>species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the fall migration.</p> <p>= Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern such as Yellowbreasted Chat and Blue Grosbeak.</p> <p>= Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway.</p> <p>= Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak.</p> <p>= South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration.</p> <p>= Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.</p> <p>I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species.</p>	<p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>

Commenter	Comment#	Comment	Response
<p>I58 Andrew Birch</p>	<p>I158-1</p>	<p>As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the fall migration.</p> <ul style="list-style-type: none"> · Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern such as Yellowbreasted Chat and Blue Grosbeak. · Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway. · Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. · Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration. <p>I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species</p>	<p>The County appreciates Andrew Birch for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>

Commenter	Comment#	Comment	Response
		<p>presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species.</p>	
<p>I59 Ari Martinez</p>	<p>I159-1</p>	<p>As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the fall migration.</p> <ul style="list-style-type: none"> · Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern such as Yellowbreasted Chat and Blue Grosbeak. · Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway. · Frogtown, adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. · Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration. <p>I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to</p>	<p>The County appreciates Ari Martinez for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>

Commenter	Comment#	Comment	Response
		<p>consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species.</p>	
<p>I60 Sara Boscoe</p>	<p>I160-1</p>	<p>As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the fall migration.</p> <ul style="list-style-type: none"> · Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell's Vireo and other breeding Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway. · Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell's Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. · Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations 	<p>The County appreciates Sara Boscoe for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>

Commenter	Comment#	Comment	Response
		<p>(on a global scale) during fall migration. This is of a particular interest to me as I live in the South bay. The species diversity here is amazing year round and a great birding spot in Los Angeles. I look forward to this being a continuing place in LA where so much species diversity can be found.</p> <p>I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species.</p>	
I61 Nancy Salem	I61-1	<p>As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the Fall migration.</p> <ul style="list-style-type: none"> · Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway. · Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo 	<p>The County appreciates Nancy Salem for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid</p>

Commenter	Comment#	Comment	Response
		<p>and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak.</p> <ul style="list-style-type: none"> · South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. · Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration. <p>I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species.</p>	<p>Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>
I62 Amy Wolfbery	I62-1	<p>As a lifelong Angeleno, I truly love and believe in our wonderful, diverse, unique city and the incredible bounty of wildlife that resides therein. To that end, I strongly urge you to please ensure that the Draft PEIR prioritizes a healthier, more resilient & brighter River future. It is thrilling to know that we are so close to having the LA River come back to vibrant life, enhancing communities and renewing civic pride in our great city.</p>	<p>The County appreciates Amy Wolfbery for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This comment is acknowledged.</p>
I63 Erica Silverman	I63-1	<p>As part of the community of local Los Angeles birders, I am writing to urge you to pay special attention to certain specific areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. At a time when we face the destruction of urban ecosystems worldwide and the continued extinction of essential species, we all must take responsibility to protect valuable habitat for federally protected breeding bird species, Bird Species of Special Concern, and significant numbers, on a global</p>	<p>The County appreciates Erica Silverman for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level</p>

Commenter	Comment#	Comment	Response
		<p>scale, of migratory shorebirds during the fall migration:</p> <ul style="list-style-type: none"> · Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern such as Yellowbreasted Chat and Blue Grosbeak. · Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway. · Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellowbreasted Chat and Blue Grosbeak. · South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. · Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration. <p>As we restore this valuable green and open space for humans, we must be cognizant of the importance of species survival and the role our cities are obligated to play in this. I hope you will consult the community-generated datasets of species presence, available via eBird and elsewhere, to understand the presence and patterns of use by sensitive and protected species.</p>	<p>approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>

Commenter	Comment#	Comment	Response
I64 Richard Barth	I64-1	<p>As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern and significant numbers (on a global scale) of migratory shorebirds during the fall migration.</p> <ol style="list-style-type: none"> 1. Atlantic Ave in Vernon/Bell to Southern Ave in South Gate. The extensive concrete section here provides important shorebird habitat during fall migration. 2. Rosecrans Ave in Paramount to Willow St in Long Beach. Also concrete riverbed. Host to significant waves of shorebirds moving through during fall migration. <p>I ask for the highest scrutiny of the impact to biological resources in these areas of the river, and consideration of the possible impact/disturbances of your project on the entire Lower LA River Important Bird Area. You can reference bird data sets on websites like eBird to understand the presence and patterns of use by bird species on the river. Stopping-off/feeding/resting areas are critical for global shorebirds on their long journeys, and such areas are in short supply in the Los Angeles area.</p>	<p>The County appreciates Richard Barth for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>
I65 Gregory Hachigian	I65-1	<p>As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the fall migration.</p>	<p>The County appreciates Gregory Hachigian for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level</p>

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		<ul style="list-style-type: none"> · Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern such as Yellowbreasted Chat and Blue Grosbeak. · Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway. · Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. · Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration. <p>I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species.</p>	<p>approvals are not part of the <i>2020 LA Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>

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I65 Gregory Hachigian	I65-2	Also, so important, is water capture and storage.	Please refer to Section 3.9, <i>Hydrology and Water Quality</i> , of the Draft PEIR, in which the discussion under <i>Project Study Area Setting</i> describes where there is earthen bottom or groundwater recharge basins. The proposed Project will not increase demand for additional groundwater or decrease the size of groundwater recharge areas. Implementation of the proposed Project will include recommended stormwater best management practices (BMPs) and landscaped areas that promote infiltration. Common Elements Typical Projects would be designed to direct runoff toward landscaping, stormwater BMP areas, or other water collection and treatment areas, which will allow that stormwater to infiltrate and recharge groundwater basins.
I66 Susan Gilliland	I66-1	<p>As a local Los Angeles birder, I would like bring your attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the fall migration. I am asking for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species.</p> <ul style="list-style-type: none"> · Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern such as Yellowbreasted Chat and Blue Grosbeak. · Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts 	<p>The County appreciates Susan Gilliland for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies,</p>

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		<p>significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway.</p> <ul style="list-style-type: none"> · Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. · Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration. 	<p>and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>
167 Frank Gilliland	167-1	<p>I am writing to ask you consideration of Lower Los Angeles River Important Bird Area in the master plan. I would like bring your attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the fall migration. I am asking for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species.</p> <ul style="list-style-type: none"> · Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other 	<p>The County appreciates Frank Gilliland for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or</p>

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		<p>breeding Bird Species of Special Concern such as Yellowbreasted Chat and Blue Grosbeak.</p> <ul style="list-style-type: none"> · Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway. · Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. · Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration. 	<p>State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>
168 Bella Liu	168-1	<p>Birds bring us more than joy and tourism money. They clean the carrion in our environment, pollinate our flowers, spread our seeds, eat our pests, and so much more. By taking care of birds, we care for our environment. Without a healthy ecosystem, we would need to purify our water and air by ourselves. We would need to grow food without their mutualistic symbionts, without the benefit of pollinators or natural pest control. Conservation isn't just sentimentality and grand notions of harmony with other species.</p> <p>As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant</p>	<p>The County appreciates Bella Liu for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat.</p>

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		<p>numbers, on a global scale, of migratory shorebirds during the fall migration.</p> <ul style="list-style-type: none"> · Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway. · Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. · Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration. <p>I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species.</p>	<p>Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>

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I69 Lisa Chang and Donald White	I69-1	<p>My wife and I are LA County residents and homeowners, and we are also avid birders in the LA area. The stretches of the LA River that are open to the public and are relatively accessible, such as in Sepulveda Basin in Van Nuys and heading east thru Sherman Oaks, and along the east & north edge of Griffith Park and thru the Frogtown area, and then especially the long section along the LA River bike path between Atlantic Ave near Slauson in Maywood down to the ocean in Long Beach, are among our favorite places to watch & study birds. These areas, and likely also the rest of the LA River that is not as easily accessible, are very important areas which provide scarce habitat for many species of breeding or migrating or over wintering birds. Such habitat is very scarce in the LA region, and what little we have should be strongly protected. Many of these species are protected under federal and state laws, and/or are designated as “species of special concern”.</p> <p>Even many of the areas of the river that appear to be badly degraded, or simply concrete wastelands, still provide important habitat for the bird species. We have on multiple occasions seen rare and endangered species in some of the most unlikely looking areas of the river, even where the river is simply a concrete channel running thru industrial zones, and with little or no vegetation or soft dirt bottom.</p> <p>We encourage the County to protect the existing stretches of the river that are in a more or less natural condition. And in addition to improve the sections that are in a far from natural condition by adding native vegetation where appropriate, and by removing as much concrete as possible and creating a dirt bottomed river channel. The entire 50-plus mile stretch of the LA River from the San Fernando Valley down to the Pacific in Long Beach should be restored and improved to</p>	<p>The County appreciates Lisa Chang and Donald White for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>

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		<p>return it to a natural river with more extensive habitat for birds and other wildlife. We realize that this would be a major undertaking, and very costly, but it is a worthy long-range goal. In the meantime, the most important areas should be given special consideration, and should be protected from any development that would adversely affect the bird populations there. Currently the areas of the river that LA area birders are most aware of as important bird areas are:</p> <ul style="list-style-type: none"> - The LA River thru Sepulveda Basin and downstream of the dam. - The LA River along the north & east edges of Griffith Park, past Frogtown & Atwater Village and down to the Elysian Park area. - The LA River thru Vernon, Maywood, Bell and Cudahy. Even though much of this appears to be a wasteland of concrete, it still provides some needed and well-used bird habitat. - The LA River thru Long Beach, especially from around Del Amo Blvd south to PCH. 	
I70 Pollito Gnoche	I70-1	<p>As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the fall migration.</p> <ul style="list-style-type: none"> - Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. 	<p>The County appreciates Pollito Gnoche for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species,</p>

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		<ul style="list-style-type: none"> · Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway. · Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. · Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration. <p>I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species.</p>	<p>habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>
171 Jeffrey Boyd	171-1	<p>As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the fall migration. Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special</p>	<p>The County appreciates Jeffrey Boyd for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level</p>

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		<p>Concern, such as Yellow-breasted Chat and Blue Grosbeak. Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration, most notably along the concrete section immediately south of the 134 Freeway. Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small, fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern, such as Yellow-breasted Chat and Blue Grosbeak. South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. Long Beach; section from Willow Street to Long Beach Boulevard. This region is host to significant shorebird populations (on a global scale) during fall migration. Also, after the last spring rains, the silt-covered cement-bottom stretches along this area afford relatively undisturbed nesting sites for our locally breeding shorebird species, such as Black-necked Stilt, American Avocet, and Killdeer. I ask for the highest scrutiny of the impacts of recreational development to biological resources, especially in these areas mentioned above, and to consider lessening the disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species along these stretches of the LA River.</p>	<p>approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>
172 Grace Wong	172-1	<p>As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird</p>	<p>The County appreciates Grace Wong for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p>

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		<p>species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the fall migration.</p> <ul style="list-style-type: none"> · Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway. · Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. · Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration. <p>I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species.</p>	<p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>

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<p>173 Rob Bender</p>	<p>173-1</p>	<p>As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the fall migration.</p> <ul style="list-style-type: none"> · Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway. · Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. · Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration. <p>I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species</p>	<p>The County appreciates Rob Bender for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>

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		<p>presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species.</p>	
<p>174 Kenneth Unger</p>	<p>174-1</p>	<p>As a local Los Angeles birder living in San Pedro, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the fall migration.</p> <ul style="list-style-type: none"> · Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway. · Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. · Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration. <p>I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to</p>	<p>The County appreciates Kenneth Unger for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>

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		<p>consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species.</p>	
175 Ron Hirst	175-1	<p>As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the fall migration.</p> <ul style="list-style-type: none"> · Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway. · Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. 	<p>The County appreciates Ron Hirst for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>

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		<p>· Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.</p> <p>I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species.</p>	
176 Sarah DeSantiago	176-1	<p>I recently reviewed the L.A. River master plan and created a research poster regarding the master plan and highlighted concerns for green gentrification and displacement of working-class tenants, residents, and unhoused communities living in encampments along the river. Public comments displayed in the reports have stressed the importance about adding more concrete solutions and protections for tenants and at-risk homeowners before the plan is carried out as land speculation is already underway. Risk for displacement is high and the plan itself does not provide a specific action plan to ensure that people feel protected and acknowledged. Please consider the many families and individuals who will be affected by this project if there aren't more equitable and socially just solutions put in place at the neighborhood, encampment, and individual levels.</p>	<p>The County appreciates Sarah DeSantiago for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-6 (Gentrification and Housing Affordability) concerning gentrification.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
177 Miles Griffis	177-1	<p>While conducting interviews for my article, most unhoused Angelenos living on the river were completely unaware of the Master Plan and were disappointed they were not given a fair opportunity to be a part of the planning. Others stated they found in person meetings to be difficult to attend because of transportation issues and many expressed they weren't able to comment because they did not have cell</p>	<p>The County appreciates Miles Griffis for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR.</p>

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		phones or reliable internet in order to voice their comments.	<p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Please refer to Master Response MR-1 (Homelessness along the LA River) and Master Response MR-3 (Public Outreach for the Draft PEIR).</p>
177 Miles Griffis	177-2	Many individuals I spoke with were concerned about gentrification and being removed from their homes and way of life on the river as a result of the master plan.	<p>Please refer to Master Response MR-6 (Gentrification and Housing Affordability) concerning gentrification. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>However, please refer to Section 3.13, <i>Population and Housing</i>, of the Draft PEIR, for a discussion on how implementation of the overall <i>2020 LA River Master Plan</i> would not result in the removal of housing or displace any existing permanent housing.</p>
177 Miles Griffis	177-3	The PEIR states that many encampments will be swept during construction and that increased patrol will be implemented to discourage those living on the river, but doesn't present any solutions to house these unhoused residents.	<p>Please refer to Master Response MR-1 (Homelessness along the LA River). Each local jurisdiction will relocate individuals and families experiencing homelessness. Please refer to Section 3.13, <i>Population and Housing</i>, of the Draft PEIR, specifically Section 3.13.2.2, <i>Regulatory</i>, which details all the different goals, objectives, and policies each individual jurisdiction could use to aid and help relocate those experiencing homelessness.</p>

Commenter	Comment#	Comment	Response
177 Miles Griffis	177-4	<p>What is the Department of Public Works plan to house these people who rely on the river as a direct source of life if the PEIR plans to remove them?</p>	<p>Please refer to Master Response MR-1 (Homelessness along the LA River). Each local jurisdiction will relocate individuals and families experiencing homelessness. Please refer to Section 3.13, <i>Population and Housing</i>, of the Draft PEIR, specifically Section 3.13.2.2, <i>Regulatory</i>, which details all the different goals, objectives, and policies each individual jurisdiction could use to aid and help relocate those experiencing homelessness.</p>
178 Robert Karn	178-1	<p>Long Beach Estuary</p> <p>Americans have become accustomed to having their "urban drainage districts/corp of engineers" entities solve a single problem. Conveyance of flood water. The byproduct of this acquiescence was and is a billion dollar enterprise to build and maintain a concrete channel. Billions more will be required to solve additional problems. A solution to one of these additional problem's is the subject of my suggestion to Los Angeles's The River Project planning process.</p> <p>Admittedly the Los Angeles river had a difficult start, inconsistent volumes lead to a communal comfort with ever encroaching infrastructure on a potentially necessary allotment of space. Until a couple of flood events demonstrated the folly of such comfort. Looking back at the outcomes that exist today one can't help but wonder couldn't the functions and densities achieved in the floodway have been achieved outside of the floodway with little or no impact on the overall look of LA and Longbeach. The answer is of course yes but that is water under the bridge so to speak.</p> <p>This second conceivably third rebuilding of the Los Angeles River corridor has opportunities, some limited by the encroached infrastructure. Solving the "new" problem of providing appropriate openspace (and</p>	<p>The County appreciates Robert Karn for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

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		<p>flood water storage/conveyance space) utilizing natural systems is certainly worth the long term investment. US city planners and residents have seen appropriate solutions elsewhere and are finally beginning to understand the value of contiguous open space systems through urban areas.</p> <p>There are a limited number of significant opportunities that would return some of the magic to the (communal understanding) of the story of the Los Angeles River basin: One and perhaps the most important is the fact of a river delta.</p> <p>Frame One of the LA River study area is Long Beach where the “drainage way” (euphemisms on early maps) empties into the ocean. There is no visual or mental understanding of what could be construed as a river delta. Normally this natural organism straddles the line between fresh and saltwater, which lives by the movement and exchange of these waters to create a unique habitat.</p> <p>Development has desired this area. Proposing to fill it with infrastructure for generating private wealth while offering the community a seat at the table for a substantial subsidy. The Los Angeles river delta needs to demonstrate how a world class city builds a sustainable future based on the idea and performance of its natural water systems. Imagine in another 100 years this generation's legacy?</p> <p>With single mindedness the previous administrators built a floodway. It is time to harness this single mindedness to build a continuous natural habitat beginning at its most important point the end of the river corridor.</p> <p>The design concept portrays an idea. The location of uses have been organized for one primary purpose. To build a vast (commiserate with the size of the city of</p>	

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		<p>Los Angeles) estuary. New development is located along the highway bordering the port with the primary cruise terminal located at the highway's end. This consolidation frames the estuary while not impacting it. The concept proposes an approximate proportion of 50% water and 50% land. With natural system engineering it could be habitat for numerous species and an active filter for some of the less desirable elements traveling out to sea from the urban drainage. It proposes a series of islands (including the existing industrial ones) to stimulate as much natural exchange as possible. Interconnecting the estuary lands are pedestrian pathways and bridges. Some areas should be reserved for habitat research and inaccessible for the general public.</p> <p>My second recommendation is to develop guidelines for the location of child play areas. They should not be within 100-300 meters of significant arterial roadways (depending on the tested pollution levels) and toxic point sources. Similar to other first world nations.</p>	
<p>I79 Marianne Vogel Bender</p>	<p>I79-1</p>	<p>As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the fall migration.</p> <ul style="list-style-type: none"> · Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell's Vireo and other breeding Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts 	<p>The County appreciates Marianne Vogel Bender for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat.</p>

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		<p>significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway.</p> <ul style="list-style-type: none"> · Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. · Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration. <p>I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species presence, especially to understand the presence and patterns of use by sensitive and protected species.</p>	<p>Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>
I80 Deloris Jones	I80-1	<p>I live in Lynwood within one mile of the LA river. Since much of the river improvements plan is not directly controlled by the LA county, my concern is about the possibility of “eminent domain” being enacted. I do not want to be displaced from my home to accommodate a river improvement.</p>	<p>The County appreciates Deloris Jones for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further</p>

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			<p>response is necessary. No changes to the Draft PEIR are needed.</p> <p>However, please refer to Section 3.13, <i>Population and Housing</i>, of the Draft PEIR, for a discussion on how implementation of the overall <i>2020 LA River Master Plan</i> would not result in the removal of housing or displace any existing permanent housing.</p>
<p>I81 Michael Connor</p>	<p>I81-1</p>	<p>We are preparing comments on the LA River Master Plan and on the PEIR. We have an email address for the PEIR comments but cannot locate an email address for submitting comments on the LA River Master Plan itself. Or are you accepting comments on both the Plan and the PEIR? Unfortunately, the LA River Master Plan website comment forms will not accept attachments and I have received no response to my question when I posted via the comment form.</p>	<p>The County appreciates Michael Connor for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR).</p>
<p>I82 Lisa Petrus</p>	<p>I82-1</p>	<p>Kester at the 101 FWY is part of this plan. There is no safe way for pedestrians or cyclists to cross Kester. There have been multiple pedestrians involved in accidents. The most recent was a 90 year woman who was run over and left for dead by a hit and run driver. She was seriously injured (2 fractured legs etc.) and her dog killed. The location has been approved for a crosswalk but apparently they don't have \$200,000 to fund it. Safety must be the number one concern for this Master Plan.</p>	<p>The County appreciates Lisa Petrus for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>I83 Molly Hill</p>	<p>I83-1</p>	<p>As a local Los Angeles resident and birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master</p>	<p>The County appreciates Molly Hill for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors</p>

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		<p>Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the fall migration.</p> <ul style="list-style-type: none"> · Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration, most notably along the concrete section immediately south of the 134 Freeway. · Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. · Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration. <p>I ask for the highest scrutiny of the impacts to biological resources, including and especially in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community generated datasets of species presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species.</p>	<p>for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>

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I84 David Joyce	I84-1	<p>It's tremendously important to me that we: restore the native plant & biodiversity of the region, and that we deal with the many invasive plant species which are so problematic - crowding out the native plant life. Restoring the native plant biodiversity is absolutely THE KEY issue, for me, as it's the cornerstone of life for the LA River, and the animals, birds, fish, insects. These are interconnected, and will impact the future of our city, our environment.</p>	<p>The County appreciates David Joyce for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Objective 3: Support Healthy, Connected Ecosystems from the <i>2020 LA River Master Plan</i>. Implementation of Mitigation Measure BIO-18, Prohibit Use of Invasive Species during Operations, found in Section 3.3, <i>Biological Resources</i>, of the Draft PEIR aims to reduce and eliminate the impacts the commenter is referring to.</p>
I85 Ann Cantrell	I85-1	<p>2. This plan and many previous ones have called for parks/open space/wetlands in the Wrigley Heights portion of the river in Long Beach. Currently a self-storage and RV parking lot have been approved and gated housing development is going through the CEQA process for the site. What appears to be missing from this Master Plan is how to ensure that cities and private land owners conform with the plan.</p>	<p>The County appreciates Ann Cantrell for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
I86 Allison McSurley	I86-1	<p>One vital consideration that seems to be left off the master plan is how South LA residents, who have been historically denied any County investment in natural amenities, are expected to get to the River. (Or aren't they?!) You need to consider that almost forty percent of South LA residents are under 21, and more than half have very low incomes, and would now have to take buses for more than an hour getting in freeway traffic to reach a river only six miles away as the crow flies.</p>	<p>The County appreciates Allison McSurley for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant</p>

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		<p>We need FREE SAFE PUBLIC RIVER SHUTTLES with stops serving all LA County neighborhoods.</p>	<p>environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Please refer to Objective 2: Provide Equitable, Inclusive, and Safe Parks, Open Space and Trails; Objective 4: Enhance Opportunities for Equitable Access to the River Corridor; and Objective 7: Foster Opportunities for Continued Community Engagement, Development, and Education of the <i>2020 LA River Master Plan</i>.</p>
<p>187 Tilly Hinton</p>	<p>187-1</p>	<p>I am writing to comment on the draft Program Environmental Impact Review (PEIR) for the County’s LA River Master Plan. I am an independent scholar and the founder/curator of Los Angeles River I have over a decade of international research and community engagement expertise in river landscapes and their complex interrelationships with surrounding communities, particularly the Los Angeles River. On that basis, I make the following comments on the Draft PEIR.</p>	<p>The County appreciates Tilly Hinton for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This comment regarding the commenter’s credentials is acknowledged.</p>
<p>187 Tilly Hinton</p>	<p>187-2</p>	<p>The PEIR should consider the entire watershed, or at least tributaries</p> <p>The overarching weakness of this PEIR is that it takes an infrastructural not an environmental view, in that the focal area has been arbitrarily defined as the river channel and a one-mile strip along each bank. By largely ignoring the nine major tributaries - which are by definition integrally part of the Los Angeles River - the PEIR cannot possibly provide an accurate environmental assessment. I ask that the final PEIR accurately conceptualize the river as including its tributaries. I know that the PEIR claims in the executive summary that it ‘uses a data-based</p>	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements), which discuss the programmatic nature of the Draft PEIR. The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River.</p>

Commenter	Comment#	Comment	Response
		<p>methodology informed by an extensive collection of data that describes the physical, social, and cultural attributes of the LA River; its surroundings; and its watershed including ecosystem, demographic, and hydrologic studies that were conducted for the entire 834-square-mile watershed and Los Angeles County’, this is not sufficient. The County is the only agency with jurisdiction to take a genuinely whole-river, whole-watershed approach and missing this opportunity is unacceptable.</p>	<p>In addition, as this is a program-level EIR, the analysis presented is conservative in nature. Under State CEQA Guidelines Section 15168, where the later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the PEIR. The <i>2020 LA River Master Plan</i> is a conceptual plan. All future specific projects would be subject to subsequent CEQA compliance.</p> <p>Please refer to Master Response MR-7 (Master Plan Area/PEIR Study Area and Addressing the LA River in a Comprehensive Manner), which addresses the <i>2020 LA River Master Plan</i> area/PEIR study area in a comprehensive manner. The 51-mile-long LA River passes through 18 total jurisdictions (1 county and 17 cities). The entirety of the 51-mile LA River corridor for 1 mile on each side of the river was defined as part of the study area for the <i>2020 LA River Master Plan</i> and the Draft PEIR.</p>
<p>187 Tilly Hinton</p>	<p>187-3</p>	<p>The “typical” projects are atypical. The two projects that are put forth as typical are far from typical when they are contrasted with other project possibilities that are framed in the Master Plan. The two “typical” projects are a Multi-use Trail and a river adjacent gathering place composed of various Common Elements from the Master Plan. These are relatively low-impact projects and are very similar to existing features of the LA River, so it is unhelpful to have built the PEIR around them. Instead, the PEIR should analyze significant projects such as:</p> <ul style="list-style-type: none"> • channel transformation (the Plan includes terracing, deepening, widening, converting walls from trapezoidal to vertical, diverting water in tunnels, and further restricting public access), 	<p>The commenter appears to believe that the Common Elements Typical Project and Multi-Use Trails and Access Gateways Typical Project are the two project components analyzed in the Draft PEIR and that the Draft PEIR only provides environmental analysis for one of these projects for the <i>2020 LA River Master Plan</i>. However, please refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR, where it describes that to inform decision-making in a comprehensive manner, the Draft PEIR includes the analysis of the potential environmental impacts from implementation of the <i>2020 LA River Master Plan</i> based on the following groupings: the two Typical Projects (Common Elements and Multi-Use Trails and Access Gateways), the six kit of parts (KOP) categories, and overall implementation of the <i>2020 LA River Master Plan</i> (i.e., all potential projects) over the 25-year horizon</p>

Commenter	Comment#	Comment	Response
		<ul style="list-style-type: none"> • capping the river with large concrete platform parks or cantilevers (a concept the County has championed in presentations and media outreach but neglected in the PEIR), • building infrastructure composed from the common elements every 0.4 – 0.6 miles along both banks of the river (while the PEIR analyzes one such project, it is an entirely different matter to consider the environmental impacts of some 204 of these Shade, Rest, and Gathering Pavilions” along the River’s banks). <p>The two typical projects are not genuinely representative of the Master Plan’s scope and intent, and on that basis the PEIR is flawed. At a minimum, please revise the PEIR to assess the cumulative impacts of multiple instances of Common Elements “typical projects”. The Master Plan’s intention is that there would be a few hundred of these Shade, Rest and Gathering Pavilions. It is manifestly insufficient to evaluate the impacts of only one. To represent the intentions of the Plan more adequately, a channel transformation project and a river capping project should also be included in the PEIR, or these should be tempered in the Master Plan document.</p>	<p>period. Please refer to Chapter 3, <i>CEQA Environmental Impact Assessment</i>, of the Draft PEIR for an analysis of the cumulative impacts for all resource topics and a description of how the Draft PEIR takes into consideration the <i>2020 LA River Master Plan’s</i> cumulative contribution to past, present, and reasonably foreseeable future projects. Please refer to Chapter 1, <i>Introduction</i>, of the Draft PEIR, which discusses how the impacts of the Typical Projects have been identified in the Draft PEIR to assist agencies in later discretionary actions to identify the individual project impacts under consideration and help determine if the later activity can be included in the scope of the PEIR and thus tiered using State CEQA Guidelines Section 15162.</p> <p>The commenter notes that a channel transformation project should be included in the PEIR. Please refer to KOP Category 2, Channel Modifications, in the Draft PEIR for more information about the type of work that may be completed in and along the channel.</p> <p>Please note that the County is not planning to “cap the river” as the commenter mentions. Concrete platform parks are not specifically analyzed in the Draft PEIR. The Draft PEIR is presented at a programmatic level and does not include project-specific or site-specific analysis. Also, project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Regardless, a platform park is a park situated on a structural deck spanning over a space typically unsuitable for parkland, such as a roadway or waterbody. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. However, given the level of detail provided in the <i>2020 LA River Master Plan</i>, the platform park does not appear to in any way “cap the river,” but would instead create new open space and foster</p>

Commenter	Comment#	Comment	Response
			<p>connectivity, ecosystem function, and cultural resources while respecting the very critical need for flood risk management.</p> <p>Please refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR, where it describes that, given its width and length, the LA River channel can separate communities and be an obstacle for connectivity. Crossings can connect existing or proposed communities or assets on one side of the river with existing or proposed communities or assets on the other side of the river. Crossings and platforms would typically include multi-use bridges for pedestrian, bike, and equestrian access, and they would connect communities to nearby parks and community facilities. Platforms are wider than crossings and can create space for parks, recreation, and habitats above the channel in addition to providing cross-river connectivity. Platforms can also host a range of habitat typologies, including riparian and upland conditions, and can allow for wildlife migration. Crossings and platforms can connect people to the river, creating new spaces for gathering and panoramic views of the river and surroundings. Any channel modifications required for crossing and platforms would require hydraulic analysis to ensure flood risk is not increased. Please refer to Section 3.1.3.3, <i>Impacts and Mitigation Measures</i>, of the Draft PEIR, which describes how, once constructed, above-ground structures related to KOP Category 3, Crossings and Platforms, which include multi-use bridges, would not result in substantial adverse effects on a scenic vista or obscure a panoramic view but would instead contribute to enhanced viewing opportunities for users to experience the vistas.</p> <p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a</p>

Commenter	Comment#	Comment	Response
			<p>conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. The responsibility for identifying, approving, and implementing specific future projects that may tier from the PEIR and preparing appropriate CEQA compliance for those projects lies with the jurisdictions along the LA River. Please see Master Response MR-2 (Program-Level Analysis in the PEIR).</p>
<p>I87 Tilly Hinton</p>	<p>I87-4</p>	<p>Complexity of the Document/Unhelpfulness of Public Meetings</p> <p>The draft PEIR is cumbersome, lengthy and inaccessible. It is vastly out of step with CEQA readability requirements. Section 15140 requires that ‘EIRs shall be written in plain language and may use appropriate graphics so that decision makers and the public can rapidly understand the documents’. Section 15141 stipulates that ‘the text of draft EIRs should normally be less than 150 pages and for proposals of unusual scope or complexity should normally be less than 300 pages’. The PEIR is 1,992 pages long, uses a hyphenated page numbering system that makes it impossible to navigate the document electronically, and it is not compatible with Read Aloud functionality in Acrobat. The PEIR is more than six times the maximum length specified in CEQA. Because of the pandemic, access to physical copies, or any large-scale maps, has not been possible. Furthermore, the PEIR due date is the same day as comments on the Master Plan itself, which is a hefty 1,170 pages long. These are unacceptable burdens to place on a constituency of community members who are likely to be alienated by the complexity of the documentation and the confusion of simultaneous public comment processes. The</p>	<p>Article 10, Considerations in Preparing EIRs and Negative Declarations, of the State CEQA Guidelines, Section 15141, Page Limits, states that the text of Draft EIRs should normally be less than 300 pages, not “shall be.” The statute allows for longer documents, when appropriate. Given the complexity and geographic extent and anticipated lifespan of the proposed Project, the Draft PEIR conveyed as much information as possible to the readers in an attempt to convey the potential impacts of the projects proposed. Please also note that every attempt was made to ensure that the Draft PEIR is available and understandable to the general public, despite the complexity of the technical topics addressed by using plain language in the document, defining acronyms, providing a searchable and navigable portable document format (PDF) electronically for the public along with flyers in libraries across the region with links to viewing access online, and conducting an extended public comment period.</p> <p>Following Governor Newsom’s Executive Order N-28-20 relating to the threat of COVID-19, the Los Angeles County Board of Supervisors announced that all Los Angeles County facilities would be closed to members of the public beginning March 16, 2020, and the closing of buildings and facilities was indefinitely extended. Public</p>

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		<p>information and town hall sessions that were held by the County and its consultants via zoom were inadequate. Some meetings prohibited questions, only allowing comments. At others, not all questions were addressed and were only visible to the organizers not to other attendees, quashing opportunities for learning from fellow community members' perspectives. Document complexity, coupled with poorly designed online meetings, places tremendous burdens on readers and locks people out of the public comment process. In practical terms, I ask the County to revise the Final PEIR using plain language for clarity and accessibility, provide a more functionally navigable PDF, and include in-person viewing opportunities for documents and large-printed maps. The document should be substantially shortened. If this is genuinely impossible then additional public comment time and proactive in-community support for informed comment writing should be provided by the County so as to empower community members to understand the documentation and submit comments under CEQA.</p>	<p>Works facilities have only recently reopened on October 1, 2021. Due to COVID-19 and Governor Newsom's safety mandates related to the pandemic, virtual sessions and online public meetings were held to engage the public and provide opportunities for feedback.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for more information about public outreach for the Draft PEIR.</p>
<p>I87 Tilly Hinton</p>	<p>I87-5</p>	<p>Tiering</p> <p>In the PEIR and in County online public meetings sessions, tiering has been discussed as a means to simplify and expedite environmental approval for future projects. The implications of this are opaque, and concerning given that CEQA is a self-executing statute, making the County akin to the judge, jury and executioner of the river's future. I am concerned by statements such as:</p> <p>"If an agency determines that a later activity is covered in the scope of the PEIR and new or substantially more severe significant impacts would not occur, no further environmental documentation would be required." (p. 199) "Impacts would be less than significant for later</p>	<p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for more information about public outreach for the Draft PEIR.</p> <p>Please refer to Chapter 1, <i>Introduction</i>, of the Draft PEIR, which describes how Section 15152 of the State CEQA Guidelines defines the conditions under which tiering is allowed to happen.</p> <p>"Tiering" refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects, incorporating by reference the general discussions from the broader EIR and concentrating the later EIR or negative declaration solely on the issues specific to the</p>

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		<p>activities when carried out by the County. Impacts would be significant and unavoidable for later activities when not carried out by the County.” (p. 331) “This conclusion of significant and unavoidable impacts also applies to the overall 2020 LA River Master Plan.” (p. 1842 and elsewhere) because these statements seem to imply that future projects, even significantly detrimental ones, may – at the discretion of the County – bypass rigorous environmental impact review.</p> <p>The PEIR also notes that future project-specific reviews ‘would incorporate by reference the general discussions from the previously prepared PEIR and would focus solely on the issues specific to the environmental analysis subsequently prepared for the later activities’ (p. 199). This amplifies the need for the current PEIR documentation to be both robust and accessible because community members and other stakeholders will need to be working with it for the next twenty-five years. Please revise the explanation of tiering and the statements about significant and unavoidable impacts – using plain English – so that the implications are clearer in the PEIR.</p>	<p>later project. Please note that the County cannot enforce or guarantee that the mitigation measures in the PEIR will be implemented by the other agencies, which is why the County provided two separate impact conclusions: County and non-County. Such changes or alterations to a project are within the responsibility and jurisdiction of other public agencies and not the agency making the finding. However, if the mitigation measures identified in the Draft PEIR are adopted by another agency for impacts that are considered less than significant after the mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for activities not carried out by County, for the same reasons as discussed for later activities carried out by the County.</p> <p>Agencies are encouraged to tier the environmental analyses that they prepare for separate but related projects including general plans, master plans, zoning changes, and development projects. This approach can eliminate repetitive discussions of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of CEQA compliance. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy, or program to an environmental assessment for another plan, policy, or program of lesser scope, or to a site-specific analysis. The County understands that tiering does not excuse a lead agency from adequately analyzing reasonably foreseeable significant environmental effects of a proposed project and does not justify deferring such analysis to a later-tier EIR or negative declaration. In the case of the Draft PEIR for the <i>2020 LA River Master Plan</i>, the level of detail contained in the PEIR represents a program-level analysis based on what is currently proposed for approval and includes a first-tier</p>

Commenter	Comment#	Comment	Response
			<p>assessment of reasonably foreseeable environmental impacts.</p> <p>Please also note that every attempt was made to ensure that the Draft PEIR is available and understandable to the general public, despite the complexity of the technical topics addressed, by using plain language in the document, defining acronyms, providing a searchable and navigable PDF electronically for the public along with flyers in libraries across the region with links to viewing access online, and conducting an extended public comment period.</p>
<p>I87 Tilly Hinton</p>	<p>I87-6</p>	<p>In conclusion</p> <p>In closing, I reiterate that the Draft PEIR requires major revisions if it is to be an appropriate CEQA document. The two major concerns with the PEIR are document complexity and that the “typical projects” are not representative of the intent or scope of the Master Plan. Underpinning this is the fundamental weakness of the Master Plan design: that it fails to take a watershed approach or even a whole-of-river approach. Layered over these concerns is a lack of clarity about the operationalization of how tiering would affect public comment and oversight opportunities for future projects that tier off this PEIR.</p> <p>The current draft of the LA River Master Plan would cause significant adverse environmental effects, many of which are obscured by the framing and design of this PEIR. The Master Plan is also a missed opportunity for doing something truly remarkable for the environmental (and that includes human) remediation and safekeeping of our city. I request that the County develop a more representative PEIR, substantially change the proposed Master Plan, or impose as a condition of approval of this PEIR that every River or</p>	<p>Please see the response to comment I87-4, which addresses complexity. Please also see the response to comment I87-3, which addresses Typical Projects and the program-level document.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Commenter	Comment#	Comment	Response
		River-adjacent project be subject to full rigorous CEQA review. As it is, the draft PEIR is unacceptable.	
I88 Erica Roach	I88-1	I have been a resident of Atwater Village for over 15 years now. In the that time, I have heard and seen city officials continuously promise to make improve the safety and cleanliness of the river path for its residents. To date, both issues have not been addressed and/or improved. In fact, from a cleanliness standpoint the river path next to me house between Glendale Blvd and Los Feliz Blvd has gotten dirtier. Partially due to the groups (gangsters, drug dealers, and unruly teenagers) that party (do drugs and drink) during the night and day and leave their paraphernalia behind. The other part is due to the homeless encampments that have been erected throughout the path, which takes a way form the desire to walk on the path due to feeling unsafe. About a week ago, I was coming home and saw a person defecating on the walk path that’s juxtaposed to my driveway. Yet you market these walkways as a great place to bring your family and you tell the public it is safe when it is not. Put the time and effort into truly addressing the homeless issue and the safely issues so that the walkways can truly be enjoyed in the manner you portray them.	<p>The County appreciates Erica Roach for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-1 (Homelessness along the LA River).</p> <p>Please refer to Objective 2: Provide Equitable, Inclusive, and Safe Parks, Open Space of the <i>2020 LA River Master Plan</i>.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
I88 Erica Roach	I88-2	On the part of leadership or departmental authority The entrance to my driveway and the walkway to the river path is apparently managed by 3-4 different divisions of the city. So, when I have tried to bring up concerns on safely related to closing the path in the evenings or for cleaning up the area or for overgrown tree grooming, I have continuously been bounced from one division to another. Each pointing the finger at the other and saying they are not responsible for what happens in that section and/or more importantly they do not have the budget to affect any change. My point is	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Commenter	Comment#	Comment	Response
		<p>your macro proposal will only exacerbate these micro issues because there isn't a set body in place with the authority and budget to address the concerns of the citizens. I urge you to address these issues first, so you have the right department in place to address the greater issues to come with the execution of your master plan.</p>	
<p>189 Allen Arslanian</p>	<p>189-1</p>	<p>My comments for the LA River plan are: local Indigenous tribes need to be more involved in returning the river to its natural habit. All the concrete walls of the river bed must be removed and returned to the native soil that is in the area. By planting native plants along the river, this will help clean river naturally.</p>	<p>The County appreciates Allen Arslanian for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Section 3.4, <i>Cultural Resources</i>, and Section 3.17, <i>Tribal Cultural Resources</i>, of the Draft PEIR for information on outreach and consultation with Native American tribes and individuals for the Draft PEIR.</p> <p>Please refer to Master Response MR-5 (Naturalization of the LA River) for more information about naturalization of the LA River.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>190 Jesse Ross</p>	<p>190-1</p>	<p>As a local Los Angeles birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant</p>	<p>The County appreciates Jesse Ross for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p>

Commenter	Comment#	Comment	Response
		<p>numbers, on a global scale, of migratory shorebirds during the fall migration.</p> <ul style="list-style-type: none"> · Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway. · Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. · Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration. <p>I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species.</p>	<p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>

Commenter	Comment#	Comment	Response
I91 Robert Leyland	I91-1	<p>1a. The EIR ought to be edited for brevity and clarity. It should be prepared by independent consultants, free from any actual or appearance of conflict of interests.</p> <p>1b. The County Public Works Department and consultants are biased and not qualified to design and manage the LAR. Their experience is inappropriate for the LAR, which require respect and likely reverence for Nature.</p>	<p>The County appreciates Robert Leyland for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>The County is the lead agency for the proposed Project, pursuant to CEQA. CEQA requires a lead agency to disclose the significant environmental effects of proposed actions to decision-makers and the public. CEQA applies to all discretionary activities proposed to be carried out or approved by public agencies. Approval of the proposed Project (<i>2020 LA River Master Plan</i>) would be a discretionary action by a public agency, in this case the Los Angeles County Board of Supervisors, acting on behalf of the County as the lead agency for the proposed Project. Therefore, compliance with CEQA is required.</p> <p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
I91 Robert Leyland	I91-2	<p>3a. Under history section, the EIR omitted the L.A. RIVER URBAN WILDLIFE REFUGE plan (LARUWR) prepared by the staff of the Santa Monica Mountains Conservancy (SMMC) circa 2005.</p> <p>3b. The EIR should adequately evaluate the LARUWR as an alternative, including but not limited to the following questions:</p> <ul style="list-style-type: none"> • What would be the impact of the LARUWR, as a wildlife corridor; • Would it help mitigate the human-caused 6th Mass Extinction; 	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>It appears that the first part of this comment is referring to the Upper Los Angeles River and Tributaries Plan or the L.A. River Rover Urban Wildlife Refuge Partnership;</p>

Commenter	Comment#	Comment	Response
		<ul style="list-style-type: none"> • Would it help mitigate the climate crises; • Could it serve as outdoor natural history classrooms; • Would it provide quality passive recreation for communities with chronic natural park deficits. 	<p>however, the County does not know the reference to the LA River Urban Wildlife Refuge Plan.</p> <p>As to the second point of this comment, please refer to Chapter 5, <i>Alternatives</i>, of the Draft PEIR, which discusses how naturalizing the river—essentially making the LA River a wildlife corridor—would significantly negatively affect the floodwater conveyance capacity of the river channel and significantly increase the chances of channel erosion and sedimentation, exacerbating flood risk. This standalone alternative would also not meet some of the proposed project objectives such as reduced flood risk or improved resiliency; provision of equitable, inclusive, and safe parks, open space, and trails; increased opportunities for equitable access to the river corridor, or for arts and culture or housing affordability strategies or improvements to water quality. While this alternative would avoid construction and operational impacts associated with improvements outside the channel (i.e., beyond top of levee), it could cause more severe in-channel downstream impacts including at the Los Angeles and Long Beach ports and harbors. Therefore, this alternative was removed from further consideration.</p> <p>Additionally, please refer to Master Response MR-5 (Naturalization of the LA River), which discusses the naturalization of the LA River, and Master Response MR-7 (Master Plan Area/PEIR Study Area and Addressing the LA River in a Comprehensive Manner), which discusses efforts to ensure that the river is addressed in a cohesive and comprehensive manner.</p>
I91 Robert Leyland	I91-3	3d. Compare the gentrification impact of the proposed LARUWR upon riverside communities, including related displacement and rising rents, with the projects proposed subject to the PEIR.	<p>Please see the response to comment I91-2.</p> <p>Additionally, please refer to Master Response MR-1 (Homelessness along the LA River), which addresses homelessness along the LA River, and Master Response MR-6 (Gentrification and Housing Affordability)</p>

Commenter	Comment#	Comment	Response
			regarding gentrification and housing affordability along the LA River.
I91 Robert Leyland	I91-4	4. What is the actual flood risks, at a time of increasing draught?	Please refer to Section 3.9, <i>Hydrology and Water Quality</i> , of the Draft PEIR for detailed information about flooding and flood risk in the proposed project area.
I91 Robert Leyland	I91-5	<p>5a. Would a robust riparian ecosystems in the midst of our communities help reduce flood risk, which real estate development increase by compacting and paving permeable soils.</p> <p>5b. Would a meandering river, more effectively replenish aquifers and reduce damages by slowing water flow?</p>	<p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR for a detailed discussion of riparian communities. Please also refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR for flood risk in the proposed project area.</p> <p>In response to 5b, please refer to Master Response MR-5 (Naturalization of the LA River).</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
I91 Robert Leyland	I91-6	6. Would the LARUWR increase carbon sequestration, hence mitigating the climate crisis?	<p>Please refer to Section 3.7, <i>Greenhouse Gas Emissions</i>, of the Draft PEIR, which addresses carbon sequestration and climate.</p> <p>It appears the commenter is raising an issue related to the 2005 LA River Urban Wildlife Refuge and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

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I91 Robert Leyland	I91-7	7. Urban farms, e.g. South Central Farm) are compatible alongside riparian systems and riverside communities, offering increase food security.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
I91 Robert Leyland	I91-8	8. In spite of my concern for the homeless and affordable housing are irrelevant to the LAR. In my view, attempts to raise the issue serves to obfuscate both the former and the latter.	<p>Please refer to Master Response MR-1 (Homelessness along the LA River) and Master Response MR-6 (Gentrification and Housing Affordability) regarding housing affordability along the LA River.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
I91 Robert Leyland	I91-9	<p>1. Flood risk and “resiliency”</p> <p>a. The fear of floods have been used to justified the destruction lo the LAR. Now more than ever the fear mongering is inexcusable as droughts are increasing in duration and frequency.</p> <p>Snowpacks are smaller, providing even less water to flow in what was once a river. These are consequences, in whole or in part, of the human-caused climate crisis.</p>	<p>Please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR for discussion of flood risk in the proposed project area. In addition, please refer to Section 3.7, <i>Greenhouse Gas Emissions</i>, in the Draft PEIR, which addresses climate issues.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

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I91 Robert Leyland	I91-10	<p>Enhancing access will likely lead to gentrification and displacement;</p> <p>Objective #5: Arts and culture; are two of the gimmicks used to gentrify and displace existing communities, usually lower incomes and diverse for higher income White outsiders known elsewhere as ‘hipsters,’ introduced to make the target area “hip.” Art and culture is fine elsewhere, not at or near the LAR. I recommend visiting Boyle Heights, to learn about its resistance to gentrification, manifested in opposition to art galleries, etc.</p>	<p>Please refer to Master Response MR-6 (Gentrification and Housing Affordability).</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
I91 Robert Leyland	I91-11	<ul style="list-style-type: none"> • I object to the apparent effort to discourage participation through review and comments by creating an unwieldy, and user unfriendly document seemingly written to obscure rather than enlighten. It should be re-written and edited, as stated, for brevity and clarity. The objective should be to encourage the public and decision makers to read the PEIR so that together we may contribute and/or make an informed decision. THE PEIR failed, using these criteria and hence failed to comply with CEQA spirits or intent to make available an adequate EIR. 	<p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR). Additionally, every attempt was made to ensure that the Draft PEIR is available and understandable to the general public, despite the complexity of the technical topics addressed, by using plain language in the document, defining acronyms, providing a searchable and navigable portable document format (PDF) electronically for the public along with flyers in libraries across the region with links to viewing access online, and conducting an extended public comment period.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
I92 Jeffery Sapin	I92-1	<p>My name is Jeffrey Sapin, and I am the Environmental Science teacher at Larchmont Charter High School. Please find attached my public comment as well as the public comments of 26 of the students in my Honors</p>	<p>The County appreciates Jeffrey Sapin for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors</p>

Commenter	Comment#	Comment	Response
		<p>Environmental Science class. Please let me know if there are any issues accessing the document.</p>	<p>for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>192 Jeffery Sapin</p>	<p>192-2</p>	<p>However, I want to echo the sentiments which my students and many other organisations have raised. With such a large scale and sweeping plan, this is a huge lift and there is little in the way assurances that the goals outlined here will be reached. While the methods described for each goal describe and define best practices, with no mention of quantifiable results for any of the described goals, it is unclear how competing agendas of environmentalism and business will balance out. Furthermore, there appears to be great reliance on “river champions” to spearhead many of the initiatives outlined. My fear is that those champions will need to have particular skills and supports, and that the places where these champions are needed the most are the places where they are least likely to get that support. With an agenda that will require the coordination of an army of people over more than a decade, how does the city support the development of those organizations and individuals who will be needed to lead on the front lines? How will the opportunities and resources be promoted equitably to foster that increase in civic engagement? While I understand that this planning document is not intended to provide all the answers to all the questions, and updates are continuously being made, in pursuit of excellence I think we would all love to see numerical</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

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		<p>expectations that match the vigorously optimistic tone of this document.</p>	
<p>I92 Jeffery Sapin</p>	<p>I92-3</p>	<p>Nonetheless, as I mentioned before, this plan is not without faults. Although this plan will create jobs and work to decrease homelessness, it might be environmentally harmful. As described by Emily Folk in an article in EcoMENA, industrializing the surrounding area of the river will likely harm wildlife. Ripping up plantlife and displacing wildlife populations will significantly harm the ecosystem. This claim is supported by a 2017 article from populationgrowth.org which explains that negative effects of this plan could resemble what we saw in the Industrial Revolution. This all needs to be considered and the pros and cons need to be weighed before setting this plan into action.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Emily Folk’s article does not mention the <i>2020 LA River Master Plan</i> but speaks in broad generalizations of industrialization. Please refer to Section 3.10, <i>Land Use and Planning</i>, of the Draft PEIR, specifically Section 3.10.4, <i>Impact Analysis</i>, for discussion of (1) compatibility with adjacent land uses; (2) avoidance of out-of-scale development; (3) ensuring diversity of land uses; (4) protection of existing residential neighborhoods from encroachment; (5) enhanced active and passive park and recreation opportunities for all users; and (6) improved accessibility and connectivity to a comprehensive trail system including rivers, greenways, and community linkages. The <i>2020 LA River Master Plan</i> objective is not to put the river into industrial use but to reduce flood risk and improve resiliency; provide equitable, inclusive, and safe parks, open space, and trails; support healthy connected ecosystems; enhance opportunities for equitable access to the river corridor; embrace and enhance opportunities for arts and culture; address potential adverse impacts on housing affordability and people experiencing homelessness; foster opportunities for continued community engagement, development, and education; improve local water supply reliability; and promote healthy, safe, clean water. In general, the <i>2020 LA River Master Plan</i> would create more habitat, clean water, and access and the negative environmental</p>

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			<p>impacts would be offset by the positive effects of the plan.</p> <p>Looking at the populationgrowth.org archives, it is not clear which article the commenter refers to; none in the archive reference the LA River in keywords.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR to address concerns about plant and wildlife.</p>
<p>192 Jeffery Sapin</p>	<p>192-4</p>	<p>As a biker, I also travel by a lot of homeless encampments, which have environmental risks all on their own. Reading the LA River Master Plan, I have serious concerns as to the extent of what the master plan addresses. If we don't do enough to mitigate the cause and effect of homelessness, the problem would absolutely persist. According to a report by Amerlia Marie Gomez presented to the faculty department of Public Policy and Administration, in 2013, San Jose officials cleaned up one of the biggest encampments in the country and retrieved 2,850 gallons of human waste, 1,200 needles, 315 shopping carts, and 618 tons of trash from the encampment located near Coyote Creek. In a separate instance, a whopping 575 tons of trash was collected over the span of four months from the American River Parkway in 2018. These examples demonstrate parallels to the LA River Homeless issue and the potential for unsheltered people's environmental impact on surrounding areas, and since the river goes straight to the ocean, the plan should do more to address this issue with specifics. According to River LA, 58,000 homeless people live in LA currently, and the vague language in the plan such as "Incentivize stronger resident equity building tools" and "Continue coordination among the web of organizations that perform outreach" is personally worrying. Instead of saying "Identify funding necessary", actually identify the funding necessary. Los Angeles has a rich history of</p>	<p>Please refer to Master Response MR-1 (Homelessness along the LA River) and Objective 6 of the <i>2020 LA River Master Plan</i> concerning homelessness and affordable housing.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

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		<p>not doing enough to mitigate the homeless epidemic, and it's worrying there isn't even a ballpark amount for how much the LARMP plans to invest in our unsheltered communities. At the start of Mayor Garcetti taking office in 2013, the city had 22,993 unhoused residents and in 2019 the problem increased to a whopping 36,300, even after promises by mayor Garcetti to "declare war on homelessness" in 2015. The Master Plan implies more of the same, and even with the success of the permanent supportive housing, more of the same just isn't enough. An issue which 95% of voters call "a very serious problem" should be more than just vague buzzwords of sorts, and instead an intricate and carefully crafted plan that does more than enough. This isn't just an environmental issue, these are people. Being more in depth is necessary when discussing such a large issue concerning the LA River and should be top priority. In relation to the environment, that is 58,000 people who potentially pose a threat against the environment. The LA River Master Plan can, and should do more to address it.</p>	
<p>I92 Jeffery Sapin</p>	<p>I92-5</p>	<p>Finally, one of the Los Angeles Rivers greatest flaws involves its channel landsets. By having these off Channel Land assets it is a lot easier to have our water exposed to toxic chemicals as all of the plastics, metals and trash will have an easy transported system to our source of H2O. Although it is meant to better organize what enters our water it isn't always the cleanest and these pathways can lead back to our system of water negatively impacting both humans and our environment. Any sort of sewage system in the street is able to lead to our source of water whether it's in the ocean or the river thus exposing it to toxic chemicals. Then these plastic's or trash will easily lead to the water that is used by our environment which will then negatively impact the plants and humans that use it. An</p>	<p>Please refer to Objectives 8 and 9 of the <i>2020 LA River Master Plan</i> for improving local water supply reliability and promoting healthy, safe, and clean water. Also, please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, which contains analysis on water quality and stormwater runoff.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

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		<p>inch of rainfall in L.A. generates 3.8 billion gallons of runoff, so you're talking about more than 12 billion gallons of water that could be captured, but that flows within hours down our concrete streets and into the ocean. That means all of the animals that live in the ocean are getting direct contact with trash from our city killing over 1 million sea animals especially with the 100 million tons of trash in the ocean right now. This would lead to a negatively impacting situation and should be rethought of or changed to where it better cares and helps our LA River. The popular LA river stretches also can harbor enough fecal bacteria to make kayakers, anglers and swimmers sick. Our oceans and Rivers have suffered enough from being polluted by human trash that was littered. If we want to keep and maintain a healthy system we need to find a new sort of system that allows such rain water to go to the river without bringing toxic pollutants with it or a way to filter the water that enters the LA River before entering such assets in order to have a clean source. Although this is an important component to the La River master plan it does much more good by transporting such trash rather than safely bringing in water that can either be reused by humans or that will negatively impact and kill animals or living plants like coral reefs that thrive from a healthy source of water.</p>	
<p>I92 Jeffery Sapin</p>	<p>I92-6</p>	<p>The La River Master Plan is meant to begin after this year's proposal fixing some of the mistakes that come with this system or upgrading already good parts of this body of water transportation and filtration. By having this master plan we are preventing any such dangers from natural disasters including flooding and managing what is put into our water so we safely can benefit rather than pollute our environment. Each part of the La River Master Plan has a purpose and some may be more efficient than others but each plays their</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

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		<p>part in benefitting all of those who live near it, not just humans. If we want to protect our ocean life and prevent further damage already sustained on this body of water then we need to be involved and sign this. There are so many people that say they want to make a change but aren't actually taking action. It only takes support from a few others for your movement to grow and to make change and that is needed at this moment. We need the LA River Master Plan and we need it to be the healthy organized system that it was meant to be.</p>	<p>Please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR for analysis on water quality and flooding.</p>
<p>192 Jeffery Sapin</p>	<p>192-7</p>	<p>The LA River Master Plan faces a potential setback in its sustainability goals when it comes to the amount of air pollution that will be produced from the implementation of its kit of parts (KOP). Many air pollutants are bound to be released, especially in regards to construction, such as the use of heavy equipment, vehicle trips, large haul trucks, and so on. According to sections 3.2-44 and 3.2-45 of the Program Environmental Impact Report, even when several measures are taken to reduce the release of various emissions, it “cannot be stated with certainty that emissions would be below applicable regional or localized emissions thresholds. Impacts would be significant and unavoidable.” Even though there will be numerous methods of mitigation, they may not be enough to meet local emissions limits. This issue must be fixed as it is becoming all the more important to prevent the acceleration of climate change in the next few decades. There must be greater efforts to mitigate the emission of air pollutants in order to ensure that the negative aspects of the plan do not outweigh its many benefits. Although air quality may be improving in Los Angeles, it does not mean that we can trade improvements for setbacks. Los Angeles county contains nine of the fifteen most polluted cities in the country, and does not meet national air quality</p>	<p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR) and Master Response MR-4 (Adherence to Local Jurisdictions’ Requirements). Please refer to Sections 3.2, <i>Air Quality</i>; 3.7, <i>Greenhouse Gas Emissions</i>; and 3.16, <i>Transportation</i>, of the Draft PEIR for analysis on vehicle miles traveled. The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p>

Commenter	Comment#	Comment	Response
		standards (IQAir, 2021). The LA River Master Plan could delay the cities from meeting these standards by contributing significantly to air pollution.	
192 Jeffery Sapin	192-8	The addition of channel offsets to the Los Angeles River raises concerns about more pollution and hazardous substances being emitted or entering the river. The intentions of this plan are intended to help humans become more coordinated, but the polluted materials at some point will eventually find their way into the river, as well as harming and deteriorating the other aspects of the environment. The adversity our ecosystem faces is the climate crisis and the need of revitalizing things that are prohibiting and ruining the climate or causing it to change. Any type of plastic or garbage can quickly find its way into the water used by our society, causing harm to the plants and humans that use it. Consequently, this will be a bad condition that should be rethought or changed to better care for and support our LA River.	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>However, please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, which discusses that both the National Pollutant Discharge Elimination System (NPDES) Construction General Permit and the Los Angeles County grading permits require best management practices (BMPs) to reduce pollutants from stormwater runoff.</p>
192 Jeffery Sapin	192-9	The LA river master plan has a flaw in that it does not address hazardous substances or materials entering the river as a result of human littering or flooding. People may be harmed by harmful chemicals in water, and death is a possibility. More effort should be put into stopping these toxic chemicals from entering the river. The production of the LA river master plan, as I've mentioned before, costs roughly, hundreds and millions of dollars. Multiple substances concentrations in the LA River were found to be above federally set water quality levels, making it a polluted water body. Total Daily Maximum Loads (TMDLs), a regulatory item that sets the maximum pollutant permitted to be discharged into an impaired water body, were created under Section 303(d) of the Clean Water Act in an attempt to restore impaired water bodies. (Page 216 of	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>However, please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, which discusses how the proposed Project is not expected to substantially affect water quality. Implementation of Mitigation Measure HAZ-1, Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures, would reduce issues related to hazardous</p>

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		<p>the LARMP). A suggestion I have in mind is-- there should be a procedure or structure in place to prevent any hazardous material from entering the river if there are any dumpsites, public areas, or sewage waste treatment buildings nearby. An upside to the use of this unpolluted water is that it may be diverted from the Los Angeles River and may be used to supplement a regional water supply. Water that has been diverted may be used to improve ecosystems, promote tourism, or provide water to municipalities and industries. The ability to use the LA River for these purposes is influenced by its water quality, as it states on Page 218 of the LARMP Document. There must be a plan in place for garbage not to end up in the river if public areas are to be built around or near the river. Trash is less likely to enter the river if these public areas are isolated or not too close to it. There should be a more comprehensive strategy in place for sewage sites and other hazardous chemicals and materials. It would be ideal if there was some kind of water catcher or watershed to prevent any water from flowing directly into the river from the site, which is only in place to keep people safe along the river and in the event of severe weather. For this strategy to be effective, it must include a component that relieves communities of the burden of displacement while also assisting in the development of stronger relationships with these communities.</p>	<p>materials. Please refer to Objective 8: Improve local water supply reliability, and Objective 9: Promote healthy, safe, clean water, of the <i>2020 LA River Master Plan</i>.</p>
<p>I92 Jeffery Sapin</p>	<p>I92-10</p>	<p>A weakness in the LA river plan is the off channel landsets that are a part of the river. Having channel offsets added to the LA river brings the concern of more pollutants and toxic chemicals being released or getting into the river. These channel offsets are to make humanity more organized but over time trash and other harmful chemicals will find themselves in the river, which will lead to pollution to the river and</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

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		<p>the ecosystem, harming surrounding wildlife. Any sort of sewage system is able to lead to our source of water whether it's in the ocean or the river thus exposing it to toxic chemicals. Any sort of plastic or trash will easily lead to the water that is used by our environment which will then negatively impact the plants and humans that use it. This would thus become a negatively impacting situation and should be rethought of or changed to where it better cares and helps our LA River.</p>	<p>However, please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, which discusses that both the NPDES Construction General Permit and the Los Angeles County grading permits require BMPs to reduce pollutants from stormwater runoff. Implementation of Mitigation Measure HAZ-1, Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures, would reduce issues related to hazardous materials.</p>
<p>I92 Jeffery Sapin</p>	<p>I92-11</p>	<p>The weakness in the LA river master plan is that there is not enough talk about harmful chemicals or materials getting into the river, from people littering or flooding. Harmful chemicals in water can hurt people and could lead to death. There needs to be more of a push towards preventing these harmful chemicals from getting into the river. In the document Hazards and Hazardous Materials from LARMP, clarifies what are the specific materials and chemicals that can be harmful and hurt people. If there are any trash sites, public areas, and sewage waste management buildings nearby, there should be a procedure or structure to prevent any harmful material from getting into the river. For the plan of having public areas around or near the river, there needs to be a plan to not have trash finding itself in the river. If these public areas are separated or not too close to the river then there is a less chance of trash getting into the river. For sewage sites and other harmful chemicals and materials, there should be more of a plan around that. If there could be some sort of water catcher or watershed to prevent any water going directly to the river from the site would be best. These are only to keep people safe around the river and incase of extreme weather conditions.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>However, please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, which discusses that both the NPDES Construction General Permit and the Los Angeles County grading permits require BMPs to reduce pollutants from stormwater runoff. Note that the proposed Project is not expected to substantially affect water quality. Implementation of Mitigation Measure HAZ-1, Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures, would reduce issues related to hazardous materials.</p>

Commenter	Comment#	Comment	Response
I92 Jeffery Sapin	I92-12	<p>There are some issues with the plan however. As I said, getting cool businesses along the river bed would be nice, but it can be overdone. My personal vision is a small cafe or rest stop along the bike path or parks, but this can very easily get out of hand, and massive supermarkets and malls can be created. I think this would be ultimately terrible for the mission we're working on here. Another worry I have is that the plan will be put in motion, dozens of construction sites will begin working along the river, and then something will go wrong, and work is paused. Around 60% of all construction projects face delays. This can happen for up to years, meaning that there would just be open work sites abandoned along the river, which would just make it even worse, possibly even compromising the little bit of beauty it still retains.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>However, please refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR, which describes how a Common Elements Typical Project may include the following elements: cafes, benches, and bike racks.</p>
I92 Jeffery Sapin	I92-13	<p>according to the introduction pdf 1.1.3.9 talks about the pollution problem that the LA River faces, stating that they are having 800 water quality improvements planned. With that said in this section even states that they are unsure of keeping up with the constant milestones in order to continue the improvement of the LA River pollution. In this small section, I was left with two questions, what are some of these plans, and two what is the majority of the pollution coming from. Referring to the LA River index talking about the majority of pollution for the LA river is from streets (cars), industries and urbanization. Also referring to the pollution section, the runoff that flows down the LA river with the mixture of trash and oil from the streets leads to contamination of the River. This creates the stance that this water should be treated and made clean before we consider letting it get absorbed back into the earth. How can we fix this polluted water situation? Well, there's really no easy way, but the solution I can think of is mindful awareness and more</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>However, please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, which discusses that both the NPDES Construction General Permit and the Los Angeles County grading permits require BMPs to reduce pollutants from stormwater runoff. Implementation of Mitigation Measure HAZ-1, Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures, would reduce issues related to hazardous materials.</p>

Commenter	Comment#	Comment	Response
		<p>extensive cleaning of storm drains on the street. Let's talk about mindful awareness, this is the idea that our society adopts that it's important to throw their trash away in a proper waste bin, and if they see trash they can throw it away because they care. Also taking more public transportation can lead to less pollution being produced from automobiles. Unforchidently when it comes to urbanization, there are not too many things we can do, planting more trees would be a good start. I believe that some of these solutions could be implicated to help decrease the pollution in the LA River would drastically decrease.</p>	
<p>I92 Jeffery Sapin</p>	<p>I92-14</p>	<p>While these detailed explanations of the bad quality of the water are necessary, they have little benefit when compared to explaining the steps of how this plan will lead to cleaner water. There are rules and regulations set in place to make sure that our water is clean, such as the California Toxics Rule, which establishes acute and chronic standards for bodies of water, such as inland surface waters and enclosed bays and estuaries that are designated statewide as having beneficial uses. Regulations such as this will help the LA River and other bodies of water become cleaner as they must adhere to these rules. This ensures that the LA River will be clean with these new plans in place.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>However, please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, which discusses that both the NPDES Construction General Permit and the Los Angeles County grading permits require BMPs to reduce pollutants from stormwater runoff. Implementation of Mitigation Measure HAZ-1, Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures, would reduce issues related to hazardous materials.</p>
<p>I92 Jeffery Sapin</p>	<p>I92-15</p>	<p>The environmental impact report for the LA River Master Plan is very detailed and well researched, but has little explanation of how the flooding situation will be lessened with this project. The communities along the LA river deserve a way to ensure that they won't be</p>	<p>Please refer to Objective 1 of the <i>2020 LA River Master Plan</i> to reduce flood risk and improve resiliency for communities along the river. Please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR for Impacts 3.9(c) and 3.9(d), which discuss flood hazards.</p>

Commenter	Comment#	Comment	Response
		<p>flooded in the case that heavy rainfall occurs. According to Patch, “The river has long created a dividing line down the county, acting as a barrier to equity and opportunity for those who live along it.” This plan leaves much to be desired as it only states that flooding has happened in the river before and that the mountains around it can create flash flooding.</p>	<p>Also, please refer to the impact analysis in Section 3.10, <i>Land Use and Planning</i>, of the Draft PEIR, which discusses if the proposed Project physically divides an established community.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>192 Jeffery Sapin</p>	<p>192-16</p>	<p>According to the LA River Master Plan, “Following catastrophic flood events in the 1930s, development and expansion of flood management infrastructure was implemented, including channelizing 51 miles of the LA River.” This would only leave someone who lives near the river concerned about flash floods and the lack of flood protection we currently have against flash floods. This needs to be addressed in the master plan as people living along the river are at risk of flooding.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>The LA River performs an extremely important flood-control function. The <i>2020 LA River Master Plan</i> balances the need for flood control with opportunities to improve natural functions along portions of the river when flood control would not be jeopardized.</p> <p>Please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR to find more information about flooding in the proposed project area.</p>
<p>192 Jeffery Sapin</p>	<p>192-17</p>	<p>The plan of the Los Angeles River Master Plan has many strengths, but also shows the potential for many flaws. The plan does recognize the threat of displacement. The biggest flaw with the plan is the little effort to reduce gentrification. The issue of gentrification is barely talked about in goal 6th of the</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further</p>

Commenter	Comment#	Comment	Response
		<p>master plan. Although the Master Plan at a Glance document points out that the community surrounding this project is what will make it successful. It does not get rid of the fact that one of the major fears of the plans for citizens is displacement.</p>	<p>response is necessary. No changes to the Draft PEIR are needed.</p> <p>Please refer to Master Response MR-6 (Gentrification and Housing Affordability).</p>
<p>I92 Jeffery Sapin</p>	<p>I92-18</p>	<p>The Los Angeles River will become a magnet for buyers. With these buyers, gentrification follows shortly behind. For real estate, the river, parks, and trails will serve as another asset to their properties. As a result the price will most likely go up. For this plan to be successful there needs to be an aspect of the Master Plan that lifts the stress of displacement from communities and helps to build stronger relations with these communities.</p>	<p>Please refer to Master Response MR-6 (Gentrification and Housing Affordability).</p>
<p>I92 Jeffery Sapin</p>	<p>I92-19</p>	<p>On the contrary, the proposed benefits and infrastructure improvements of the LA River Master Plan will inevitably come at the cost of housing availability and affordability. The vague and general response that the plan provides for these issues is undeniably one of the primary weaknesses of the plan. As stated under Goal 6 on page 189 of the plan, there is an overwhelming correlation between increased parks/open spaces and increased displacement/housing costs in the surrounding area. Although Goal 6 outlines a general plan of action aimed to resolve the housing crisis, there are no guarantees or timelines provided to ease public concerns. Section 6.3 on page 193 calls for “increasing units of affordable housing within one mile of the river”, however, it does not provide any discrete information on exactly how this will be paid for, where the money will come from, and when this will be achieved by. There is also no consideration for the possible negative implications that such large-scale housing development will have on the environment.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>As noted in the comment, Objective 6 of the <i>2020 LA River Master Plan</i> recognizes that the objective of increasing parks and open space may simultaneously have the potential to negatively affect housing affordability. The <i>2020 LA River Master Plan</i> seeks to improve neighborhoods without causing negative effects of displacement by proactively implementing a strategy for preventing displacement and supporting continuing affordability of housing in river-adjacent communities. Please refer to Section 3.13, <i>Population and Housing</i>, of the Draft PEIR, which concludes that inclusion of affordable housing in the <i>2020 LA River Master Plan</i> would not induce population growth but would rather</p>

Commenter	Comment#	Comment	Response
			serve the existing underserved low-income population and facilitate development of supportive housing for people experiencing homelessness.
I92 Jeffery Sapin	I92-20	<p>The aim of the <i>2020 LA River Master Plan</i> is to reduce flood risk and enhance river resiliency (LA River Master Plan). However, not all parts of the river have the same potential for transport. Low-channel capability in some areas increases the likelihood of flooding of river-adjacent communities by as much as 25% in any given year (LA County). With storms, rain, and floods, the LA River may exceed water levels that it cannot handle. To control flood risk for people and property during storms, it is important to preserve total capacity as well as improve river conveyance capacity in high-risk areas. Furthermore, as the environment changes, the frequency and severity of extreme precipitation events will likely increase, resulting in flows that could surpass the channel's current capacity. For example, with a plan that is expected to take years, climate change will change the flow, water supply, and may even exceed the current water supply. The LA River Master Plan aims to have a strong understanding of hydrology of the LA River in managing flood risk. There have been multiple studies, "The Master Plan is based on the best available hydrologic study of the entire LA River watershed." However there is no clear direction of any plan or solution which is worrying. Just having data is not enough especially when this is one of the biggest concerns regarding the LA River. There is no guarantee that it can be updated well enough or in time as it will probably cost a lot and researchers may not understand all the variables to be able to upgrade at this current time. There are several new projects in the works. New projects along the LA River would have to take into account the long-term effects of climate</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR for more information about flooding in the proposed project area. Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR).</p>

Commenter	Comment#	Comment	Response
		change as well as the need for resilient infrastructure to handle these extreme events.	
I92 Jeffery Sapin	I92-21	As the LA River is focused on 51 miles of linked open space, this may have a strong negative impact on housing and homelessness. There is a risk that growing parks and open space would reduce housing affordability. As a result, we will just grow these issues that we have been wrestling for decades. While the LA River may seem to bring communities together, the large attraction of homelessness may scare away residents. Like any other open space/park, it will be a large gathering for homeless people. Without a plan to balance our problems in housing/homelessness and urbanization, this will just create more chaos and more trouble for our communities.	<p>Please refer to Master Response MR-1 (Homelessness along the LA River) and Objective 6 of the <i>2020 LA River Master Plan</i> concerning homelessness and affordable housing.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
I92 Jeffery Sapin	I92-22	I think one way to improve this weakness is that you make sure that even all areas outside of the floodplains are also being protected, because as we know, floods can reach anywhere. Because I noticed that in the master plan you wrote this “All areas outside of the floodplain were considered to have no need.” So it seems to me that you gave no importance to outside communities that could also be greatly affected by these floods. It also seems that you only have an evacuation plan just for the surrounding communities which is important. But you should make sure that all the city is prepared for these floods, because everyone’s lives are at risk. Floods can reach high feet of water and can damage anything in its way. It can last for many weeks and months and can create hazards. As we know when Los Angeles gets rainfall some roads will get filled up with water because of the sewers being flooded with trash and this just shows that communities don’t need to be close to the river to face floods, they can happen anywhere at any time. In	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>The <i>2020 LA River Master Plan</i> objective is not to put the river into industrial use but to reduce flood risk and improve resiliency; provide equitable, inclusive, and safe parks, open space, and trails; support healthy connected ecosystems; enhance opportunities for equitable access to the river corridor; embrace and enhance opportunities for arts and culture; address potential adverse impacts on housing affordability and people experiencing homelessness; foster opportunities for continued community engagement, development, and education; improve local water supply reliability; and promote healthy, safe, clean water. In general, the <i>2020 LA River</i></p>

Commenter	Comment#	Comment	Response
		<p>March 1938 there was a disastrous flood that took out most of Southern California from all the rivers like the La River, San Gabriels rivers, and the Valley rivers. As we know Los Angeles doesn't have a stable plan because nobody really recognizes or thinks that these natural disasters can happen.</p>	<p><i>Master Plan</i> would create more habitat, clean water, and access and the negative environmental impacts would be offset by the positive effects of the plan.</p> <p>Please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR for more information about flooding in the proposed project area.</p>
<p>192 Jeffery Sapin</p>	<p>192-23</p>	<p>There also seems that communities by the LA River don't have shelters or facilities that they can turn to in case of an emergency. And these things are needed because floods most of the time completely destroy houses. I feel like there should be community meetings that the community can attend to, where they can learn and inform themselves on how to stay safe and know what to do if there ever was a big flood again. Even how to have first aid kits or items they should have in their homes to be prepared. Also making sure that home structures that are near the river are built to stabilize floods and that they can focus on creating insurance plans for families that the government will pay for if they get damaged. The community should also have a say and participate in what they think is the most safest way to build the LA river, because they are the ones living near it and should know and have a sense of protection. Hopefully you take action on preparing the county of Los Angeles and all of Southern California on natural disasters that could happen and that they should have an open mind that homes and surrounding can be greatly affected. And that they focus on strengthening this section of the LA River master plan because many people will want to feel satisfied that they know that the new plan will bring a better and stable structure for the LA River because of how many dangerous floods it has brought.</p>	<p>Please refer to Objective 1 of the <i>2020 LA River Master Plan</i> to reduce flood risk and improve resiliency for communities along the river. Please also refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR for Impacts 3.9(c) and 3.9(d), which discuss flood hazards.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

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I92 Jeffery Sapin	I92-24	<p>With the removal of concrete, replacing the river with the soft ground instead of hard ground will bring many benefits. The most prominent benefit will be seen through the dramatic improvements our ecosystem endures. For starters, the ecosystem will improve dramatically. The ecosystem will be much more natural, where the different species will be able to adapt much easier, especially living in a healthier environment. The species that rely upon the river will have more available habitats which add to the diversity and health of the overall river. The extraction of the concrete can also help to get the endangered steelhead trout to return to the Los Angeles River. The replacement of more vegetation will help brighten the areas around the river. The more trees and vegetation in the river can improve the mental health of the people who live near the river. Additionally, trees can also provide more carbon absorption which will help with the slowing of climate change. The concrete being taken out will bring a variety of positive effects on the environment. The ecosystems living around or in the river will flourish as well. Even with the removal of just the bottom of the river so that the river will have a soft dirt bottom instead of a hard bottom can tremendously improve the river. If the river had a soft bottom, some of the water will be able to absorb into the soil for the plants and soil health instead of just going straight to the ocean. The concrete removal has a bunch of positives but it also has negatives. The actual removal of the concrete will be very expensive and a long and hard process. The river is 51 miles long and is accompanied by concrete throughout the entire stretch stated by the Department of Public Works (2021). This is one of the biggest problems that removing the concrete will face. With the removal of all the concrete to be able to complete this, the river would have to widen to take out all the concrete which will affect</p>	<p>Please refer to Master Response MR-5 (Naturalization of the LA River).</p>

Commenter	Comment#	Comment	Response
		people living right by the river. This would not be a problem if you chose to only remove the bottom of the river and kept the sides with concrete.	
I92 Jeffery Sapin	I92-25	Another huge obstacle that needs to be tackled is the distribution of the amount of water in the river. This can cause flooding. If a heavy rainstorm comes, the water will not be able to move fast enough which may lead to floods becoming a huge possibility. If these events arise, the property could be lost through flooding that can accrue with the lack of concrete. This is the reason the concrete was initially put in, informed by “What Does the New LA River Master Plan Means for NELA?” by Eliot Brody (2021). The concrete provides a fast way for the water to flow to the ocean, making floods a very low possibility. With the amount of water that is going into the river during a storm if there was no concrete the water flow would be much slower, making floods happen more of a chance. As well as the concrete would be much cheaper and also easier to maintain, as it cuts off the possibilities of landslides into the river.	<p>Please refer to Master Response MR-5 (Naturalization of the LA River) concerning naturalization of the LA River. Eliot Brody’s article on the <i>2020 LA River Master Plan</i> references third-party concerns from Michael Atkins, communications director for Friends of the LA River, who has not commented on the <i>2020 LA River Master Plan</i>. In addition, please refer to Chapter 5, <i>Alternatives</i>, of the Draft PEIR and Master Response MR-5 (Naturalization of the LA River), which discuss how naturalizing the LA River through removal of concrete along the entire length of the river and restoring the channel to a naturalized substrate while maintaining the current channel alignment was an alternative that was considered but eliminated from further evaluation. Therefore, although the commenter makes an argument for concrete to line the river and not to naturalize the river, it should be noted that concrete would not be removed.</p> <p>Lastly, please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR to find more information about flooding in the proposed project area.</p>
I92 Jeffery Sapin	I92-26	This is where the solution to both problems can be solved; by keeping the concrete walls but having a soft bottom creating an invitation for trees and vegetation to grow. Concrete sides will naturally maintain the trees and vegetation as it limits the area of growth, allowing for sustainability by keeping the growth within the middle of the river. Also with the soft bottom, the trout will be able to access the river stated by “How Saving Southern California’s Steelhead Trout Could Also Help the State’s Watershed” by Debra Utacia Krol (2018), then begin to create its ecosystem in the river again and then being able to bring up the	This comment is acknowledged. Please refer to Master Response MR-5 (Naturalization of the LA River).

Commenter	Comment#	Comment	Response
		<p>population of this endangered species in the river. Even with the problems that the removal of the concrete will bring, the positives overcome the negatives. Being able to bring back the ecosystems that this river once supplied, can tremendously improve Los Angeles.</p>	
<p>192 Jeffery Sapin</p>	<p>192-27</p>	<p>This is one of multiple gripes I have with this plan. There’s lots of nice sounding things, like Section 7.3.5’s promise to “integrate Native American knowledge of plants and wildlife”, but honestly, to me this means nothing. It reads like shiny sugar coated words to me that are made to appeal to people who scan and go on with their day. What is this “Native American knowledge”? Who are they going to get this knowledge from and how will this help the river’s ecosystems? It feels a little closed-minded and vague to me. It doesn’t really help push anything forward, it’s at best a promise to talk to some non-specific people.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>However, please note that Native American consultation did occur for the Draft PEIR. Please refer to Section 3.17, <i>Tribal Cultural Resources</i>, of the Draft PEIR for tribal consultation information.</p>
<p>192 Jeffery Sapin</p>	<p>192-28</p>	<p>According to the CEQA Environmental Impact Assessment, the construction used along the river to achieve these things would result in “generation of air pollutant emissions from heavy-duty construction equipment, construction worker vehicle trips, material deliveries, trips by heavy-duty haul trucks, earthwork activities, and other construction activities.” The document goes on to say that these emissions could reach levels that “pose a significant risk to air quality.” (Los Angeles River Master Plan: Program Environmental Impact Report 2020) Not to mention, the introduction of these centers may need lighting, which will increase light pollution and use more energy, and might also need heating and cooling for bathrooms, gyms, museums, community centers, restaurants, and more. I understand that some of these things are unavoidable but the use of green energy</p>	<p>Please refer to Section 3.7, <i>Greenhouse Gas Emissions</i>, of the Draft PEIR for discussion on how the construction industry is moving toward cleaner fuels and electrified equipment, which would result in fewer pollutant emissions, and the technology would provide greater efficiencies in the equipment’s energy consumption over time. As such, the use of energy during construction of a Common Elements Typical Project would likely decrease over the lifetime of the proposed Project and be lower than what is analyzed in the Draft PEIR. Please refer to Sections 3.5, <i>Energy</i>, and 3.7, <i>Greenhouse Gas Emissions</i>, of the Draft PEIR for more information about the use of green energy sources and energy usage for the proposed Project. Lastly, please refer to Section 3.1, <i>Aesthetics</i>, of the Draft PEIR for Impact 3.1(d), Create a new source of substantial light or glare that would adversely affect day</p>

Commenter	Comment#	Comment	Response
		sources can limit these results. Perhaps the river itself could be used for some sort of hydroelectric power source.	<p>or nighttime views in the area, which addresses light pollution.</p> <p>Lastly, thank you for your suggestion to use the river as a source of hydroelectric power; however, it is out of the purview of the Draft PEIR.</p>
I92 Jeffery Sapin	I92-29	In that same vein, the construction of platform parks introduce more concrete and construction for the sole benefit of aesthetics. More concrete and construction around the river will potentially harm the air and water quality. Global cement production is at 4.2 billion metric tons, according to the World Cement Association and, according to Dr. Aditya Kumar who is an assistant professor of material science and engineering, “for every metric ton of cement produced, there’s 1.2 tons of CO2 released.” This is a huge problem. Research also shows that cement production accounts for 8 percent of CO2 emissions. (Sherman, 2021) Cement is a polluting industry and construction needs to start moving away from it and toward more sustainable practices. These ambitious plans for cement parks will just feed the global production of concrete.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
I92 Jeffery Sapin	I92-30	The lack of actual numerical goals given in the LA River Master Plan is troubling. The implementation of numerical goals allows for a better understanding and tracking of whether or not the plan has been met. Without quantifiable success metrics, it’s hard to hold government officials accountable for reaching and following the goals laid out in the plan for water quality. Concrete around the river can cause runoff and hurt the quality of the water. According to the Environmental Protection Agency (EPA), 46% of U.S. streams are contaminated from water pollution. While there are many causes for this, runoff from rain is a big one. (National Water Quality Inventory: Report to	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Also, please note that the <i>2020 LA River Master Plan</i> identifies nine goals, referred to as objectives under CEQA. Please refer to Chapter 1, Section 1.1.3, <i>Master</i></p>

Commenter	Comment#	Comment	Response
		<p>Congress, 2017) Rain can pick up oils and dirt from the concrete and flow into the river. Also, if fertilizers and pesticides are used to treat the grass and plants in these parks, those harmful substances can make their way into the river, further polluting it. Plans can be put in place to make sure that these things are not used to maintain the flora dispersed in these trails, parks, and walkways. Furthermore, platform parks can block out the sun from the water in the river which could potentially have negative effects on the water quality. (Advocacy Workshop Presentation Overview, 2020) There are ways to measure how much the water quality has been affected. With numerical goals for water health, the public can make sure that the water hasn't been contaminated in any major way.</p>	<p><i>Plan Objectives</i>, of the Draft PEIR for the numerical objectives.</p> <p>Please refer to Master Response MR-5 (Naturalization of the LA River) concerning naturalization of the LA River.</p> <p>Also, please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR to address concerns about runoff water quality.</p>
192 Jeffery Sapin	192-31	<p>Overall, the platform parks are not worth the downsides. It's not worth ruining our water and air quality for a few pretty parks over the water. The plan needs to focus more on green space which will act as natural flood control and will be good for the environment. If all the money used to create platform parks went to developing and maintaining bike paths and green spaces in disadvantaged communities by the river, more residents would be served.</p>	<p>Please refer to Master Response MR-5 (Naturalization of the LA River) concerning naturalization of the LA River. Note that concrete platform parks are not mentioned in the Draft PEIR. Crossings and platforms would typically include multi-use bridges for pedestrian, bike, and equestrian access, and they would connect communities to nearby parks and community facilities. Platforms are wider than crossings and can create space for parks, recreation, and habitats above the channel in addition to providing cross-river connectivity. Platforms can also host a range of habitat typologies, including riparian and upland conditions, and can allow for wildlife migration.</p> <p>The commenter appears to be expressing an opinion that crossing and platforms will cause impacts on water and air quality. Please refer to Objectives 8 and 9 of the <i>2020 LA River Master Plan</i> for improving local water supply reliability and promoting healthy, safe, and clean water. Also, please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, which analyzes the proposed Project's impacts on water quality and stormwater runoff and Section 3.2, <i>Air Quality</i>, of the Draft PEIR, which</p>

Commenter	Comment#	Comment	Response
			<p>analyzes impacts on air quality. Note that the proposed Project is not expected to substantially affect water quality. Please refer to Section 3.8, <i>Hazards and Hazardous Materials</i>, of the Draft PEIR, which addresses hazards and hazardous materials. Implementation of Mitigation Measure HAZ-1, Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures, would reduce issues related to hazardous materials.</p>
<p>I92 Jeffery Sapin</p>	<p>I92-32</p>	<p>Although the Master Plan has really adjustments and modifications, it really lacks in community engagement which is one of their biggest weaknesses. The plan fails to provide any incentives that will attract community members and engage them in this large scale effort. It also fails to address situations that can possibly happen if something goes wrong such as harmful chemicals or materials getting into the river, from people littering or flooding.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) regarding public outreach for the Draft PEIR. Additionally, the <i>2020 LA River Master Plan</i> was developed through engaging members of the public; the Steering Committee appointed by the Board of Supervisors made up of 41 organizations in the Los Angeles region with expertise across all the plan’s themes; and the technical team led by Public Works that included representatives of various County departments and a consultant team that included Geosyntec, OLIN, Gehry Partners, River LA, engagement and facilitation partners, technical specialists, and experts in housing policies and displacement. More information on community engagement for the <i>2020 LA River Master Plan</i> is available at larivermasterplan.org.</p> <p>Additionally, please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, which outlines how the</p>

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			<p>proposed Project is not expected to substantially affect water quality.</p>
<p>I92 Jeffery Sapin</p>	<p>I92-33</p>	<p>In the document Hazards and Hazardous Materials from LARMP, clarifies what are the specific materials and chemicals that can be harmful and hurt people. Additionally, the plan fails to address public disapproval pertaining to fears of displacement and availability of affordable housing.</p>	<p>Please refer to Section 3.8, <i>Hazards and Hazardous Materials</i>, of the Draft PEIR.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>The <i>2020 LA River Master Plan</i> seeks to improve neighborhoods without causing negative effects of displacement by proactively implementing a strategy for preventing displacement and supporting continuing affordability of housing in river-adjacent communities.</p> <p>Please refer to Master Responses MR-1 (Homelessness along the LA River) and MR-6 (Gentrification and Housing Affordability).</p>
<p>I92 Jeffery Sapin</p>	<p>I92-34</p>	<p>In the Environmental Impact Report’s Hydrology and Water Quality section of the Master Plan overview, multiple statements are made about how we can control the water quality levels by pollution prevention within land management. “This permit requires runoff issues to be addressed during major phases of urban development (planning, construction, and operation) to reduce the discharge of pollutants from stormwater to the maximum extent practicable, effectively prohibit non-stormwater discharges, and protect the beneficial uses of receiving waters.” This is an important message to note because it highlights goals about the protection of the water’s quality. That is an essential aspect of water supply reliability. Since the introduction of the</p>	<p>This comment is acknowledged. Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR) regarding program-level analysis in the Draft PEIR. Additionally, the <i>2020 LA River Master Plan</i> contains Objective 9, which aims to promote healthy, safe, and clean water. Requirements and laws that apply to the proposed Project within the PEIR to protect community health include, but are not limited to, items such as the inclusion in the project design of structural and non-structural BMPs that would be implemented to capture, convey, and control pollutant discharge, and infiltrate stormwater during a rain event; compliance with the Los Angeles County Municipal Separate Storm Sewer System Permit and its associated provisions; the Public Works</p>

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		<p>Master Plan discusses where the LA river’s water comes from, it’s important to address how that water gets polluted. In an article by CA Patch titled LA River Master Plan Focuses On Water Quality, Parks Access, the City News Service states that “The revised draft of the river master plan -- the first update in 25 years and the only plan encompassing all 51 miles of the LA River -- doesn’t propose specific projects, but uses research and data to signify community needs, such as improved water quality, housing, improved ecosystems, access to parks, flood risk management, and needed funding opportunities for river- adjacent projects.” This article addresses both the benefits and potential problems of the plan. It does a good job of explaining issues and who should be in charge of fixing them, but it does not explain how to specifically fix the issues. To continue on this sentiment, in an article by Steven Sharp titled Here’s a Look at the Updated L.A. River Master Plan, “Although the master plan does not effectuate any specific investments along the river, the document identifies 56 potential projects between the San Fernando Valley and the South Bay.” From this statement, we can conclude that although the action plans presented in the proposal do a good job of setting up goals, the actual explanations of how to complete those goals are replaced by vague language. If LA is to continue with this Master Plan, I will once again state that one of the most important things to focus on would be the water’s quality and reliability.</p>	<p>Low-Impact Development Standards Manual; compliance with the Clean Water Act; the requirement to prepare a Stormwater Pollution Prevention Plan; and compliance with the California Toxics Rule. These requirements are set in place with many objectives in mind, including to protect human health and the environment, protect the quality of the nation’s surface waters, improve water quality, and reduce impacts on surface water quality.</p>
192 Jeffery Sapin	192-35	<p>Technically speaking, due to the Channel Landsets, water is at a higher risk of being exposed to toxic chemicals because of the vulnerability of trash and other pollutants interfering with the clean H2O. The water supply of LA relies on the water quality of the river. In the passage, a background of how clean and reliable the water is in the riviera was showcased to</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further</p>

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		<p>the public to an extent. The proposition prevalently reports how the river could become sustainable, economically viable, environmentally protected, and socially equitable.</p>	<p>response is necessary. No changes to the Draft PEIR are needed.</p> <p>Please refer to Section 3.8, <i>Hazards and Hazardous Materials</i>, of the Draft PEIR, which outlines how Mitigation Measure HAZ-1, Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures, requires a professional hazardous materials specialist specializing in hazardous materials impact assessment to conduct a project-level analysis to verify the presence or absence of hazardous materials conditions (including Cortese List sites) in the vicinity of the construction site and if there is potential for existing hazardous materials conditions to affect construction activities. If a site is considered a risk to construction workers, the public, or the environment, the implementing agency will implement measures to reduce risk. Additionally, Mitigation Measure HAZ-1 includes provisions that would minimize the release and emissions of contaminated media (if identified on site) to nearby receptors, including schools.</p>
<p>I92 Jeffery Sapin</p>	<p>I92-36</p>	<p>I want to talk to you about the gentrification that will take place once this plan goes to action. I know in the overview it says how you don't want to make this a vulnerable area for gentrification but rather make it an area for any homeless to have housing. But regardless, gentrification is still a very much big issue in Los Angeles. With major improvements to the area violence may not be an issue as well as it may become more of a tourist attraction place. East LA is a place that would get affected the most as we are now seeing major housing developments in the area. Just earlier this year it was announced that one of the historic Sears departments will be shutting down to make way into apartments. East LA is considered a Hispanic Latin American a low income area and with these changes it</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>However, please refer to Section 3.13, <i>Population and Housing</i>, of the Draft PEIR, which discusses how inclusion of affordable housing in the <i>2020 LA River Master Plan</i> would not induce population growth but would rather serve the existing underserved low-income population</p>

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		<p>would no longer be a low income area as housing developments are being done and more people are willing to come to the place as changes are happening around the area. Now let me give you the of the doubt saying that you actually are going to make housing for the homeless and make the area a more sustainable lifestyle area for low income people. How do I know that the lifestyle cost won't increase making it hard for people to live in the area. As the place improves more tourists are going to want to come in making more businesses want to come in as well. With more businesses sure we get more jobs opportunities but it also makes the area expensive to live in. Making the area expensive for such a low income community will just push them out and you would create more unstable housing for these people making them possibly homeless at some point creating even bigger homeless situations that we have in LA. A great example of this would be in the West Adams community when the USC Village was introduced. Sure it did improve the area, as crime week rate went down but we saw major gentrification in the area too. Not only did the University change but the outer community changed too, as now people wanted to buy properties close to the Village. Rent that was once \$800 a month went up to almost \$2000 a month which is a tremendous amount of increase in price pushing an African-American and Hispanic base community. It helped make it a more white centered area. I brought that up as the Plan of the village was like that LA river plan, to help one community but it ended up hurting the other. Although I have talked bad about this project I believe it is attended to do good. East LA is a high crime rate area and with these improvements it would decrease the crime rate, making the community a safer place for people to actually feel confident in. Most of the time when people hear East LA they associate it to</p>	<p>and facilitate development of supportive housing for people experiencing homelessness.</p> <p>Please also refer to Master Responses MR-1 (Homelessness along the LA River) and MR-6 (Gentrification and Housing Affordability).</p>

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		<p>gangs and drugs. With the LA River Master Plan more parks are going to open as well as recreational centers for everyone. The addition of these instalments will bring in more people from different communities creating a better environment overall. People will have a different perspective of East Los Angeles, South Central, and Long Beach as they wont be associated with such a negative connotation. A nicer environment will inspire others to keep it that way and clean after it instead of trashing it and putting up graffiti. Overall the LA River master plan is intended to do good to the environment and help improve the surrounding communities of the river. However the plan shouldn't have to sacrifice community housing. With a couple of restrictions it is possible for the plan to go smoothly.</p>	
<p>193 Jon Fisher</p>	<p>193-1</p>	<p>I am a Los Angeles County resident and birder (birdwatcher). I would like to bring to your attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers of migratory shorebirds during fall migration (July through September). This is not “natural” habitat, but much of it has become a critically important feeding, resting and breeding area for many, many birds.</p> <p>I have been to and observed birds at all these locations, and it's difficult to put into words how important and rewarding to me those experience have been and continue to be. But these places are much more important to the birds themselves. Imagine a tired and hungry migrating shorebird, having flown for many hours and looking for a place to set down to feed and rest. For them, the Los Angeles River is that place.</p>	<p>The County appreciates Jon Fisher for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or</p>

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		<p>The Sepulveda Basin and the adjacent Los Angeles River includes extensive riparian habitat that is home to the threatened and federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern including Yellowbreasted Chat and Blue Grosbeak.</p> <p>Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations during fall migration. Most notably along the concrete section immediately south of the 134 Freeway.</p> <p>“Frogtown”; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak.</p> <p>South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration.</p> <p>Long Beach; section from Willow Street to Del Amo Boulevard. This area plays host to significant shorebird populations (on a global scale) during fall migration. This lower portion of the Los Angeles River hosts large numbers of migrating shorebirds from July through September. This is the best place in the county to observe these birds. Its preservation is critical. Shorebirds and many other species utilize this area for resting and foraging throughout the year. There is precious little other habitat of this type in the county. This truly is a critically important bird habitat. If lost, there is nothing else to replace it.</p> <p>It’s odd to think (even for the seasoned birdwatcher) that so many birds can thrive in what is basically a concrete channel, but this is the reality. All too often these areas are bulldozed, scraped, trimmed or</p>	<p>State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>

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		<p>otherwise impacted by agencies that are wellmeaning, but understandably wildlife conservation is not at the top of their priority list.</p> <p>I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species.</p> <p>Biological diversity is key to healthy ecosystems and the quality of the planet overall. Preserving both species and numbers of birds is an essential place to start. Birds, as the most visible of wildlife, are a barometer for what’s happening in the environment. Both current and future generations will thank us for doing all we can to protect these irreplaceable natural resources.</p>	
<p>194 Calvin Bon</p>	<p>194-1</p>	<p>As a local Los Angeles young birder, I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the fall migration. Watching thousands of shorebirds fly together in sync, or spread out on a mudflat foraging is a truly amazing sight, and stretches of the LA River are some of the best places to observe these incredible birds in Los Angeles County. Other members of the LA birding community and myself strongly urge you to give special consideration to the following areas due to their importance to the bird life of Los Angeles;</p>	<p>The County appreciates Calvin Bon for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce</p>

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		<ul style="list-style-type: none"> · Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway. · Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. · Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration. <p>I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species presence, especially eBird (ebird.org), to understand the presence and patterns of use by sensitive and protected species.</p>	<p>the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>
195 Cesar Estrada	195-1	<p>Thank you all for the opportunity to participate in this very important phase in the LA River Master Plan PEIR Comments and suggestions, Being a responsible and peaceful and environmental friendly loving citizens I just have a few comments and suggestions and wont</p>	<p>The County appreciates Cesar Estrada for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors</p>

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		<p>hurt and take much of your time on reading it. First and not the least is that I would love to see Military Hardware on the middle or on the banks of the River like a non nuclear or Conventional Aircraft Carrier at the opening of the LA River starting from the City of Long Beach then the likes of Planes, Tanks, Cannons, all varied kinds of military vehicles not including live ammunition off course.</p>	<p>for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This comment is acknowledged. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>I95 Cesar Estrada</p>	<p>I95-2</p>	<p>And if that is not gonna happen! I would just love to see trees or Palm Trees planted on the both banks and sides of the River to serve as shades on a warm weather and to add better aesthetics when times are and the interesting view in front of you are too far to be noticed with your plain sight and to the diminishing like mine's. The last but not the least is the wonderful life saving device this magical living trees will provide during the rush of flood during the storm seasons, imagine where are you can tie the other end of the rope, if there is a rope, at least when times people are coming to rescue a fellow individual every one can think instinctively to hold hand in hand or even hand to feet, and sometimes maybe feet to hands.</p> <p>And if this still not going to happen, I will sneak every single night, sometimes days, and I will start planting nursery trees near by my house and work towards farther until every River Loving individuals would join me and hopefully.</p>	<p>This comment is acknowledged. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>I96 Christine Rowe</p>	<p>I96-1</p>	<p>Thank you for extending the public comment period. I wish that the public comment period was extended longer. Due to COVID - 19, and other factors, including the extension of the time for our Federal income taxes to be due, I have not been able to study the Master Plan</p>	<p>The County appreciates Christine Rowe for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p>

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		<p>issue in detail as I would have liked. I am commenting at this time only on what I heard on the ZOOM meeting presentations in recent months. In specific, I am commenting on this presentation attached.</p> <p>1) I oppose the widening of the river at any point due to the potential impacts of that widening down stream. 2) Most important, the widening of the river could displace between 20,000 - 106,000 residents along the river. 3) We already have a major homeless crisis, and there is no end in sight on how to house the unhoused. The issue of the unhoused must be addressed before we make any changes to the river. 4) Your map - slide 18 - on COVID - is inaccurate to the location of Canoga Park. The headwaters where the creeks converge is in Canoga Park. That is not shown on that map page. 5) I use the CalEnviroScreen 3.0 and 4.0 tools for pollution burden and population information. 6) The channel should remain lined for the purposes of flood control. Please let me know if you can extend the comment period further.</p>	<p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR). In response to this comment and others initially received, on March 4, 2021, the review period was extended to April 2, 2021 (60 days). The review period was then extended a second time to May 13, 2021, to provide additional review time to all interested parties. In total, the review period was open from February 1, 2021, to May 13, 2021, for 101 days, which is more than twice the 45-day minimum required by CEQA (State CEQA Guidelines Section 15105).</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Master Response MR-1 (Homelessness along the LA River). It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
I97 Steve Appleton	I97-1	<p>The LA County Master Plan’s first order of business is to argue that a “naturalized” Los Angeles cannot co-exists with safe flood control. Common questions about LA River are presented and quickly dismissed as naïve: “Can we remove concrete?” “What if we put trees in the channel...” “What is so complicated about widening and naturalizing the river?” The answers are brief and general, setting the tone for a document that in my view both oversimplifies and overcomplicates. I will address one specific situation to make my point. The</p>	<p>The County appreciates Steve Appleton for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-5 (Naturalization of the LA River). Please note that the County is not planning to “cap the river” as the commenter mentions. Concrete platform parks are not specifically analyzed in the Draft PEIR, as the Draft PEIR is a program-level analysis where</p>

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		<p>LA River adjacent to Taylor Yard is, without a doubt, is the area that has inspired a generation of poets, recreational enthusiasts, and small businesses. As a public artist who was drawn into its sway living on the edge of the river in Elysian Valley, I established LA River Kayak Safari in 2013. I have led nearly 10,000 people on kayaking trips in this soft-bottom stretch. Down here in the river, one enters that I call the river’s “stage”, an almost theatrical space within the City where the sounds and experiences of nature overtake the urban. Many creatures perform here, such as our native Baja California Chorus Frogs that are drawn to vernal ponds, willows, slow moving section. Waterfowl and fish are abundant. This intimate experience of nature within the City is precisely what has foisted the LA River into our consciousness. What has it taken to bring the LA River to public consciousness here? All it took was to build a bike path, a few pocket parks and increase public access. There is much more than can and will be done but my point is to say that the natural condition was the draw. The intimacy of nature is the draw for people and for a burgeoning river economy. From the “people perspective” the primary charm of the LA River derives from the intimate break it provides from the City. Not all the river should or can emulate Elysian Valley. However, for those of you public servants assessing this plan, you need to get your feet wet. People seek this intimate experience, and it should be forwarded in all processes of assessment of river plans. Not incidentally people and ecological perspective do oftentimes align. Each stretch of the river will require a specific inventory of its assets and possibilities – including how to mitigate flood risks. Unfortunately, the Masterplan also employs broad generalities when it concludes that naturalization dreams are not feasible due to flood risk. For instance, the document lumps together the unique</p>	<p>the environmental impact analysis is presented at a programmatic level and does not include project-specific or site-specific analysis. Regardless, a platform park is a park situated on a structural deck spanning over a space typically unsuitable for parkland, such as a roadway or waterbody. The project example at this point is conceptual but, given the level of detail provided in the <i>2020 LA River Master Plan</i>, the platform park does not appear to in any way “cap the river,” but would instead create new open space and foster connectivity, ecosystem function, and cultural resources while respecting the very critical need for flood risk management.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

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		<p>natural bottom section of Elysian Valley with the rest of the 52 miles when it states unequivocally, “The additional space needed for channel widening would require the displacement of people, businesses, and infrastructure adjacent to the LA River. (page 26) In a similar vein it states on page 23, “It is not feasible to remove the concrete from the LA River without causing significant negative impacts to communities and local culture.” What? How would an engineered expansion of the river into publicly owned lands of Taylor Yard displace, “people, business and infrastructure?” How does it cause “significant negative impacts to communities and local culture?” The lands of Taylor Yard were purchased at great cost by the City of Los Angeles for the specific purpose of enlarging the river’s ecological footprint of the LA River and expand public access and stewardship alongside the presumed ecological benefits of increased aquifer recharge, biodiversity and cooling impacts of vegetation and waterway. Many have contended that there is no alternative for Elysian Valley to mitigate its flood risks but to draw down the canopy of plants or to make a giant pipeline many miles upstream to bypass Elysian Valley in high water conditions. As members of the public, non-profit organizations and technical commentors have sought more data and information about this conclusion, the relevant agencies have provided scarce data or analysis. Asks for detailed topographic data have gone unanswered, possibly on the mistaken assumption that the public are not sufficiently skills to render technical comments?</p> <p>The shape of Elysian Valley today closely mimics the shape of the river dating back to the very first patent map of Los Angeles. See below: (image not copied in) Unlike so many other parts of the river where its banks were “straightened” during channelization, Elysian Valley was spared the straightedge. Why? Because</p>	

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		<p>Taylor Yard was in full swing as a local employer and the key method to move goods to and from the growing region. It could not be moved, or in the parlance of the plan “displaced.” This historical artifact of the river’s shape, combined with the flows of underground waters from the nearby Mt. Washington hills, is exactly why the river is softbottom here and why nature proliferates, and humans enjoy it. Is there a way to backchannel waters in a straighter line during flood conditions? Are there ways to expand the ecological footprint without creating public safety risks? Possibly. Has it been sufficiently studied? I think not.</p> <p>(A good point of reference would be the detailed GIS mapping framework recently brought forth by Ethington and Longcore.) I will conclude my limited comment by imploring government officials who serve constituents to think carefully about the approval of this plan without further study and engagement. I would caution you that proposed project ideas that cap the LA River with concrete expansions of real estate may consumed massive infrastructure spending but not deliver on the promised public and ecological value. Why not first study river adjacent underutilized properties and buildings that might more equitably, and efficiency be utilized to expand the flood, park, and public access of the river in your areas?</p>	
I97 Steve Appleton	I97-2	<p>You should also pay attention to the fact that many leading non-profit and stakeholder groups who were the leaders that drove the river to prominence are opposed to the current Masterplan. Public works projects require strong consensus and the embrace of constituents. I am deeply worried that this Masterplan does not currently possess such a consensus and that it has defined sketchy projects rather than a process for the future. To embark without consensus of key constituencies is not wise. About consensus I would ad</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

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		<p>that the planning process lacked adequate community participation. As a person engaged in the river for more than 25 years- as artist, kayaker, activist, and volunteer public servant - my only option for engagement was to respond to presentations already hatched or make editorial comments on a 494-page document. My slight insult is of no import. What matters is that you have failed to take account of local knowledge that will be crucial for sustainable LA River projects. The assumption that local knowledge is merely about “what people want to see” or “how they want their parks to be...” is a slight to the depth of local knowledge which often contains historical, practical, and technical insights. I urge you to convene of working group of community reviewers as a first step to establishing a process that is both more detailed and open-ended than the current Masterplan and which can gain broad consensus.</p>	<p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for information about the extensive public outreach for the Draft PEIR. Each comment addressing environmental analysis in the Draft PEIR will receive a response from the County (State CEQA Guidelines Section 15088). These comments are included in the Final PEIR.</p>
<p>I98 Aida Ashouri</p>	<p>I98-1</p>	<p>1) The document is overly complicated, too long, and has not been presented in a simplified manner to the community in order to be understood.</p>	<p>The County appreciates Aida Ashouri for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>However, if the commenter is discussing the Draft PEIR, then please note that every attempt was made to ensure that the Draft PEIR is available and understandable to the general public, despite the complexity of the technical</p>

Commenter	Comment#	Comment	Response
			<p>topics addressed, by using plain language in the document, defining acronyms, providing a searchable and navigable portable document format (PDF) electronically for the public along with flyers in libraries across the region with links to viewing access online, and conducting an extended public comment period. In addition, please refer to Master Response MR-3 (Public Outreach for the Draft PEIR).</p>
<p>198 Aida Ashouri</p>	<p>198-2</p>	<p>2) The plan doesn't include the watershed or tributaries when considering the river, which would be a part of the river. The river is not just a storm drain, it is a living, breathing connection to the earth. It spans a wider area than what is currently considered.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>198 Aida Ashouri</p>	<p>198-3</p>	<p>3) The projects that are proposed in the Mater Plan are limited and there is not a full environmental review of all plans proposed or possible in the Master Plan</p> <p>4) Many projects are promoted in the Master Plan but they are not evaluated in the PEIR.</p> <p>5) What is a typical project? The final PEIR should evaluate projects that are more representative.</p>	<p>In the <i>2020 LA River Master Plan</i>, these projects were provided as examples of implementation of the <i>2020 LA River Master Plan</i>. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. The <i>2020 LA River Master Plan</i> is intended to guide how future projects would be planned and define their key design elements, including best management practices to reduce environmental impacts. Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>Please refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR, which discusses that the two Typical Projects most likely to be proposed throughout the 51-mile-long corridor include the Common Elements Typical Project and Multi-Use Trails and Access Gateways Typical Project. The Typical Projects could be sited between the</p>

Commenter	Comment#	Comment	Response
			top of levee and the fenceline at any location in the study area.
I98 Aida Ashouri	I98-4	<p>6) I am concerned that the PEIR states that there are impacts that are “significant and unavoidable” which could open the door for damaging projects. I would like to make sure that nothing damaging is considered “unavoidable.” Please clarify this language.</p> <p>7) Please examine impacts from the river that incorporate the entire watershed and tributaries and not just the concrete barriers.</p>	<p>Please refer to Chapter 1, <i>Introduction</i>, Section 1.3.1.1, <i>Enforceability of Mitigation Measures</i>; Section 1.3.1.2, <i>PEIR and Later Activities</i>; and Section 1.4.2, <i>Later Activities</i>. The County would commit to the mitigation proposed in the PEIR, if approved as recommended, and the County believes that other entities that propose projects under the <i>2020 LA River Master Plan</i> and PEIR similarly can and should adopt the proposed mitigation. However, the County cannot enforce or guarantee that the mitigation measures in the PEIR will be implemented by the other agencies, which is why the County provided two separate impact conclusions: County and non-County. Such changes or alterations to a project are within the responsibility and jurisdiction of other public agencies and not the agency making the finding. However, if the mitigation measures identified in the Draft PEIR are adopted by another agency for impacts that are considered less than significant after the mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for projects not carried out by the County, for the same reasons as discussed for later activities carried out by the County.</p> <p>Additionally, please refer to Master Response MR-7 (MR-7 Master Plan Area/PEIR Study Area and Addressing the LA River in a Comprehensive Manner) in response to the comment regarding the entire watershed.</p>
I99 Elena Tucci	I99-1	<p>PEIR</p> <p>The Draft PEIR requires major revisions to be an appropriate CEQA document for the County’s draft Los Angeles River Master Plan. The two major concerns with the PEIR are document complexity and that the</p>	<p>The County appreciates Elena Tucci for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p>

Commenter	Comment#	Comment	Response
		<p>“typical projects” are not representative of the intent or scope of the Master Plan. I request that these two flaws be robustly addressed in revisions to the Draft PEIR.</p> <p>In terms of complexity, the draft PEIR is cumbersome, lengthy and inaccessible, in breach of CEQA Sections 15140 and 15141 which require plain language and where appropriate graphics so that the public can rapidly understand the documents as well as a length limit of less than 300 pages for highly complex projects. A document six times that length is unacceptable. In practical terms, the County must in the Final PEIR use plain language for clarity and accessibility, have a more functionally navigable PDF, and include in-person viewing opportunities for documents and large-printed maps. The document should be shortened and if this is genuinely impossible then additional public comment time and proactive incommunity support should be provided by the County so as to empower community members to understand the documentation and submit comments under CEQA.</p>	<p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR).</p> <p>In addition, Article 10, Considerations in Preparing EIRs and Negative Declarations, of the State CEQA Guidelines, Section 15141, Page Limits, states that the text of Draft EIRs should be 150 pages and for projects of unusual scope or complexity should normally be less than 300 pages, not “shall be.” The statute allows for longer documents, when appropriate. Given the complexity and geographic extent and anticipated lifespan of the proposed Project, the Draft PEIR conveyed as much information as possible to the readers in an attempt to convey the potential impacts of the projects proposed.</p> <p>Please also note that every attempt was made to ensure that the Draft PEIR is available and understandable to the general public, despite the complexity of the technical topics addressed, by using plain language in the document, defining acronyms, providing a searchable and navigable portable document format (PDF) electronically for the public along with flyers in libraries across the region with links to viewing access online, and conducting an extended public comment period.</p> <p>Following Governor Newsom’s Executive Order N-28-20 relating to the threat of COVID-19, the Los Angeles County Board of Supervisors announced that all Los Angeles County facilities would be closed to members of the public beginning March 16, 2020, and the closing of buildings and facilities was indefinitely extended. Public Works facilities have only recently reopened on October 1, 2021.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for information about the extensive outreach program that was conducted for the Draft PEIR. In response to this comment and others initially received, on March 4, 2021, the review period was extended to</p>

Commenter	Comment#	Comment	Response
			<p>April 2, 2021 (60 days). The review period was then extended a second time to May 13, 2021, to provide additional review time to all interested parties. In total, the review period was open from February 1, 2021, to May 13, 2021, for 101 days, which is more than twice the 45-day minimum required by CEQA (State CEQA Guidelines Section 15105).</p>
<p>199 Elena Tucci</p>	<p>199-2</p>	<p>Secondly, the PEIR is misleading and ineffective because the two projects that are put forth as typical are far from typical when they are contrasted with other project possibilities that are framed in the Master Plan. The two “typical” projects are a multi-use trail and a river adjacent gathering place composed of various common elements from the Master Plan. These are relatively low impact projects and are very similar to existing features of the LA River, so it is unhelpful to have built the PEIR around them. Instead, the PEIR should analyze significant projects such as channel transformation (the Plan includes suggestions to terrace, deepen, widen, convert walls from trapezoidal to vertical, divert water in tunnels, and restrict public access), capping the river with large concrete platform parks or cantilevers (a concept the County has championed in presentations and media outreach but neglected in the PEIR), or building infrastructure every 0.4 miles along both banks of the river.</p>	<p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR does not include project-specific or site-specific analysis. Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance. Please refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR, which analyzes the impacts of the Common Elements Typical Project, all six kit of parts categories, and the overall <i>2020 LA River Master Plan</i> (i.e., all potential projects) itself. As such, the Draft PEIR analysis includes channel transformation and build-out of the <i>2020 LA River Master Plan</i>, as suggested by the commenter. In addition, cumulative impacts for all resource topics are analyzed in Chapter 3, <i>CEQA Environmental Impact Assessment</i>, of the Draft PEIR and take into consideration the <i>2020 LA River Master Plan’s</i> cumulative contribution to past, present, and reasonably foreseeable future projects. Please refer to Chapter 1, <i>Introduction</i>, of the Draft PEIR, which discusses how the impacts of the Typical Projects have been identified in the Draft PEIR to assist agencies in later discretionary actions to identify the individual project impacts under consideration and help determine if the later activity can be included in the scope of the PEIR. Under State CEQA Guidelines Section 15168, where the later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to</p>

Commenter	Comment#	Comment	Response
			<p>determine whether the environmental effects of the operation were within the scope of the PEIR.</p> <p>Please note that the County is not planning to “cap the river” as the commenter mentions. Concrete platform parks are not specifically analyzed in the Draft PEIR, as the Draft PEIR is a program-level analysis where the environmental impact analysis is presented at a programmatic level and does not include project-specific or site-specific analysis. Regardless, a platform park is a park situated on a structural deck spanning over a space typically unsuitable for parkland, such as a roadway or waterbody. The project example at this point is conceptual but, given the level of detail provided in the <i>2020 LA River Master Plan</i>, the platform park does not appear to in any way “cap the river,” but would instead create new open space and foster connectivity, ecosystem function, and cultural resources while respecting the very critical need for flood risk management.</p>
199 Elena Tucci	199-3	<p>Master Plan</p> <p>While the LA River Master Plan is an impressive and useful piece of river research, it is a manifestly inadequate vision document for the river over the next 25-year time horizon (and beyond). The Plan continues an almost century-old legacy of disregarding the riverly-ness of the river.</p> <p>The major flaw in the Master Plan is that it is framed in terms of infrastructure and commercial opportunity, not ecology or even hydrology. Because of this failing, we risk regression rather than advancement of nature connectedness, ecological improvements, and climate resilience in Los Angeles. A major flaw of the Plan is that it considers only a two mile wide strip of land along the river’s 51 miles, a conceptualization of the landscape which has no logic other than to reveal the</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>The <i>2020 LA River Master Plan</i> objective is not to put the river into industrial use but to reduce flood risk and improve resiliency; provide equitable, inclusive, and safe parks, open space, and trails; support healthy connected ecosystems; enhance opportunities for equitable access to the river corridor; embrace and enhance opportunities for arts and culture; address potential adverse impacts on housing affordability and people experiencing</p>

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		<p>built environment bias of the Plan. The expansiveness of the Plan’s countless pick-and-choose possibilities, coupled with an absence of a schema for prioritization or any professed values around tangible environmental justice, makes it likely that what would proceed under this Plan would be commercially-driven and highly deleterious for the river and the city’s environmental wellbeing. Los Angeles has waited a long time for the Master Plan update, and deserves much better than what has been offered in the draft. Key issues regarding the Master Plan that public officials and private investors should consider while finalizing this plan include:</p> <ul style="list-style-type: none"> • Managing knowledge. • Protecting the environment. • Reducing gentrification. • Physical footprint. • Promoting transparency and monitoring. <p>Addressing these challenges and mitigating negative impacts will transform the L.A. River and ensure a sustainable and just river for the coming generations. Managing Knowledge The Master Plan lays out the blueprint for this once-in-a-century project to transform a large swathe of the city and with the city’s extremely checkered past of urban planning and injustice, this generation better get it right or risk being on the wrong side of history, again. No shortage of “what could have been done” or more accurately “should have been done” exists, but these learnings should act as a stencil for the L.A. River project. The L.A. River project should take all of these and ensure that “never again” actually means never again. In that respect, knowledge from historians, former public officials, and civil society organizations should be</p>	<p>homelessness; foster opportunities for continued community engagement, development, and education; improve local water supply reliability; and promote healthy, safe, clean water. In general, the <i>2020 LA River Master Plan</i> would create more habitat, clean water, and access and the negative environmental impacts would be offset by the positive effects of the plan.</p> <p>Please refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR, which outlines how the <i>2020 LA River Master Plan</i> contains nine objectives (referred to as “goals” in the <i>2020 LA River Master Plan</i>). Note that Objectives 2 and 4 address enhancing opportunities for equitable access to safe parks, green space, and the river corridor. The Common Elements Typical Project includes pavilions, cafés, hygiene facilities, restrooms, benches, emergency call boxes, water fountains, trash and recycling, bike racks, environmental graphics, lighting, planting, stairs/ramps, guardrails, fences and gates, stormwater best management practices, and art/performance spaces that would be constructed at a set cadence along the LA River. It is anticipated that the Tier III pavilions would occur every 2 to 3 miles along the river. The Tier I and Tier II pavilions would potentially be placed every 0.5 mile while being spaced to optimize distance. The nine objectives, as outlined, ensure that the resilience of the river’s native ecosystems and hydrological or climate changes be considered as part of future project implementation.</p> <p>In addition, please refer to Master Responses MR-6 (Gentrification and Housing Affordability) and MR-7 (Master Plan Area/PEIR Study Area and Addressing the LA River in a Comprehensive Manner) to address concerns about gentrification and the 2-mile-wide study area buffer analyzed in the Draft PEIR.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) regarding public outreach.</p>

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		<p>captured and transferred to policy makers to ensure that urban planning is more just. From redlining to destroying neighborhoods with freeways to rampant gentrification, the lessons are enormous. A systematic approach to gathering and applying lessons from the past should be an integral part of any major undertaking. Such an approach creates a culture of learning, from which present and future generations can profit.</p> <p>Ensuring that “never again” is less a slogan and more a part of the city’s DNA, both government and nongovernment forces and sources need to play a key role. Multistakeholderism is taking hold around the world in a variety of fora, such as the Extractive Industries Transparency Initiative (EITI, covering oil, gas and mining revenues) and the Kimberley Process Certification Scheme (addressing “blood diamonds”). A multi-billion project in the City of Angels (indeed potentially tens of billions) should be no different.</p> <p>Protecting the Environment</p> <p>With a mission to “protect and enhance California’s coast,” the California Coastal Commission has staunchly protected the California coast from undue commercial real estate influence and possible negative impacts. While overly cautious at times, the Commission has protected the environment and the interests of coast users, not just the wealthy few.</p> <p>Compared to unregulated coastal development in Croatia or the Crimea (in the latter, private property to the water’s edge, fenced to the water), California should be proud of having a regulatory body that ensures that human imprint and impact is kept to a minimum. Given the L.A. River’s ecology, should there be a regulatory body to oversee the entire section of impacts from Mile 1 to Mile 51? Rivers don’t live in</p>	<p>Additionally, the <i>2020 LA River Master Plan</i> was developed through engaging members of the public; the Steering Committee appointed by the Board of Supervisors made up of 41 organizations in the LA region with expertise across all the plan’s themes; and the technical team led by Public Works that included representatives of various County departments and a consultant team that included Geosyntec, OLIN, Gehry Partners, River LA, engagement and facilitation partners, technical specialists, and experts in housing policies and displacement. More information on community engagement for the <i>2020 LA River Master Plan</i> is available at larivermasterplan.org.</p>

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		<p>silos and neither should public servants. The strain on city services will likely rise—commercial and residential buildings require water and usually have parking spaces, to mention just two examples. Los Angeles should show leadership by abandoning parking minimums for housing. Following UCLA’s Donald Shoup (the “Moses of Parking”—thou shalt not park for free), erasing parking minimums would have a large impact. Having a river that can be accessed and traveled by bike along large parts of its length (like Paris and London) will reduce traffic and directly, positively impact community health. Indeed, an interactive map models several crowded areas showing parking availability and the impact of reducing parking to make way for housing.</p>	
<p>199 Elena Tucci</p>	<p>199-4</p>	<p>Reducing Gentrification</p> <p>Gentrification is the elephant in the room. The Master Plan touches on the subject without actually mentioning the word, as part of its “6th Goal” regarding housing and the negative impacts of development. The housing crunch centers around Downtown L.A. and Long Beach, but affordability challenges are pressing all along the river. With the planned beautification and access to parks, areas will be more attractive and available, creating parking “creep” in surrounding neighborhoods and new demand for housing in the neighborhood. Neighborhoods along the river that aren’t currently experiencing housing scarcity will likely be soon. As the quality of the river environment improves, real estate agents will mention river access as an additional asset. In peripheral neighborhoods, a potential rush of buyers is likely and should spur the requisite planning. Indeed, the Master Plan lays it out in black and white—one in four Californians lives within one hour of the river. That is quite a magnet and a rush of buyers can be expected. To help alleviate the</p>	<p>Please refer to Master Response MR-6 (Gentrification and Housing Affordability) regarding gentrification.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

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		<p>stress and build communities, county officials should consider the following principles: Embrace the 15-minute city concept – With this concept, all essential services and amenities can be reached using public transport, biking, or walking within a quarter of an hour. While it is hard to imagine any U.S. metropolis within striking distance of the coveted 15 minutes or under, Los Angeles should try, and try hard, to reach that goal. This policy would reduce strains on the city’s transportation infrastructure and the millions of hours wasted in commuting to work and to shop. Promote home ownership – Low interest rates present a significant opportunity for homeownership, despite the pandemic. As the quality of life improves in some areas around the river, prices will go up and ownership will change. Boyle Heights and West Oakland in the East Bay Area are perfect examples of that. Civil society organizations (CSOs) discussing these topics in multiple languages should be part of any master plan. Financial literacy is a crucial aspect to justice.</p> <p>Consider housing unit size – California’s housing unit size is the smallest of any state, with an average unit size of 837 square feet. Seattle is the smallest city with 711 square feet with challenging weather. Los Angeles has a considerably larger apartment size at 792 square feet. With only one river, and as one of the world’s largest metropolises, the demand for housing along the river in Los Angeles will require some people to live in smaller units. Space is too much of a premium for lofts. The Casitas Lofts, which offered a paltry 10% of its units for affordable housing, are a case in point. Lofts near transport hubs or with nearly exclusive access to parks would be as unjust as freeways. Public ownership of housing – The Master Plan discusses land banks, in which the public agencies can purchase or hold land in the short-term to sell to the private sector for future development. Policymakers should go one</p>	

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		<p>step further—own and develop the land forever. An interactive map on public agencies that own land in the area is revealing. Initiated by L.A.’s Controller Ron Galperin, the map scopes the ownership of public agencies. Some German cities wholly own companies with the mission to build affordable housing. These entities have proven the concept that social mission and economic activity are not a contradiction. Given that hundreds of lots in the city and county are vacant, the economic upside of developing publicly owned land in Los Angeles must be in the billions. Los Angeles should consider having its own building entity, which provides a responsible and sustainable approach to the city’s housing. It can lead by example—promoting justice and sustainability simultaneously. At the very least, an absolute freeze on any selling of public land should take immediate effect. If there is any transaction, it should be leased, but not sold outright.</p>	
<p>199 Elena Tucci</p>	<p>199-5</p>	<p>The Physical Footprint</p> <p>In addition to soft policies designed to mitigate gentrification and protect the environment, the following three issues will help to shape a more enlightened and just physical space.</p> <p>The built environment – It is likely that an inordinate amount of buildings will be built along the corridor, so sustainability has to be the priority. Leadership in Energy and Environmental Design (LEED) rates buildings in energy, energy efficiency, environmental impact, water use, and footprint. A blanket policy should demand that all commercial and residential buildings are LEED Platinum, the highest level, to ensure that the environmental footprint and energy use are minimized. Finally, each building should roll out “materials passports” to increase recycling at the end of a structure’s life cycle, to help spur participation</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>However, please refer to Section 3.5, <i>Energy</i>, of the Draft PEIR, which addresses Leadership in Energy and Environmental Design.</p>

Commenter	Comment#	Comment	Response
		<p>in the circular economy. Parks and recreational space – Some of the river’s adjacent communities are the most park poor in the county, and the Master Plan rightly addresses it in the document’s second goal. Neighborhoods along the river with the smallest amount of park space include:</p> <ul style="list-style-type: none"> • Compton - .6 acres per 1,000 • East Rancho Dominguez - .4 acres per 1,000 • Maywood - .3 acres per 1,000 <p>With L.A. County’s average park space at about 8.5 acres for every 1,000 citizens, East Rancho Dominguez and Maywood have 20-25 times less park space than the county average. Congratulations are due to the Master Plan for highlighting this in its second goal. If the plan delivers, the liveability around some neglected neighborhoods will improve significantly.</p> <p>Community bridge building – Most bridges crossing the river are meant for cars and large vehicles. Therefore, it is important that small pedestrian and cycling bridges are constructed, connecting communities with active transportation routes.</p> <p>Aesthetically pleasing simple structures, using Accelerated Bridge Construction (ABC), would allow more exchange on both sides. These bridges would facilitate community interaction and duly promote cycling corridors, providing alternatives to more dangerous main arteries. From a structure to a concept, bridges could also help to promote dialogue and exchange through areas to sit in the middle, allow both sides of the river to “build bridges” among themselves.</p> <p>Promoting Transparency and Monitoring</p>	

Commenter	Comment#	Comment	Response
		<p>The L.A. River contracting process must be transparent and requires vigilant monitoring for its soft and hard impacts in the coming generations. Contract Transparency – In the notoriously opaque extractive sector, the momentum toward contract transparency reached a crescendo in January when countries belonging to the Extractive Industries Transparency Initiative (EITI) pledged to publish their oil, gas and mining contracts. Some of EITI’s 55 member countries—Nigeria, Democratic Republic of the Congo and Kazakhstan—routinely fare poorly in Transparency International’s Corruption Perceptions Index (CPI). American transportation, in which there are tens of billions of dollars at stake, could take a page out of EITI’s hymnal. The publication of large-scale contracts (e.g., for freeways, bridges, and feasibility studies) would create more accountability in the private and public sectors and facilitate financial literacy among communities. After all, billions of dollars, impacting millions of people, are at stake.</p> <p>Constant evaluation – With leading universities located within an hour of the L.A. River, several could form a consortium, acting as a neutral third-party, offering mountains of data regarding the Master Plan’s impacts for the coming decades.</p> <p>UCLA, USC, Occidental, and Cal Poly Pomona all have very solid faculties in environment and urban planning. Given the Master Plan’s complexities, a standalone unit could measure the impacts on an annual basis as a complement to civil society organizations.</p>	
199 Elena Tucci	199-6	<p>In Conclusion</p> <p>The impacts of the vision expressed by the L.A. River Master Plan on those living adjacent to the river are and will be enormous. Our shared goal should be to bolster the positive impacts of the plan and do our</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared</p>

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		<p>collective best to mitigate the negative impacts as the Master Plan goes from paper to policy to practice. L.A.’s freeways are a monument to cutting out and cutting off those with little or no voice. With the L.A. River, while we cannot change history, we can certainly learn from it. If we can do that, then we will succeed in transforming 50 miles of river in a climate-challenged metropolis.</p> <p>One man’s developer is another man’s destroyer. If some of these ideas are implemented, developers might not make a financial killing like the days of yore, but they will do more than a respectable business. Lewis MacAdams, the L.A. River’s patron saint, summed up his philosophy succinctly: “If it’s not impossible, I’m not interested.” Many may view some of the above proposals as unrealistic or impossible. That sentiment should be the ticket to entry for the project of the century. With that “impossible, but I’m in” attitude, those courageous and long-term thinking public servants and responsible private companies will achieve immortality. Most importantly, Los Angeles and its concrete channel-turned-river will serve as not only a place of community but as a lighthouse around the world not only talking sustainability and justice, but proudly walking it.</p>	<p>with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
I100 Joyce Dillard	I100-1	<p>This document did not have the proper circulation without public access such as a library. It is impossible to read it on a smartphone. One must own a computer and have internet access.</p>	<p>The County appreciates Joyce Dillard for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) regarding public outreach. Following Governor Newsom’s Executive Order N-28-20 relating to the threat of COVID-19, the Los Angeles County Board of Supervisors announced that all Los Angeles County</p>

Commenter	Comment#	Comment	Response
			<p>facilities would be closed to members of the public beginning March 16, 2020, and the closing of buildings and facilities was indefinitely extended. Public Works facilities have only recently reopened on October 1, 2021. Due to COVID-19 and Governor Newsom’s safety mandates related to the pandemic, virtual sessions and online public meetings were held to engage the public and provide opportunities for feedback.</p> <p>Please also note that every attempt was made to ensure that the Draft PEIR is available and understandable to the general public, despite the complexity of the technical topics addressed and the COVID-19 pandemic, by using plain language in the document, defining acronyms, providing a searchable and navigable portable document format (PDF) electronically for the public along with flyers in libraries across the region with links to viewing access online, and conducting an extended public comment period of 101 days.</p>
I100 Joyce Dillard	I100-2	Chapter 2 objectives include homelessness, water supply and water quality. Homelessness is the wrong objective. Public health and safety should be the objective.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
I100 Joyce Dillard	I100-3	Water supply is not an issue since the river is channelized. Water quality is related to the Clean Water Act and permitting. Channelized rivers fall outside the federal definitions.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.

Commenter	Comment#	Comment	Response
I100 Joyce Dillard	I100-4	The KOP Kit of Parts needs to include aspects on the upstream and downstream of the area. The river is fragile and stability is questionable. The US Army Corps of Engineers have jurisdiction not the County or the cities.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
I100 Joyce Dillard	I100-5	Scientific measurable data is lacking. Earthquake activity from the coastal cities and ocean affect this area yet it is not addressed as part of this project.	Please refer to Section 3.6.2.1 in Section 3.6, <i>Geology, Soils, and Paleontological Resources</i> , of the Draft PEIR for more information on earthquake activity in the proposed project region.
I100 Joyce Dillard	I100-6	The problem with PEIRs is the lack of additional environmental filings by the Lead Agency. Other agencies such as the City of Los Angeles may file Categorical Exemptions with their City Clerk, but not with the State of California and not under the Lead Agency of the PEIR.	<p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) and MR-4 (Adherence to Local Jurisdictions’ Requirements). Agencies are encouraged to tier the environmental analyses they prepare for separate but related projects including general plans, master plans, zoning changes, and development projects. There is no definition of specific future projects because the <i>2020 LA River Master Plan</i> is a conceptual plan and project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance. This approach can eliminate repetitive discussions of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of CEQA compliance.</p> <p>Please note that the County cannot enforce or guarantee that the mitigation measures in the PEIR will be implemented by the other agencies, which is why the County provided two separate impact conclusions: County and non-County. Such changes or alterations to a project are within the responsibility and jurisdiction of</p>

Commenter	Comment#	Comment	Response
			<p>other public agencies and not the agency making the finding. However, if the mitigation measures identified in the Draft PEIR are adopted by another agency for impacts that are considered less than significant after the mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for projects not carried out by the County, for the same reasons as discussed for later activities carried out by the County.</p>
<p>I101 Katherine Kato</p>	<p>I101-1</p>	<p>I am writing in response to the request for comments to the Draft PEIR of the <i>2020 LA River Master Plan</i>. Something happened to my original email, this is a copy.</p> <p>The LA River’s purpose has always been flood protection. I’d like to see the new focus of our River to be the aesthetic enhancement of the water views and natural habitat.</p> <p>Of utmost importance, the overriding main goal should be to create a respite from the City, where visitors enjoy gorgeous natural and pastoral beauty. The River is the element we celebrate. It should not be a big money grab for everyone that ever wanted to have their own project. Please focus on designing areas that look like nature so our citizens can learn to enjoy this experience. The whole thing of the LA River is the experience. It’s not about looking at it, it’s about experiencing it—interacting with it. The intangible connection is what is missing.</p>	<p>The County appreciates Katherine Kato for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p> <p>The <i>2020 LA River Master Plan</i> objective is not to put the river into commercial use but to reduce flood risk and improve resiliency; provide equitable, inclusive, and safe parks, open space, and trails; support healthy connected ecosystems; enhance opportunities for equitable access to the river corridor; embrace and enhance opportunities for arts and culture; address potential adverse impacts on housing affordability and people experiencing homelessness; foster opportunities for continued community engagement, development, and education; improve local water supply reliability; and promote healthy, safe, clean water. In general, the <i>2020 LA River Master Plan</i> would create more habitat, clean water, and</p>

Commenter	Comment#	Comment	Response
			<p>access and the negative environmental impacts would be offset by the positive effects of the plan.</p> <p>Please refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR, which discusses how the <i>2020 LA River Master Plan</i> contains nine objectives (referred to as “goals” in the <i>2020 LA River Master Plan</i>). The <i>2020 LA River Master Plan</i> is founded on a community and data-based goal-driven framework that closely ties the plan’s recommendations to their potential to achieve the broader <i>2020 LA River Master Plan’s</i> nine objectives.</p> <p>Please also refer to Master Response MR-5 (Naturalization of the LA River).</p>
<p>I101 Katherine Kato</p>	<p>I101-3</p>	<p>I live in Studio City, less than half a mile from the LA River and visit almost daily on an unimproved area. We have several projects along the River in Studio City and it is exciting to have an opportunity to share my experience and contribute my suggestions. I will briefly review the pitfalls and, hopefully, steer you away from repeating our mistakes.</p> <p>Art: We spent too much on fanciful gates and art installations every few feet. Too much art can be a bad thing. If we could go back in time, I would save funds for basic maintenance instead of ornamentation or art installations.</p> <p>Suggestion: Art does not have to be on every space available. I see an overabundance of murals, panels, and decorative tiles all of which soon looked tired and dated. Consider a limited thematic element for each section of the river incorporated within the environmental graphics. Plants and large boulders can be the “art”, creating a natural and picturesque atmosphere. Any views of art should not interfere with the serenity of the natural site. This includes art on bridges and any property frontage visible from the</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Commenter	Comment#	Comment	Response
		<p>natural sanctuary and on temporary installations. Areas that have urban blight or billboards should not have additional features to add to the cacophony. No “statement art piece” on any fence, no installed artwork or land art should not take precedence over nature.</p> <p>Plant Selection: We had difficulties with the learning curve on maintenance. Deciduous plants were removed as they were deemed to be dead. The heavy leaf litter did not break down quickly and smothered plants even on hillsides. Santa Ana winds blew leaves and periods of rain brought enough precipitation to silt up the areas along the fence line and low areas.</p> <p>Suggestion: Avoid those that require any maintenance trimming and restrict deciduous or poor out of season appearance to background areas. Please ask yourselves how each plant would look if you did no maintenance whatsoever or no maintenance after 3 years. Consider our drought and California’s increasing heat situation. Choose slow growing and long lived plants to save replacement costs.</p>	
<p>I101 Katherine Kato</p>	<p>I101-4</p>	<p>River view: Our Riverwalk has tubular steel fencing which block out most glimpses of water and wildlife; at some angles, it looks like a solid wall. All tubular steel fences will fail especially near access points and heavily dog accessed areas. This is usually from dog urine causing rapid oxidation.</p> <p>Suggestion: Channel modifications shall be to increase a wider surface of water where possible, perhaps large reflecting ponds to lessen the endless views of concrete. It would be wonderful to have vernal ponds where possible. Please select wire fencing for maximizing expansive views.</p>	<p>Please refer to Master Response MR-1 (Homelessness along the LA River). Please refer to Section 3.1, <i>Aesthetics</i>, of the Draft PEIR, which outlines how attempts to maintain positive aesthetics and visually pleasing sights are included as part of Mitigation Measure AES-2, Minimize Obstruction of Scenic Vistas. The measure requires the implementing agency to maintain the scenic vistas’ visual quality and comply with the applicable jurisdiction’s general plan and design guidelines to preserve scenic vistas and minimize visual intrusions. In addition to the kit of parts categories with related design components, the <i>2020 LA River Master Plan</i> includes a series of smaller Common Elements that include site furnishings, amenities, and facilities. These include</p>

Commenter	Comment#	Comment	Response
		<p>No O & M: Our area has woefully underestimated day to day maintenance costs. Build less and choose well in an effort to have the lowest maintenance as possible.</p> <p>Suggestion: I recommend a much, much larger maintenance budget, not managed by any LA City department.</p> <p>Graffiti and Tagging: Every type of surface has been defaced by various marks.</p> <p>Suggestion: All fixtures must have anti graffiti coatings on the face and reverse. On flat surfaces design for obfuscation o such as perforated or mesh design trash receptacles. All surfaces should be able to withstand multiple chemical / repeated pressure washings.</p> <p>Homeless: This report seems as though you have no real world experience. Our Riverwalk is completely unusable; it is only a space for the unhoused. In our local park, brand new self cleaning restrooms were installed to reduce maintenance. They lasted almost 6 months before they were irreparably damaged and cannot be repaired.</p> <p>Suggestion: Rangers should be on call to connect service providers to individuals experiencing homelessness. The River should not be a magnet for more homeless. Please, no showers or phone chargers and limit restroom facilities at select access points at manned ranger stations.</p> <p>Facilities and Amenities: We have no restrooms along the length of our local Riverwalk. City parks only have one restroom building for a huge area, some have no facilities whatsoever. The Griffith Park has walks from .6 miles to 8.7 miles, and no accommodation for restrooms. Baldwin Park to Playa Trail averages less than one restroom for three miles.</p>	<p>consistent lighting, drinking fountains, places to sit along the river, river pavilions, and cafés that are intended to contribute to habitability of the river environs; promote safety, accessibility, and legibility; and build a cohesive identity of the river corridor.</p> <p>The <i>2020 LA River Master Plan</i> also includes Design Guidelines (summarized in Section 2.5.2, <i>2020 LA River Master Plan Design Guidelines</i>, of the Draft PEIR and included in their entirety as Appendix B.2) that have been developed as a framework to support the development of specific design and technical solutions for subsequent projects to be implemented under the <i>2020 LA River Master Plan</i> while presenting a unified, cohesive identity along the 51-mile connected open space corridor and promoting best practices and resiliency.</p> <p>Lastly, the Common Elements Typical Project includes the following elements: pavilions, cafés, hygiene facilities, restrooms, benches, emergency call boxes, water fountains, trash and recycling, bike racks, environmental graphics, lighting, planting, stairs/ramps, guardrails, fences and gates, and stormwater best management practices.</p>

Commenter	Comment#	Comment	Response
		<p>There are no shade structures because we plan to visit during good weather and not during the heat of the day.</p> <p>Snack bars should not be installed in the river project. This is not Disneyland. I prefer community inclusion where the local area becomes improved due to access to the LA River.</p> <p>A good example is Frogtown where there are many local cafes. This feels much more community oriented and of greater benefit.</p> <p>Platform park seems to be a good idea for the park starved areas, but should not include a museum or amphitheater.</p> <p>Avoid motorized travel on the bike trails.</p> <p>Avoid political and religious statements.</p> <p>Grow trees, not build rest pavilions. Within 10 years, you will have a natural shade area. Residential areas alongside the River need a buffer from recreational activities. We have a channel and all sounds bounce off the vertical channel on the Other side and bounce back. I object to any pavilions, shade/rest pavilions within 300 feet of any residential property or viewed from residential site lines. Be good stewards of our environment, with the main emphasis on creating a respite from the City, not an extension of the City. The whole thing of the LA River is the experience. It's not about looking at it, it's about experiencing it—interacting with it. Miles of concrete and other distractions destroy the human spirit. Please restore areas of nature that Angelenos need to learn to engage with and understand that this will breathe life back into people's lives as a wonderful healing experience. You can save Los Angeles with nature, this intangible connection which is almost lost from our society.</p>	

Commenter	Comment#	Comment	Response
I102 Anonymous	I102-1	Morons, what is your objective???	<p>The County appreciates you for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>This comment is acknowledged.</p>
I103 Erin Judge	I103-1	<p>I live in Palms (zip code 90034), and I care about birds having safe places to live, eat, and migrate in LA. I would like to highlight for special attention the following areas within the 51-mile stretch of river under consideration by County Public Works as part of the LA River Master Plan. These areas host federally protected breeding bird species, Bird Species of Special Concern, and significant numbers, on a global scale, of migratory shorebirds during the fall migration.</p> <ul style="list-style-type: none"> · Sepulveda Basin and the adjacent Los Angeles River. These areas have extensive riparian habitat hosting federally protected breeding Bell’s Vireo and other breeding Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · Glendale; Bette Davis Park to Colorado Bridge. A mix of soft bottom and concrete section that hosts significant shorebird populations (on a global scale) during fall migration. Most notably along the concrete section immediately south of the 134 Freeway. · Frogtown; adjacent Taylor Yard (G2) and Rio de Los Angeles State Park. This area has small fragmented riparian habitat hosting federally protected Bell’s Vireo and other Bird Species of Special Concern such as Yellow-breasted Chat and Blue Grosbeak. · South of Downtown; Atlantic Boulevard to Clara Street. The extensive concrete section here provides important shorebird habitat during fall migration. 	<p>The County appreciates Erin Judge for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive national communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p> <p>Lastly, many of the areas mentioned are covered in the Draft PEIR. A series of nine distinct geographical sections, or planning frames, related to jurisdictional, hydraulic,</p>

Commenter	Comment#	Comment	Response
		<p>· Long Beach; section from Willow Street to Del Amo Boulevard. Host to significant shorebird populations (on a global scale) during fall migration.</p>	<p>and ecological zones have been identified along the LA River and are included in the <i>2020 LA River Master Plan</i>. The use of the frame illustrates how the areas adjacent to a river reach are critical to understand in planning and implementing a connected and accessible river corridor. Please refer to Chapter 2, Section 2.3, <i>LA River Planning Frames</i>, of the Draft PEIR. For example, Frame 1 is primarily in the City of Long Beach and discusses the soft channel bottom as well as important bird habitat. Frame 6 is in the Cities of Los Angeles, Glendale, and Burbank and Frame 8 contains the Sepulveda Basin.</p>
<p>I103 Erin Judge</p>	<p>I103-2</p>	<p>I ask for the highest scrutiny of the impacts to biological resources, including in these areas, and to consider disturbances to the Lower Los Angeles River Important Bird Area. I encourage you to take advantage of community-generated datasets of species presence, especially eBird, to understand the presence and patterns of use by sensitive and protected species.</p>	<p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR). The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>Please refer to Section 3.3, <i>Biological Resources</i>, of the Draft PEIR, which addresses special-status species, habitats of concern, sensitive natural communities, significant ecological areas, and critical habitat. Implementation of the following measures will reduce the impacts on the species of concern the commenter has raised: Mitigation Measures BIO-1, Conduct Literature Review, Habitat Assessment, and Project Surveys; BIO-2, Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements; BIO-20a, Avoid Riparian and Sensitive Natural Communities; and BIO-20c, Implement Riparian Mitigation and Restoration.</p>

2.3.2.43 Oral Comments OC1–OC57: Oral Comments

Commenter	Comment#	Comment Text	Response
Ms. Raymond	OC1-1	Ms. Raymond: great. I wasn't expecting to talk but thank you for the opportunity. I appreciate all the hard work you've done and I know it's a very complicated process and I would encourage everyone on this call to pay attention to the various levels of scrutiny that are built into the program that they have just outlined. I think it's a very thoughtful effort. Obviously, no one is going to exactly agree on everything, but I think it's a very heroic effort in bringing together a lot of information and a lot of people's ideas. Thank you.	The County appreciates Ms. Raymond for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project. No further response is necessary.
Ms. Austin	OC2-1	Ms. Austin: Thank you. I've been following the LA Planning Department's many, multiple zooms about the new community plans for our city, and my concern and my question is when you were making your presentation, did I understand that at the end of the day, that no matter what you've planned, that the city, the individual cities, can override your very thoughtful plans for the LA River and its dependent on individual cities, or do you have the ultimate say in what happens with our river and watersheds on either side of it? That's it.	The County appreciates Ms. Austin for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project. This comment refers to the LA Planning Department and the content of the <i>2020 LA River Master Plan</i> , not the Draft PEIR. Furthermore, please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) for a summary of the programmatic nature of the Draft PEIR and MR-4 (Adherence to Local Jurisdictions' Requirements) for a summary of how future projects will need to adhere to applicable Federal, State, and local regulations. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
Mr. Lewis	OC3-1	Mr. Lewis: Okay. I'm going to pass on comment for the moment but thank you.	Thank you for your comment. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR

Commenter	Comment#	Comment Text	Response
			for the proposed <i>2020 LA River Master Plan</i> Project. No further response is necessary.
Ms. Slaughter	OC4-1	Ms. Slaughter: I actually am just getting up to speed on this project. And the one thing that it seems distressing to me is that the CEQA doesn't really seem to have a lot of teeth in terms of preventing, let's say, greenhouse gas emissions or other things that might be destructive to the river, and I just didn't hear anything like that in all of the presentations, and I really appreciate the work you guys have done into giving these presentations, but I feel like I'm not sure what our goals are here. And I really want to preserve the river and make it, you know, it's not a static thing, this river, and I would like it to be more than just like little side parks and more of an ecosystem, living thing. Thank you so much. I'm finished.	<p>The County appreciates Ms. Slaughter for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Section 3.7, <i>Greenhouse Gas Emissions</i>. Implementation of Mitigation Measures GHG-1a, Implement Sector-Specific Operations GHG Emissions Reduction Strategies; GHG-1b, Implement Operations GHG Emissions Reduction Strategies Specific to Emission Sources of Multi-Use Trails and Access Gateways; TRA-1b, Implement TDM Strategies and/or Enhancements to Reduce VMT; and GHG-2, Implement Construction GHG Emissions Reduction Strategies, would result in the reduction of greenhouse gases. Furthermore, the objectives of the <i>2020 LA River Master Plan</i> are discussed in Chapter 2, <i>Project Description</i>, of the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Prieto	OC5-1	Ms. Prieto: I will say that it doesn't let you change your name; so there may be other folks who registered, but they're not going to be called on because this zoom doesn't let you change your name.	The County appreciates Ms. Prieto for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project. No further response is necessary. No further response is necessary. No changes to the Draft PEIR are needed.

Commenter	Comment#	Comment Text	Response
Ms. Prieto	OC6-1	<p>Yeah. So my name is Jessica Prieto with East Yard. Our organization is the steering committee member of the LA River Master Plan. East Yard has participated in the committee in good faith that county would listen to our concerns, our recommends, and our expertise in drafting this master plan. Both East Yard and other LA administering committees has stressed multiple times throughout this process that if the County develops the river without addressing the structure that caused existing inequities in the first place, then past legacies of racism and colonialism will just repeat themselves through new inequities.</p>	<p>The County appreciates Ms. Prieto for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Environmental justice issues, such as the structure that caused existing inequalities, are not part of CEQA review and were not analyzed as part of the Draft PEIR. This comment does not identify specific significant environmental issues for purposes of drafting a response or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Prieto	OC6-2	<p>First, the plan and the process to create this plan does not center indigenous races. We have advocated for the County to invite Admiron Mendosa, a fellow Tongva leader, into the LA River Master Plan Steering Committee, but she has yet to be invited. That in itself should be enough to invalidate this whole process. However, there is more.</p>	<p>This comment is acknowledged. Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for a summary of the extensive outreach program that was conducted for the Draft PEIR. Also, please refer to Section 3.17, <i>Tribal Cultural Resources</i>, of the Draft PEIR, as it details the Assembly Bill 52 consultation process. Five tribes took part in Native American consultation for the proposed Project: the Fernandeño Tataviam Band of Mission Indians, Gabrieleño Band of Mission Indians – Kizh Nation, Gabrieleño/Tongva San Gabriel Band of Mission Indians, San Manuel Band of Mission Indians, and Tejon Indian Tribe. Also refer to <i>2020 LA River Master Plan</i> Objective 7: Foster Opportunities for Continued Community Engagement, Development, and Education; Action 7.2.6: Consult with Local Native American Tribal Governments and Work with Native American Communities; and Action 7.3: Engage the Indigenous Peoples of the Region.</p>

Commenter	Comment#	Comment Text	Response
Ms. Prieto	OC6-3	<p>Two, East Yard organizes and represents several communities along the lower portion of the LA River. These are communities that face environmental racism due to goods movement and structures that enabled the goods movement, such as, the 710 Freeway, multiple rail yards, and the local courts. All of which are directly adjacent to the LA River and countless unregulated polluting industries. Regardless, the county fails to commit to addressing these issues in the plan. It acknowledges them somewhat but it doesn't commit to remediating them and regulating these existing inequities.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Section 3.0.2 of the Draft PEIR, as it addresses cumulative impacts. The planning documents, such as general plans prepared by cities, would be subject to regional plans, such as the Southern California Association of Governments' Regional Comprehensive Plan and the Regional Transportation Plan/Sustainable Communities Strategy. The general plans of County jurisdictions have been prepared to be consistent with the population forecast of the regional planning documents. The Interstate 710 and rail projects have been forecasted in those documents.</p> <p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Prieto	OC6-4	<p>Three, this history of environmental racism leaves lower LA River communities vulnerable to new inequities, specifically, displacement and gentrification. The County fails to address land speculation and gentrification caused by the proposed plan. It talks about affordable housing, producing affordable housing, but many who organize around housing policy— Ms. Piggott: 30 seconds. Ms. Prieto: Yes. Many who organize around housing policy recognize that this is not the only solution. Housing production needs to be trying to preserve existing affordable housing and protection for tenants. However, the planned proposed solutions have no teeth, no commitments whatsoever to passing policies that will stop displacements, such as, rent control or right to counsel in the cities that need it most. The County talks about how the County's passing these</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please see Master Response MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Environmental justice issues such as those the commenter raises are not part of CEQA review and were not analyzed as part of the Draft PEIR. Please refer to Section 3.10, <i>Land Use and Planning</i>, of the Draft PEIR, as it addresses displacements and indicates the <i>2020 LA River Master Plan</i> is consistent with policies concerning displacements. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment</p>

Commenter	Comment#	Comment Text	Response
		policies but that is not representative of a smaller jurisdiction that are failing to curb displacement. Thank you for your time.	was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
Ms. Hoffman	OC7-1	Ms. Hoffman: I'm so sorry. I just, kind of, messed up there. Anyway, I would just like to say that I stand behind the idea of maximizing the influence of indigenous cultures and the master plan, and as a LA resident, I welcome any kind of cultural influence at all because we're such a huge diversity here, and I think it's a great idea. And I champion everything that you guys have done so far. I really enjoyed your presentation and looking forward to being involved in it in future. Keep up the good work.	The County appreciates Ms. Hoffman for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project. Please see response to comment OC6-2 for information about the tribal cultural outreach completed for the Draft PEIR, and please refer to <i>2020 LA River Master Plan</i> Objective 5: Embrace and enhance opportunities for art and culture.
Mr. Contreras	OC8-1	Mr. Contreras: All right. Thank you. My name is Brandon. I am a resident of Long Beach, and I just want to comment on a little bit about the pollution going on in the river. I don't know where to find the exact ambitions of the plan to reduce our pollution on the river, but as a Long Beach resident, we see a lot of the trash coming down from the upper cities all the way down to Long Beach and into our Pacific Ocean. So I'd like to know what we're going to do about that and to just try to tear off the top from the beginning. Thank you.	The County appreciates Mr. Contreras for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Section 3.9, <i>Hydrology and Water Quality</i> , of the Draft PEIR, as it outlines that both the National Pollutant Discharge Elimination System Construction General Permit and the County grading permits require best management practices to reduce pollutants from stormwater runoff and includes mitigation measures to reduce impacts. Additionally, as discussed in Section 3.9, <i>Hydrology and Water Quality</i> , all construction activities must comply with the County or Long Beach Municipal Separate Storm Sewer System (MS4) Permit or the MS4. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further

Commenter	Comment#	Comment Text	Response
			response is necessary. No changes to the Draft PEIR are needed.
Ms. Donis	OC9-1	<p>Ms. Donis: Hi. My name Cindy. I am a resident here in South Gate and have been a long-time resident of Southeast LA. Specifically parts— specific parts of the plan that I have concerns around is around reclaiming the floodplain. I feel like it should be prioritized across the entire river for ecological and wildlife benefits, letting the river breathe and be, and if we have to look for other benefits, there is also educational and enrichment programming benefits to rebuild a relationship with nature across all communities living next to river, particularly in repairing the relationship for Tongva people and the river that has been hindered since colonization.</p>	<p>The County appreciates Ms. Donis for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. However, Objective 3 of the <i>2020 LA River Master Plan</i> supports healthy, connected ecosystems. Also refer to Objective 7: Foster Opportunities for Continued Community Engagement, Development, and Education; Action 7.2.6: Consult with Local Native American Tribal Governments and Work with Native American Communities; and Action 7.3: Engage the Indigenous Peoples of the Region.</p> <p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Donis	OC9-2	<p>Another concern that I have, that’s specific, is around day lighting across the entire river. This does sound like a waste of water, a misuse of water that shouldn’t be suggested in this plan. It also results in less reliability of clean water and can lead to increase of flooding. I’ve heard of this in Seoul, South Korea, which has brought an array of issues. Generally, looking at the plan, it doesn’t adequately address the contaminated soil, and potentially water, from industry water— industry along the river and illegal dumping.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, as it addresses clean water and water quality in Impact 3.9(a) and flood hazards in Impact 3.9(d). This section also outlines that both the National Pollutant Discharge Elimination System Construction General Permit and the County grading permits require best management practices to reduce pollutants from stormwater runoff. Additionally, as discussed in Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, all</p>

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			<p>construction activities must comply with the County or Long Beach Municipal Separate Storm Sewer System (MS4) Permit or the MS4. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>Ms. Donis</p>	<p>OC9-3</p>	<p>It also doesn't appropriately address the mitigation—any excavation of these contaminated elements that can be found during construction along the river. This plan also lacks any tenant protections and will cause displacement and gentrification if it proceeds and gets approved as is. This plan really does need to center the river and create a plan for the river to be and exist as it should. It needs to protect the communities along the river who have faced multiple hardships and neglect at the hands of the state and the county and it also needs to be better at repairing the harm done to Tongan people and the river.</p> <p>Ms. Piggott: 30 seconds.</p> <p>Ms. Donis: So I really do hope that you all take these public comments seriously and we see a better plan. Thank you.</p>	<p>Regarding the first part of this comment about contaminated elements during construction, please refer to Mitigation Measure HAZ-1, Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures, found in Section 3.8.3.3, <i>Hazards and Hazardous Materials</i>, which would require future projects to conduct a project-level hazardous materials site assessment for construction of subsequent projects involving soil disturbance and implement measures. Implementation of this measure would address the excavation of contaminated elements.</p> <p>As for the second part of the comment that discusses displacement and gentrification, please refer to Master Response MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing. Environmental justice issues such as those the commenter raises are not part of the CEQA review, are not required under the State CEQA Guidelines, and were not analyzed as part of the Draft PEIR. Furthermore, Section 3.10, <i>Land Use and Planning</i>, of the Draft PEIR addresses displacements and indicates the <i>2020 LA River Master Plan</i> is consistent with policies concerning displacements.</p>

Commenter	Comment#	Comment Text	Response
Ms. Daret-Quiroz	OC10-1	Ms. Daret-Quiroz: Hi. Good evening. My name is Maggie Daret-Quiroz. I'm a native of Glassell Park, North Glassell Park, Cypress Park, Northeast Community. And thank you guys for all your work. This is really great. I really got to see the kit; I'm impressed. I'm always welcoming change. I mean, I've been here— this is all I know, the Northeast Community, and I am happy to see that finally this— this land— I'm talking about the land around the river that is undeveloped for so many years. I'm excited to see something new that we all get to enjoy.	The County appreciates Ms. Daret-Quiroz for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project. No further response is necessary.
Ms. Daret-Quiroz	OC10-2	As a kid, I remember the trains and things like that, but I also would like to see if we could incorporate some gardening farms. Maybe not edible because I'm not sure how contaminated the soil can be, but at least some kind of like gardening farms, teaching farms and things like that. But nevertheless, I did notice that on your e-mail it said that it was the only meeting, so I'm not sure if there is going other meetings for more community people to be informed of what is going on.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Chapter 8, <i>Design Components</i> , of the <i>2020 LA River Master Plan</i> to see conceptual design incorporating community gardens; also see Objective 5, Action 2.6.3, which fosters opportunities for urban agriculture. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
Ms. Daret-Quiroz	OC10-3	But nevertheless, I am grateful for all your effort. I did like the kit and hopefully we can incorporate a little bit of everything to bring new change and something that we could all enjoy in our communities. Thank you so much for all your hard work. My name is Maggie Daret-Quiroz.	Thank you for your comments. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project. No further response is necessary.
Ms. Dixon	OC11-1	Ms. Dixon: Yes. Good evening. I just wanted to make a comment that some of the maps that I have seen for the proposed project have ended at the confluence of two of the rivers near Canoga High School. And my comment	The County appreciates Ms. Dixon for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of

Commenter	Comment#	Comment Text	Response
		<p>was that river runs— continues past that, past that 51 miles, and it goes all the way to the Chatsworth Reservoir which is, of course, a dry reservoir. And I am curious why it stopped at that confluence of, you know, of the two rivers there behind the high school and why it couldn't continue all the way to Chatsworth Reservoir where you could put a welcome center, you could put parking, which really would encourage the local residents to use it. I personally— the river runs behind by home. I would welcome that as, you know, the landscaping and pathways, anything that you have prepared, you know, could run past our residential properties all the way to Chatsworth Reservoir. So I wanted to make sure— I know I did submit some comments on that and some e-mails to some of the people that were project managers when this first began. But I want to see that opportunity, or at least I should hope that the opportunity has been investigated to take the project all the way to Chatsworth Reservoir, which, of course, is still part of LA county. It's actually part of LA City. So I don't know if, you know, those things were considered in the— Ms. Piggott: 30 seconds. Ms. Dixon: Plan of the project or not, but I just wanted to make sure, again, that, you know, the continuation all the way to Chatsworth reservoir was considered because there is absolutely beautiful opportunity through west hills, Canoga Park, and Chatsworth to make better— great walking area for residents. Thank you.</p>	<p>Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Mr. Zhao	OC12-1	<p>Mr. Zhao: I'm a USC student. My major is environment engineer, and I am really excited to be here to listen to a lot of people's opinions about the—this project, so that's it. I'm out.</p>	<p>The County appreciates Mr. Zhao for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project. No further response is necessary.</p>

Commenter	Comment#	Comment Text	Response
Ms. Gonnelli	OC13-1	<p>Ms. Gonnelli: sure. Thank you. I have similar comments that were already mentioned. I just wanted to note some more have an evaluation of the pollution control and cleanup in the area where Long Beach meets the ocean. We're residents of Long Beach in downtown by the courthouse, so just wanting to know a little bit more about pollution control, cleanup, and filtration prior to hitting the ocean.</p>	<p>The County appreciates Ms. Gonnelli for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, as it outlines that both the National Pollutant Discharge Elimination System Construction General Permit and the County grading permits require best management practices to reduce pollutants from stormwater runoff. Additionally, as discussed in Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, all construction activities must comply with the County or Long Beach Municipal Separate Storm Sewer System (MS4) Permit or the MS4. This comment does not identify specific significant environmental issues for purposes of drafting a response or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Gonnelli	OC13-2	<p>Also hoping to learn a little bit more about if public gardens would be an opportunity along the river as well as making sure that there is plenty of parking and bike racks and ways to have some safe spaces for people to relax along the river walk. Thank you.</p>	<p>Please refer to Chapter 8, <i>Design Components</i>, of the <i>2020 LA River Master Plan</i> to see conceptual design incorporating community gardens; also see Objective 5, Action 2.6.3, which fosters opportunities for urban agriculture. In addition, although the specific locations and details of potential projects are not proposed, future projects that tier from the Draft PEIR may include a Common Elements Typical Project or a Multi-Use Trails and Access Gateways Typical Project, which could include components such as bike racks, lighting, and benches (please refer to Chapter 2, <i>Project Description</i>, of the Draft PEIR for more information). This comment</p>

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			<p>does not identify specific significant environmental issues for purposes of drafting a response or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Mr. Fox	OC14-1	<p>Mr. Fox: Hi. My name is Marcus Fox. I live in Atwater Village, and I've recently joined our river committee and we've been reviewing all this great work you guys are doing. We appreciate it very much. I think our biggest concern— I can probably speak for many here in Atwater— is flood control. So although there's lots of great ideas and really important things about environmental impacts and recreation, we are very concerned about flood control and how that has been addressed. That's my time. Thank you.</p>	<p>The County appreciates Mr. Fox for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to the <i>2020 LA River Master Plan</i> Objective 1 concerning reducing flood risk and improving resiliency. This objective details how the <i>2020 LA River Master Plan</i> addresses the issue the commenter presents.</p>
Ms. Steers	OC15-1	<p>Ms. Steers: Thank you very much. I wanted to first thank you all for the wonderful presentation that you had earlier, the Power Point. It was very helpful in understanding what's been going on with the EIR process. And I am a born and raised long-term resident of Long Beach, and I'm concerned with the property over here located across— adjacent from Los Cerritos Park that is— has always been the 3701 (audio distortion) has always been in the LA Master— LA River Master Plan as part of the concept in the plan for future development, and I was wondering why— and why it is now being turned into a 580-unit RV storage park and what that is going to be doing to our environmental issues already that we're having in the 710-405 diesel death trap area with all the trucks going by.</p>	<p>The County appreciates Ms. Steers for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. It also appears that the commenter is raising issues from separate projects involving road and rail, which are not part of this Project and are not analyzed in the Draft PEIR. However, implementing Mitigation Measure AQ-3, Require Subsequent Projects that Exceed the SCAQMD LSTs and Are within 1,000 Feet of Sensitive Receptors to Perform a Health Risk Assessment and Implement Measures to Reduce Health Risks (in Section 3.2, <i>Air Quality</i>, of the Draft PEIR), will reduce impacts. This comment does not identify specific significant environmental issues for purposes of drafting a response or address the adequacy or accuracy</p>

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			of the Draft PEIR. This comment was shared with the 2020 LA River Master Plan team. No further response is necessary. No changes to the Draft PEIR are needed.
Ms. Steers	OC15-2	So in addition to that, we have found geological— I’m sorry— the geological department of LA has done surveys acknowledging all of the waste that was put in the ground 30 feet below and multiple barrels on that property when it was owned by Oil Operators, Inc., from 1930 to about 1990 and why it’s okay to just leave that under there and put a four story administration building covered in concrete— Ms. Piggott: 30 seconds. Ms. Steers: —and what that’s going do to— if it’s— if there’s any compromising to the weight of those buildings underneath, and if that is then depletes into the soil. So thank you for listening to my comments. We’d really like to have the support of LA River to get this into a nice green space and park. Thank you very much, again, for your time and, once again, my name is Serena Steers.	Implementation of Mitigation Measure HAZ-1, Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures —found in Section 3.8, <i>Hazards and Hazardous Materials</i> , of the Draft PEIR—would require future projects to conduct project-level hazardous materials site assessments for construction of subsequent projects involving soil disturbance and implement measures. Implementation of this measure would address the hazardous waste issues the commenter has raised.
Ms. Hinton	OC16-1	Ms. Hinton: Thank you. My name is Dr. Tilly Hinton. I’m a public historian who specializes in the LA River’s contemporary history and IQ rate, art projects that interpret the river through visual arts and community engagement. I very much appreciate the complexity of this effort, the richness of the planning documentation, the bilingual materials that have been prepared, and I commend each of you on the staff for steering what must be a complex and many headed high roads, an incredibly intricate process, and I give you my warmest congratulations on steering that ship. I would like to first of all add my voice to Jessica’s earlier comments that appropriate and ample indigenous representation is pivotal to the plan’s integrity and, likewise, to the integrity of the consultation process.	The County appreciates Ms. Hinton for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed 2020 LA River Master Plan Project. Please refer to Section 3.17, <i>Tribal Cultural Resources</i> , of the Draft PEIR, which details the Assembly Bill 52 consultation process. Five tribes took part in Native American consultation for the proposed Project: the Fernandeño Tataviam Band of Mission Indians, Gabrieleño Band of Mission Indians – Kizh Nation, Gabrieleño/Tongva San Gabriel Band of Mission Indians, San Manuel Band of Mission Indians, and Tejon Indian Tribe. Also refer to 2020 LA River Master Plan Objective 7: Foster Opportunities for Continued Community Engagement, Development, and Education; Action 7.2.6: Consult with Local Native American Tribal Governments

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			and Work with Native American Communities; and Action 7.3: Engage the Indigenous Peoples of the Region.
Ms. Hinton	OC16-2	I am disappointed to see that what appears to me to be the most controversial aspect of the plan and that is the capping of the river with concrete platforms has not been analyzed as one of the two typical projects even though it appears to be one of most environmentally dramatic projects of all of those proposed, and it is one that has received significant public attention.	For typical projects, please see Master Response MR-2 (Program-Level Analysis in the PEIR) for a summary of the programmatic nature of the Draft PEIR. The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analyses. Because the PEIR does not examine specific projects at this time, the County anticipates that future specific projects would require subsequent CEQA compliance.
Ms. Hinton	OC16-3	It also seems important here to note that the high profile architect, Frank Gehry, whose firm is developing the proposed platform park at South Gate, a project of major concern in both ecological and housing justice terms, was closely involved in the master planning process and in the preparation of all of the documents that we are discussing this evening. This seems to undermine the argument that— Ms. Piggott: 30 seconds. Ms. Hinton: —no specific projects are proposed by the master plan. I would like to see more online explanations on both the master plan and the PEIR website about the two simultaneous but separate comment processes. It seems like a recipe for confusion and dilution of public input. Thank you.	<p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for a summary of the extensive outreach program that was conducted for the Draft PEIR. Additionally, the review period was extended from a 45-day review (per State CEQA Guidelines Section 21091) from March 4, 2021, to April 2, 2021 (60 days), and was extended a second time to May 13, 2021, to provide additional review time to all interested parties. In total, the review period extended from February 1, 2021, to May 13, 2021, for a total of 101 days.</p> <p>Each comment addressing environmental analysis in the Draft PEIR requires a response from the County (State CEQA Guidelines Section 15088). These comments are included in the Final PEIR. The CEQA analysis is based on the project design. The CEQA process is used to help inform the <i>2020 LA River Master Plan</i>, and it allows the opportunity for potential project redesign to avoid significant environmental issues. The Draft PEIR and comments on the Draft PEIR inform the decisionmakers for the <i>2020 LA River Master Plan</i> and may lead to changes in that plan.</p> <p>The difference between commenting on the <i>2020 LA River Master Plan</i> and the Draft PEIR is that comments</p>

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			<p>for the <i>2020 LA River Master Plan</i> are directed at the plan itself and comments for the Draft PEIR are directed at the environmental analysis of the proposed Project. Both comment processes are the responsibility of the Project’s lead agency. Comments related to the content of the <i>2020 LA River Master Plan</i> are shared with the <i>2020 LA River Master Plan</i> team.</p>
Mr. Cowley	OC17-1	<p>Mr. Cowley: Good evening. I live in Canoga Park, and to Mr. Contreras, I would like to apologize on behalf of all of us at the beginning of the river for any pollution that has made its way down to you. We do our best, but, obviously, it’s not good enough. I thank you for trying to write here on 17 different municipalities and bringing this program altogether over a 25-year period. Blessed is he who plants trees under whose shade he will never set. I will be an old man when this is done, but I am proud to be part of the city that it looks that far ahead to the future and tries to make an improvement of this magnitude. Thank you. That’s all.</p>	<p>The County appreciates Mr. Cowley for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project. No further response is necessary.</p>
Ms. Sanchez	OC18-1	<p>Ms. Sanchez: Thank you. It was recently asked, imagine what the river would look like, your wildest dreams, like go for it, just whatever you could you could think of. And my original thought was, God, it would be really beautiful if when I walked by the river, I would hear birds chirping, if I heard rustling of trees/leaves, the smell that I would smell would be of wet dirt. It would be not of what we grew up smelling which was sewage which was putrid, which was pollution and so from— on that thought, you know, what my wildest dream would be, it wouldn’t be this huge construction led by the Gehry— Frank Gehry’s development team, it would be going back to nature. Something that— especially coming from Frame 5, which is Boyle Heights— something that we never experienced. Our city, our area, Frame 5, Boyle Heights, Frame 4, Frame 3, those cities</p>	<p>The County appreciates Ms. Sanchez for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR.</p> <p>Please refer to Master Response MR-5 (Naturalization of the LA River) for a summary addressing naturalization of the LA River</p> <p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further</p>

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		are completely built out, and if we're talking in zoning, we're talking about there is no space at all for anything, right?	response is necessary. No changes to the Draft PEIR are needed.
Ms. Sanchez	OC18-2	<p>So then here you guys are going to come and you guys are going to take up as much space and you're talking about acquiring different open land uses, there's no open land use in our area. You know, we have the skyline. We understand that that's like the appeal, right, of building something like that. And what I want to know is how are you going to protect the next generation of youth that are going be looking for housing there and there's nothing there. So— Ms. Piggott: 30 seconds. Ms. Sanchez: —what we want is housing. We want this project to ensure that we're going to have space for housing, primarily. Because there is going to be a generation of Boyle Heights natives that are not going to be able to afford or, let alone, find any housing. And so that's the real question. What are you guys going to do for that?</p>	<p>Please refer to Master Response MR-2 (Program-Level Analysis in the PEIR), which discusses the programmatic nature of the PEIR. Because the <i>2020 LA River Master Plan</i> is conceptual, the PEIR is a programmatic document and does not include project-specific or site-specific analysis, including for the Typical Projects. Project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. Please also refer to Master Response MR-4 (Adherence to Local Jurisdictions' Requirements) for a summary of how future projects will need to adhere to applicable Federal, State, and local regulations, and Section 3.10, <i>Land Use and Planning</i>, of the Draft PEIR, which discusses relevant land use plans and policies.</p> <p>Please refer to Master Response MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing. Furthermore, please refer to Section 3.13, <i>Population and Housing</i>, of the Draft PEIR, as it provides a detailed description of objectives and goals by jurisdiction. The overall <i>2020 LA River Master Plan</i> implementation is not expected to displace any existing permanent housing, but it could affect individuals or families experiencing homelessness. For more information about homelessness, please refer to Master Response MR-1 (Homelessness along the LA River) for a summary of homelessness along the LA River.</p>
Mr. Ginger	OC19-1	<p>Mr. Ginger: Hello. My name is Luke Ginger. I just speak in pronouns, and I'm speaking on behalf Heal the Bay. First, I would like to thank you for this opportunity to leave comment. I would also like to second what Jessica, from East Yard Communities For Environmental Justice,</p>	<p>The County appreciates Mr. Ginger for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of</p>

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		<p>said earlier particularly with regard to the lack of indigenous representation in this process and the greater master plan process overall, but so you can also expect a comment letter from Heal the Bay a little later on, a written letter, but right now I would like to comment on one thing. And that is we urge the County to do more education and outreach on this issue so— people need more background information on this process. None of what is going on here today is common knowledge or intuitive for people. It is my job to follow these issues, and even I’m left confused by a lot of this. So the County needs to explain how this differs from the master plan. And there also needs to be an equivalent of this for the master plan itself. The County needs to explain what CEQA is and what a PEIR is, for folks. The county— you know, it sounds like from this presentation, that the county won’t have much control over the projects that are happening out of their jurisdiction. So it needs to clarify— Ms. Piggott: 30 seconds. Mr. Ginger: —what’s going to happen then. You know, will there be separate EIR processes for those other projects? And then, finally, it’s clear the people are passionate and frustrated here. So, you know, please just do more outreach and education, so people understand what all of this is. Thank you.</p>	<p>Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Section 3.17, <i>Tribal Cultural Resources</i>, of the Draft PEIR, which details the Assembly Bill 52 consultation process. Five tribes took part in Native American consultation for the proposed Project: the Fernandeño Tataviam Band of Mission Indians, Gabrieleño Band of Mission Indians – Kizh Nation, Gabrieleño/Tongva San Gabriel Band of Mission Indians, San Manuel Band of Mission Indians, and Tejon Indian Tribe. Also refer to <i>2020 LA River Master Plan</i> Objective 7: Foster Opportunities for Continued Community Engagement, Development, and Education; Action 7.2.6: Consult with Local Native American Tribal Governments and Work with Native American Communities; and Action 7.3: Engage the Indigenous Peoples of the Region.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for a summary of the extensive outreach program that was conducted for the Draft PEIR. Each comment addressing environmental analysis in the Draft PEIR requires a response from the County (State CEQA Guidelines Section 15088). These comments are included in the Final PEIR. The CEQA analysis is based on the project design. The CEQA process is used to help inform the <i>2020 LA River Master Plan</i>, and it allows the opportunity for potential project redesign to avoid significant environmental issues. The Draft PEIR and comments on the Draft PEIR inform the decisionmakers for the <i>2020 LA River Master Plan</i> and may lead to changes in that plan.</p> <p>Section 1.2 of the Draft PEIR and Section 1.1 of the Final PEIR detail how and why the PEIR was produced and explains that the PEIR was prepared pursuant to CEQA, a State law. CEQA establishes a State policy to disclose to the public significant environmental effects of proposed projects. Additionally, the purpose of CEQA was briefly</p>

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			<p>mentioned at the beginning of the Draft PEIR public meeting held on March 3, 2021.</p> <p>Refer to Master Response MR-4 (Adherence to Local Jurisdictions’ Requirements) for a summary of how future projects will need to adhere to applicable Federal, State, and local regulations. Jurisdictions implementing projects associated with the <i>2020 LA River Master Plan</i> will be able to tier off the PEIR to streamline their review.</p> <p>The difference between commenting on the <i>2020 LA River Master Plan</i> and the Draft PEIR is that comments for the <i>2020 LA River Master Plan</i> are directed at the plan itself and comments for the Draft PEIR are directed at the environmental analysis of the proposed Project. Both comment processes are the responsibility of the Project’s lead agency. Comments related to the content of the <i>2020 LA River Master Plan</i> are shared with the <i>2020 LA River Master Plan</i> team.</p>
Ms. Beckhardt	OC20-1	Ms. Beckhardt: I mistakenly registered. I don’t have a comment.	The County appreciates Ms. Beckhardt for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.
Mr. Bastien	OC21-1	Mr. Bastien: Thank you very much. I appreciate this opportunity. I’m a long-term resident of Studio City. And the portion of the riverside you have improved in this area has become a magnet for a large community of homeless. And so what’s happening is an environmental disaster. Human fecal matter is throughout that area. Some is getting into the river; some is polluting the area. So local residents don’t go there. And the ones who have— or even on the other side of the river— recently, the homeless are becoming more hostile and more violent so that there have been a number of attacks on	<p>The County appreciates Mr. Bastien for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising issues related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Master Responses MR-1 (Homelessness along the LA River) for a summary of homelessness along the LA River, and MR-3 (Public Outreach for the Draft PEIR). This comment does not identify specific significant</p>

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		<p>people recently. So local use of the riverbed has plummeted because of this situation, and the more you improve it, the more homeless you seem to bring in. The only thing I can recommend is the homeless problem needs to be solved first, to give these people lives and opportunities and futures, but everything that happens seems to make the homeless communities bigger, and they're leaving drug refuse and broken glass and a raw sewage. I feel so sorry for our fellow citizens in the South Bay area, Long Beach, and so on. I was born in Long Beach so I have a softness in my heart for Long Beach, and I hate to think of what we're sending down the river or what is coming our way from farther up. So I think that there are problems with the homeless that must be solved before we can improve the sides of the river, ever, because now local people here in studio city simply aren't using the river anymore. They're— out of personal fear. So thank you for the time. Appreciate the work you're doing, but I think that some very necessary reassessment needs to go on before this project spends any more of our money. Thank you very much. God bless.</p>	<p>environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Cervantes	OC22-1	<p>Ms. Cervantes: Okay. Hey everyone. My name is Jamila. I live in the City of Maywood and I live, literally, across the LA River, so I care deeply about the future of the river being as vibrant as possible. River and adjacent communities like mine have long awaited restoration and park access to LA River— to the LA River, but as you all know, implementing major park constructions in low— in extremely low-income communities like mine pose a threat that current residents will be displaced by new projects. So I think the County needs to invest heavily in anti-displacement programs and policy in this plan before any project construction is under way. Like what my family needs and what I need is a guarantee that displacement housing affordability will be</p>	<p>The County appreciates Ms. Cervantes for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing. Furthermore, this comment is in line with objectives found under multiple Housing and Land Use Elements throughout the project area. Refer to Section 3.13, <i>Population and Housing</i>, of the Draft PEIR for a detailed description of objectives and goals by jurisdiction. The overall <i>2020 LA River Master Plan</i> implementation is not</p>

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		<p>meaningfully addressed in the plan or else you all will literally displace me, my family, my friends, and my neighbors. And so I have concerns over the plans as it stands, and I want to see new improvements made on that. Thank you.</p>	<p>expected to displace any existing permanent housing, but it could affect individuals or families experiencing homelessness. For more information about homelessness, please refer to Master Response MR-1 (Homelessness along the LA River).</p>
Ms. Angel	OC23-1	<p>Ms. Angel: Hi. I'm Laurie Angel, and I live in Long Beach, and I want to echo the comments concerning pollution, air pollution from the courts along the freeway and then also industrial pollution and how that is going to be addressed. It's such a mass enterprise, I would expect that there would be some kind of effort that could be put together that would include several cities, or some concerted effort, because we have extensive oil dumpage that's been done— that's been brought up at park place along the 710 and 405 freeway. I'm not sure how this is all going to be addressed and how concreting over it is going to ensure the water quality. There's a huge concern about water quality and pollution in the water.</p>	<p>The County appreciates Ms. Angel for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears that the commenter is raising an issue from separate projects involving Interstate 710 and Interstate 405, which are not part of the proposed Project and are not analyzed in the Draft PEIR. However, as outlined in Section 3.2, <i>Air Quality</i>, of the Draft PEIR, neither construction nor operation of the Project is expected to create a substantial amount of air pollution. Also, as stated in Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR, the proposed Project is not expected to substantially affect water quality. Implementation of Mitigation Measure HAZ-1, Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures, would reduce hazardous materials impacts. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Angel	OC23-2	<p>So the other thing— the other concern has to do with your putting together a master plan, and what do the cities do, or do they incorporate that into their general plan, or how do we get them to participate in a manner</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or</p>

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		<p>that benefits the community rather than allowing industrialized uses or buildings that have nothing to do with green space and open space and improving along the river? I mean, how do we make this work for areas of the city that do not have enough open space? So what I keep hearing is that— Ms. Piggott: 30 seconds. Ms. Angel: —the county has no teeth to accomplish much in terms of getting this plan moving forward. I’m not quite sure how we get the cooperation. But also I want to make sure that there’s continuity in terms of trails, safety, and signage so that everybody’s safe along the river as they travel. So thank you.</p>	<p>accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Zamazal	OC24-1	<p>Ms. Zamazal: Hi. Sorry. I didn’t expect to be called. But so I didn’t actually prepare any questions exactly, but I wanted to ask what this meant for— and thank you for the plan that you put together. I understand that it must be difficult. But I’m wondering what does this mean for homeowners, what does it also mean for, you know, people that are living along the river in— permit building, what does this mean from— can the city state imminent domain from the homeowners that is my question. Thank you.</p>	<p>The County appreciates Ms. Zamazal for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising issues related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. However, please refer to Section 3.13, <i>Population and Housing</i>, of the Draft PEIR. Implementation of the overall <i>2020 LA River Master Plan</i> would not result in the removal of housing or displace any existing permanent housing. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Tovat	OC25-1	<p>Ms. Tovat: My name is Gabriella Tovat, representing Collins neighborhood association and Andy Street Association. Resident of District 09, North long Beach. My question is: What is your plan in regards to relocation— relocating the homeless population that has established themselves on the river? Do you have a plan and what is the plan? As well as are you working,</p>	<p>The County appreciates Ms. Tovat for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p>

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		<p>conjoining with the EPA in regards of preserving animal habitat? My last question would be are there any plans to improve the lighting conditions? That will be all. Thank you very much.</p>	<p>Please see Master Response MR-1 (Homelessness along the LA River) for a summary of homelessness along the LA River. As discussed in Chapter 2, <i>Project Description</i>, of the Draft PEIR, one of the objectives of the <i>2020 LA River Master Plan</i> addresses potential adverse impacts on housing affordability and people experiencing homelessness (Objective 6).</p> <p>Additionally, Objective 3 is to support healthy connected ecosystems, and Section 3.3, <i>Biological Resources</i>, of the Draft PEIR includes various mitigation measures to reduce potential impacts on habitats to less-than-significant levels.</p> <p>Lastly, please refer to Master Response MR-2 (Program-Level Analysis in the PEIR) for a summary of the programmatic nature of the Draft PEIR. Although site- or location-specific projects are not proposed, future Common Elements Typical Projects may include lighting as part of the project design.</p>
Ms. Lee	OC26-1	<p>Ms. Lee: This is Corliss Lee. I'm a member of the Riverpark Coalition in Long Beach, and if you're in Long Beach, please look that up on the web and think about becoming a member of Riverpark Coalition. We have the documented support from congressman Alan Lolenpile, State Legislator Patrick O'Donnell, and Speaker Anthony Rendon. We would like to add Janice Hall to that, Janice Hahn. We have prime property along the river for this plan. The properties by the 710 and 405 freeways have tremendous potential for this project. It's called the jewel in the crown. The properties are privately owned for the most part, but the money is out there to purchase them. However, our city favors revenue producing land uses. They have classed this as a neo-industrial location and our councilman Alan— Al Austin needs the connection to realize that there are better uses for this property. We ask for your support in that. We also</p>	<p>The County appreciates Ms. Lee for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising issues related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. However, please refer to Section 3.13, <i>Population and Housing</i>, of the Draft PEIR. Please see Master Response MR-2 (Program-Level Analysis in the PEIR) for a summary of the programmatic nature of the Draft PEIR. The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. Implementation of the overall <i>2020 LA River Master Plan</i> would not result in the removal of housing or displace any existing</p>

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		<p>would like to know if the county is willing to exercise imminent domain. There are two meetings coming up in our city council. March 23rd is feasibility study, and on April 6th there is an appeal of the planning commission decision— Ms. Piggott: 30 seconds. Ms. Lee: —to put in a neo-industrial project there. Thank you so much.</p>	<p>permanent housing. In addition, please refer to Master Response MR-4 (Adherence to Local Jurisdictions’ Requirements) for a summary of how future projects will need to adhere to applicable Federal, State, and local regulations. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Lawler	OC27-1	<p>Ms. Lawler: Thank you for the opportunity to speak. I’m a stakeholder resident of Long Beach. I have been an advocate for river-related issues since the mid ‘90s. In particular, I’m interested in the preservation of our open spaces, not just the river lands but the one-mile zone on either side of the land as was promised in this legislation. We have a number of culturally significant assets with this river such as the linear equestrian trail. I also find that we have many culturally significant assets from indigenous Indian tribes, and so the combination of all those assets we’re finding there is not equity. These linear features are not being properly planned for.</p>	<p>The County appreciates Ms. Lawler for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please see Master Response MR-2 (Program-Level Analysis in the PEIR) for a summary of the programmatic nature of the Draft PEIR. The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. However, Section 3.17, <i>Tribal Cultural Resources</i>, of the Draft PEIR details the Assembly Bill 52 consultation process. Five tribes took part in Native American consultation for the proposed Project: the Fernandeño Tataviam Band of Mission Indians, Gabrieleño Band of Mission Indians – Kizh Nation, Gabrieleño/Tongva San Gabriel Band of Mission Indians, San Manuel Band of Mission Indians, and Tejon Indian Tribe. Also refer to <i>2020 LA River Master Plan</i> Objective 7: Foster Opportunities for Continued Community Engagement, Development, and Education; Action 7.2.6: Consult with</p>

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			<p>Local Native American Tribal Governments and Work with Native American Communities; and Action 7.3: Engage the Indigenous Peoples of the Region.</p> <p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Lawler	OC27-2	<p>The language of the law— the state legislation AB-530 is really primary in understanding the scope and objective for this particular DEIR and really that state law indicated that there would be an alignment, a collaboration of many entities understanding that there’s just really no one entity that can consider all of the complex issues along the river corridor. But the choice for a program EIR is really not achieving that state legislative goal. So instead what you’re doing is you’re assuming that the local entities, such as the City of Long Beach, are going to use the kit of tools and— Ms. Piggott: 30 seconds. Ms. Lawler: —and cities are not adhering to this plan, so there is not equity and we don’t have teeth and if you can’t implement and ensure that the agencies along the river are going to cooperate. So there needs to be a different manner to ensure equity. That includes flood control, cultural significance, and the linear needs of the environmental corridor.</p>	<p>Please see Master Response MR-2 (Program-Level Analysis in the PEIR) for a summary of the programmatic nature of the Draft PEIR. The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis. The <i>2020 LA River Master Plan</i> analyzed parcels that could provide opportunities to site the 107 potential projects and completed an opportunities and constraints analysis at sites along the corridor. However, implementation of these potential 107 subsequent projects would depend on many factors, including, but not limited to, the location (e.g., jurisdiction, planning frame, in-channel [bank to bank]/off-channel [outside of bank]), design, and timing), agency oversight, and jurisdiction; proponent of subsequent projects; implementing party; local community needs; policy decisions; timing of implementation; and availability of funding.</p>
Ms. Elliot	OC28-1	<p>Ms. Elliot: I looked at your plan on my computer which is about 11-by-14, and the map was really too small to see a lot of detail, but it did look to me like the river as it goes— there is— somebody drew a bridge from, North Whittington Park South Whittington Park via the road Riverton, I guess it’s called the Riverton Overpass. This is misguided. I only know that one person drew it in on one of the open houses, and Riverton is too narrow to</p>	<p>The County appreciates Ms. Elliot for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR.</p>

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		<p>run any kind of a path through it. You'd have to take park land from a very small park; park users would be very upset to run it through there. It really doesn't—shouldn't happen. I have been following the LA River since I was on Mayor Bradley's LA River Committee in the 1980s. I came down to meeting at the county building before Sheila Kuehl represented my area because Universal Studios had contributed money. I'm still not clear on how this one jives with that one that we spent so much time at. But since I've been doing this since the 1980s, I am hoping that this happens before I die. Thank you.</p>	<p>This comment was shared with the <i>2020 LA River Master Plan</i> team. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>Ms. Cantrell</p>	<p>OC29-1</p>	<p>Ms. Cantrell: Good evening. Ann Cantrell, I live in Long Beach. I'm also a board member of the Riverpark Coalition. I think others have mentioned that this meeting tonight is confusing to many people because this is a CEQA document, a program EIR, and many people are— evidently think that this is a meeting for the LA River Master Plan. I am confused as to why you would do an EIR when the master plan has not been completed and approved. I would think you're doing this backwards. The master plan should be approved first, and then you do CEQA on it. There's many people that are making suggestions as to how the master plan should be changed or done, and as I understand it, your EIR is not concerned with that. You're trying to find out if this is an environmentally— the project is environmentally correct. Ms. Piggott: 30 seconds. Ms. Cantrell: I agree with the comments of Tilly Hinton. She brought up a lot of good points. The people that have spoken for a natural river, and I think you're spending a lot of time and effort on a CEQA document that is not going to be applicable to what the master plan is going to, finally, present. Thank you.</p>	<p>The County appreciates Ms. Cantrell for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for a summary of the extensive outreach program that was conducted for the Draft PEIR. Each comment addressing environmental analysis in the Draft PEIR requires a response from the County (State CEQA Guidelines Section 15088). These comments are included in the Final PEIR. The CEQA analysis is based on the project design. The CEQA process is used to help inform the <i>2020 LA River Master Plan</i>, and it allows the opportunity for potential project redesign to avoid significant environmental issues. The Draft PEIR and comments on the Draft PEIR inform the decisionmakers for the <i>2020 LA River Master Plan</i> and may lead to changes in that plan.</p> <p>The difference between commenting on the <i>2020 LA River Master Plan</i> and the Draft PEIR is that comments for the <i>2020 LA River Master Plan</i> are directed at the plan itself and comments for the Draft PEIR are directed</p>

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			<p>at the environmental analysis of the proposed Project. Both comment processes are the responsibility of the Project’s lead agency. Comments related to the content of the <i>2020 LA River Master Plan</i> are shared with the <i>2020 LA River Master Plan</i> team.</p>
<p>Ms. Zimmerman</p>	<p>OC30-1</p>	<p>Ms. Zimmerman: Hi. I’m Wendy Zimmerman, and I am a cyclist, and I attended the Friday meeting at Pierce. I want to continue to make sure that the entire length of the river is accessible to cyclist and other users of active transportation, scooters, skating, walking. Whatever people happen to prefer or comes into the future, but I also want to make sure that public transit in a clean form that is easily accessible for people bringing bikes and scooters and that kind of equipment back with them is readily available in both directions along the entire length of the river so that people can go, say, from Canoga Park to Long Beach, and then they can get a ride on public transit without making 20 different changes to get back to where they started. So I want to make sure that there is a clean, easy, accessible public transit network along with the multiuse path along the river.</p>	<p>The County appreciates Ms. Zimmerman for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>Ms. Zimmerman</p>	<p>OC30-2</p>	<p>The other thing is I’d really love to see the caps come back and a lot of my friends— every time I mentioned the LA River project, we want our caps back on the manhole covers, or whatever you want to call those covers, because they were part of our childhood and they’re part of the tradition of the river. Thank you.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>Ms. Barnett</p>	<p>OC31-1</p>	<p>Ms. Barnett: We’re using two computers. Okay. Thank you for this opportunity to speak. I’ll make it as quick as possible. First, there are a lot of neighbors— I live in Atwater Village. I want to second what Marcus said about flood, top priority. If the area floods, all your</p>	<p>The County appreciates Ms. Barnett for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p>

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		<p>projects go down river. Regarding the noise, your station in Atwater Village, ST8 Los Feliz Golf Course, it was found on May 14 at the very beginning of the pandemic, so your 6.3 is probably low. You should increase that by the amount of turrent traffic that was missing because it's not reflective of reality. You have multiple projects along the river, and also it would take care of our earlier comment on the draft about the diesel particulates.</p>	<p>Please refer to <i>2020 LA River Master Plan</i> Objective 1 concerning reducing flood risk and improving resiliency. This objective details how the <i>2020 LA River Master Plan</i> addresses the issue the commenter presents. Section 3.2, <i>Air Quality</i>, of the Draft PEIR analyzed diesel particulates, and implementation of Mitigation Measure AQ-1, Require Cleaner Construction Equipment and Vehicles and Low-VOC Coatings, would reduce diesel particulates. Impact 3.9(c) in Section 3.9, <i>Hydrology and Water Quality</i>, of the Draft PEIR addresses flood analysis.</p> <p>Field measurement ST8 was conducted within the Atwater Village community. The field measurement was conducted on May 14, 2020, and is representative of the ambient noise level in the vicinity of the Los Feliz golf course, which is north of Los Feliz Boulevard. The ambient measurement is representative of the single-family homes to the south of Los Feliz Boulevard, which are considered noise sensitive. This field measurement is considered acoustically equivalent to those homes, as the source-to-receiver geometry is very similar with relatively flat topography and Interstate 5 across the LA River from the homes. While this area is not representative of the entire Atwater Village community, other field measurement locations such as ST7 to the north are included to reflect ambient noise levels at locations that have more noise-intensive uses (such as interstates or State highways). Therefore, the noise measurements prepared during the course of the noise study are reflective of the alignment as a whole and can be considered at locations that have similar noise sources.</p> <p>Additionally, please see MR-2 (Program-Level Analysis in the PEIR) for a summary of the programmatic nature of the Draft PEIR. As the PEIR provides a program-level analysis of the <i>2020 LA River Master Plan</i>, the noise</p>

Commenter	Comment#	Comment Text	Response
			<p>measurements were conducted at a program level for the Draft PEIR and are sufficient for this level of analysis. A long-term baseline sound study in Atwater Village is not required. Further site-specific noise analysis could be conducted for future projects or subsequent actions, if determined necessary.</p> <p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Barnett	OC31-2	<p>I also noticed that lariverworks said— asked that the scope of analysis would include use of sound barriers along the freeway to mitigate the impacts to humans and wildlife at the river. Also, under land change, we just discovered in reading the draft master plan that about two miles on our neighbor side, the east bank, and I think you call it the left, all our access points are not in the plan and you also have errors on the right bank calling out for access points when they are not there and you missing park spaces— identifying park spaces. So for you to truly understand and propose new projects, you need to have that in your database which would impact your scoping.</p>	<p>Implementation of Mitigation Measures NOI-5, Prepare Focused Noise Study and Implement Findings; NOI-6, Prepare a Noise Study; NOI-7, Locate Project 200 feet or More from Occupied Structures or Prepare Vibration Study and Implement Findings; and NOI-8, Locate Project 400 feet or More from Occupied Structures or Prepare Vibration Study and Implement Findings, from the Draft PEIR would reduce noise impacts from implementation of the <i>2020 LA River Master Plan</i>.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please see Master Response MR-2 (Program-Level Analysis in the PEIR) for a summary of the programmatic nature of the Draft PEIR. The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval.</p> <p>The comment about access points called out in the plan is referring to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the</p>

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			adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
Ms. Barnett	OC31-3	and then we have— we have to disagree on planned projects and proposed projects because we have one at Los Feliz bridge which does not fit the master plan’s call out, and it would impede any flood mitigation measures. Thank you.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please see Master Response MR-2 (Program-Level Analysis in the PEIR) for a summary of the programmatic nature of the Draft PEIR. The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. Impact 3.9(c) in Section 3.9, <i>Hydrology and Water Quality</i> , of the Draft PEIR addresses flood analysis. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
Ms. Gonzalez	OC32-1	Ms. Gonzalez: Yeah, hi. My name is Jasmine. I live in Southeast Los Angeles. My concern with the PEIR is that it is proposing a physical change to the environment without taking into account the impact it will have on human lives and all of our communities along the LA River. The PEIR does not substantially address homelessness, nor does it address how a project like this could accelerate displacement of our community members. Our communities are a part of this environment, and what you do affects us. It affects our emotional health, our mental health, our physical health, as well as our ability to thrive. So I recommend there be a thorough analysis on the health impacts to us and our communities as a whole, and also an analysis on whether this project will increase homelessness.	The County appreciates Ms. Gonzalez for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project. The purpose of the CEQA process and the Draft PEIR is to disclose significant environmental effects of proposed actions to decision-makers and the public. An EIR is an informational document prepared in compliance with CEQA that describes a proposed project’s significant environmental effects, measures to mitigate those effects, and alternatives for avoiding or minimizing the effects.

Commenter	Comment#	Comment Text	Response
			<p>Please refer to Master Responses MR-1 (Homelessness along the LA River) for a summary of homelessness along the LA River and MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing. As discussed in Chapter 2, <i>Project Description</i>, of the Draft PEIR, one of the objectives of the <i>2020 LA River Master Plan</i> is to address potential adverse impacts on housing affordability and people experiencing homelessness (Objective 6).</p>
Ms. Gonzalez	OC32-2	<p>This is a dream project for developers hungry to make a buck, meanwhile, us renters have no real protections from risings rents. I speak candidly when I say that, as a renter, I feel as though I am in constant attack by both my city and my county. The apartment directly next me is already 55 percent more expensive than mine, and this affects me and my wellbeing as I am already rent burdened. Three out of four people in LA county are rent— are already rent burdened. My point is, I wish that you, Public Works cared enough to include an analysis of this in the PEIR. Also, it is naive to think that any environmental impacts would be limited to a two-mile wide area along the river, which is the study area in the PEIR. The reports— Ms. Piggott: 30 seconds. Ms. Gonzalez: —the report doesn’t take into account that displaced community members may have to have longer commutes causing an increase in traffic. My recommendation is to expand the study area and include a study on the increases in traffic caused by a gentrifying project such as this.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Master Response MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing. Environmental justice issues such as those the commenter raises are not part of the CEQA review, are not required under CEQA, and were not analyzed as part of the Draft PEIR.</p> <p>The 2-mile-wide corridor was selected as the study area for the <i>2020 LA River Master Plan</i> and was selected for the Draft PEIR for consistency with <i>2020 LA River Master Plan</i>. Please refer to Master Response MR-7 (Master Plan Area/PEIR Study Area and Addressing the LA River in a Comprehensive Manner) for more information on <i>2020 LA River Master Plan Area/PEIR Study Area</i>. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Commenter	Comment#	Comment Text	Response
Mr. Liao	OC33-1	<p>Mr. Liao: Hello my name is Seymour Liao. I live in Atwater Village, and I would very much encourage the PEIR study to aggressively take into consideration the connectivity in and around the LA River both up and down its banks, most notably on the east side and all of the connectivity points coming into the river and how well the non-vehicular traffic will feed through the river, so well connected bike lanes and ADA accessible access points. Thank you.</p>	<p>The County appreciates Mr. Liao for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Although this comment mentions the PEIR study, it appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Additionally, Object 4 of the <i>2020 LA River Master Plan</i> is to enhance opportunities for equitable access to the river corridor. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Rich	OC34-1	<p>Ms. Rich: Hi. Yeah, that wasn't me, but I am also— I'm just going to speak, I guess. I'm also a resident of the Atwater Village Area, and I definitely concur with the comments that have been made by Karen and Mark Fox and also Seymour. I am a resident, actually, that lives right at the, I would say, one of entry points to the LA River, and I would concur with a lot people where it's true that there have been many homeless people that have been, I guess, migrating to that part of the river, and they've been sleeping on benches that you guys have created. All the, I would say, plantations that you guys have also— not you guys per se, but other people from past times have done so that, you know, like, you guys don't really maintain the stuff that you already put into the area. So my concern is, if you haven't maintained what you've already established, what is the likelihood that you will continue to maintain whatever you put in unestablished right now? So that's a very big</p>	<p>The County appreciates Ms. Rich for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please see Master Response MR-1 (Homelessness along the LA River) for information on homelessness along the LA River. As discussed in Chapter 2, <i>Project Description</i>, of the Draft PEIR, one of the objectives of the <i>2020 LA River Master Plan</i> is to address potential adverse impacts on housing affordability and people experiencing homelessness (Objective 6). As discussed in Section 3.12, <i>Noise</i>, of the Draft PEIR, implementation of Mitigation Measures NOI-5, Prepare Focused Noise Study and Implement Findings; NOI-6, Prepare a Noise Study; NOI-7, Locate Project 200 feet or More from Occupied Structures or Prepare</p>

Commenter	Comment#	Comment Text	Response
		<p>concern for me as well as the additional noise that will be brought in to the area. Thank you.</p>	<p>Vibration Study and Implement Findings; and NOI-8, Locate Project 400 feet or More from Occupied Structures or Prepare Vibration Study and Implement Findings, would reduce noise impacts from implementation of the proposed Project.</p> <p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>Ms. Lena</p>	<p>OC35-1</p>	<p>Ms. Lena: I live in Canoga Park, the area— it’s called the River District and the Warner Center 2035 Project, and I do feel with several of the comments regarding apartments and housing and so forth, here alone it’s going to be 24,000 new apartments, none of which are owner occupied that is consisting of about 80,000 homes. Mine— my particular home— condos directly behind and adjacent to the river which is— my wall is actually about five feet in height and that’s it. That’s what stops me and a small parking structure which is going to turn into a park and then the river is right behind it. Last year we had a horrible— and every year, but last year was one of the worst— with stench, very much like a sewer stench, to the point where an odor was causing several people to throw up, to vomit, and it lasted for about three weeks. I’m not sure what the LA river is, in conjunction with the air quality control, is doing about all of this. Yes, I agree with the person— the gentleman that spoke about the studio city area with the human feces and the homeless back here.</p>	<p>The County appreciates Ms. Lena for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please see Master Response MR-1 (Homelessness along the LA River) for a summary of homelessness along the LA River. As discussed in Chapter 2, <i>Project Description</i>, of the Draft PEIR, one of the objectives of the <i>2020 LA River Master Plan</i> is to address potential adverse impacts on housing affordability and people experiencing homelessness (Objective 6).</p> <p>This comment does not identify specific significant environmental impacts or address the adequacy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Commenter	Comment#	Comment Text	Response
Ms. Lena	OC35-2	<p>In addition, there’s so many mosquito issues here along with the river. That alone in regards to the environment needs to be taken care of. The health pandemic— the borders between our own homes— in a distance of six feet. I’m not sure if that’s all being taken care of but there should be no public space in that area. Ms. Piggott: 30 seconds. Ms. Lena: not only now, but also for future pandemics. So we definitely— for homeowners we need that six feet of space between us and the public. I’m not sure which department is also taking on and taking a risk in management of that. So thank you so much for your time.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Implementation of Mitigation Measure HAZ-1, Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures, could account for pesticides used for vector control. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Soto	OC36-1	<p>Ms. Soto: Great. Good evening. I just want to— first of all, I wanted to recognize— you know, recognition of women’s history month. I just thought it was great to see so many female planners, you know, giving the presentation tonight. That was a big win for us women. I also want to basically share that the community sessions I thought were very successful. I did attend about a couple of years ago and provided comment, and I see those comments reflected in the priorities so I’m very pleased about that. But I still do have three concerns. One, is the need for consistent oversight of the river and its approved uses and pollution control.</p>	<p>The County appreciates Ms. Soto for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Master Response MR-4 (Adherence to Local Jurisdictions’ Requirements) for a summary of how future projects will need to adhere to applicable Federal, State, and local regulations. Once details for future projects are proposed, implementing agencies for later activities under the PEIR would need to meet the requirements of all applicable Federal, State, and local jurisdictions. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Commenter	Comment#	Comment Text	Response
Ms. Soto	OC36-2	Also, displacement and gentrification specifically for those that reside in the southeast cities.	Please refer to Master Responses MR-1 (Homelessness along the LA River) and MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing.
Ms. Soto	OC36-3	And then also, I would say, greater respect and acknowledgement of the indigenous cultures that thrived along the river need to be lifted up. I think that would say a lot to the communities that reside there, especially a person who has been in California for multiple generations. Thank you.	<p>Please refer to <i>2020 LA River Master Plan</i> Objective 7: Foster Opportunities for Continued Community Engagement, Development, and Education; Action 7.2.6: Consult with Local Native American Tribal Governments and Work with Native American Communities; and Action 7.3: Engage the Indigenous Peoples of the Region.</p> <p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Mr. Berg	OC37-1	<p>Mr. Berg: Thank you Ms. Piggott. I wanted to let you know that I am from the Los Angeles communication historical society; I am a board member. I'm also on the board of the Aliso Street manufactured gas plant historical society and the Chinese Historical Society of Southern California, and I am commenting on this project— the impact of the environment— on the project, not the environment, but the project on the environment on site of the largest indigenous tribe's city Tongva in the LA River between what is Aliso Street, 101 Freeway, East Cesar Chavez or Macy's Street that location was the site of the largest city in the Tongva Nation. It also held the El Aliso Tree. It was subsequently turned into a manufactured gas plant and is now on EPA ground field of historic proportions 64 acres of toxic acid wastes awaits anybody who enters that area and that should be raised and created as an open park or equitable access to the LA River from</p>	<p>The County appreciates Mr. Berg for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising issues from a separate project, which is not part of the proposed Project and is not analyzed in the Draft PEIR. However, implementation of Mitigation Measure HAZ-1, Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures, found in Section 3.8, <i>Hazards and Hazardous Materials</i>, of the Draft PEIR, would require future projects to conduct a project-level hazardous materials site assessment for construction of subsequent projects involving soil disturbance. Implementation of this</p>

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		<p>leading station and to also celebrate the fact that the original indigenous people have the largest city and the El Aliso Tree in that location which was known to indigenous people in the united states as far away as— Ms. Piggott: 30 seconds. Mr. Berg: —as far away as Pima, Arizona. This site has— cause of injury and death of many people due to pollution and has to be cleaned up before any project can be done there to ensure the safety of the people who would like to use it in the future. Thank you.</p>	<p>measure would address the hazardous waste issues that the commenter has raised.</p>
<p>Ms. Bender</p>	<p>OC38-1</p>	<p>Ms. Bender: Yes, hi. This is Marianne Bender. I'm a stakeholder with the Atwater Village Neighborhood Council River Committee. My master plan peer comment is about public safety along the river. In the current master plan, page 161, it says, community members named safety as the top reason they do not use the LA River. If safety is the top reason why the public is not using the river, then we feel that the plan does not do enough to prioritize public safety. In the PEIR, Section 3.14, police protection, it reads, public services, such as law enforcement and fire, have been actively developing in tandem with growth in the communities and the region. I have to say that this above statement is simply not correct. Law enforcement agencies have not been actively developing in tandem with growth. According to LAPD themselves there is currently no active law enforcement on the la river itself. And the defunding/restructuring structuring of LAPD, there are currently no plans or budget increases to have any active enforcement on the river.</p>	<p>The County appreciates Ms. Bender for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Section 3.14, <i>Public Services</i>, of the Draft PEIR identifies Mitigation Measure PS-1, Ensure Police and Fire Service Providers Have Adequate Resources, to ensure police and fire service providers have adequate resources to continue to serve the project area within their respective required levels of service and response times once the subsequent project is constructed. Per Mitigation Measure PS-1, during subsequent project design and development, the implementing agency will regularly notify and coordinate with police and fire service providers that have jurisdiction over subsequent project sites on project construction design, activities, and scheduling—including any street or lane closures related to subsequent projects—to ensure police and fire service providers have adequate resources to continue to serve the project area within their respective required levels of service and response times once the subsequent project is constructed. The County will coordinate with local jurisdictions; however, the</p>

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			funding and growth of local jurisdiction law enforcement are reliant on those local jurisdictions.
Ms. Bender	OC38-2	In addition, the LA River is not mapped in the 311 systems of LA resident call system. Therefore, when a resident tries to place a service request, city agencies often are not even able to find the problem, such as trash, graffiti, homeless camps, and the like. Are you going to say 30 seconds? We strongly recommend— Ms. Piggott: 30 seconds. Ms. Bender: —we strongly recommend that the master plan prioritizes a thorough mapping with milage markers and the like on both banks of the river, east and west, north and south. We also recommend the plan advocates increased county and city funding for law enforcement to address the river area. Thank you.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
Mr. Edwards	OC39-1	Mr. Edwards: Yeah. I live in Burbank— I’ve lived also in Los Feliz, Atwater Village, and Lassen Valley. I ride a bicycle frequently along the LA River bike path both to commute, shop, and it’s a lifestyle choice to improve health and wellness in the community of the people that I live with. I would like to see more assessment in the environmental impact review of the availability of public spaces. This becomes especially important now because we need to gather together and yet stay apart, and so the river presents an opportunity for large public events, spaces including artworks, entertainments, and so on.	The County appreciates Mr. Edwards for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project. Objective 2 of the <i>2020 LA River Master Plan</i> aims to provide equitable, inclusive, and safe parks, open space, and trails and Objective 5 is to embrace and enhance opportunities for arts and culture. Please refer to Section 3.15, <i>Recreation</i> , of the Draft PEIR for analysis discussing open space. Mitigation measures identified for the overall <i>2020 LA River Master Plan</i> construction and operations impacts in Sections 3.1 through 3.19 of the Draft PEIR will reduce impacts on public open space that supports health and wellness in the community.
Mr. Edwards	OC39-2	The other thing I would like to hear more about in the environmental impact review is the impact on the communities and indigenous peoples and those that are economically impacted directly by their involvement in	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or

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		<p>these projects as they move forward. I’ve read the nine objectives and agree with all of them. However, nine objectives is one— what is that one mission statement for the LA River? Is it a way of connecting the entire 51 miles of the city from that unfortunate confluence at the far, north end of the west valley all the way down into Long Beach, or do we recognize the special and particular needs of each of the communities that live along that river and those cities that may prefer projects that are revenue producing and other communities that may produce projects that are more concrete slabs and bridges and access points. Ms. Piggott: 30 seconds. Mr. Edwards: Each of these concerns, I think, are important, and I’m hopeful to continue to participate in the planning and development project over the, you know, let’s see some change on the river. Let’s make it happen now. I’m ready; let’s go. Thank you.</p>	<p>accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Ashouri	OC40-1	<p>Ms. Ashouri: Hi. Thank you so much for having me. My name is Aida Ashouri, and I have— I would like to echo the comments of the east yard communities. I think that this plan needs to have indigenous communities at the forefront. California has a history of ignoring indigenous practices. This was emblematic in the issues with the wildfires, and LA should learn from the mistakes of communities that have ignored indigenous knowledge. Mexico City is a good example where they ignored the practices and now face drought because it has paved over their water sources.</p>	<p>The County appreciates Ms. Ashouri for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. However, Section 3.17, <i>Tribal Cultural Resources</i>, of the Draft PEIR details the Assembly Bill 52 consultation process. Five tribes took part in Native American consultation for the proposed Project: the Fernandeño Tataviam Band of Mission Indians, Gabrieleño Band of Mission Indians – Kizh Nation, Gabrieleño/Tongva San Gabriel Band of Mission Indians, San Manuel Band of Mission Indians, and Tejon Indian Tribe. Also refer to <i>2020 LA River Master Plan</i> Objective 7: Foster Opportunities for Continued Community Engagement, Development, and Education; Action 7.2.6: Consult with Local Native American Tribal Governments and Work</p>

Commenter	Comment#	Comment Text	Response
			<p>with Native American Communities; and Action 7.3: Engage the Indigenous Peoples of the Region.</p> <p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Ashouri	OC40-2	<p>The other thing I would ask is that the river be treated, not just as a recreation point but actually a point of use for the land and it be used basically to mitigate carbon footprint and used as a, basically, a bike freeway and that department of transportation would be incorporated in terms of using the la river as access point for bicyclists and feeding into the— the communities all along the river so people can use it as a transportation point and this should be worked in to sustainability plan as well.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Ashouri	OC40-3	<p>As a member of the Los Feliz Neighborhood Council Committees, the environmental and cultural affairs, we’re planning to get an event on the LA River homelessness for earth day. You can learn more at my instagram at aidaforlosfeliz. I’m also running for the Los Feliz Neighborhood Council this— Ms. Piggott: 30 seconds. Ms. Ashouri: —if you’re— apply for your ballot and learn more on my instagram or my website aidaforlosfeliz.com and please join us on earth day. And if you know of any indigenous representation, we’d love to have them at our meeting, and please contact me. Thank you.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please see Master Response MR-1 (Homelessness along the LA River) for a summary of homelessness along the LA River. As discussed in Chapter 2, <i>Project Description</i>, of the Draft PEIR, one of the objectives of the <i>2020 LA River Master Plan</i> is to address potential adverse impacts on housing affordability and people experiencing homelessness (Objective 6).</p> <p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>

Commenter	Comment#	Comment Text	Response
Ms. Rowe	OC41-1	<p>Ms. Rowe: I am Christine Rowe. I want to thank you for the presentation. I want to say I wish it was— there was more to it. I want to thank all the speakers who have spoken today because I really have not disagreed with any of them. I would like to reference, in terms of the indigenous people, that where this begins on Canoga Park that I would recommend that there are actually four tribes that are historic, the Chumash, Tongva, Fernandeño, and Gabrieleño all and that there should be a phase 1 survey, archeological survey of the whole route; that there should be— any work that’s going to be done, would require archeological and Native American monitoring.</p>	<p>The County appreciates Ms. Rowe for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please see Master Response MR-2 (Program-Level Analysis in the PEIR) for a summary of the programmatic nature of the Draft PEIR. The Draft PEIR provides a program-level analysis and does not include project-specific or site-specific analysis because project-level approvals are not part of the <i>2020 LA River Master Plan</i> approval. Furthermore, implementation of mitigation measures detailed in Section 3.4, <i>Cultural Resources</i>, of the Draft PEIR—including Mitigation Measures CR-1a, Conduct a Cultural Resources Assessment for Historical/Built Archaeological and Tribal Cultural Resources to Determine the Presence of Resources; CR-1b, Conduct Cultural Resources Investigations for Historical/Built Archaeological and Tribal Cultural Resources and Implement Findings; CR-4a, Retain a Qualified Archaeologist; CR-4b, Avoid Significant Archaeological Sites or TCRs through Establishment of Environmentally Sensitive Areas; CR-4c, Provide Archaeological and Native American Monitoring and Establish Archaeological Monitoring Plan; CR-4d, Develop and Implement an Archaeological Evaluation and Treatment Plan to Evaluate Potentially Significant Archaeological Discoveries; and CR-5, Temporarily Halt Ground Disturbance for Unanticipated Discoveries per SOI Standards—would address the commenter’s points. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the</p>

Commenter	Comment#	Comment Text	Response
			Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
Ms. Rowe	OC41-2	But in terms of the one person that I disagreed with, was someone referencing carrying the river all the way out to nature preserve. As a former member of the West Hills Neighborhood Council, this issue of the river going beyond the confluence at Canoga Park was discussed and would impact the single family residences; that they would have been obligated to get access through their private backyards and have to pay for certain— there was requirements under the guidelines for mitigation that— that they would have to do things to their own private property. And with the concerns about the homeless and gang activity that I’ve heard about historically in Canoga Park, along the river there— Ms. Piggott: 30 seconds. Ms. Rowe: —I would not like to see that in West Hills. Again, it would be behind single family residences. So I do— I know that there are various creeks that leave off the confluence at Canoga High, but the river stops there, and I would like it to stop there for the reasons that I mentioned. Thank you for your time.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Section 3.13, <i>Population and Housing</i> , of the Draft PEIR, as it analyzes potential impacts on housing. Additionally, extending the LA River is not a project that is analyzed in the scope of the Draft PEIR. The proposed Project is not expected to affect any permanent housing. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
Ms. Bander	OC42-1	Ms. Bander: Thank you so much. I think that the primary goal in the LA River Master Plan should be that we need to use this river as the watershed that it is meant to be for Los Angeles. We have such a problem and will only get worse in the future with not enough water to sustain ourselves, and water captured and being able to use the water that falls as rain and, you know, into Los Angeles, it’s got to be the primary focus of revamping the river.	The County appreciates Ms. Bander for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further

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			response is necessary. No changes to the Draft PEIR are needed.
Ms. Bander	OC42-2	Secondarily, I'm interested in the river as a natural space. I am not— I am not a supporter of the concrete parks above the river. My understanding is that that is not an environmentally good solution. I'm personally not impressed that we have a world-renowned architect, Frank Gehry, having so much involvement in this plan. To me that's like gentrification of the river and not my vision for what we should be doing at this time. I'm very concerned about displacement of lower income people along the sides of the river and— Ms. Piggott: 30 seconds. Ms. Bander: —where that may be necessary, we've got to satisfactorily rehouse those people.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Master Responses MR-5 (Naturalization of the LA River) for a summary addressing naturalization of the LA River and MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing. Furthermore, please refer to Section 3.10, <i>Land Use and Planning</i> , of the Draft PEIR, as it addresses displacements and indicates the <i>2020 LA River Master Plan</i> is consistent with policies concerning displacements. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
Ms. Bander	OC42-3	And lastly, yes, I am in support of more indigenous input. We need to follow the indigenous people here and get their input into this project. Thank you so much for allowing me to speak to.	Refer to <i>2020 LA River Master Plan</i> Objective 7: Foster Opportunities for Continued Community Engagement, Development, and Education; Action 7.2.6: Consult with Local Native American Tribal Governments and Work with Native American Communities; and Action 7.3: Engage the Indigenous Peoples of the Region.
Unidentified Speaker	OC43-1	Unidentified speaker: Okay. Thank you. I'm a turtle and I've lived in the LA River with the unsheltered human residents of the wash, aka the river people, for many years. And I'm worried about the obvious lack of input from the unsheltered river residents as well as the absence of turtle complications in your updated plans. These populations will be the most impacted by the consequences of this document which as it stands, is offering no reassurances that they won't be	The County appreciates the commenter for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Master Response MR-1 (Homelessness along the LA River) for a summary of homelessness

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		<p>disappeared. It also make no effort to reach them, connect them here for the river which they know more intimately than most of the people involved with the drafting plan. They sleep on its banks, fish in its water, and find homes in the overgrowth and bridges that punctuate its 104 miles green land.</p>	<p>along the LA River. As discussed in Chapter 2, <i>Project Description</i>, of the Draft PEIR, one of the objectives of the <i>2020 LA River Master Plan</i> is to address potential adverse impacts on housing affordability and people experiencing homelessness (Objective 6). Additionally, Objective 3 is to support healthy connected ecosystems, and Section 3.3, <i>Biological Resources</i>, of the Draft PEIR includes various mitigation measures to reduce potential impacts on habitats to less-than-significant levels.</p> <p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Unidentified Speaker	OC43-2	<p>Like turtles, unsheltered humans are vulnerable and need protection. Even before the pandemic, their average life expectancy was in their 40s in LA compared to in their 80s for the over 99 percent of Angelinos that are housed. And displacement is what brought them to the LA River. Some of them came from overpasses and underpasses thanks to Judge Carter evicting all the highways. And their rights to the LA River is guaranteed in the California constitution. Displacement is a huge reason why they aren't living full lives and I would like to see it addressed in the plan with like— I would like to see it actually addressed in the plan and not just— they say that it is going to go to the authorities that have already failed these people. So— Ms. Piggott: 30 seconds. Unidentified speaker: —they can do better than that. So thank you from the unsheltered human and custodian residents of the Los Angeles River.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please see Master Response MR-1 (Homelessness along the LA River) for a summary of homelessness along the LA River. As discussed in Chapter 2, <i>Project Description</i>, of the Draft PEIR, one of the objectives of the <i>2020 LA River Master Plan</i> is to address potential adverse impacts on housing affordability and people experiencing homelessness (Objective 6).</p> <p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Ballhaus	OC44-1	<p>Ms. Ballhaus: Yes. Hello. My name is Ramona Ballhaus, and I'm long-term resident in the, northeast. What I</p>	<p>The County appreciates Ms. Ballhaus for preparing comments on the Draft PEIR. These comments will be</p>

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		<p>would really like is accountability for the cleanups of different brown sites that run along the LA River and to ensure more equitable housing. That also contains low-income housing not just what you so-called affordable housing because this is only encouraging gentrification. In our area it has already started. And it's luxury apartments instead of providing housing to the most needed. But most of all, because of all the cities and entities involved, there is no mention of who the lead person or agency is going to be that's going to oversee this project. Every time you try— and you mention you have like 100-and-something projects along the river, but there is no one person taking accountability for anything that is happening or one agency or lead person that the community can reach out to.</p>	<p>provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to the implementation of Mitigation Measure HAZ-1, Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures, found in Section 3.8, <i>Hazards and Hazardous Materials</i>, of the Draft PEIR, as it would require future projects to conduct project-level hazardous materials site assessments for construction of subsequent projects involving soil disturbance and implement measures. Implementation of this measure would address the hazardous waste issue that the commenter raised.</p> <p>Please refer to Master Responses MR-2 (Program-Level Analysis in the PEIR) for a summary of the programmatic nature of the Draft PEIR and MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Ballhaus	OC44-2	<p>I also agree with what's been said in the past that there should be more outreach in the community, and when I'm talking about outreach, I'm not talking about presenting plans that has already been agreed upon. I'm talking about actually involving community members of what they want to see in their own communities.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Information about the <i>2020 LA River Master Plan</i> community meetings is available at larivermasterplan.org. Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for a summary of the extensive outreach program that was</p>

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			<p>conducted for the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>Ms. Ballhaus</p>	<p>OC44-3</p>	<p>Also, we need safety and accountability and that is one of main problems with the river. Because it is owned and overseen by so many different cities, there is no safety and there is no police force or anything— Ms. Piggott: 30 seconds. Ms. Ballhaus: —if you are in trouble along any of the paths that you’re planning to create. So they need to create a police force in order to oversee that. It is greatly needed. Thank you.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Master Response MR-4 (Adherence to Local Jurisdictions’ Requirements) for a summary of how future projects will need to adhere to applicable Federal, State, and local regulations. Implementation of Mitigation Measure PS-1, Ensure Police and Fire Service Providers Have Adequate Resources, in Section 3.14, <i>Public Services</i>, of the Draft PEIR addresses the commenter’s concerns and works to make the communities within the project area safer. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>Mr. Keshav</p>	<p>OC45-1</p>	<p>Mr. Keshav: Hello. Thank you. Yeah, I’m Keshav. Very good presentation. Thank you for all your efforts and work. I’m from Orange County, Brea. Right now, I’m actually in India, though. But, yeah, I wanted to especially draw attention to the gentrification issue which is a big problem. So just a few things to consider especially from, like, environmentally sustainable priority. So I advocate for like— more like urban to rural migration. One thing— I saw this YouTube video, complete history of the LA Aqueduct, and they were talking about it’s like— in terms of the carrying capacity of the Los Angeles River, it’s like 1,000 percent beyond,</p>	<p>The County appreciates Mr. Keshav for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Master Response MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing. This comment does not identify specific significant environmental impacts or address the adequacy or</p>

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		which I think is like 20 times. So in terms of— yeah, like, there’s too many people living in that area, so ecologically think about the impact for that, for the gentrification thing.	accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
Mr. Keshav	OC45-2	And, yet, I’m also opposed to gentrification or, like, you know, that one person or, like, that greedy, like, corporate type of mindset. Like more for us, less for— you know, that that’s unjust. But in terms of, like, ecologically seeing it— and of course, yeah, there’s a sentiment too, you know, like, you’ve been living in those— I can’t even relate to that as much, but, you know, that can’t be discounted either.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Master Response MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing within the project area. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
Mr. Keshav	OC45-3	Anyway, then, one more thing. Also, FOLAR is a great resource, Friends of the Los Angeles River, their website and so much good information from them and their perspective, their values. And one other thing, the executive summary ES 1.1.1, at the end— Ms. Piggott: 30 seconds. Mr. Keshav: —sure— at the end regarding the channelization, I would think that it should also include, at the end of the— that part also include, how even FOLAR includes the— it’s a very pertinent explanation of the development property being in the flood plain to begin with, again, for gentrification, like. So the plan to begin with, so many property and houses, developments were in the flood plain to begin with which is not ecologically a very good idea. So thank you.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Master Response MR-5 (Naturalization of the LA River) for a summary addressing naturalization of the LA River. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
Mr. Captain Obvious	OC46-1	Mr. Captain Obvious: okay. I just want to address this entire process and say that this a complete waste of resources and we should be focusing on poor issues not developing an area that serves a functional purpose to not flood our entire city. Yes, there was a river there at	The County appreciates the commenter for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.

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		<p>one time when we were on a barter system it would be great to go back to trading first and we would have far less traffic it would be great for the environment as well, but we're not doing that because we like whole foods. So let's not convert our power plants and our aqueducts to something that it's not. Let it serve that purpose.</p>	<p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>Mr. Captain Obvious</p>	<p>OC46-2</p>	<p>Spend the resources on addressing issues like the rampant homelessness, feces, and urine that plagues our city. Put the homeless people at the top of the walkway, build them a real shelter that's not tent cities and give them a place to live. If they want to pee on the street, it goes where it's going to end up anyway. And it will be a fraction of the price. I still have 56 seconds so we can talk about mosquitos or whatever, but, yeah, there you go. Just stop wasting resources. Do your job. Provide some benefit to everybody in the city. Also, yes, let's talk about gentrification. It is not a bad thing. It means that we are developing an area. Things are getting better. If the people there— Ms. Piggott: 30 seconds. Mr. Captain Obvious: —don't know better, to ask for more than they should think a little bit farther out about where they can go and ask for more. Nobody's forcing them to sell. You cannot police the city. You can't even keep malls safe and Santa Monica safe from riots. Why do you think you can police hundreds of miles of a park that is totally unpoliced now? What are you thinking? Thank you.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Master Responses MR-1 (Homelessness along the LA River) for a summary of homelessness along the LA River and MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing. Note that the Common Elements under the <i>2020 LA River Master Plan</i> would provide safety, comfort, and wayfinding. You can read more about some of the safety features in Chapter 2 of the Final PEIR.</p> <p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>Unidentified Speaker</p>	<p>OC47-1</p>	<p>Unidentified speaker: Okay. I am a resident of South Gate, and I want to expo the Heal the Bay Person who said that there needs to be a better job of outreaching out to communities. I live in South Gate, and I heard about this meeting literally 30 minutes into the meeting. And so I think there needs to be some way to expand where you're reaching out to. I heard about the meeting through east yard. And to the point to the previous gentleman about gentrification, it would be interesting</p>	<p>The County appreciates the commenter for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Master Responses MR-3 (Public Outreach for the Draft PEIR) for a summary of the extensive</p>

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		<p>to know where he lives, and why he thinks that gentrification is not important or is something that just naturally happens; it doesn't. It's pushed by developers who want to pick up and eat up the land and displace our communities.</p> <p>So I just would really like for this planning committee to think about the outreach and the lack of outreach that they're doing in our communities regarding this project. Thank you.</p>	<p>outreach program that was conducted for the Draft PEIR and MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing.</p> <p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Unidentified Speaker	OC48-1	<p>Unidentified speaker: Cool. Hi. Yeah, so I wanted to echo what the previous— some of the concerns that the previous caller from South Gate brought up about the gentrification process that is currently going— ongoing in the Southeast LA Area, and I actually wanted to address and bring up this— bring this up to everyone listening and to you all specifically something that is happening. Right now in the City of Bell there are mobile homes— there are two different parks that are full of mobile homes and some of them are even owned by these— these homes are owned by the people. They are being evicted the by Bell City Council because they want to sell off these mobile homes in order to, you know, build something nicer, add this LA River Revitalization Project is happening at the same time.</p>	<p>The County appreciates the commenter for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Master Response MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Unidentified Speaker	OC48-2	<p>So I invite Captain Obvious to actually, you know, go on Instagram and— this information is publicly available and I invite everyone to go on Instagram and look up the Instagram page sellatcheesmith, and they have been producing information and media about this for months because this map tuition that Bell City Council is planning to do right next to the LA River is going to affect hundreds of families who are currently living in</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Master Responses MR-1 (Homelessness along the LA River) for a summary of homelessness along the LA River and MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing.</p>

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		<p>Bell and like many of the points that have been brought up before about the problems of gentrification this whole displacement of community networks, immigrant families. This will make people, you know— it will decrease everyone’s quality of life. So it— obviously, this master plan or, you know, whatever it has no, you know, apparently it does not have any, you know, quote, unquote, safeguards for— Ms. Piggott: 30 seconds. Unidentified speaker: I think most of us are keenly aware that the master plan will be the facilitator after gentrification. So I, you know, want to echo some solutions that other people have brought in here which is, you know, spend the money on the real issues, such as the homeless in this crisis that has, you know, been ongoing in Los Angeles and the many other crisis that affect our city and our county. Thank you.</p>	<p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Unidentified speaker	OC49-1	<p>Unidentified speaker: Hi. I would like to— okay. Thank you. I have something to say about the displacement of people that live on the river. And I have dozens of— about a dozen people I know, most of them are good people that live in the river. And this is their last house on the block. If you take their last house on the block away from them, a good person, especially during a pandemic that we’re having right now, I would consider you guys murderers. Thank you. That’s all I have to say.</p>	<p>The County appreciates the commenter for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Master Responses MR-1 (Homelessness along the LA River) for a summary of homelessness along the LA River and MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing. Furthermore, please refer to Section 3.10, <i>Land Use and Planning</i>, of the Draft PEIR, as it addresses displacements and indicates the <i>2020 LA River Master Plan</i> is consistent with policies concerning displacements. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No</p>

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			further response is necessary. No changes to the Draft PEIR are needed.
Mr. Reki	OC50-1	Mr. Reki: Hi, there. Just a quickie about what the actual purpose of this was. I, like most others, apparently didn't really do our homework. I'm just now reviewing the pdf on the PEIR and it's given me a lot of good history on the whole deal. So I think that's something that we all need to take care of. Thank you. Bye.	<p>The County appreciates Mr. Reki for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>The State CEQA Guidelines, Section 21092, requires public notice of a preparation of an EIR or negative declaration. As part of that process, a public meeting or hearing is typically held for an EIR.</p> <p>A public meeting on the Draft PEIR was held on March 3, 2021, to supply the public with information about the Draft PEIR and provide an opportunity for the public to comment. These comments are included in the Final PEIR.</p> <p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Mr. Captain Obvious	OC51-1	Mr. Captain Obvious: Thank you, Jennifer. This is Captain Obvious again. I just want to point out that this is— that we still have 20 minutes left, so I'm basically on here where nobody is listening anyway; so it doesn't really matter. Generally projects with importance that represent— truly in the city's interest of 10-, 14-million people the LA River area that this affects represented by the handful of 20 or 30 sole preregistered people and very— you need citizens like myself that— I want to bring up what are we doing for people with chihuahuas that live near the river, like, how come nobody's talking about that? We have 20 minutes, and I want to know	<p>The County appreciates the commenter for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further</p>

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		because I got chihuahuas. They're indigenous and it's important to me. So I know that that was really important, so just think about it. Okay? Thank you for your time.	response is necessary. No changes to the Draft PEIR are needed.
Ms. Rowe	OC52-1	Ms. Rowe: Thank you. I am weighing in now for a point of clarification. I know you can't respond to me. But, again, I want to reference that about a decade ago in the West Hills Neighborhood Council there was a discussion about— there was another name for the LA River Master Plan at the time, and what it said— the plan stated that if you had property within about a mile, personal property, family residences, that, again, you would have to give access, literally set up benches so people could go onto your property to view the river. And so this is why our neighborhood council voted against continuing the river through West Hills. The— there are many tributaries. There are tributaries that go, as someone mentioned, to Chatsworth. There's tributaries that go to Calabasas. And a tributary that is Bell Creek that goes all the way up to the Santa Susana field laboratory.	<p>The County appreciates Ms. Rowe for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Rowe	OC52-2	And this has been discussed with, I think, federal parks and state parks. I know members, former members of the west hills neighborhood council, that have actually hiked the river quite some distance throughout west hills. I know there are people that would like to see the trail continue through west hills, and I know people that, again, who own the property, that back to there, who did not want the potential access by gang members or whatever into their backyards because this was like another— Ms. Piggott: 30 seconds. Ms. Rowe: —road essentially leading up behind their houses that could allow people access to their backyards. Thank you for your time.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.

Commenter	Comment#	Comment Text	Response
Mr. Captain Obvious	OC53-1	<p>Mr. Captain Obvious: Thank you, Jennifer and Christine. I— thank you, Jennifer, for giving me the opportunity to respond to Christine. So now we can have a real discourse on this topic. A bad— I just want to address a bunch of things that were said— a bad decision ten years ago that didn’t go anywhere for ten years and was rebranded as something else, doesn’t mean it’s a good decision today. That’s one. Two, you have the same problems you did ten years ago. They’re probably worse. So how is this the solution? I don’t get it, and I just think there’s a far better use of the resources that it seems like we all agree is needed in the communities that everybody’s here trying to represent, but let’s be honest. Parks and concerns of gentrification this isn’t the answer. This is a complete waste of resources, a waste of time, and it’s exhibited by the fact we have 15 minutes of dead air because of a chihuahua comment. I get it. It was to make a point. These are not coming back on, but you still have 10 minutes of dead air. So I’m going to log off, allow Christine to respond if she wants to, and now we can have a real conversation, since we have so much time. Thanks.</p>	<p>The County appreciates the commenter for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Jessica	OC54-1	<p>Ms. Jessica: Hi. My name is Jessica. Since Captain Obvious gets to submit three different public comments, I guess I can continue mine since I wasn’t able to finish it. Like I said, I represent East Yard Communities for Environments of Justice. I live along the Lower LA River Communities along with a whole bunch of our members and, as other folks from the Southeast LA Communities mentioned already, gentrification is a very real issue in our communities. It may not be in whatever community wealthier, white, affluent, residents, homeowners are living in, but it is very real in our community. And I want to highlight that this is an attack. Okay? This is an attack on our livelihood. This is an attack on unhoused folks. As someone already, previously mentioned, this is their last</p>	<p>The County appreciates Ms. Jessica for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Master Response MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared</p>

Commenter	Comment#	Comment Text	Response
		<p>stop. They are not being given the services and the support that they need from the county, and that is a failure on the county, not a failure on them.</p>	<p>with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>Ms. Jessica</p>	<p>OC54-2</p>	<p>So it is onto the County to house these people and to give them the support that they need and not to just kick them out because that’s what a whole bunch of Atwater Residents want. The County needs to commit to this. Not just by saying that oh, we’re going to send a whole bunch of cops, and we’re going to increase policing in the community, and we’re going to have those cops talk to homeless residents. That’s not addressing the homeless issue; that’s making it worse. You need to actually commit to building low-income, extremely low-income, very low-income housing. Plus supportive housing. You need to commit to implementing rent control. You need to commit to implementing right to counsel. You need to commit to actually protecting the renters and the unhoused communities along the lower LA River and the Upper LA River because those are the people who are going to be most directly impacted by further concretizing the river, by having projects that are going to increase property values without any of that value being captured by the local communities— Ms. Piggott: 30 seconds. Ms. Jessica: —by having more policing and having more cops in the name of safety. No. No. No. You need to actually address the actual concerns of the local community, and you need to— instead of giving people who are very well represented, aka white affluent folks, more time. You need to, once again, outreach and educate low-income communities who are not being heard in these meetings. Thank you.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Master Responses MR-1 (Homelessness along the LA River) for a summary of homelessness along the LA River and MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing. As discussed in Chapter 2, <i>Project Description</i>, of the Draft PEIR, one of the objectives of the <i>2020 LA River Master Plan</i> is to address potential adverse impacts on housing affordability and people experiencing homelessness (Objective 6). This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
<p>Ms. Hinton</p>	<p>OC55-1</p>	<p>Ms. Hinton: Hi. Given this unexpected opportunity for a round two of comments, like Jessica, I’m going to jump in here and finish. My final point is to say that given these extraordinary times and the pandemic conditions</p>	<p>The County appreciates Ms. Hinton for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of</p>

Commenter	Comment#	Comment Text	Response
		<p>that are disconnecting us from the usual social fabric through which conversations and understanding of processes like this one would travel, I would ask that the county make and, in the revised EIR documentation, the extraordinary efforts to ensure that a diverse array of community stakeholders are both aware of these dual comment process the commentary on the plan itself and on the EIR, that people are empowered to read the extensive documentation that pertains to both and enabled to give comments on both the plan and the program environmental impact report. To merely replace public meetings with zoom meetings is neither equivalent, nor sufficient. And any of us who have been to a public meeting about the river will know that meeting together on zoom is not the same thing as being in a large room of people, with visual aids, with large scale maps, with professionals able to explain in detail and respond to questions. This is not the same as that process. And the comments tonight were demonstrative of a massive need, I would say, for— Ms. Piggott: 30 seconds. Ms. Hinton: —questions— answering questions, a need for more outreach, a need for more affective messaging, and a need for the County to do a lot more than has been done so far in explaining both the plan and the policy frameworks. Otherwise, it could very easily look like the counties are attempting to race these documents through the process without paying due attention to people whose opinions are so crucial. Thank you.</p>	<p>Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>Following Governor Newsom’s Executive Order N-28-20 relating to the threat of COVID-19, the Los Angeles County Board of Supervisors announced that all Los Angeles County facilities would be closed to members of the public beginning March 16, 2020, and the closing of buildings and facilities was indefinitely extended. Public Works facilities have only recently reopened on October 1, 2021.</p> <p>Please refer to Master Response MR-3 (Public Outreach for the Draft PEIR) for a summary of the extensive outreach program that was conducted for the Draft PEIR. Each comment addressing significant environmental issues discussed in the Draft PEIR requires a response from the County (State CEQA Guidelines Section 15088). These comments are included in the Final PEIR. The CEQA analysis is based on the project description. The CEQA process is used to help inform the <i>2020 LA River Master Plan</i>, and it allows the opportunity for potential project changes to avoid significant environmental issues. The Draft PEIR and comments on the Draft PEIR inform the decisionmakers for the <i>2020 LA River Master Plan</i> and may lead to changes in that plan.</p> <p>The difference between commenting on the <i>2020 LA River Master Plan</i> and the Draft PEIR is that comments on the <i>2020 LA River Master Plan</i> are directed at the plan itself and comments on the Draft PEIR are directed at the environmental analysis of the proposed Project. Both comment processes are the responsibility of the Project’s lead agency. Comments related to the content of the <i>2020 LA River Master Plan</i> are shared with the <i>2020 LA River Master Plan</i> team.</p>

Commenter	Comment#	Comment Text	Response
Ms. Ayvazian	OC56-1	<p>Ms. Ayvazian: Hello. I live in the Canoga Park area, which is part of the Werner’s Center Project which, again, I’m hearing so many issues relative to rental and risk and safety, and so forth. First, for the rental properties, I— yes, we own our condos, but next door is a complex— an apartment complex that was just built. And that alone is \$2700 for a two bedroom/two bath. In front of us the building is going to be torn down and that is going to start off as rentals at \$3,000 a month for two bedrooms/two baths. And this is in Canoga Park. Werner’s center is having 24,000 apartments which is 80,000 new folks coming into this area, and zero— zero regarding new police, fire departments, school districts, anything to do with risk or environmental.</p>	<p>The County appreciates Ms. Ayvazian for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project.</p> <p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Master Response MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Ayvazian	OC56-2	<p>We also know that the river itself had water coming in from the property in front of us that’s coming into the river directly that nobody is really addressing. That alone is an environmental hazard, and that alone is a one-billion-dollar project that’s underway with an arena and would allow houses coming up with a 7500-dollar— 7500 seatings.</p>	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to the implementation of Mitigation Measure HAZ-1, Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures, found in Section 3.8, <i>Hazards and Hazardous Materials</i>, of the Draft PEIR, as it would require future projects to conduct project-level hazardous materials site assessments for construction of subsequent projects involving soil disturbance and implement measures. Implementation of this measure would address the hazardous waste issue that the commenter raised.</p> <p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further</p>

Commenter	Comment#	Comment Text	Response
			response is necessary. No changes to the Draft PEIR are needed.
Ms. Ayvazian	OC56-3	And, again, if you all remembered that one city, promise, that burned down. What happened? 80,000 folks were misplaced, 80,000. Here alone in a one-and-a-half-mile radius in the Werner’s Center 2035 Project 80,000 renters are coming in. Zero owner occupied. This city has sold out to investors all over. And I’m— Ms. Piggott: 30 seconds. Ms. Ayvazian: —We have one-and-a-half-mile radius adjacent to this river in Werner’s center project that is bringing in 80,000 folks. This is a magnet for homeless, a magnet for many other issues, including mosquitos, including all kinds of odors, and so forth. We need to address these first. Thank you.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to Master Response MR-1 (Homelessness along the LA River) for a summary of homelessness along the LA River and the implementation of Mitigation Measure HAZ-1, Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures , which would account for pesticides used for vector control. Furthermore, please refer to Impact 3.2(d) in Section 3.2, <i>Air Quality</i> , of the Draft PEIR, as it addresses odors within the proposed Project. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
Ms. Lawler	OC57-1	Ms. Lawler: Thank you. Thank you for this second-round opportunity to just really emphasize the importance of collaborative effort that’s necessary for planning along the river. I mean, it’s really, really important that it be looked at in a linear nature, that all the communities that are being affected be taken into consideration. In this EIR process that flood control risks are addressed that safe, equitable, inclusive parks and open space and trails are considered that we support healthy connected ecosystems, that we consider that larger linear environmental corridor that you can’t just segment it out in five minute— five-mile segments. It’s really all related.	The County appreciates Ms. Lawler for preparing comments on the Draft PEIR. These comments will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final PEIR for the proposed <i>2020 LA River Master Plan</i> Project. A primary goal of the proposed Project is to create 51 miles of connected open space with equitable access, including trails, gateways, and access points. The <i>2020 LA River Master Plan</i> discusses how potentially underutilized spaces such as utility and railroad rights-of-way could be repurposed to increase access, connectivity, and park space. It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR.

Commenter	Comment#	Comment Text	Response
			<p>Please refer to Master Responses MR-1 (Homelessness along the LA River) for a summary of homelessness along the LA River and MR-3 (Public Outreach for the Draft PEIR) for a summary of the extensive outreach program that was conducted for the Draft PEIR. Furthermore, please refer to Impacts 3.9(d) and 3.9(e) of Section 3.9, <i>Hydrology and Water Quality</i>, in the Draft PEIR for analysis of flood risks associated with the proposed Project. <i>2020 LA River Master Plan</i> Objective 1 aims to reduce flood risk and improve resiliency; Objective 2 aims to provide equitable, inclusive, and safe parks, open space, and trails; and Objective 3 aims to support healthy, connected ecosystems.</p> <p>This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Lawler	OC57-2	We have to enhance opportunities for equitable access.	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. However, <i>2020 LA River Master Plan</i> Objective 2 is to provide equitable, inclusive, and safe parks, open space, and trails. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.</p>
Ms. Lawler	OC57-3	We have to embrace and enhance opportunities for arts and culture.	<p>It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. Please refer to <i>2020 LA River Master Plan</i> Objective 5, which is to embrace and enhance opportunities for arts and culture. This comment does not identify specific significant environmental impacts or address the</p>

Commenter	Comment#	Comment Text	Response
			adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
Ms. Lawler	OC57-4	We do have to address the potential adverse impacts on housing affordability and homelessness. We have to foster opportunities from the community engagement. All of these individuals who have spoken tonight, the various groups that have very valid concerns, we have to be in a collaboration to consider all of our needs.	Please see Master Responses MR-1 (Homelessness along the LA River) for a summary of homelessness along the LA River and MR-6 (Gentrification and Housing Affordability) for a summary of concerns regarding gentrification and affordable housing. However, <i>2020 LA River Master Plan</i> Objective 6 addresses potential adverse impacts on housing affordability and people experiencing homelessness. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
Ms. Lawler	OC57-5	The program EIR is assuming that the local entities are going to do the right thing, but they're not, and so we have to have accountability with this effort, and we have to ensure that the comments and the concerns of stakeholders that have spoken tonight— Ms. Piggott: 30 seconds. Ms. Lawler: —are considered.	Please see Master Response MR-4 (Adherence to Local Jurisdictions' Requirements) for a summary of how future projects will need to adhere to applicable Federal, State, and local regulations. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.
Ms. Lawler	OC57-6	So I thank you for the opportunity. I think that this has been a wonderful effort. I do think, though, that we continue to repeat history, and plans occur every decade, and yet we're not accomplishing as much as we need to. So we need to work harder as a community. Thank you.	It appears the commenter is raising an issue related to the <i>2020 LA River Master Plan</i> and not the Draft PEIR. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the Draft PEIR. This comment was shared with the <i>2020 LA River Master Plan</i> team. No further response is necessary. No changes to the Draft PEIR are needed.

Clarifications and Modifications to the Draft PEIR

3.1 Introduction

The following clarifications and revisions update the Draft PEIR in response to the comments received during the public review period and due to minor clarifications made by the County. These changes, which have been incorporated into the Draft PEIR, constitute the Final PEIR, to be presented to the County of Los Angeles Board of Supervisors with a recommendation for certification. These modifications clarify, amplify, or make insignificant changes to the PEIR. Revisions to the PEIR have not resulted in new significant impacts or mitigation measures or increased the severity of an impact. As noted below, none of the criteria for recirculation set forth in State CEQA Guidelines Section 15088.5(a) have been met, and recirculation of the PEIR is not required.

State CEQA Guidelines Section 15088.5(a):

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification..."Significant new information" requiring recirculation include, for example, a disclosure showing that:
- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
 - (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
 - (3) A feasible project alternative or mitigation measure considerably different from the others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
 - (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The revisions compiled in this chapter do not constitute "significant new information" noted in Section 15088.5(a) because of the following:

- No new significant environmental impacts have been identified following the publication of the Draft PEIR. Although new mitigation measures have been added based on input from commenters to ensure impacts remain less than significant, these new measures would not in and of themselves result in significant impacts nor do they represent that a new impact was identified. Rather, the measures provide for greater assurance of less-than-significant impacts.
- None of the modifications would result in a substantial increase in impacts already identified. Rather, the revisions are designed to further reduce the potential for significant impacts.
- No new alternatives have been identified that would clearly lessen impacts.
- The PEIR is not fundamentally or basically inadequate and conclusory in nature. The PEIR compiles information available at the time of publication to assist in evaluating the values and risks of moving forward with the *2020 LA River Master Plan*. The PEIR as an advanced planning

tool is meant to set the stage for future analysis of projects within the program as they are proposed for implementation.

For certain changes shown below, an explanation is provided for why the change or revision does not constitute “significant new information.” All other changes shown below are considered minor clarifications or technical changes and are not substantive (i.e., new significant information not previously analyzed).

3.2 Clarifications and Modifications

Corrections or revisions to the Draft PEIR are presented below by chapter or section. Deleted text is shown in ~~striketrough~~, and new text is in shown in underline.

3.2.1 Changes to the Executive Summary

Changes to Section ES-1, Page ES-1

The proposed Project is along a 51-mile-long, approximately 2-mile-wide corridor (i.e., 1 mile on each side) of the LA River in the County and spans through 18 jurisdictions (17 cities and unincorporated County areas). The river encompasses an 834-square-mile watershed and flows from its headwaters at river mile 51.0 in Canoga Park within the City of Los Angeles to river mile 0.0 in Long Beach, where the river meets the Pacific Ocean. The LA River was channelized between the ~~late 19th and mid~~early and mid-20th centuries to protect lives and property from flooding as the Los Angeles region rapidly grew and transformed to a largely urbanized area (see Section 3.4.2.1 in Section 3.4, *Cultural Resources*, for the history of channelization in the LA River). Today, 1 million people live within 1 mile of the river.

Changes to Section ES-1, Table ES-2, Page ES-1

Table ES-2. Summary of Environmental Impacts of the Proposed Project

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
Aesthetics				
<p>3.1(a): Would the proposed Project have a substantial adverse effect on a scenic vista?</p>	<p><u>Construction</u> Typical Projects: Potentially significant KOP Categories 1–6: Potentially significant Overall 2020 LA River Master Plan Implementation: Potentially significant</p> <p><u>Operation</u> Typical Projects: Less than significant KOP Categories 1–5: Less than significant</p>	<p><u>Construction</u> Mitigation Measure AES-1: Install Construction Fencing for Screening and Security for Construction Lasting Longer than 30 Days. For construction of a project component lasting longer than 30 days, the implementing agency will require contractors 1) to install solid green or blue fabric perimeter fencing of a minimum height of 6 feet around construction areas to screen and provide security to pedestrians and other trail and park users and reduce views of construction staging areas, grading, and site disturbance, and 2) to conduct regular visual inspections of fencing to ensure fencing is in good working order and any visual breaks are repaired.</p> <p>Mitigation Measure LU-1: Prepare and Implement Construction Management Plan. Detailed in Impact 3.10(a).</p> <p>Mitigation Measure REC-1: Minimize Disruption of Recreational Uses During Construction. Detailed in Impact 3.15(a).</p>	<p><u>Construction</u> Typical Projects: Less than significant KOP Categories 1–6: Less than significant Overall 2020 LA River Master Plan Implementation: Less than significant</p> <p><u>Operation</u> Typical Projects: Less than significant KOP Categories 1–5: Less than significant</p>	<p><u>Construction</u> Typical Projects: Significant and unavoidable KOP Categories 1–6: Significant and unavoidable Overall 2020 LA River Master Plan Implementation: Significant and unavoidable</p> <p><u>Operation</u> Typical Projects: Significant and unavoidable KOP Categories 1–5: Less than significant</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
	<p><i>KOP Category 6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>	<p><u>Operation</u> <i>Typical Projects and KOP Categories 1–5:</i> None required.</p> <p><u>Operation</u> <i>KOP Category 6 and Overall 2020 LA River Master Plan Implementation:</i></p> <p>Mitigation Measure AES-2: Minimize Obstruction of Scenic Vistas.</p> <p>During project design, the implementing agency will minimize visual intrusions from public views of designated scenic vistas by following local jurisdictions’ applicable policies and ordinances that protect views of designated scenic vistas by taking into consideration sightlines, scale and massing of structures, and materials used for construction, and other measures as needed.</p> <p>To the extent practicable, the implementing agency will maintain the scenic vistas’ visual quality and comply with the applicable jurisdiction’s general plan and design guidelines to preserve scenic vistas and minimize visual intrusions.</p>	<p><i>KOP Category 6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>	<p><i>KOP Category 6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>
<p><i>3.1(b): Would the proposed Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic</i></p>	<p><u>Construction and Operation</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p>	<p>None required.</p>	<p><u>Construction and Operation</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p>	<p><u>Construction and Operation</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
<i>buildings within a state scenic highway?</i>	<p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>		<p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>
<p><i>3.1(c): In non-urbanized areas, would the proposed Project 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 it conflict with applicable zoning and other regulations governing scenic quality?</i></p>	<p><u>Construction</u> <i>Typical Projects:</i> Potentially significant <i>KOP Categories 1–6:</i> Potentially significant <i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p> <p><u>Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><u>Construction</u> Mitigation Measure AES-1: Install Construction Fencing for Screening and Security for Construction Lasting Longer than 30 Days. Detailed in Impact 3.1(a). Mitigation Measure LU-1: Prepare and Implement Construction Management Plan. Detailed in Impact 3.10(a). Mitigation Measure REC-1: Minimize Disruption of Recreational Uses during Construction. Detailed in Impact 3.15(a). <u>Operation</u> None required.</p>	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><u>Construction</u> <i>Typical Projects:</i> Significant and unavoidable <i>KOP Categories 1–6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p> <p><u>Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
<p>3.1(d): Would the proposed Project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?</p>	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u> <i>Typical Projects:</i> Potentially significant <i>KOP Categories 1–6:</i> Potentially significant <i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>	<p><u>Construction</u> None required.</p> <p><u>Operation</u> Mitigation Measure AES-3a: Design Exterior Lighting to Minimize Nighttime Illumination Spillover. Exterior lighting will be designed to shield and direct illumination to the subsequent project sites and minimize light spillover to any adjacent residential uses. Mitigation Measure AES-3b: Design Exterior Structures to Minimize Glare. The exterior of the proposed buildings/structures will be constructed of materials such as high-performance, tinted, non-mirrored glass; painted metal panels; and pre-cast concrete or fabricated wall surfaces.</p>	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u> <i>Typical Projects:</i> Significant and unavoidable <i>KOP Categories 1–6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
Air Quality				
<p>3.2(a): Would the proposed Project conflict with or obstruct implementation of the applicable air quality plan?</p>	<p><u>Construction and Operation</u> Typical Projects: Less than significant KOP Categories 1–6: Less than significant Overall 2020 LA River Master Plan Implementation: Less than significant</p>	<p>None required.</p>	<p><u>Construction and Operation</u> Typical Projects: Less than significant KOP Categories 1–6: Less than significant Overall 2020 LA River Master Plan Implementation: Less than significant</p>	<p><u>Construction and Operation</u> Typical Projects: Less than significant KOP Categories 1–6: Less than significant Overall 2020 LA River Master Plan Implementation: Less than significant</p>
<p>3.2(b): Would the proposed Project result in a cumulatively considerable net increase in any criteria pollutant for which the project region is a nonattainment area with respect to the applicable federal or State ambient air quality standard?</p>	<p><u>Construction</u> Typical Projects: Less than significant KOP Categories 1–6: Potentially significant Overall 2020 LA River Master Plan Implementation: Potentially significant</p>	<p><u>Construction</u> Typical Projects: None required. <u>Construction</u> KOP Categories 1 through 6 and Overall 2020 LA River Master Plan Implementation: Mitigation Measure AQ-1: Require Cleaner Construction Equipment and Vehicles and Low-VOC Coatings. In the event that construction-period emissions exceed regional or localized emissions standards in effect at the time that subsequent project details are known, implementing agencies will implement the following or</p>	<p><u>Construction</u> Typical Projects: Less than significant KOP Categories 1–6: Significant and unavoidable Overall 2020 LA River Master Plan Implementation: Significant and unavoidable</p>	<p><u>Construction</u> Typical Projects: Less than significant KOP Categories 1–6: Significant and unavoidable Overall 2020 LA River Master Plan Implementation: Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
	<p><u>Operation</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>	<p>more effective measures to achieve emissions reductions:</p> <ul style="list-style-type: none"> • For exceedances of PM or NO_x regional or localized significance thresholds, the implementing agency (or its contractors) will: <ul style="list-style-type: none"> ○ Require at Least Tier 4 Final Engines on Construction Equipment. All off-road equipment greater than 50 horsepower and operating for more than 20 total hours over the entire duration of construction activities will operate on at least an EPA-approved Tier 4 Final or newer engine. ○ Require Best Available Control Technology on Construction Equipment. All construction off-road equipment must be outfitted with Best Available Control Technology devices including, but not limited to, CARB-certified Level 3 Diesel Particulate Filters. ○ Require Use of Diesel Trucks with 2010-Compliant Model Year Engines. Diesel trucks that have 2010 model year or newer engines, but no less than the average fleet mix for the current calendar year as set forth in CARB’s EMFAC database, must be used. In the event that 2010 model year or newer diesel trucks cannot be obtained, a rationale explaining why and showing that a good-faith effort to locate such engines was conducted must be documented. ○ Require Low-VOC Coatings during Construction. To reduce construction-related fugitive VOC emissions beyond the requirements of SCAQMD Rule 1113, low-VOC 	<p><u>Operation</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>	<p><u>Operation</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<p>coatings that have a VOC content of 25 grams per liter or less will be used during construction. Evidence must be submitted to SCAQMD detailing the use of low-VOC coatings prior to the start of construction.</p> <p>Mitigation Measure GHG-2: Implement Construction GHG Emissions Reduction Strategies.</p> <p>Detailed in Impact 3.7(b).</p> <p><u>Operations</u></p> <p><i>Typical Projects:</i></p> <p>None required.</p> <p><u>Operations</u></p> <p><i>KOP Categories 1 through 6 and Overall 2020 LA River Master Plan Implementation:</i></p> <p>Mitigation Measure AQ-2: Implement Operations Strategies to Reduce VOC Emissions.</p> <p>The implementing agency will verify if operations air pollutant emissions exceed regional or localized VOC emissions standards in effect at the time that subsequent project details are known. In the event that operations emissions under subsequent projects exceed regional or localized VOC emissions standards, the implementing agency will implement the following to achieve VOC emissions reductions during operations.</p> <ul style="list-style-type: none"> • Use low-VOC coatings (VOC content less than or equal to 25 grams per liter) for periodic painting and facility upkeep. 		

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<p>Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.</p> <p>Detailed in Impact 3.7(a).</p> <p>Mitigation Measure TRA-1b: Implement TDM Strategies and/or Enhancements to Reduce VMT.</p> <p>Detailed in Impact 3.16(b).</p>		
<p>3.2(c): Would the proposed Project expose sensitive receptors to substantial pollutant concentrations?</p>	<p><u>Construction</u></p> <p>Typical Projects: Potentially significant</p> <p>KOP Categories 1–6: Potentially significant</p> <p>Overall 2020 LA River Master Plan Implementation: Potentially significant</p> <p><u>Operation</u></p> <p>Typical Projects: Potentially significant</p> <p>KOP Categories 1–6: Potentially significant</p>	<p><u>Construction</u></p> <p>Mitigation Measure AQ-3: Require Subsequent Projects that Exceed the SCAQMD LSTs and Are within 1,000 Feet of Sensitive Receptors to Perform a Health Risk Assessment and Implement Measures to Reduce Health Risks.</p> <p>For subsequent projects that (1) exceed the SCAQMD LSTs and (2) are within 1,000 feet of existing sensitive receptors, as defined by SCAQMD (e.g., residences, daycares), the implementing agency will prepare a site-specific construction and operational HRA. The HRA must identify whether the health risk exposures for adjacent receptors will be less than the SCAQMD project-level thresholds. If the HRA demonstrates that the health risk exposures for adjacent receptors will be less than SCAQMD project-level thresholds, then additional mitigation will be unnecessary. However, if the HRA demonstrates that health risks will exceed SCAQMD project-level thresholds, additional on- and offsite mitigation will be analyzed by the implementing agency to help reduce risks to the greatest extent practicable. Mitigation Measures AQ-1 and GHG-2 would be required.</p>	<p><u>Construction</u></p> <p>Typical Projects: Significant and unavoidable</p> <p>KOP Categories 1–6: Significant and unavoidable</p> <p>Overall 2020 LA River Master Plan Implementation: Significant and unavoidable</p> <p><u>Operation</u></p> <p>Typical Projects: Significant and unavoidable</p> <p>KOP Categories 1–6: Significant and unavoidable</p>	<p><u>Construction</u></p> <p>Typical Projects: Significant and unavoidable</p> <p>KOP Categories 1–6: Significant and unavoidable</p> <p>Overall 2020 LA River Master Plan Implementation: Significant and unavoidable</p> <p><u>Operation</u></p> <p>Typical Projects: Significant and unavoidable</p> <p>KOP Categories 1–6: Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
	<p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Potentially significant</p>	<p>Mitigation Measure AQ-1: Require Cleaner Construction Equipment and Vehicles and Low-VOC Coatings.</p> <p>Detailed in Impact 3.2(b).</p> <p>Mitigation Measure GHG-2: Implement Construction GHG Emissions Reduction Strategies.</p> <p>Detailed in Impact 3.7(b).</p> <p><u>Operation</u></p> <p>Mitigation Measure AQ-2: Implement Operations Emissions-Reduction Strategies.</p> <p>Detailed in Impact 3.2(b).</p> <p>Mitigation Measure AQ-3: Require Subsequent Projects that Exceed the SCAQMD LSTs and Are within 1,000 Feet of Sensitive Receptors to Perform a Health Risk Assessment and Implement Measures to Reduce Health Risks.</p> <p>Detailed above.</p> <p>Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.</p> <p>Detailed in Impact 3.7(a).</p> <p>Mitigation Measure TRA-1b: Implement TDM Strategies and/or Enhancements to Reduce VMT.</p> <p>Detailed in Impact 3.16(b).</p> <p><u>Operation</u></p> <p><i>KOP Category 6 and Overall 2020 LA River Master Plan Implementation:</i></p>	<p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p>	<p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<p>Mitigation Measure AQ-4: Require Subsequent Projects with Sensitive Receptors within 1,000 Feet of Existing Toxic Air Contaminant Hazards to Perform a Health Risk Assessment.</p> <p>For subsequent projects with sensitive receptors (e.g., affordable housing) within 1,000 feet of existing TAC hazards (e.g., heavily traveled roadways, stationary sources), the implementing agency will prepare a site-specific construction and operational HRA. If the HRA demonstrates that the health risk exposures for onsite receptors will be less than SCAQMD project-level thresholds, then additional mitigation would be unnecessary. However, if the HRA demonstrates that health risks will exceed SCAQMD project-level thresholds, additional feasible onsite mitigation (e.g., air filters with a higher Minimum Efficiency Reporting Value rating) will be analyzed by the implementing agency to help reduce risks to the greatest extent practicable.</p> <p>Mitigation Measure AQ-2: Implement Operations Emissions-Reduction Strategies.</p> <p>Detailed in Impact 3.2(b).</p> <p>Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.</p> <p>Detailed in Impact 3.7(a).</p> <p>Mitigation Measure TRA-1b: Implement TDM Strategies and/or Enhancements to Reduce VMT.</p> <p>Detailed in Impact 3.16(b).</p>		

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<p>In the event that the emission thresholds are exceeded, apply the following mitigation measure:</p> <p>Mitigation Measure AQ-3: Require Subsequent Projects that Exceed the SCAQMD LSTs and Are within 1,000 Feet of Sensitive Receptors to Perform a Health Risk Assessment and Implement Measures to Reduce Health Risks.</p> <p>Detailed above.</p>		
<p>3.2(d): Would the proposed Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?</p>	<p><u>Construction</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Category 1:</i> Potentially significant</p> <p><i>KOP Categories 2–6:</i> Less than significant</p>	<p><u>Construction</u></p> <p>None required.</p> <p><u>Operation</u></p> <p><i>Typical Projects, KOP Categories 2–6:</i> None required.</p> <p><u>Operation</u></p> <p><i>KOP Category 1 and Overall 2020 LA River Master Plan Implementation:</i></p> <p>Mitigation Measure AQ-5: Implement Equestrian Manure Management.</p> <p>Equestrian activities may generate odors due to improper handling of manure and soiled bedding. The implementing agency will comply with the following measures:</p> <ul style="list-style-type: none"> • The facility, including animal stalls and warmup and training areas, will be cleaned at least once per day, including the removal of manure and soiled bedding. • Manure and soiled bedding will either be incorporated into composting by the end of the day 	<p><u>Construction</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Category 1:</i> Less than significant</p> <p><i>KOP Categories 2–6:</i> Less than significant</p>	<p><u>Construction</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Category 1:</i> Significant and unavoidable</p> <p><i>KOP Categories 2–6:</i> Less than significant</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
	<p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Potentially significant</p>	<p>or temporarily stockpiled prior to incorporation into the composting system.</p> <ul style="list-style-type: none"> Stockpiled material in containment vessels will be covered with a lid or tarp. Containment vessels will be located at the farthest feasible distance from nearby residents and/or sensitive receptors. 	<p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Less than significant</p>	<p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p>
Biological Resources				
<p><i>3.3(a): Would the proposed Project 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?</i></p>	<p><u>Construction</u></p> <p><i>Typical Projects:</i></p> <p>Potentially significant</p> <p><i>KOP Categories 1– 6:</i></p> <p>Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Potentially significant</p> <p><u>Operation</u></p> <p><i>Typical Projects:</i></p> <p>Potentially significant</p> <p><i>KOP Categories 1– 6:</i></p> <p>Potentially significant</p>	<p><u>Construction</u></p> <p>Mitigation Measure BIO-1: Conduct Literature Review, Habitat Assessment, and Project Surveys.</p> <p>The purpose of BIO-1 is to begin the process of making a determination of whether or not the proposed individual subsequent project would have a significant environmental impact on biological resources. BIO-1 is the first step, and in some cases, the final step, in reaching the goal of a no impact, less-than-significant impact, or significant impact determination for each of the six biological thresholds of significance (see Section 3.3.3.2, <i>Criteria for Determining Significance</i>).</p> <p>During the design of individual subsequent projects and prior to construction, the implementing agency will employ a qualified biologist to review the proposed subsequent project. The qualified biologist will conduct a site-specific literature review, which will consider, at a minimum, the proposed subsequent project, site location, GIS information, and known sensitive biological resources. <u>If appropriate, the literature review will include a review of the California State Wildlife Action Plan, focusing on Chapter 5.5, South Coast Province, and Chapter 6, Anadromous Fish (CDFW 2015), and the City of Los Angeles Department of</u></p>	<p><u>Construction</u></p> <p><i>Typical Projects:</i></p> <p>Less than significant</p> <p><i>KOP Categories 1– 6:</i></p> <p>Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Less than significant</p> <p><u>Operation</u></p> <p><i>Typical Projects:</i></p> <p>Less than significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Less than significant</p>	<p><u>Construction</u></p> <p><i>Typical Projects:</i></p> <p>Significant and unavoidable</p> <p><i>KOP Categories 1– 6:</i></p> <p>Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p> <p><u>Operation</u></p> <p><i>Typical Projects:</i></p> <p>Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i></p> <p>Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
	<p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>	<p><u>Sanitation 2020 Biodiversity Report (LASAN 2020)</u>. The review will assess the site for special-status plants and/or wildlife, aquatic resources, sensitive natural communities, wildlife corridors or nurseries, biological resources protected by local ordinances policies such as protected trees, or other regulated biological resources pursuant to CEQA, FESA, or CESA could be affected by the project. In some cases, a literature review will be sufficient for the biologist to make a no impact and/or a less-than-significant impact determination for all six of the thresholds of significance (Section 3.3.3.2) of biological resources. In this case, no further work will be required, and a summary report stating the basis for these findings, identifying each threshold of significance with a CEQA finding, will be the only requirement.</p> <p>If, during the literature review, it is determined that potential biological resources exist in the individual subsequent project area that could be affected, then a habitat assessment survey will be required unless a qualified biologist determines that a field review/habitat assessment is not needed. If needed, this survey will consist of a site visit conducted by a qualified biologist, where the proposed subsequent project and adjacent buffer (as appropriate for the target species relative to the potential project direct and indirect impacts) will be assessed for candidate, sensitive, or special-status plants and/or wildlife, aquatic resources, sensitive natural communities, wildlife corridors or nurseries, biological resources protected by local ordinances policies, such as protected trees or other regulated biological resources, while identifying and mapping all vegetation communities and land-cover types (initial study). If suitable habitat is present for candidate, sensitive, or special-status plants</p>	<p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<p>or animals and could not be avoided, then focused protocol surveys may be required, as determined by a qualified biologist, with appropriate reporting.</p> <p><u>To determine presence/absence or to accurately identify rare plants, a qualified botanist shall conduct multiple rare plant surveys throughout the growing season for any given year, as needed. Surveys shall occur during the time of year when rare plants are more likely to be visually detectable. Rare plant surveys performed during a low precipitation year shall be supplemented with one or two additional rare plant surveys over a number of years, depending on the rare plant species, annual weather patterns, and whether the project area was recently disturbed (e.g., fire).</u></p> <p>If aquatic resources are present and could not be avoided, a jurisdictional delineation per Mitigation Measure BIO-21a may be required. Mitigation Measure BIO-1 will include an analysis of all of the biological resources identified in the thresholds of significance, with a determination made regarding significance for each threshold. Reporting will include regulatory assessment, construction and operation impact analyses, and identification and implementation of appropriate measures based on the presence of biological resources. Impact analyses will also include appropriate assessment of project-specific disturbances (e.g., recreational effects, night lighting, noise).</p> <p>If, following the literature review and project surveys, it is determined that the project will not directly or indirectly affect any species listed as endangered, threatened, or candidate by CDFW or USFWS, then the impact will be less than significant for listed species, and no further mitigation for listed species will be required.</p>		

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		<p>If, however, it is determined that impacts on federally or State-listed plant or animal species will occur and therefore will be considered significant, then Mitigation Measure BIO-2 will be required <u>and implemented</u> to reduce impacts to less-than-significant levels.</p> <p>Mitigation Measure BIO-2: Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements.</p> <p>The implementing agency will avoid “take” of species, if applicable/occurring, within the action area (i.e., project area and buffer for species that USFWS and CDFW list as endangered, threatened, or candidate). The <i>action area</i> is a FESA term that refers to the area directly and indirectly affected by the proposed action and is based on the range of impacts (e.g., ground disturbance, water quality, air quality, lighting, noise). If avoidance of take is not possible, then the implementing agency will initiate the process of consultation with the wildlife agencies (i.e., USFWS, NMFS and/or CDFW, as appropriate based on species habitat present).</p> <p>During informal consultation, it may be determined that the proposed action is not likely to affect any federally listed species or critical habitat in the project area, with no requirement to consult formally with the USFWS, this will complete the consultation process. If the proposed action may affect listed species or critical habitat, and the action has a federal nexus, then Section 7 of the FESA process applies. Under FESA Section 7, the project proponent will need to prepare a Biological Assessment (BA) to assist the USFWS in its determination of the project’s effect on species and/or critical habitat. If the action is likely to adversely affect a listed species, then a</p>		

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		<p>request for formal consultation is submitted. Pursuant to FESA, formal consultation may last up to 90 days, after which the USFWS has 45 days to prepare a Biological Opinion (BO). These timelines may be extended through a request from USFWS. The conclusion of the BO will state whether or not the proposed action is likely to:</p> <ol style="list-style-type: none"> 1. Jeopardize the continued existence of the listed species; and/or 2. Result in the destruction or adverse modification of critical habitat that appreciably diminishes the value of critical habitat as a whole for the conservation of the listed species. <p>If the action is reasonably certain not to jeopardize the continued existence of the listed species or diminish the value of critical habitat as a whole for the species, then the BO will include an incidental take statement with the BO. <i>Incidental take</i> is subject to the terms and conditions provided in the incidental take statement. Examples of terms and conditions included within a typical BO are included below.</p> <p>FESA section 10(a)(1)(B) consultation occurs for non-federal actions. An HCP is prepared by the project proponent and accompanies the application for an ITP. The USFWS prepares the ITP and a BO. The elements of the HCP are made binding through the ITP. The timelines for HCP completion are project-specific.</p> <p>If a species is listed by both FESA and CESA, Fish and Game Code Section 2080.1 allows an applicant who has obtained a federal incidental take statement (FESA Section 7 consultation) or a federal ITP (FESA § 10(a)(1)(B)) to request that the Director of CDFW find</p>		

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		<p>the federal documents consistent with CESA. If the federal documents are consistent with CESA, a consistency determination is issued, and no further authorization or approval is necessary under CESA.</p> <p>For species that are listed by CDFW, but not the USFWS, as endangered, threatened, candidate, or a rare plant, and where take would occur, the project proponent will apply for a State ITP under Section 2081(b) of the Fish and Game Code. CDFW typically requires that the project proponent seek a 2081(b) ITP rather than a 2080.1 consistency determination because of inconsistencies between FESA and CESA, particularly conditions of approval. For example, FESA does not prohibit the take of listed plants on private lands, whereas CESA does. When the 2081(b) ITP is issued, terms and conditions will be specified by CDFW within the 2081(b) ITP, and these terms and conditions will ensure that the items 1 through 5 below are met.</p> <ol style="list-style-type: none"> 1. The authorized take must be incidental to an otherwise lawful activity. 2. The impacts of the authorized take must be minimized and fully mitigated. 3. The measures required to minimize and fully mitigate the impacts of the authorized take: <ol style="list-style-type: none"> a. Are roughly proportional in extent to the impact of the taking on the species; b. Maintain the applicant’s objective to the greatest extent possible; and c. May be successfully implemented by the applicant. 		

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		<p>4. Adequate funding is provided to implement the required minimization and mitigation measures and monitor compliance with the effectiveness of the measures.</p> <p>5. Issuance of the permit will not jeopardize the continued existence of the CESA-listed species.</p> <p>As a part of the above described processes, examples of mitigation for impacts on listed species through the following pathways are included below:</p> <ul style="list-style-type: none"> • If suitable habitat for listed species is present within the action area, the project will be designed to avoid impacts (direct and indirect). Through the avoidance of impacts on listed species, the project proponent will avoid the FESA/CESA permitting process. <ul style="list-style-type: none"> ○ Informal consultation with the wildlife agencies may be required to complete the process. • For impacts on federally listed species and a federal permit or federal funding is involved, Section 7 consultation (if available through federal nexus) will be required. This may include consistency determination from CDFW for State-listed species. <ul style="list-style-type: none"> ○ A “May Affect and Is Likely to Adversely Affect” BA will be prepared and submitted to USFWS, and initiation of formal consultation will be requested. The BA will include applicant proposed mitigation measures that are often included in the required Terms and Conditions in the BO. These conditions depend on the species under consideration, as well as severity of the project impacts, but typically include avoidance and minimization measures, as well 		

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		<p>as compensatory mitigation to reduce take to the extent feasible.</p> <ul style="list-style-type: none"> ○ Conservation measures or similar requirements may be required within the BO that specify conservation, minimization, and compensation measures to avoid, minimize, or offset effects to listed species. Examples include: <ul style="list-style-type: none"> ● Biological monitoring ● Worker environmental awareness program (WEAP) training ● Minimization of construction-related impacts ● Preconstruction clearance surveys ● Weed management surveys ● Compensation for loss of habitat <ul style="list-style-type: none"> – Protection of lands in perpetuity – Mitigation ratios for impacts (e.g., 1:1 mitigation for suitable habitat, 3:1 for riparian habitat, 5:1 for critical habitat) – Permanent protection and management of compensation lands – Costs to acquire and manage lands – Financial assurances ○ Terms and Conditions within the Incidental Take Statement in the BO will include mitigation measures for listed species. Examples include: <ul style="list-style-type: none"> ● Immediate notification of wildlife agencies in the event of the permit’s listed species being killed or injured as a result of project activities 		

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		<ul style="list-style-type: none"> • Re-initiation of consultation if more than a specified number of listed species are killed or injured as a result of project activities • Reporting requirements • For impacts on federally listed species for which no federal permit or federal funding is involved, Section 10(a)(1)(B)) consultation (if no federal nexus) will be required. This may include consistency determination from CDFW for State-listed species. <ul style="list-style-type: none"> ○ Applicant-prepared HCP that includes mitigation measures: <ul style="list-style-type: none"> • Preservation (via acquisition or conservation easement) of existing habitat • Enhancement or restoration of degraded or former habitat • Creation of new habitat • Establishment of buffer areas around existing habitats • Restrictions to access ○ The USFWS then issues an ITP and prepares a BO, and the HCP mitigation measures become legally binding. USFWS ITP measures will be similar to those described above for Section 7. • For impacts on State-listed species, a 2081 (b) ITP will be issued. The BO conservation measures are often included in the BO in order to meet CESA requirements and allow CDFW to make a consistency determination. For this reason, the 2081 (b) ITP requirements are often similar to the BO conservation measures and may include other measures, such as: 		

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		<ul style="list-style-type: none"> ○ CNDDDB Observations (reporting of any CNDDDB species) ○ Traffic speed limits ○ Habitat acquisition, permanent protection, and perpetual management of compensatory habitat <p>In addition to the measures listed above, additional measures may be required through agency consultations and/or permits that are deemed necessary for the recovery of a listed species.</p> <p><u>As outlined in Mitigation Measures BIO-1 and BIO-2, if it is determined that there is suitable habitat present for special-status species of nesting birds, raptors, or eagles, or if construction involves non-incident take of migratory birds that are not special-status, and if construction is to occur during the nesting season within suitable habitat, then the following mitigation measures will be required and implemented.</u></p> <p>Mitigation Measure BIO-3a: Conduct Preconstruction Nesting Bird Surveys.</p> <p>Prior to any ground-disturbing activity, including vegetation removal or structure disturbance/ demolition, during the bird breeding season (February 1 to August 31), a qualified biologist will conduct nesting bird surveys within 7 days prior to construction for any activities that could disturb nesting birds within the subsequent project area and its 500-foot buffer area for nesting birds and active nests (i.e., nests with eggs or young) of non-raptor species listed under the MBTA or CFGC. <u>A minimum 0.5-mile no-disturbance buffer around each nest of California fully protected bird species—American peregrine falcon, bald eagle,</u></p>		

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		<p><u>California brown pelican, and California least tern—will be required.</u></p> <p>If active bird nests are observed, the biologist will establish an appropriate ESA buffer based on the species, work activities, and the tolerance of the species to disturbance. No entry or work will occur within the ESA nest buffer unless approved by the qualified biologist. The ESA nest buffer will be maintained until nestlings have fledged and are no longer reliant on the nest or parental care for survival, or the biologist determines that the nest has been abandoned.</p> <p>Mitigation Measure BIO-3b: Conduct Preconstruction Raptor Nest Surveys.</p> <p>If construction is scheduled to occur during the breeding season for raptors (January 1 to September 1), then no more than 7 days before the start of the activities, a qualified biologist will conduct a pre-construction survey for nesting raptors in areas where suitable habitat is present within the project area and up to a 500-foot buffer, as determined by a qualified biologist. If active raptor nests are found, then the biologist will delineate an ESA buffer of sufficient size or utilize a buffer as determined by regulatory authorizations for species listed under the FESA or CESA, around the nest. The ESA buffer will be maintained until the young have fledged from the nest and are no longer reliant on the nest or parental care for survival or until such time as the biologist determines that the nest has been abandoned. <u>A minimum 0.5-mile no-disturbance buffer around each nest of California fully protected bird species will be required.</u></p>		

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		<p>Mitigation Measure BIO 3c: Active Eagle Nest Avoidance Measures.</p> <p>If an occupied nest (as defined by Pagel et al. 2010) is detected within 4 miles of the work areas, the implementing agency will notify USFWS and CDFW and will follow the specified line-of-sight and no line-of-sight no-work buffer requirements during the breeding season to ensure that construction activities do not result in injury or disturbance to eagles. <u>A minimum 0.5-mile no-disturbance buffer around bald eagle nests (California fully protected bird species) will be required.</u> The implementing agency in coordination with the project biologist, will coordinate with the USFWS regarding any modifications to these proposed buffers. It is not anticipated that activities during operations will disturb eagle nesting, but should operations activities have the potential to disturb eagle nesting, then this measure will be required.</p> <ul style="list-style-type: none"> • The no-work buffer will be maintained throughout the breeding season or until the young have fledged and are no longer dependent on the nest or parental care that includes nest use for survival. • Buffers around occupied nests may be reduced if a qualified biologist determines that smaller buffers will be sufficient to avoid impacts on nesting eagles. <p><u>As described in Mitigation Measures BIO-1 and BIO-2, if</u> If it is determined that suitable habitat is present for burrowing owls, then then the following mitigation measure will be <u>required and</u> implemented.</p>		

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		<p>Mitigation Measure BIO-3d(i): Conduct Burrowing Owl Preconstruction Surveys.</p> <p>Prior to any ground-disturbing activity or any activity that could disturb burrowing owl burrows or nesting, a qualified biologist will conduct protocol-level surveys for burrowing owl within suitable habitat located in the work area or extending 500 feet from the boundary of the work area, where access is available. Surveys will be conducted in accordance with guidelines in the <i>CDFW Staff Report on Burrowing Owl Mitigation</i> (CDFG 2012).</p> <p><u>If occupied burrowing owl burrows are detected and cannot be avoided, then the following two mitigation measures will be required and implemented.</u></p> <p><u>Mitigation Measure BIO-3d(ii): Implement Burrowing Owl Avoidance and Relocation Measures.</u></p> <p><u>Prior to any ground-disturbing activity or activities that could disturb burrowing owls, CDFW will be contacted. Avoidance of occupied burrowing owl burrows (with an appropriate buffer) is the preferred minimization measure. However, if avoidance is not possible, burrowing owls may be excluded by a qualified burrowing owl biologist with experience conducting burrowing owl passive relocations. In coordination with CDFW, the biologist will prepare a Burrowing Owl Exclusion Plan. Burrowing owl exclusions will only occur during the non-nesting season and only after a qualified biologist has determined that burrowing owls are not nesting. The plan will be submitted to approval by CDFW prior to implementation. The Burrowing Owl Exclusion Plan will be prepared in accordance with guidelines in the <i>CDFW Staff Report on Burrowing Owl Mitigation</i> (CDFG 2012).</u></p>		

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		<p><u>Mitigation Measure BIO-3d(iii): Implement Burrowing Owl Mitigation Management Plan</u></p> <p><u>Prior to any ground-disturbing activity or activities that could disturb burrowing owls, a Burrowing Owl Mitigation Management Plan will be prepared and approved by CDFW. The Burrowing Owl Mitigation Management Plan will be prepared by a qualified biologist and will be prepared in accordance with guidelines in the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012).</u></p> <p><u>As described in Mitigation Measures BIO-1 and BIO-2, if it is determined that suitable habitat is present for bats, then the following mitigation measure will be required and implemented to avoid potentially significant impacts.</u></p> <p>Mitigation Measure BIO-3e: Conduct Preconstruction Special-Status Bat Surveys.</p> <p>No earlier than 30 days prior to the start of ground-disturbing activities or activities that could disturb bat roost sites in a work area, a qualified bat biologist will conduct a visual and acoustic survey (over the course of one day and one evening at a minimum) for roosting bats in the work area and extending a distance deemed appropriate by the qualified biologist from the boundary of the work area, where access is available. Such surveys will be conducted only in those areas in which bridges, abandoned structures, or trees with large cavities or dense foliage are present. The qualified bat biologist will also visually inspect for crevice dwelling birds (e.g., nesting, overwintering swifts) and note any observations.</p>		

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		<p><u>As described in Mitigation Measures BIO-1 and BIO-2, if bat roost sites are identified and could be disturbed, then the following mitigation measure will be required and implemented.</u></p> <p>Mitigation Measure BIO-3f: Implement Bat Avoidance and Relocation Measures.</p> <p>Prior to any ground-disturbing activity or activities that could disturb bat roost sites, a qualified bat biologist will survey for active bat colonies, such as hibernacula or maternity roosts. If active hibernacula or maternity roosts are identified in the work area or in the buffer area (as defined by the qualified bat biologist, based on site conditions, planned work, and anticipated indirect impacts on bats), they will be avoided. If avoidance is not feasible, then a qualified bat biologist with experience conducting bat evictions, exclusion, and mitigation will prepare a mitigation plan detailing the eviction, exclusion, and relocation of the bat colony and will provide for construction of an alternative bat roosting habitat outside of the work area. Alternative bat habitat may be required to be constructed and installed up to 2 years prior to any bat eviction and exclusion and must be approved by CDFW.</p> <p>The qualified bat biologist will implement the mitigation plan for a period of time determined by the qualified bat biologist to be sufficient for the bats to adjust to the disturbance before the commencement of any ground-disturbing activities that will occur within the buffer area of the hibernacula. All bat colony and roost management will be conducted in accordance with accepted exclusion and deterrent techniques. If non-breeding or non-hibernating individuals or groups of bats are found roosting within the work area, cannot be</p>		

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		<p>avoided, and would be affected by the proposed Project, then the following will be <u>required and</u> implemented:</p> <ul style="list-style-type: none"> Implement Bat Exclusion and Deterrence Measures. A qualified biologist will facilitate the eviction of the bats by either opening the roosting area to change the lighting and airflow conditions or installing one-way doors or other appropriate methods. To the extent feasible, the roosts will remain undisturbed by project activities for a minimum of 1 week after implementing eviction and exclusion activities. Evictions will not occur to active maternity or hibernacula. <p><u>As described in Mitigation Measures BIO-1 and BIO-2, if</u> if it is determined that suitable habitat is present for American badgers, and impacts on badgers could not be avoided and would therefore be significant, then the following mitigation measure will be <u>required and</u> implemented.</p> <p>Mitigation Measure BIO-3g: Conduct Preconstruction Surveys for American Badger.</p> <p>Prior to ground disturbance, the implementing agency will require a qualified biologist to conduct preconstruction surveys for American badger den sites within suitable habitat located within the project site. These surveys will be conducted no less than 14 days and no more than 30 days prior to the start of ground-disturbing activities in the project site. As required by CDFW, the biologist will establish a no-work buffer around occupied maternity dens throughout the pup-rearing season (February 15 through July 1) and an ESA buffer around occupied dens during other times of the year. If non-maternity dens are found and cannot be</p>		

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		<p>avoided during construction activities, they will be monitored for badger activity. If the biologist determines that dens may be occupied, passive den exclusion measures (outside the pupping season) will be implemented for 3 to 5 days to discourage the use of these dens prior to disturbance activities.</p> <p>If it is determined that sensitive habitat (e.g., wetlands, habitat for special-status species, wildlife movement corridors, nest sites) is present, and the impacts of the project have been determined to be potentially significant, then the following mitigation measure will be implemented.</p> <p>Mitigation Measure BIO-4: Identify Work Areas and Environmentally Sensitive Areas.</p> <p>Prior to any ground-disturbing activity, the implementing agency will require the construction area, including access roads and staging areas, to be delineated through the use of construction flagging and signage under the supervision of a qualified biologist. To prevent the inadvertent disturbance of habitat, vehicle traffic and construction personnel will be restricted to established roads, construction areas, and other designated areas. Any ESAs, such as wetlands, habitat for special-status species, wildlife movement corridors, and/or nest sites, will be delineated, and no access will be allowed into these areas. Delineation of ESAs will include fencing, flagging, and other methods of demarcation sufficient to prevent entry into the ESA. <u>Prohibited materials shall include, but are not limited to, spikes, glass, razor, or barbed wire. Use of chain link and steel stake fence shall be avoided or minimized. Fences shall not have any slack that may cause wildlife entanglement. No grading or fill activity of any type will</u></p>		

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		<p><u>be permitted within the ESA.</u> No grading or fill activity of any type will be permitted within ESAs. In addition, no construction activities, materials, or equipment will be allowed within ESAs. All construction equipment will be operated in a manner to prevent accidental damage to nearby preserved areas. Construction personnel will strictly limit their activities, vehicles, equipment, and construction materials to the limits of disturbance and designated staging areas and routes of travel. Silt fence barriers will be installed at the ESA boundary to prevent accidental deposition of fill material in areas where vegetation is immediately adjacent to planned grading activities. ESA fencing and exclusion fencing will remain in place and be maintained until project construction is completed. <u>If, during the project phase, wildlife becomes entangled in construction fencing, work must immediately stop, a qualified biologist notified, and dead or injured wildlife documented immediately. If injury or mortality involves a special-status species, the qualified biologist will notify CDFW and USFWS within three calendar days of the incident or finding. Work in the immediate area will only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or mortality.</u></p> <p>Equipment storage, fueling, and staging areas will be located on upland sites with minimal risks of direct drainage into riparian areas or other sensitive natural communities. These designated areas will be located in such a manner as to prevent any runoff from entering sensitive habitat. Necessary precautions will be taken to prevent the release of cement or other toxic substances into surface waters. Project-related spills of hazardous materials will be reported to appropriate regulating</p>		

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		<p>entities including, but not limited to, the applicable jurisdictional city and RWQCB and will be cleaned up immediately and contaminated soils removed to approved disposal areas.</p> <p>If sensitive biological resources are identified within the project footprint or surrounding buffer, but will not be affected by the proposed Project, then those resources must be marked clearly with permanent signage to promote avoidance of the resource by the public and operations and maintenance staff.</p> <p><u>As described in Mitigation Measures BIO-1 and BIO-2, if there is ground disturbance that could result in the establishment of invasive plant species, and this impact has been determined to be potentially significant, then the following mitigation measure would be required and implemented.</u></p> <p>Mitigation Measure BIO-5: Prepare and Implement Weed Abatement Plan.</p> <p>Prior to construction on all projects, a weed abatement plan will be prepared and implemented by the project proponent to minimize the spread and importation of nonnative plant material during and after construction and will include the following:</p> <ul style="list-style-type: none"> • Any exotic species removed during construction will be properly handled to prevent sprouting or regrowth. Methods will be developed to avoid spreading exotic plant seeds during plant removal and ensure plants will be removed prior to flowering, if feasible. • An herbicide use protocol will be included within the weed abatement plan. Anyone using herbicides will be required to complete a "Report of Chemical Spray 		

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		<p>Form” per the LA County Department of Public Works BMP Manual (Public Works 2010). Hazardous waste management practices will apply to the use of all herbicides. The application of all herbicides will be performed by a licensed applicator. <u>A qualified biologist will review the herbicide use protocol referencing the Cal-IPC’s Best Management Practices (BMPs) for Wildland Stewardship (Cal-IPC 2015).</u></p> <ul style="list-style-type: none"> • Construction equipment will be cleaned of mud or other debris that may contain invasive plants and/or seeds and inspected to reduce the potential of spreading noxious weeds before mobilizing to the site and before leaving the site or at the nearest staging area during the course of construction. Cleaning of equipment will occur in a designated area distant from ESA fencing. • Trucks carrying loads of vegetation removed from the project footprint will be covered and disposed of in accordance with applicable laws and regulations. • Only certified weed-free straw, mulch, and/or fiber rolls will be used for erosion control. Fill material will be obtained from weed-free sources. • After construction, any disturbed areas remaining as bare ground will be returned to original grade (unless the design incorporated permanent grade changes), soils will be decompacted, and areas will be revegetated with native hydroseed and/or container plantings to match existing sensitive habitats as detailed in design plans or a project-specific restoration plan. All revegetated areas will avoid the use of species listed in Cal-IPC’s California Invasive Plant Inventory. 		

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		<p><u>As described in Mitigation Measures BIO-1 and BIO-2, if it is determined that special-status plants, wildlife, and/or aquatic resources, sensitive habitat, or protected trees have the potential to be present at the project site, then the following mitigation measures will be required and implemented.</u></p> <p>Mitigation Measure BIO-6: Conduct Biological Monitoring During Construction.</p> <p>In sensitive areas or adjacent to special-status plants, wildlife, and/or aquatic resources, sensitive habitat, protected trees, a biological monitor will be required to monitor construction activities for the duration of construction activities to ensure that practicable measures are being employed to avoid incidental disturbance of habitat and special-status species outside of the project footprint.</p> <p>Biological monitoring will include items such as monitoring activities associated with the installation of protective barriers (e.g., ESAs fencing, silt fencing, sandbags, fencing); ensuring that the removal of vegetation near sensitive biological resources is limited to the proposed disturbance area; monitoring of active bird nests; ensuring that all food related trash items are enclosed in sealed containers and removed from the site; ensuring that construction employees strictly limit their activities, vehicles, equipment and construction materials to the proposed project footprint, designated staging areas, and approved routes of travel, with construction areas being the minimal area necessary to complete the proposed Project as specified in construction plans; ensuring that equipment storage, fueling, and staging is located in upland sites to protect</p>		

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		<p>riparian habitats and other sensitive habitats; ensuring that brush, loose soils, and other debris materials will not be stockpiled within stream channels or on banks; checking potential wildlife pitfalls; contacting CDFW (and USFWS as appropriate) regarding any dead or injured federally or State-listed wildlife; and disposal of road-killed animals.</p> <p>The biological monitor will conduct WEAP training to train construction contractors and other site personnel. The purpose of WEAP training is to provide training regarding the avoidance and minimization measures for biological resources, the laws and regulations related to biological resources, and the fines and penalties for violating those laws.</p> <p>The biological monitor will monitor construction within the vicinity of any riparian habitats or other sensitive natural community areas prior to and during vegetation removal to ensure that vegetation removal, best management practices (BMPs), ESAs, and all avoidance and minimization measures are properly implemented. ESA fencing will be inspected by the biological monitor at a frequency necessary to ensure that it is in place and properly maintained.</p> <p><u>Where impacts on special-status wildlife are unavoidable, the biological monitor will protect special-status wildlife and allow special-status wildlife to move away on its own if possible. If not possible, special-status wildlife will be relocated to adjacent appropriate habitat on site or to suitable habitat adjacent habitat. If relocation of special-status wildlife is to occur, species specific relocation plans and handling permits may be required. Special-status wildlife will only be captured by</u></p>		

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		<p><u>a qualified biologist with appropriate handling permits (as required).</u></p> <p>As part of this effort, the biological monitor will document compliance with applicable avoidance and minimization measures, including measures set forth in regulatory authorizations.</p> <p>Mitigation Measure BIO-7: No Intentional Collection and/or Killing of Plants or Wildlife.</p> <p>During construction, the biological monitor will ensure that intentional killing or collection of any plant or animal species unrelated to lawful construction activities does not occur. Construction crews will attend WEAP training (as specified in BIO-1), where field crews will be educated regarding biological resources and the avoidance of impacts on these resources, including the prohibition of collecting and killing of plant and animals. The fines and penalties for the collection and killing of special-status species and nesting birds will be explained in the WEAP training and will be enforced. In addition, purposeful collection and killing of plants and animals unrelated to lawful construction could result in a construction noncompliance and/or a stop work order.</p> <p>Mitigation Measure BIO-8: Work Stoppage.</p> <p>The biological monitor, under the direction of the Resident Engineer or Construction Inspector, has the authority to stop work to protect biological resources, including but not limited to, aquatic resources, special-status wildlife and plants, and protected trees.</p> <p>If aquatic resources or protected trees are identified in the work area and are not adequately protected, the</p>		

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		<p>biological monitor will have the authority to halt work in the area to prevent impacts on the resource. Any such work stoppage will be limited to the area necessary to protect the resource. Work will be resumed as quickly as possible once the appropriate the course of action has been determined.</p> <p>In the event that any special-status plant or wildlife species is found in a work area, the biological monitor will have the authority to halt construction to prevent the death or injury to the species. Any such work stoppage will be limited to the area necessary to protect the species and work may be resumed once the biologist determines that individuals have moved out of harm's way or the biologist has relocated them out of the work area.</p> <p>Mitigation Measure BIO-9: Prepare and Implement Construction Best Management Practices and Operations Recreation Plan.</p> <p>Construction BMPs</p> <p>The implementing agency will require all construction contractors to prepare and implement a construction BMP plan and stipulate the requirement in construction bid documents. The construction BMP plan will include, at a minimum, the following measures.</p> <ul style="list-style-type: none"> • All construction contractors and all construction personnel will be responsible for promptly cleaning up any fuel or other hazardous materials spills, and any leaks from equipment will be stopped and repaired immediately. Vehicle and equipment fluids that are no longer in use will be transported to an appropriate offsite disposal location. Fuel and lubricant storage and dispensing locations will be 		

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		<p>constructed to fully contain spilled materials until disposal can occur. Hazardous waste, including used motor oil, hydraulic fluid, and coolant, will be stored and transferred in a manner consistent with applicable regulations and guidelines.</p> <ul style="list-style-type: none"> • Dust-control measures will be implemented by the contractor to reduce excessive dust emissions. Dust-control measures will be carried out during periods of grading or other activities that will disturb soils and may include wetting work areas, using soil binders on dirt roads, and wetting or covering stockpiles. • Fire-suppression capability, including extinguishers, shovels, and water tankers, will be available on site whenever construction occurs during the fire season (as determined by the Los Angeles County fire department) to help minimize the chance of human-caused wildfires. Activities that may produce sparks, including welding or grinding, will use protective gear, such as shields and protective mats, to reduce fire risks. • Available ESA data and information will be reviewed prior to placement of deposition and stockpiling of any material, such as erodible materials, vegetation, loose soils, or other debris material. No erodible materials will be deposited into aquatic features (e.g., rivers, channels, drainages, ditches, drains, ponds, lakes) or areas demarcated. • Construction and maintenance activities will be timed during sensitive periods with ESA fencing, and materials will not be stockpiled within such areas. 		

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		<p>Operations Recreation Plan</p> <p>The Operations Recreation Plan will include requirements for the following measures (as applicable) to be implemented for areas of the 2020 LA River Master Plan where recreational opportunities will be created:</p> <ul style="list-style-type: none"> • Signage requiring pets to be on leash • Pet dropping/waste bag dispensers and disposal stations • Foot-wiping stations with signage explaining the purpose of the station (to prevent the spread of invasive weeds that degrade natural habitats that species depend on) • Wildlife-proof waste bins • Educational interpretive kiosks/signage (e.g., how to respect wildlife and habitats, stay on trail signs, identifying sensitive areas, pick up trash and fishing line, pick up after pets; opportunities to view wildlife) • Incorporation of signage to avoid ESAs around sensitive wildlife/habitat features • <u>Sensitive wildlife and habitat features</u> <ul style="list-style-type: none"> ○ <u>Trail design – where avoidance is not feasible and where necessary, a project could incorporate into design the modification of trails, spatial arrangement of trails, trail dimensions, access points, and recreational structures to avoid and minimize impacts on sensitive wildlife and/or habitat features</u> ○ <u>Setbacks and restrictions – where avoidance is not feasible and where necessary, a project could incorporate into design setbacks that consider alert and flight initiation distances for sensitive wildlife</u> 		

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		<p><u>with respect to the type and intensity of proposed recreational uses, could include restrictions of the size of gathering areas at pavilions, etc.</u></p> <ul style="list-style-type: none"> • Seasonal closures during sensitive periods (will occur if there were a significant biological impact that could not be mitigated except through avoidance) • Improvement (i.e., restoration) of affected habitat areas • Seasonal restrictions on certain uses (e.g., no kayaking during least Bell’s vireo nesting if vireo are present) • Prevention of fertilizer runoff • Management of unauthorized uses through coordination with local resources • Proper handling of any exotic plant species removed during operations and maintenance activities to prevent sprouting or regrowth; development of methods to ensure that exotic plant seeds are not spread during plant removal and that plants will be removed prior to flowering, if feasible <p><u>As outlined in BIO-1 and BIO-2, if it is determined that there is the potential for special-status wildlife, including special-status mammals, reptiles, or amphibians, that could become entrapped in construction materials or excavations, then the following mitigation measures <u>Mitigation Measure BIO-10 or BIO-11</u> will be required and implemented.</u></p> <p>Mitigation Measure BIO-10: Prevent Entrapment in Construction Materials and Excavations.</p> <p>Any excavated steep-sided holes, pits, or trenches more than 12 inches deep with sidewalls steeper than 45</p>		

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		<p>degrees will be covered with plywood or similar materials at the end of the day or have escape ramps, with at least one ramp per 100 feet of trenching, and slopes of escape ramps of no greater than 3:1. All construction pipe, culverts, or other structures with a diameter of 3 inches or greater that are stored overnight will either be elevated at least 1 foot above the ground, screened, or covered each night.</p> <p>Mitigation Measure BIO-11: Restrict Monofilament Materials.</p> <p>The implementing agency will restrict the use of monofilament materials. Plastic monofilament netting (i.e., erosion control wattles or matting) or similar material will be prohibited as part of erosion-control activities. Alternative materials that could be used include, but are not limited to, geotextiles, fiber rolls, geomembranes, tackified hydroseeding compounds, loose-weave mesh, such as jute, hemp, and coconut (i.e., coir) fiber, and rice straw wattles (e.g., Earthsaver wattles; biodegradable, photodegradable, burlap).</p> <p><u>As outlined in Mitigation Measures BIO-1 and BIO-2, if it is determined that special-status birds (or those protected by the MBTA and CFGC) and special-status mammals, reptiles, or amphibians have the potential to occur, then the following mitigation measures</u> Mitigation Measure BIO-12 will be required and implemented.</p> <p>Mitigation Measure BIO-12: Implement Best Practices for Night Lighting.</p> <p>Construction and/or facility lighting will be designed to minimize or lessen the attraction of birds, bats, or their prey to the project site. Best practices for lighting for</p>		

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		<p>avian species conflict with those for bats. Best practices for avian species include using non-steady burning lights (e.g., red, dual red, and white strobe-like flashing lights) using motion or heat sensors and switches to reduce the time when lights are illuminated, using appropriate shielding to reduce horizontal or skyward illumination, and avoiding the use of high-intensity lights (e.g., sodium vapor, quartz, halogen). Best practices for lighting for bat species include avoiding green and red lights, as these interfere with migration patterns. White lighting tends to attract prey species and increase foraging. Lighting adjacent to wildlife areas should be limited to an upper limit of 3,000 on the Kelvin color temperature scale and shielded to prevent light from entering the wildlife area.</p> <p>Night lighting will be designed for best practices for both avian and bat species, while also considering special-status reptiles and amphibians. Some design measures could include construction and facility lighting designed to prevent casting light toward surrounding wildlife habitats and the riverbed and using non-steady burning lights and avoiding green and red lights.</p> <p>Mitigation Measure BIO-13: Avoid Bird and Bat Entrapment in Poles.</p> <p>Biological monitors will ensure that any installed poles, whether temporary or permanent, will not have openings that could entrap birds or bats. Construction contractors will be required to seal and cap all openings in poles or provide for escape routes (i.e., openings accommodating escape for various species). Installation of poles will not begin until it is demonstrated that the</p>		

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		<p>poles can be adequately capped and/or sealed on installation.</p> <p><u>As outlined in Mitigation Measures BIO-1 and BIO-2, if it is determined that special-status wildlife, nesting birds, raptors, or eagles could occur, then the following mitigation measure will be Mitigation Measure BIO-14 will be required and implemented.</u></p> <p>Mitigation Measure BIO-14: Minimize Noise Disturbance of Wildlife.</p> <p>The implementing agency will incorporate setbacks, berms, walls, or similar noise-attenuating method to avoid and minimize the effects of noise on special-status wildlife, nesting birds, raptors, or eagles in noise-generating activities affecting areas where special-status wildlife has been identified. Wildlife habitat areas occupied by sensitive species will not be subject to noise that will exceed residential noise standards as specified in Section 3.12, <i>Noise</i>. If the biological monitor determines that noise generation by construction activities may affect nesting, the biological monitor may require the monitoring of noise by a qualified technician, if attenuation is not possible. Setbacks or other structures will be sufficient to ensure noise attenuates adequately to avoid disturbance of special-status wildlife, nesting birds, raptors, or eagles. If noise standards cannot be met, other measures may be incorporated, such as delaying construction until nesting is completed (for nesting birds) or until special-status species are no longer present or until a take permit for special-status species is obtained.</p>		

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		<p><u>Construction</u></p> <p><i>KOP Categories 1–6:</i></p> <p>Mitigation Measure BIO-19: Implement Habitat Reclamation Efforts.</p> <p>Where habitat reclamation opportunities exist (e.g. floodplain reclamation, creation of naturalized banks, braided channels, habitat blocks for crossing and platforms, wetlands through diversions, wetland terraces and planting trays), restoration BMPs will be used. These will include the following:</p> <ul style="list-style-type: none"> • Planting of invasive species will be prohibited, as specified in Mitigation Measure BIO-18, Invasive Species, Operations. • The plant palette for restoration will be composed of native species that will be expected within the project area. • If special-status plant species were removed prior to reclamation efforts, where feasible, these will be replanted within the reclamation site. • A qualified biologist will assist in the design of habitat reclamation efforts. The biological goal of each reclamation site may differ (e.g., one site may function mainly as a wildlife corridor, whereas another may provide foraging habitat for special-status mammals), but given the limited amount of reclamation opportunities in the LA River, the wildlife and botanical goals that each reclamation site can achieve will be maximized. • Upstream hydrological regimes and conditions and their impacts on the project area will be assessed. 		

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		<p><u>Operation</u></p> <p>Mitigation Measure BIO-15: Use Wildlife-Proof Trash Canisters.</p> <p>The implementing agency will require that all installed trash canisters will be wildlife proof/animal tamper resistant. The design will ensure that the trash will be securely stored to keep wildlife from being attracted to the project site. Trash containers must be resistant to mountain lions.</p> <p>Mitigation Measure BIO-16: Use Wildlife Safety Glass.</p> <p>The implementing agency will require that glass used in the design of buildings and other facilities is bird safe. Bird-safe glass is designed specifically for making glass a visible obstacle to birds, while still being transparent to humans.</p> <p>Mitigation Measure BIO-17: Prepare and Implement Pest Management Plan.</p> <p>The implementing agency will require that a pest management plan be developed by a qualified biologist. To prevent the inadvertent poisoning of raptors and non-target animals during operations, pest-control measures will prohibit the use of rodenticides. Other methods of rodent control, such as resetting lethal rat traps (https://goodnature.co.nz/), will be used. As a part of the pest-management plan, the use of neonicotinoid pesticides will be prohibited, as these are known to be harmful to bumble bees.</p>		

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		<p>To avoid the spread of invasive species and encourage the use of native plant species, the following mitigation measure will be <u>required and</u> implemented.</p> <p>Mitigation Measure BIO-18: Prohibit Use of Invasive Species during Operations.</p> <p>The implementing agency will require landscape plans to prioritize the use of native plant species and will prohibit the use of invasive, nonnative plant species. <u>The invasive plant species on the California Invasive Plant Council (CAL-IPC) list (https://www.cal-ipc.org/plants/inventory) The species on the invasive plant species listed on the Invasive Species of California website (http://icc.ucdavis.edu/invasives/home/species) will be prohibited within or adjacent to the LA River or within wildlife corridors or sensitive habitat.</u></p>		
<p><i>3.3(b): Would the proposed Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S.</i></p>	<p><u>Construction</u></p> <p><i>Typical Projects:</i> Potentially significant</p> <p><i>KOP Categories 1–6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p> <p><u>Operation</u></p>	<p><u>Construction</u></p> <p>Mitigation Measure BIO-20a: Avoid Riparian and Sensitive Natural Communities.</p> <p>Prior to construction, mapped riparian and sensitive natural communities will be delineated using ESA staking in the field and removal or disturbance of riparian habitats or other sensitive natural communities will be avoided.</p> <p><u>Mitigation Measure BIO-20b: Protect Against Tree Diseases, Pests, and Pathogens.</u></p> <p><u>To protect sensitive natural communities and native trees, when deemed necessary by a qualified biologist or arborist, prior to tree removal, a certified arborist will evaluate trees for infectious tree diseases such as</u></p>	<p><u>Construction</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u></p>	<p><u>Construction</u></p> <p><i>Typical Projects:</i> Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p> <p><u>Operation</u></p>

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<p><i>Fish and Wildlife Service?</i></p>	<p><i>Typical Projects:</i> Potentially significant</p> <p><i>KOP Categories 1–6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>	<p><u>sudden oak death (<i>Phytophthora ramorum</i>), thousand canker fungus (<i>Geosmithia morbida</i>), polyphagous shot hole borer (<i>Euwallacea</i> spp.), and goldspotted oak borer (<i>Agrilus auroguttatus</i>).</u></p> <p><u>If a certified arborist determines that trees are affected by infectious pests or diseases, the arborist will prepare an Infectious Tree Disease Management Plan or develop a list of preventative measures to be implemented. A plan/list will provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees will not be transported from a project area without first being treated using best available management practices described in the Infectious Tree Disease Management Plan or list of preventative measures.</u></p> <p><u>If possible, and as much as possible, all tree material, especially infected tree material, will be left on site (e.g., the material could be chipped for use as ground cover or mulch).</u></p> <p><u>During all tree removal activities, pruning and power tools will be cleaned and disinfected prior to use to prevent introducing pathogens from known infested areas, and after use to prevent the spread of pathogens to new areas.</u></p> <p><u>As outlined in Mitigation Measures BIO-1 and BIO-2, if the proposed Project cannot avoid direct impacts on either riparian habitats or other sensitive natural communities, then the following mitigation measure Mitigation Measure BIO-20c will be required and implemented.</u></p>	<p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><i>Typical Projects:</i> Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>

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		<p>Mitigation Measure BIO-20b20c: Implement Riparian Mitigation and Restoration.</p> <p>Prior to start of construction, the implementing agency will mitigate permanent impacts on riparian habitats or other sensitive natural communities at a ratio the resource agencies determine, through payment into an agency-approved in-lieu fee mitigation program, applicant-sponsored mitigation site, or other approved mitigation method as determined during the project-specific environmental document or permitting phase. Onsite restoration of temporarily affected riparian habitats or other sensitive natural communities will occur in-kind at their current locations on completion of construction and will consist of returning affected areas to original contour grades, decompacting the soil, and replanting with a plant palette composed of native species found onsite prior to disturbance.</p> <p>Mitigation Measure BIO-1: Conduct Literature Review and Project Surveys and Mitigation.</p> <p>Detailed in Impact 3.3(a).</p> <p>Mitigation Measure BIO-4: Identify Work Areas and Environmentally Sensitive Areas.</p> <p>Detailed in Impact 3.3(a).</p> <p>Mitigation Measure BIO-5: Prepare and Implement Weed Abatement Plan.</p> <p>Detailed in Impact 3.3(a).</p> <p>Mitigation Measure BIO-6: Conduct Biological Monitoring During Construction.</p> <p>Detailed in Impact 3.3(a).</p>		

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		<p>Mitigation Measure BIO-9: Prepare and Implement Construction Best Management Practices and Operations Recreation Plan.</p> <p>Detailed in Impact 3.3(a).</p> <p><u>Operation</u></p> <p>Mitigation Measure BIO-9: Prepare and Implement Construction Best Management Practices and Operations Recreation Plan.</p> <p>Detailed in Impact 3.3(a).</p> <p>Mitigation Measure BIO-18: Prohibit Use of Invasive Species during Operations.</p> <p>Detailed in Impact 3.3(a).</p>		

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<p>3.3(c): Would the proposed Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?</p>	<p><u>Construction</u> <i>Typical Projects:</i> Potentially significant <i>KOP Categories 1–6:</i> Potentially significant <i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p> <p><u>Operation</u> <i>Typical Projects:</i> Potentially significant <i>KOP Categories 1–6:</i> Potentially significant <i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>	<p><u>Construction</u> Mitigation Measure BIO-21a: Conduct a Jurisdictional Delineation. Prior to the start of project construction with aquatic resources present within or directly adjacent to the limits of disturbance, a formal jurisdictional delineation will be performed within the proposed project footprint and appropriate surrounding buffer to identify and map all wetlands and jurisdictional aquatic resources subject to the jurisdiction of the USACE, SWRCB or RWQCB, CDFW, and, if the project footprint is within the Coastal Zone, the CCC or appropriate city or county. A desktop review and/or field review may be sufficient to determine if a formal delineation is needed.</p> <p>If any wetlands and/or jurisdictional aquatic resources are identified, then implement the following mitigation measures.</p> <p><u>As outlined in Mitigation Measure BIO-21a, if any wetlands and/or jurisdictional aquatic resources are identified, then Mitigation Measure BIO-21b, c, d, or e will be required and implemented.</u></p> <p>Mitigation Measure BIO-21b: Flag Wetland ESA. If wetlands or jurisdictional aquatic resources are identified within the project footprint, but will not be affected by the project, then those resources must be clearly marked for avoidance using flagging, fencing, or other appropriate avoidance method prior to project implementation.</p>	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><u>Construction</u> <i>Typical Projects:</i> Significant and unavoidable <i>KOP Categories 1–6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p> <p><u>Operation</u> <i>Typical Projects:</i> Significant and unavoidable <i>KOP Categories 1–6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>

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		<p>Mitigation Measure BIO-21c: Obtain Wetland Permits.</p> <p>If wetlands or jurisdictional aquatic resources are identified within the project footprint and would be affected by construction of the project, the appropriate permits will be obtained from the USACE, SWRCB or RWQCB, CDFW, and/or the CCC, as required. The permittee will implement all measures and conditions included in those permits.</p> <p>Mitigation Measure BIO-21d: Restore Temporary Wetland Impacts.</p> <p>Immediately following completion of construction, temporary impacts on wetlands and jurisdictional aquatic resources will be restored to preconstruction elevation and conditions, or as specified by the aquatic resource permits.</p> <p>Mitigation Measure BIO-21e: Implement Mitigation for Permanent Loss of Wetlands or Jurisdictional Aquatic Resources.</p> <p>Prior to the start of construction, impacts that result in a permanent loss of jurisdictional aquatic resources within a concrete channel or bank will be mitigated as specified in the aquatic resource permits. Impacts that result in a permanent loss of jurisdictional aquatic resources within an earthen channel, bank, or associated riparian will be mitigated at a minimum 2:1 ratio, or as specified in the aquatic resource permits.</p> <p>Mitigation Measure BIO-1: Conduct Literature Review and Project Surveys and Mitigation.</p> <p>Detailed in Impact 3.3(a).</p>		

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		<p><u>Operation</u></p> <p>Mitigation Measure BIO-22a: Implement Permanent Wetlands Signage.</p> <p>If wetlands or jurisdictional aquatic resources are identified within the project footprint or surrounding buffer, but will not be affected by the proposed Project, then those resources must be clearly marked with permanent signage to promote avoidance of the resource, including by the public and operations and maintenance staff.</p> <p>Mitigation Measure BIO-22b: Obtain Wetland Permits for Operations.</p> <p>If wetlands or jurisdictional aquatic resources are identified within the project footprint or surrounding buffer and would be affected by the proposed Project, then operations activities, including any recreational activities that could temporarily or permanently affect aquatic resources, will be included in the appropriate permits to be obtained from the USACE, SWRCB or RWQCB, CDFW, and/or the CCC, as required for construction. If operations activities are not covered by the appropriate permits issued for construction, separate permits will be obtained from the USACE, SWRCB or RWQCB, CDFW, and/or the CCC, as required. The permittee will implement all measures and conditions included in those permits.</p>		
<p>3.3(d): Would the proposed Project interfere substantially with the movement of</p>	<p><u>Construction</u></p> <p>Typical Projects:</p> <p>Potentially significant</p>	<p><u>Construction</u></p> <p>Mitigation Measure BIO-23: Maintain Connectivity in Subsequent Project Design, Construction, and Operation.</p>	<p><u>Construction</u></p> <p>Typical Projects:</p> <p>Less than significant</p>	<p><u>Construction</u></p> <p>Typical Projects:</p> <p>Significant and unavoidable</p>

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<p><i>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?</i></p>	<p><i>KOP Categories 1–6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p> <p><u>Operation</u> <i>Typical Projects:</i> Potentially significant</p> <p><i>KOP Categories 1–6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>	<p>All subsequent projects will be planned in coordination with a qualified biologist with demonstrated expertise in wildlife connectivity and wildlife crossing design in order to ensure that all projects, during design, construction, operations, and maintenance, at a minimum maintain current existing ecological connectivity function and value and prevent unintended deleterious consequences to wildlife species, connectivity, and nursery sites. The qualified biologist will provide recommendations and design alternatives that can be implemented to avoid impacts on connectivity and nursery sites, prevent wildlife-human conflicts, and avoid other effects on connectivity and nursery site function and value. If project components are intended to have ecological function and/or maintain wildlife connectivity, then the qualified biologist will participate in their planning and design. <u>The biologist will review all proposed temporary and permanent project elements—such as fencing, gates, and guardrails—for potential impacts on wildlife through trapping, entanglement, collisions, etc., and as potential barriers to connectivity and movement.</u></p> <p>Mitigation Measure BIO-9: Prepare and Implement Construction Best Management Practices and Operations Recreation Plan.</p> <p>Detailed in Impact 3.3(a).</p> <p>Mitigation Measure BIO-10: Prevent Entrapment in Construction Materials and Excavations.</p> <p>Detailed in Impact 3.3(a).</p>	<p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u> <i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><i>KOP Categories 1–6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p> <p><u>Operation</u> <i>Typical Projects:</i> Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<p>Mitigation Measure BIO-11: Restrict Monofilament Materials. Detailed in Impact 3.3(a).</p> <p>Mitigation Measure BIO-12: Implement Best Practices for Night Lighting. Detailed in Impact 3.3(a).</p> <p>Mitigation Measure BIO-13: Avoid Bird and Bat Entrapment in Poles. Detailed in Impact 3.3(a).</p> <p>Mitigation Measure BIO-14: Minimize Noise Disturbance of Wildlife. Detailed in Impact 3.3(a).</p> <p>Mitigation Measure BIO-16: Use Wildlife Safety Glass. Detailed in Impact 3.3(a).</p> <p>Mitigation Measure BIO-19: Implement Habitat Reclamation Efforts. Detailed in Impact 3.3(a).</p> <p><u>Operations</u></p> <p>Mitigation Measure BIO-9: Prepare and Implement Construction Best Management Practices and Operations Recreation Plan. Detailed in Impact 3.3(a)</p> <p>Mitigation Measure BIO-11: Restrict Monofilament Materials. Detailed in Impact 3.3(a).</p>		

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		<p>Mitigation Measure BIO-12: Implement Best Practices for Night Lighting. Detailed in Impact 3.3(a).</p> <p>Mitigation Measure BIO-13: Avoid Bird and Bat Entrapment in Poles. Detailed in Impact 3.3(a).</p> <p>Mitigation Measure BIO-14: Minimize Noise Disturbance of Wildlife. Detailed in Impact 3.3(a).</p> <p>Mitigation Measure BIO-15: Use Wildlife-Proof Trash Canisters. Detailed in Impact 3.3(a).</p> <p>Mitigation Measure BIO-16: Use Wildlife Safety Glass. Detailed in Impact 3.3(a).</p> <p>Mitigation Measure BIO-17: Prepare and Implement Pest Management Plan. Detailed in Impact 3.3(a).</p> <p>Mitigation Measure BIO-18: Prohibit Use of Invasive Species during Operations. Detailed in Impact 3.3(a).</p> <p>Mitigation Measure BIO-23: Maintain Connectivity in Subsequent Project Design, Construction, and Operation. Detailed in Impact 3.3(d).</p>		

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<p><i>3.3(e): Would the proposed Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</i></p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Potentially significant <i>KOP Categories 1–6:</i> Potentially significant <i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>	<p><u>Construction and Operation</u> Mitigation Measure BIO-24: Implement Avoidance, Transplantation, and Compensatory Mitigation Measures for Protected Trees. During the conceptual design of each individual subsequent project, all applicable local policies and ordinances, including tree preservation policies, will be followed, and protected trees will be avoided where possible. If protected trees have been identified and their removal cannot be avoided, then prior to ground-disturbing activities, where local tree policies exist and trees are present in the work area, a qualified biologist or arborist will conduct surveys in the work area to identify protected trees. The biologist or arborist will establish ESAs around protected trees that have the potential to be affected by construction activities, but do not require removal. ESAs will be based on local government ordinances, policies, and regulations. Compensatory mitigation for impacts on protected trees will be required, including impacts associated with removing or trimming a protected tree, based on requirements set out in applicable local government ordinances, policies, and regulations. Compensatory mitigation based on these local ordinances, policies, and regulations may include, but is not limited to, the following:</p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Significant and unavoidable <i>KOP Categories 1–6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<ul style="list-style-type: none"> • Transplantation of protected trees to areas outside of the work area • Replacement of protected trees onsite or offsite, based on the number of protected trees affected, at a ratio required by local government ordinances or regulations 		
<p>3.3(f): Would the proposed Project conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?</p>	<p><u>Construction and Operation</u></p> <p>Typical Projects: No Impacts</p> <p>KOP Categories 1–6: No Impacts</p> <p>Overall 2020 LA River Master Plan Implementation: No Impacts</p>	<p>None required.</p>	<p><u>Construction and Operation</u></p> <p>Typical Projects: No Impacts</p> <p>KOP Categories 1–6: No Impacts</p> <p>Overall 2020 LA River Master Plan Implementation: No Impacts</p>	<p><u>Construction and Operation</u></p> <p>Typical Projects: No Impacts</p> <p>KOP Categories 1–6: No Impacts</p> <p>Overall 2020 LA River Master Plan Implementation: No Impacts</p>
Cultural Resources				
<p>3.4(a): Would the proposed Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?</p>	<p><u>Construction and Operation</u></p> <p>Typical Projects: Potentially significant</p> <p>KOP Categories 1–6: Potentially significant</p>	<p><u>Construction</u></p> <p>Mitigation Measure CR-1a: Conduct a Cultural Resources Assessment for Historical/Built Archaeological and Tribal Cultural Resources to Determine the Presence of Resources.</p> <p>For later activities under the 2020 LA River Master Plan, during design and prior to construction, the implementing agency will conduct a cultural resources assessment to determine the potential for presence of</p>	<p><u>Construction and Operation</u></p> <p>Typical Projects: Significant and unavoidable</p> <p>KOP Categories 1–6: Significant and unavoidable</p>	<p><u>Construction and Operation</u></p> <p>Typical Projects: Significant and unavoidable</p> <p>KOP Categories 1–6: Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
	<p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Potentially significant</p>	<p>historical/built, archaeological, and tribal cultural resources.</p> <p>As part of this assessment, the implementing agency will identify sensitive historical resources that physically may be outside the construction area, but could be affected by changes in noise levels or alterations to visual continuity, if these features are important to the significance of the historical resources. During the design phase of the Project, the implementing agency will conduct a records search/literature review. The records search will be conducted at the South Coastal Central Information Center and will cover a quarter-mile around the location-specific project study area. The records search will provide background information on cultural surveys and site identification and will be supplemented by reviewing the maps/tables of identified historical resources. For the literature review, additional background research conducted online and in person will be conducted.</p> <p>Required information sources will include, at a minimum:</p> <ul style="list-style-type: none"> ● NRHP National Park Service online website (https://www.nps.gov/subjects/nationalregister/database-research.htm and https://www.nps.gov/subjects/nationalregister/database-research.htm) ● Office of Historic Preservation (https://ohp.parks.ca.gov/?page_id=30338) <ul style="list-style-type: none"> ○ California Historical Landmarks ○ California Points of Historical Interest ○ California Historical Resource Inventory System 	<p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p>	<p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<ul style="list-style-type: none"> ○ California Register of Historical Resources (CRHR) ● Local historical societies ● Local registers and general plans ● Sacred Land File Search at Native American Heritage Commission <p>Supplemental information sources that could be consulted include:</p> <ul style="list-style-type: none"> ● Sanborn maps (available at the Los Angeles Public Library) ● Historic U.S. Geological Survey quadrangles ● Historic aerial maps ● Ethnographic data ● Surface geological data <p>In addition to conducting literature review and searches, the implementing agency tiering from the PEIR will coordinate with the applicable California Native American Tribe, to verify the presence/absence of tribal cultural resources (TCRs) in the API. The California Native American Tribe will identify TCRs and provide substantial documentation of the TCR per PRC Section 5024.1. All TCR documentation and information obtained during consultation will be confidential and not included in public documents.</p> <p>If, following the records search, literature review, sacred land file search, and coordination with the tribe, it is determined that there are no historical/built, archaeological, and TCRs present in the API, then the impact would be less than significant and no further action is required.</p>		

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		<p><u>As outlined in CR-1a, if</u> following the records search, literature review, sacred land file search, and coordination with the tribe, it is determined that historical/built, archaeological, or TCRs are present in the API, then Mitigation Measure CR-1b would be <u>required and</u> implemented.</p> <p>Mitigation Measure CR-1b: Conduct Cultural Resources Investigations for Historical/Built Archaeological and Tribal Cultural Resources, and Implement Findings.</p> <ul style="list-style-type: none"> • Conduct Field Survey of API: The implementing agency will hire qualified architectural historians and/or historians and archaeologists to physically inspect the API, verify the presence or absence of known historical resources, and document potentially historical resources. This will be accomplished through intensive pedestrian surveys, photo-documentation, and written notes, at a minimum. • Record and Identify Cultural Resources: Each historical resource and archaeological site that has been previously identified will be recorded with an updated California Natural Resources Agency – Department of Parks and Recreation DPR form (Continuation Sheet, DPR 523-L). Newly identified historical resources and archaeological sites will be recorded on DPR 523A (Primary Record), DPR 523B (Building, Structure, Object Record), and DPR 523J (Location Map), with recordation on DPR 523D (District Record), DPR 523E (Linear Feature Record), and DPR 523L (Continuation Sheet) completed as appropriate. DPR forms will be completed by a 		

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		<p>qualified architectural historian, historian, or archaeologist.</p> <ul style="list-style-type: none"> Prepare Technical Report and Evaluate Identified Resources: The report will include the background, research, methods, results, and evaluation of any identified cultural resources. All cultural resources identified in the project area will be evaluated for their inclusion in the CRHR and, if determined to be historical resources (eligible), then a determination of impacts would occur. Each technical report, which includes proposed subsurface work elements, will need to include a buried site sensitivity analysis, which assesses the potential for the location-specific subsequent project study area to contain buried cultural deposits. For areas determined to be sensitive for buried deposits, archaeological monitoring will be required. <p>If, following the physical survey of the API, and eligibility determination, it is determined that the later activity <i>would not</i> cause an adverse change in the significance of a significant historical resource, then the impact would be less than significant, and no further action is required.</p> <p><u>As outlined in CR-1b, if</u>, following the physical survey of the API, and eligibility determination, it is determined that the later activity <i>would</i> cause an adverse change in the significance of a significant historical resource, then the impact would be significant and Mitigation Measures CR-2a through CR-2c will be <u>required and</u> implemented.</p>		

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		<p>Mitigation Measure CR-2a: Avoid or Relocate Historical/Built Resources.</p> <p>If significant impacts are identified for historical/built resources after completing Mitigation Measures CR-1a and CR-1b, the implementing agency will implement one of the following measures:</p> <ul style="list-style-type: none"> • Avoidance/Redesign: Avoid historical resource impacts during the design process and require redesign of the Project to avoid impacts. • Relocation: If a historical resource cannot be avoided but can be relocated (if location, setting, and association are not important aspects of its integrity or support the significance of the resource), then the following actions are required: <ul style="list-style-type: none"> ○ Contact local historical societies, community resource groups, and/or local groups with an interest in the type and/or style of the historical resource who may have a suitable site for relocation. ○ Contact specialized movers of historical resources to develop a plan for preparing of and moving of the resource from its original location and for conducting groundwork necessary for the transplanting of the resource to the new location. ○ Conduct photo documentation of the resource in the original and new locations. <p>Mitigation Measure CR-2b: Prepare and Implement Historical Resources Mitigation Plan during Construction.</p> <p>If historical resources are present in the API and cannot be avoided in the design stages, nor relocated, then the</p>		

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		<p>implementing agency will prepare a Historical Resources Mitigation Plan (HRMP) for Construction. The following actions are required in the preparation of the HRMP:</p> <ul style="list-style-type: none"> • Survey or photographic documentation of the historical resource before construction begins as a baseline condition for assessing damage • Preparation of protocols for the documentation of inadvertent damage, should it occur, as well as notification to the appropriate owner and/or jurisdiction • Strategy for repair of historical resource in accordance with the SOI’s Standards <p>Mitigation Measure CR-2c: Prepare Noise and Vibration Plan for Construction.</p> <p>If noise and/or vibration are considered a potential significant impact of construction, then instrumentation that will capture those impacts will be installed at a suitable location, as necessary (i.e., noise and/or vibration monitors), and qualified preservation architects and/or historic preservation specialists will review the feedback from those instruments on a regular basis. These instruments will monitor the historical resource for physical changes, such as cracks in the exterior material, or inadvertent changes to a historical resource, such as character-defining features falling from a structure, due to increased vibration. A preconstruction survey must be prepared for each individual historical resource to identify existing issues, such as cracks, or other damage, which must include general photos of the historical resource, detailed photos of existing damage, and detailed photos of</p>		

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		<p>potentially affected features. Instrumentation may be physically attached to building/structures or placed in close vicinity if damage would occur from the installation of the measuring instruments. Similarly, preconstruction noise surveys will establish base levels of noise if a quiet setting is a character-defining features of the historic setting. During and post-construction noise measurements must be taken to determine if ambient or specific noise occurrences are present. Thresholds will be determined on a case-to-case basis. If impacts are discovered due to noise and vibration, then a strategy for repair in accordance with the Standards would be required. See Mitigation Measure CR-2b.</p> <p><u>Operation</u></p> <p>Mitigation Measure CR-3a: Avoid Impacts on Historical/Built Resources During Operations.</p> <p>If historical resources are identified within a project API during design of subsequent projects, indirect effects during operations will be avoided, including redesigning project elements. Specific steps to be taken during operations include but are not limited to the following:</p> <ul style="list-style-type: none"> • Secure resource from accessibility or visitation. • Prepare an operations and maintenance/restoration plan to avoid degradation of resource. Identify a baseline of conditions (e.g., photo-documentation, written documentation) that is stored with the appropriate jurisdiction (e.g., Los Angeles County or other implementing agency) in the plan, with a requirement that the implementing agency or project proponent conduct visual inspection of the historical resource at least twice a year. The baseline condition 		

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		<p>report must be supplemented with yearly photographs, yearly updates on condition, and any additional reports related to vandalism, accidental damage due to humans or animals, and damage due to weather or earthquakes.</p> <p>Mitigation Measure CR-3b: Prepare and Implement Historical Resources Mitigation Plan for Operations.</p> <p>If historical resources are present in the API and potential effects cannot be avoided in the design stages or the resource cannot be relocated, then the implementing agency will prepare an HRMP for operations. The following actions will be implemented for the HRMP:</p> <ul style="list-style-type: none"> • Survey or photographic documentation of the historical resource will be completed before construction begins as a baseline condition for assessing damage. • Protocols for the documentation of inadvertent damage, should it occur, will be prepared, and notification made to the appropriate owner and/or jurisdiction. • Strategy for repair of historical resource will be developed in accordance with the SOI’s Standards. <p>Mitigation Measure CR-3c: Prepare Noise and Vibration Plan for Operations.</p> <p>If it is determined that noise and/or vibration are considered a potential significant impact of operations, then instrumentation that will capture those impacts will be installed (i.e., noise and/or vibration monitors), and the feedback from those instruments will be</p>		

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		<p>reviewed on a regular basis by qualified preservation architects and/or historic preservation specialists.</p> <p>These instruments will monitor the historical resource for physical changes, such as cracks in the exterior material, or inadvertent changes to a historical resource, such as character-defining features falling from a structure, due to increased vibration. A preconstruction survey must be prepared for each individual historical resource to identify existing issues, such as cracks, or other damage, which must include general photos of the historical resource, detailed photos of existing damage, and detailed photos of potentially affected features. Instrumentation may be physically attached to buildings/structures or placed in close vicinity if damage would occur from the installation of the measuring instruments. Similarly, preconstruction noise surveys will establish base levels of noise if a quiet setting is a character-defining feature of the historic setting. During and post-construction noise measurements must be taken to determine if ambient or specific noise occurrences are present. Thresholds would be determined on a case-to-case basis. If impacts are discovered, then a strategy would be required for repair in accordance with the Standards. See Mitigation Measure CR-2b.</p>		

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<p>3.4(b): <i>Would the proposed Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?</i></p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Potentially significant <i>KOP Categories 1–6:</i> Potentially significant <i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>	<p><u>Construction</u> Mitigation Measure CR-1a: Conduct a Cultural Resources Assessment for Historical/Built Archaeological and Tribal Cultural Resources to Determine the Presence of Resources. Detailed in Impact 3.4(a). Mitigation Measure CR-1b: Conduct Cultural Resources Investigations for Historical/Built Archaeological and Tribal Cultural Resources, and Implement Findings. Detailed in Impact 3.4(a). Mitigation Measure CR-4a: Retain a Qualified Archaeologist. The implementing agency will retain a qualified archaeologist defined as an archaeologist who meets the SOI’s Standards for professional archaeology to carry out all mitigation measures related to prehistoric and historic period archaeological resources. The qualified archaeologist will be the subsequent project’s Principal Investigator and will oversee and direct all archaeologists working on the subsequent project. For TCRs, a Native American Monitor, as determined by the appropriate Native American Tribe(s) during consultation, will coordinate with the Qualified Archaeologist as needed for mitigation measure implementation.</p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Significant and unavoidable <i>KOP Categories 1–6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Significant and unavoidable <i>KOP Categories 1–6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>

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		<p>Mitigation Measure CR-4b: Avoid Significant Archaeological Sites or TCRs through Establishment of Environmentally Sensitive Areas.</p> <p>If significant archaeological sites or TCRs are identified in the API, avoidance, where feasible, is the preferred method of treatment. Impacts on significant archaeological resources can be avoided through establishing fencing around the known boundaries of these resources and delineating these locations as Environmentally Sensitive Areas (ESAs). Preservation in place of archaeological materials will maintain the critical relationship between archaeological artifacts and their archaeological context. Additionally, should sacred objects or objects of religious importance to Native American groups be identified, preservation in place avoids conflicts with traditional values of groups who ascribe meaning to these resources.</p> <p>Mitigation Measure CR-4c: Provide Archaeological and Native American Monitoring and Establish Archaeological Monitoring Plan.</p> <p>If avoidance is not feasible, and if the subsequent project-related ground disturbance is anticipated to occur at archaeological sites identified as a result of the archaeological fieldwork and inventory efforts, an archaeologist will be present to monitor ground-disturbing activity. If ground-disturbing activities are to proceed at archaeological sites that contain Native American cultural materials, a Native American monitor will be retained, in addition to an archaeological monitor. Prior to the commencement of fieldwork, an Archaeological Monitoring Plan</p>		

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		<p>(AMP) will be developed to guide archaeological monitoring work during ground-disturbing activities.</p> <p>The AMP will be prepared and the Native American Consulting Tribes will be provided the opportunity to review and provide comments. The AMP will outline the requirement to conduct Cultural and Tribal Cultural Resource Awareness Training for construction workers and the qualifications necessary for archaeological monitors. The plan must also detail the locations where archaeological monitoring will take place and the depths of excavation that will require monitoring. The AMP must include roles and responsibilities for cultural resources staff and contact information for the Archaeological Principal Investigator, archaeological and Native American monitors, and appropriate management staff.</p> <p>The AMP must detail monitoring procedures, discovery protocols, and general procedures for documenting and recovering archaeological materials, artifact identification, repository institution identification, associated repository fees, guidelines for preparing the archaeological monitoring, and the mitigation final report. The AMP must also include protocols for communication and response should an unanticipated discovery be made at times that archaeological monitors are not present.</p> <p>The AMP must require attendance by construction personnel at a preconstruction meeting led by a Qualified Principal Investigator/Project Archaeologist. The Principal Investigator/Project</p>		

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		<p>Archaeologist will explain the likelihood for encountering archaeological resources, what resources may be discovered, and the methods that will be employed if anything is discovered (who to call, construction diversion away from the find, etc.). The AMP must include a sample proposed letter regarding transfer of salvaged materials to an appropriate museum curation facility, a sample daily monitoring report form, and recordation and analysis forms for all other pertinent archaeological resources.</p> <p>The Native American monitor should be affiliated with a local Native American tribe. At a minimum, the archaeological monitor will meet the Society for California Archaeology professional qualification standards for an archaeological crew leader and will work under the direction of an individual that meets the Secretary of the Interior’s Standards and Guidelines for Archaeology.</p> <p>If unanticipated discoveries are made during archaeological monitoring, then the unanticipated discoveries protocol described in Mitigation Measure CR-5 will be enacted. This includes halting ground-disturbing activities for a reasonable period of time, consultation with the lead agency and Native American representatives (if the find is Native American in origin), development of a mitigation plan, and potential development and implementation of a data recovery plan. In the event of an unanticipated discovery of human remains, the archaeological monitor will follow the HSC 7050.5</p>		

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		<p>(Mitigation Measure CR-7), described in Section 3.4.2.2, <i>Regulatory</i>.</p> <p>Mitigation Measure CR-4d: Develop and Implement an Archaeological Evaluation and Treatment Plan (AETP) to Evaluate Potentially Significant Archaeological Discoveries.</p> <p>If an existing archaeological resource cannot be avoided and has not been evaluated for the CRHR, then evaluation, testing excavations, recovery, and treatment will be needed to reduce the impacts on the resource. The implementing agency will develop an Archaeological Evaluation and Treatment Plan (AETP) that describes methods and procedures for conducting subsurface excavations to determine the vertical and horizontal extents of an archaeological site. Implementation of such a plan may include mechanical and/or manual excavations to provide data on the cultural constituents at the site and the depositional context of such materials (if found to exist). These data can be used to determine the integrity of the site and make a formal evaluation based on the eligibility criteria set forth in CEQA and Section 106 of the National Historic Preservation Act for inclusion in the CRHR and NRHP. The AETP should define the parameters of archaeological testing at the site and the extent of excavation and analysis of any materials recovered. The AETP must also include guidelines for treatment and curation of any materials recovered during the testing process. Subsequent to implementation of the AETP, a technical report describing the methods and results of archaeological testing and formal evaluations of the archaeological sites and recommendations for further treatment will be completed. The AETP will be approved</p>		

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		<p>by the implementing agency and should involve consultation and review by interested Native American groups, if applicable.</p> <p>Mitigation Measure CR-5: Temporarily Halt Ground Disturbance for Unanticipated Discoveries per SOI Standards.</p> <p>If buried cultural resources of potential significance are discovered inadvertently during ground-disturbing activities, work will be temporarily halted in the area and within 50 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with the implementing agency. If the find is prehistoric or Native American in origin, consultation with local Native American tribes who have expressed interest and concern regarding the proposed Project will be undertaken.</p> <p>The implementing agency’s Principal Investigator will notify the implementing agency to discuss the significance determination and will also submit a letter indicating next steps required. If the discovery is determined to be not significant in consultation with the implementing agency, work will be permitted to continue in the area. If, in consultation with the implementing agency, a discovery is determined to be significant, the implementing agency will prepare a mitigation plan to be carried out in accordance with state guidelines. If the resource cannot be avoided, the implementing agency will develop a data recovery plan to ensure collection of sufficient information to address archaeological and historical-period research questions, with results presented in a technical report describing field methods, materials collected, and conclusions. The</p>		

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		<p>qualified archaeologist will treat recovered items in accordance with current professional standards by properly proveniencing (i.e., establishing the in-situ location at the time of archaeological discovery), cleaning, analyzing, researching, reporting, and curating them in a collection facility meeting the SOI's Standards, as promulgated in 36 CFR 79.</p> <p><u>Operation</u></p> <p>Mitigation Measure CR-6: Avoid Archaeological Resources by Establishing Environmentally Sensitive Areas (ESAs) During Operations.</p> <p>The implementing agency will avoid significant archaeological resources through establishment of ESAs specific to Typical Projects' operations. If physical portions of previously identified archaeological resources are left in place after construction, then ESAs will be established to protect any remaining physical portions of the resource from further direct or indirect effects that may result as part of operations of Typical Projects. The implementing agency will establish ESAs in coordination and consultation with Native American Tribes, as necessary. As part of the operational avoidance activities, the implementing agency will:</p> <ul style="list-style-type: none"> • Prepare an operations and maintenance plan to minimize degradation of archaeological resources still extant in the API. • Design and develop interpretive exhibits to provide education and understanding of the importance to avoid the resource. 		

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		<p>Mitigation Measure CR-5: Temporarily Halt Ground Disturbance for Unanticipated Discoveries per SOI Standards.</p> <p>As described above.</p>		
<p><i>3.4(c): Would the proposed Project disturb any human remains, including those interred outside of dedicated cemeteries?</i></p>	<p><u>Construction and Operation</u></p> <p><i>Typical Projects:</i></p> <p>Potentially significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Potentially significant</p>	<p><u>Construction and Operation</u></p> <p><i>Typical Projects:</i></p> <p>Mitigation Measure CR-7: Avoid or Minimize Impacts to Human Remains and Associated or Unassociated Funerary Objects.</p> <p>If human remains are found, no further disturbance will occur until the county coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98 (State of California Health and Safety Code Section 7050.5). In the event of an unanticipated discovery of human remains, all work within 50 feet of the find will be halted until the remains have been evaluated by the county coroner, and appropriate action taken in coordination with the NAHC, in accordance with Section 7050.5 of the California Health and Safety Code or, if the remains are Native American, Section 5097.98 of the PRC. If the human remains are determined to be prehistoric, the county coroner will notify the NAHC, which will determine and notify a Most Likely Descendant. The Most Likely Descendant will complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.</p>	<p><u>Construction and Operation</u></p> <p><i>Typical Projects:</i></p> <p>Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i></p> <p>Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p>	<p><u>Construction and Operation</u></p> <p><i>Typical Projects:</i></p> <p>Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i></p> <p>Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<p><u>Construction</u></p> <p><i>KOP Categories 1-6:</i></p> <p>Mitigation Measure CR-7: Avoid or Minimize Impacts to Human Remains and Associated or Unassociated Funerary Objects.</p> <p>As described above.</p> <p><u>Operation</u></p> <p><i>KOP Categories 1-6:</i></p> <p>Mitigation Measure CR-5: Temporarily Halt Ground Disturbance for Unanticipated Discoveries per SOI Standards.</p> <p>Detailed in Impact 3.4(b)</p> <p>Mitigation Measure CR-6: Avoid Archaeological Resources by Establishing Environmentally Sensitive Areas (ESAs) During Operations.</p> <p>Detailed in Impact 3.4(b)</p> <p><u>Construction</u></p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Mitigation Measure CR-1: Conduct Cultural Resources Investigations for Historical/Built Archaeological, and Tribal Cultural Resources.</p> <p>Detailed in Impact 3.4(a).</p> <p>Mitigation Measure CR-4a: Retain a Qualified Archaeologist.</p> <p>Detailed in Impact 3.4(b).</p>		

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<p>Mitigation Measure CR-4b: Avoid Significant Archaeological or TCRs Sites through Establishment of Environmentally Sensitive Areas (ESAs). Detailed in Impact 3.4(b).</p> <p>Mitigation Measure CR-4c: Provide Archaeological and Native American Monitoring and Establish Archaeological Monitoring Plan. Detailed in Impact 3.4(b).</p> <p>Mitigation Measure CR-4d: Develop and Implement an Archaeological Evaluation and Treatment Plan (AETP) to Evaluate Potentially significant Archaeological Discoveries. Detailed in Impact 3.4(b).</p> <p>Mitigation Measure CR-5: Temporarily Halt Ground Disturbance for Unanticipated Discoveries per SOI Standards. Detailed in Impact 3.4(b).</p> <p>Mitigation Measure CR-7: Avoid or Minimize Impacts to Human Remains and Associated or Unassociated Funerary Objects. As described above.</p> <p><u>Operation</u> <i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Mitigation Measure CR-5: Temporarily Halt Ground Disturbance for Unanticipated Discoveries per SOI Standards. Detailed in Impact 3.4(b).</p>		

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		Mitigation Measure CR-6: Avoid Archaeological Resources by Establishing Environmentally Sensitive Areas (ESAs) During Operations. Detailed in Impact 3.4(b).		
Energy				
3.5(a) <i>Would the proposed Project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</i>	<u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant	None required.	<u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant	<u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
<p>3.5(b) <i>Would the proposed Project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?</i></p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p>None required.</p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>
Geology, Soils, and Paleontological Resources				
<p>3.6(a): <i>Would the proposed Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:</i></p> <p><i>Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State</i></p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Potentially significant <i>KOP Categories 1–6:</i> Potentially significant <i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>	<p><u>Construction and Operation</u> Mitigation Measure GEO-1: Conduct a Site-Specific Geotechnical Study and Implement Recommendations for Load-Bearing Subsequent Projects Prior to Construction Activities.</p> <p>Prior to final design of subsequent projects that would feature load-bearing structures (e.g., Tier III pavilions), the implementing agency will ensure that a licensed geologist and engineer will prepare a design-level geotechnical investigation prior to construction.</p> <p>The investigation will include subsurface soil sampling, laboratory analysis of samples collected to determine soil characteristics and properties (including identifying and defining the limits of unstable, compressible, and collapsible soils), and an evaluation of the laboratory testing. Recommendations based on the results will be</p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Significant and unavoidable <i>KOP Categories 1–6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
<p><i>Geologist for the area or based on other substantial evidence of a known fault?</i></p> <p><i>Strong seismic ground shaking?</i></p> <p><i>Seismic-related ground failure, including liquefaction?</i></p> <p><i>Landslides?</i></p>		<p>used in the design specifications for the proposed subsequent projects. The report will include recommendations to avoid potential risks associated with seismic hazards (including ground shaking and fault rupture, seismically induced landslides, liquefaction, and the other seismic effects described in this section), in accordance with the specifications of CGS's Special Publication 117A, <i>Guidelines for Evaluating and Mitigating Seismic Hazards in California</i>, and the requirements of the Seismic Hazards Mapping Act. The geotechnical study will provide detailed project-specific recommendations for design and construction, and implementation of those recommendations will be required during construction of relevant projects. Mitigation to address potential fault rupture, seismic ground shaking, ground failure, and liquefaction hazards can include (but are not limited to) the following:</p> <ul style="list-style-type: none"> ● Fault rupture: Studies will evaluate the location and relative activity of potentially active fault splays at the project site and the feasibility of locating future site improvements will be conducted by geologic consultants as part of the geotechnical study. Fault investigations will be conducted by a California State Certified Engineering Geologist and submitted to CGS. Appropriate building setback zones will be established in locations deemed not feasible for construction of occupied structures. ● Seismic ground shaking: Structural elements of subsequent projects will be designed to resist or accommodate appropriate site-specific ground motions and conform to current seismic design standards, including those set forth by prevailing building codes. 		

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		<ul style="list-style-type: none"> • Liquefaction/ground failure: Assessment of liquefaction potential at subsequent project sites will be conducted as part of the geotechnical study. Structural design will be developed to reduce the potential impacts of liquefaction, including the incorporation of techniques such as structural design, in-situ ground modification, or supporting foundations with piles at depths designed specifically for seismically induced settlement. • Landslides: Where applicable, assessment for landslide potential and/or potential for surficial failure will be performed as part of the geotechnical study with measures to be incorporated into the design, as appropriate. Mitigation measures in areas subject to a landslide hazard could include the following measures: excavation of potentially unstable material for a more stable slope configuration; reduction of landslide-driving forces by removal of earth materials at the top of the landslide; construction of a buttress and/or stabilization fills; construction of retaining walls installation of rock bolts on a slope face, and/or installation of protective wire mesh on a slope face; construction of debris impact walls at the toe of the slope to contain rock fall debris, or other such measures. <p>The following measures could be recommended in the site-specific geotechnical study to mitigate the potential effects of unstable and/or expansive soils:</p> <ul style="list-style-type: none"> • Groundwater: Excavations for improvements in areas with shallow perched groundwater may need to be cased, shored, and/or dewatered to maintain 		

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		<p>stability of the excavations and adjacent improvements and provide access for construction.</p> <ul style="list-style-type: none"> Collapsible soils/settlement: Assessment of soil settlement will be performed as part of the geotechnical study and techniques will be recommended, as appropriate, to reduce impacts related to settlement. Assessment of settlement potential of onsite natural soils and undocumented fill will include drilling of exploratory borings or test pits and laboratory testing of soils. Possible mitigation measures for soils with the potential for settlement could include removal of the compressible/collapsible soil layers and replacement with compacted fill, surcharging to induce settlement prior to construction of improvements, allowing for a settlement period after or during construction of new fills, and utilization of specialized foundation design, including the use of deep foundation systems, to support structures. Various in-situ soil improvement techniques are also available, such as dynamic compaction (i.e., heavy tamping) or compaction grouting. Expansive soils: Assessment of the potential for expansive soils will be performed as part of the geotechnical study, and mitigation techniques, such as over-excavation and replacement with non-expansive soils, soil treatment, moisture management, and/or specific structural design for expansive soil conditions, will be developed, as appropriate. <p>The implementing agency will apply the recommendations of the site-specific geotechnical study to minimize risks related to potential fault rupture,</p>		

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		seismic ground shaking, ground failure, and liquefaction hazards/landslides.		
3.6(b): Would the proposed Project result in substantial soil erosion or the loss of topsoil?	<u>Construction and Operation</u> Typical Projects: Less than significant KOP Categories 1–6: Less than significant Overall 2020 LA River Master Plan Implementation: Less than significant	None required.	<u>Construction and Operation</u> Typical Projects: Less than significant KOP Categories 1–6: Less than significant Overall 2020 LA River Master Plan Implementation: Less than significant	<u>Construction and Operation</u> Typical Projects: Less than significant KOP Categories 1–6: Less than significant Overall 2020 LA River Master Plan Implementation: Less than significant
3.6(c): Would the proposed Project 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 an onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	<u>Construction</u> Typical Projects: Potentially significant KOP Categories 1–6: Potentially significant Overall 2020 LA River Master Plan Implementation: Potentially significant <u>Operation</u>	<u>Construction and Operation:</u> Mitigation Measure GEO-1: Conduct a Site-Specific Geotechnical Study and Implement Recommendations for Load-Bearing Subsequent Projects Prior to Construction Activities. Detailed in Impact 3.6(a).	<u>Construction</u> Typical Projects: Less than significant KOP Categories 1–6: Less than significant Overall 2020 LA River Master Plan Implementation: Less than significant	<u>Construction</u> Typical Projects: Significant and unavoidable KOP Categories 1–6: Significant and unavoidable Overall 2020 LA River Master Plan Implementation: Significant and unavoidable

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	<p><i>Typical Projects:</i> Potentially significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>		<p><u>Operation</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><u>Operation</u></p> <p><i>Typical Projects:</i> Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>
<p><i>3.6(d): Would the proposed Project 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?</i></p>	<p><u>Construction</u></p> <p><i>Typical Projects:</i> Potentially significant</p> <p><i>KOP Categories 1–6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p> <p><u>Operation</u></p> <p><i>Typical Projects:</i> Potentially significant</p>	<p><u>Construction and Operation:</u></p> <p>Mitigation Measure GEO-1: Conduct a Site-Specific Geotechnical Study and Implement Recommendations for Load-Bearing Subsequent Projects Prior to Construction Activities.</p> <p>Detailed in Impact 3.6(a).</p>	<p><u>Construction</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u></p> <p><i>Typical Projects:</i> Less than significant</p>	<p><u>Construction</u></p> <p><i>Typical Projects:</i> Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p> <p><u>Operation</u></p> <p><i>Typical Projects:</i> Significant and unavoidable</p>

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	<p><i>KOP Categories 1–6:</i> Less than significant <u>Potentially significant</u></p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>		<p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>
<p><i>3.6(e): Would the proposed Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal where sewers are not available for the disposal of waste water?</i></p>	<p>No impacts</p>	<p>None required.</p>	<p>No impacts</p>	<p>No impacts</p>
<p><i>3.6(f): Would the proposed Project directly or indirectly destroy a unique paleontological resource or site or</i></p>	<p><u>Construction</u></p> <p><i>Typical Projects:</i> Potentially significant</p> <p><i>KOP Categories 1–6:</i></p>	<p><u>Construction</u></p> <p>Mitigation Measure GEO-2: Conduct Paleontological Resources Investigations.</p> <p>During design of individual subsequent projects and prior to construction, the implementing agency will conduct paleontological resource investigations</p>	<p><u>Construction</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i></p>	<p><u>Construction</u></p> <p><i>Typical Projects:</i> Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i></p>

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<p><i>unique geologic feature?</i></p>	<p>Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Potentially significant</p> <p><u>Operation</u></p> <p><i>Typical Projects:</i></p> <p>Potentially significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Potentially significant</p>	<p>consistent with SVP Guidelines. This process will include:</p> <ul style="list-style-type: none"> • Conducting a paleontological records search through the Los Angeles County Natural History Museum to identify previously recorded paleontological localities and the presence of sensitive deposits in the proposed project study area • Reviewing project design and maximum depths and extents of project ground disturbance components • Reviewing publicly available geotechnical reports for information concerning subsurface deposits and deposit depths across the project area • Identifying the potential for sensitive paleontological deposits underlying the proposed Project that project implementation could affect • Determining whether impacts on sensitive deposits, if present, would be significant <p>If no sensitive deposits are identified or if they are sufficiently deeper than the proposed project excavations and would not be encountered during construction, no further steps will be required.</p> <p>If sensitive deposits are identified <u>during implementation of Mitigation Measure GEO-2</u> and could be affected by the proposed Project, implement Mitigation Measure GEO-3 will be <u>required and implemented</u>.</p> <p>Mitigation Measure GEO-3: Avoid Paleontological Resources or Conduct Monitoring.</p> <p>The implementing agency will redesign the subsequent project to avoid sensitive paleontological resources and deposits that could potentially contain these resources.</p>	<p>Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Less than significant</p> <p><u>Operation</u></p> <p><i>Typical Projects:</i></p> <p>Less than significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Less than significant</p>	<p>Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p> <p><u>Operation</u></p> <p><i>Typical Projects:</i></p> <p>Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i></p> <p>Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<p>If avoidance and/or project redesign is not feasible, then paleontological monitoring will be implemented and will include the following implementation steps:</p> <ul style="list-style-type: none"> • The implementing agency will retain a qualified paleontologist, who will attend the preconstruction meeting(s) to consult with the grading and excavation contractors or subcontractors concerning excavation schedules, paleontological field techniques, and safety issues. A qualified paleontologist is defined as an individual (1) who has an MS or PhD in paleontology or geology; (2) who also has demonstrated familiarity with paleontological procedures and techniques; (3) who is knowledgeable in the geology and paleontology of the County; and (4) who has worked as a paleontological mitigation project supervisor in the County for at least 1 year. • A paleontological monitor or a qualified paleontologist will be on site on a full-time basis during excavation and ground-disturbing activities that occur in any undisturbed deposits below ground surface, to inspect exposures for contained fossils. The paleontological monitor will work under the direction of the proposed Project’s qualified paleontologist. A paleontological monitor is defined as an individual selected by the qualified paleontologist who has experience in the collection and salvage of fossil materials. • If fossils are discovered on a development site, the qualified paleontologist will recover them and temporarily direct, divert, or halt grading to allow recovery of fossil remains. 		

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		<ul style="list-style-type: none"> • The qualified paleontologist will be responsible for the cleaning, repairing, sorting, and cataloguing of fossil remains collected during the monitoring and salvage portion of the mitigation program. • Prepared fossils, along with copies of all pertinent field notes, photos, and maps, will be deposited (as a donation) at a scientific institution with permanent paleontological collections, such as the Los Angeles County Natural History Museum. Donation of the fossils will be accompanied by financial support for initial specimen storage, paid for by the project proponent. • Within 30 days after the completion of excavation and ground-disturbing activities, the qualified paleontologist will prepare and submit to the implementing agency a paleontological resource recovery report that documents the results of the mitigation program. This report will include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils. <p><u>Operation</u></p> <p>Mitigation Measure GEO-4: Avoid/Minimize Impacts on Paleontological Resources During Operations.</p> <p>If significant paleontological resources and sensitive deposits with the potential to contain significant paleontological resources are identified within a project area during design/planning of individual projects (Mitigation Measures GEO-2 and GEO-3), and deposits that are sensitive for significant paleontological resources remain exposed at or near the ground surface or become exposed during project operations, then an</p>		

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		<p>avoidance and minimization plan will be prepared to avoid/minimize potential impacts during operations. This plan may include, but not be limited to:</p> <ul style="list-style-type: none"> • Securing sensitive deposits from accessibility through the development of Environmentally Sensitive Areas • Preparing an operations and maintenance plan to minimize degradation and exposure of sensitive deposits • Designing and developing interpretive exhibits to provide education and understanding of the importance of avoiding and protecting sensitive deposits and paleontological resources <p>If significant impacts on a newly exposed or existing significant paleontological resource cannot be avoided, then Mitigation Measure GEO-3 will need to be <u>required and implemented</u>.</p>		
Greenhouse Gas Emissions				
<p><i>3.7(a): Would the proposed Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</i></p>	<p><u>Construction and Operation</u> <u>Construction</u> Typical Projects – Common Elements: Potentially significant Typical Projects – Multi Use Trails and Access Gateways</p>	<p><u>Construction and Operation</u> <i>Common Elements, KOP Categories 1–6, and Overall 2020 LA River Master Plan:</i> Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies. Implementing agencies will require implementation of the following GHG emissions reduction strategies:</p> <ul style="list-style-type: none"> • Energy <ul style="list-style-type: none"> ◦ Energy-efficient Appliances in Buildings. New construction will use only ENERGY STAR 	<p><u>Construction and Operation</u> <i>Typical Projects – Common Elements:</i> Significant and unavoidable <i>Typical Projects – Multi Use Trails and Access Gateways</i> Less than Significant</p>	<p><u>Construction and Operation</u> <i>Typical Projects – Common Elements:</i> Significant and unavoidable <i>Typical Projects – Multi Use Trails and Access Gateways</i> Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
	<p>Potentially significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Potentially significant</p>	<p>rated appliances for appliance types that are offered ENERGY STAR ratings.</p> <ul style="list-style-type: none"> ○ Electric Space and Water Heating for Buildings. New construction will employ electric and water heating. Where natural gas appliances need to be installed, these appliances will be an ENERGY STAR certified gas water heater) or be powered by renewable natural gas. ○ Building Energy. New construction will implement one or more of the Design Guidelines related to building energy consumption. <ul style="list-style-type: none"> ● Use renewable energy sources (solar, wind, water, and renewable natural gas). ● Optimize building orientation for solar exposure, diffused daylight, and passive ventilation. ● Optimize high thermal performance. ● Use high-albedo roof and paving materials to mitigate heat gain. ● Use green roof and pervious paving. ● Implement building energy best practices from the following standards: United States Green Building Council’s LEED, United States Department of Energy Better Buildings Initiative, ENERGY STAR, Dark Sky, Cradle-to-Cradle, and Green Globes. ● Area <ul style="list-style-type: none"> ○ Electric Landscaping Equipment. Maintenance and operations activities that use landscaping equipment (e.g., lawn mowers, 	<p><i>KOP Categories 1–6:</i></p> <p>Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p>	<p><i>KOP Categories 1–6:</i></p> <p>Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<p>trimmers) for new construction will employ electric landscaping equipment.</p> <ul style="list-style-type: none"> ● Water Use <ul style="list-style-type: none"> ○ Water Conservation and Efficiency. New construction will implement one or more of the Design Guidelines related to indoor and outdoor water conservation and efficiency. <ul style="list-style-type: none"> ● Install systems for on-site water retention, detention, and filtration. ● Capture 100 percent of on-site rainfall for the 85 percent rain event. ● Reuse rainwater and greywater. ● Create bioswales or treatment basins to collect stormwater runoff. ● Install low-flow water fixtures that exceed the requirements of codes and ordinances. <ul style="list-style-type: none"> – Public bathroom faucet aerators with a flow rate of 0.4 gallon per minute – Rotating sprinkler nozzles for landscape irrigation 0.5 to 1.0 gallons per minute, or – Drip/subsurface irrigation (i.e., micro-irrigation) ● Wastewater Generation <ul style="list-style-type: none"> ○ Waste Reductions. New construction will implement one or more of the Design Guidelines related to minimization and recycling of waste generation. <ul style="list-style-type: none"> ● Use locally sourced, recycled, and recyclable materials with low-embodied energy. 		

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<ul style="list-style-type: none"> • Use green cleaning products and integrated building management. • Regularly monitor building systems and optimize usage. <p>As discussed in Section 3.16, <i>Transportation</i>, the Common Elements Typical Project was determined to have the potential to generate a significant VMT impact. If, as part of Mitigation Measure TRA-1a, the subsequent project cannot be screened out using the County’s VMT impact criteria and the VMT is determined to exceed the threshold based on applicable guideline and project type, then Mitigation Measure TRA-1b will be <u>required and implemented</u>.</p> <p>Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT.</p> <p>Detailed in Impact 3.16(b).</p> <p><u>Construction and Operation</u></p> <p><i>Multi-Use Trails and Access Gateways:</i></p> <p>Mitigation Measure GHG-1b: Implement Operations GHG Emissions Reduction Strategies Specific to Emission Sources of Multi-Use Trails and Access Gateways.</p> <p>Implementing agencies will require implementation of the following GHG emissions reduction strategies:</p> <ul style="list-style-type: none"> • Area <ul style="list-style-type: none"> ○ Electric Landscaping Equipment. Maintenance and operations activities that use landscaping equipment (e.g., lawn mowers, trimmers) for new construction will employ electric landscaping equipment. 		

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		<ul style="list-style-type: none"> ● Water Use <ul style="list-style-type: none"> ○ Water Conservation and Efficiency. New construction will implement one or more of the Design Guidelines related to indoor and outdoor water conservation and efficiency. <ul style="list-style-type: none"> ● Install systems for on-site water retention, detention, and filtration. ● Capture 100 percent of on-site rainfall for the 85 percent rain event. ● Reuse rainwater and greywater. ● Install low-flow water fixtures that exceed the requirements of codes and ordinances: <ul style="list-style-type: none"> – Rotating sprinkler nozzles for landscape irrigation 0.5 to 1.0 gallons per minute, or – Drip/subsurface irrigation (i.e., micro-irrigation) ● Wastewater Generation <ul style="list-style-type: none"> ○ Waste Reductions. New construction will implement one or more of the Design Guidelines related to minimization and recycling of waste generation. <ul style="list-style-type: none"> ● Use locally sourced, recycled, and recyclable materials with low-embodied energy. ● Recycle construction waste. 		

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<p>3.7(b): Would the proposed Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</p>	<p><u>Construction and Operation</u></p> <p>Typical Projects: Potentially significant</p> <p>KOP Categories 1–6: Potentially significant</p> <p>Overall 2020 LA River Master Plan Implementation: Potentially significant</p>	<p><u>Construction and Operation</u></p> <p>Typical Projects:</p> <p>Mitigation Measure GHG-2: Implement Construction GHG Emissions Reduction Strategies.</p> <p>Implementing agencies will require applicants of future development to implement the following GHG emissions-reduction strategies where feasible.</p> <ul style="list-style-type: none"> • Zero-emission and near-zero-emission construction equipment will be used, to the extent feasible. <p>Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.</p> <p>Detailed in Impact 3.7(a).</p> <p><u>Construction and Operation</u></p> <p>KOP Categories 1–6:</p> <p>Mitigation Measure GHG-1a: Implement Operations GHG Emissions Reduction Strategies.</p> <p>Detailed in Impact 3.7(a).</p> <p>Mitigation Measure GHG-2: Implement Construction GHG Emissions Reduction Strategies.</p> <p>As described above.</p> <p>Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT.</p> <p>Detailed in Impact 3.16(b).</p>	<p><u>Construction and Operation</u></p> <p>Typical Projects: Less than significant</p> <p>KOP Categories 1–6: Significant and unavoidable</p> <p>Overall 2020 LA River Master Plan Implementation: Significant and unavoidable</p>	<p><u>Construction and Operation</u></p> <p>Typical Projects: Significant and unavoidable</p> <p>KOP Categories 1–6: Significant and unavoidable</p> <p>Overall 2020 LA River Master Plan Implementation: Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
Hazards and Hazardous Materials				
<p><i>3.8(a): Would the proposed project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</i></p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p>None required.</p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>
<p><i>3.8(b): Would the proposed project 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?</i></p>	<p><u>Construction</u> <i>Typical Projects:</i> Potentially significant <i>KOP Categories 1–6:</i> Potentially significant <i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>	<p><u>Construction</u> Mitigation Measure HAZ-1: Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures. To avoid exposure of construction personnel, the public, or the environment to contaminated media and/or hazardous building materials, prior to construction activities associated with any subsequent project involving ground disturbance, the implementing agency will be required to retain a professional hazardous materials specialist specializing in hazardous materials impact assessment to conduct a project-level analysis to verify the presence or absence of hazardous materials conditions (including Cortese List sites) in the vicinity of the construction site and if there is potential for existing</p>	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><u>Construction</u> <i>Typical Projects:</i> Significant and unavoidable <i>KOP Categories 1–6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>

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	<p><u>Operation</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p>hazardous materials conditions to affect construction activities.</p> <p>This assessment will consist of a search for environment-related information present in publicly accessible databases. The information will be reviewed to determine if the construction footprint or adjacent properties are listed in the aforementioned databases.</p> <p>If the construction footprint or adjacent properties are listed in the databases, the professional hazardous materials specialist will determine the potential risk to construction workers, the public, or the environment from construction activities (to be documented in a technical memo). The determination of risk would consider, among other factors, regulatory status, the type of project, type of contaminated property, distance and direction to the project, and appropriate measures. If the hazardous materials specialist concludes that the subsequent project would not 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, then no further action would be required.</p> <p>If a site is considered a risk to construction workers, the public, or the environment, implementing agency will implement measures to reduce risk, including one or more of the following:</p> <ul style="list-style-type: none"> • Implement engineering controls and best management practices (BMPs) during construction to minimize human exposure to potentially contaminated soils during construction. Engineering controls and construction BMPs could include, but are not limited to, the following: 	<p><u>Operation</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><u>Operation</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>

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		<ul style="list-style-type: none"> ○ Contractor employees working on site handling potentially contaminated media will be certified in the Occupational Health and Safety Administration’s 40-hour Hazardous Waste Operations and Emergency Response training. ○ Contractors will water or mist soil as it is being excavated and stockpiled or loaded onto transportation trucks. ○ Contractors will place any stockpiled soil in areas shielded from prevailing winds or cover stockpiles with staked and/or anchored sheeting. ● Conduct a soil and/or groundwater sampling program to determine the type and extent of contaminants. The sampling program could include: <ul style="list-style-type: none"> ○ A scope of work for preparation of a health and safety plan that specifies pre-field activity marking of boring locations and obtaining utility clearance, and field activities, such as identifying appropriate sampling procedures, health and safety measures, chemical testing methods, and quality assurance/quality control procedures ○ Necessary permits for well installation and/or boring advancement ○ A soil sampling and analysis plan in accordance with the scope of work ○ Laboratory analyses conducted by a State-certified laboratory ○ Disposal processes, including transport by a State-certified hazardous material hauler to a State-certified disposal or recycling facility licensed to accept and treat hazardous waste 		

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		<ul style="list-style-type: none"> • Implement a soil management plan. The purpose of a soil management plan is to provide administrative, procedural, and analytical guidance to expedite and clarify decisions and actions if contaminated soils are encountered. Typically, procedures and protocols are included to ensure that contaminated soil is excavated properly and efficiently, and that unacceptable risks are not posed to human health or the environment from contaminated soils. Additionally, the soil management plan would contain procedures for handling, stockpiling, screening, and disposing of the excavated soil. The soil management plan is a site-specific technical plan that could be required depending on other screening activities conducted (listed above) and is not included as part of this EIR. • If dewatering would be necessary in areas where contaminated groundwater exists, then dewatering procedures could be subject to permit requirements of the National Pollutant Discharge Elimination System (NPDES). Discharges of treated or untreated groundwater generated from dewatering operations or other applicable wastewater discharges not specifically covered in other general or individual NPDES permits are currently regulated under a regional general permit, General Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2013-095, NPDES No. CAG994004) • Conduct an asbestos and lead-based paint survey for any structures built prior to 1980 (the use of asbestos in buildings and structures was common 		

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		<p>prior to 1980) and planned for demolition as part of subsequent projects. An asbestos survey would be conducted in accordance with the South Coast Air Quality Management District (Rule 1403), Cal OSHA (CCR, Title 8, Section 1529), and the National Emission Standards for Hazardous Air Pollutants for Asbestos Surveys (40 CFR Part 61, Subpart M). CCR, Title 8, Section 1532.1, "Lead," and Cal OSHA requirements should be followed when handling materials containing lead.</p> <p><u>Operations</u> None required.</p>		
<p><i>3.8(c): Would the proposed project emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</i></p>	<p><u>Construction</u> <i>Typical Projects:</i> Potentially significant <i>KOP Categories 1–6:</i> Potentially significant <i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant <u>Operation</u> <i>Typical Projects:</i> Less than significant</p>	<p><u>Construction</u> Mitigation Measure HAZ-1: Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures. Detailed in Impact 3.8(b). <u>Operations</u> None required.</p>	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant <u>Operation</u> <i>Typical Projects:</i> Less than significant</p>	<p><u>Construction</u> <i>Typical Projects:</i> Significant and unavoidable <i>KOP Categories 1–6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable <u>Operation</u> <i>Typical Projects:</i> Less than significant</p>

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	<p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>		<p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>
<p><i>3.8(d): Would the proposed project be located on a site that 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?</i></p>	<p><u>Construction</u> <i>Typical Projects:</i> Potentially significant</p> <p><i>KOP Categories 1–6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p> <p><u>Operation</u> <i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p>	<p><u>Construction</u> Mitigation Measure HAZ-1: Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures.</p> <p>Detailed in Impact 3.8(b).</p> <p><u>Operation</u> None required.</p>	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u> <i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p>	<p><u>Construction</u> <i>Typical Projects:</i> Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p> <p><u>Operation</u> <i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p>

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	<p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>		<p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>
<p><i>3.8(e): Would the proposed project be located within an airport land use plan area or, where such a plan has not been adopted, be within 2 miles of a public airport or public use airport, and result in a safety hazard or excessive noise for people residing or working in the project area?</i></p>	<p>No impacts</p>	<p>None required.</p>	<p>No impacts</p>	<p>No impacts</p>
<p><i>3.8(f): Would the proposed project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</i></p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p>None required.</p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>

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<p>3.8(g): Would the proposed project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?</p>	<p><u>Construction</u> <i>Typical Projects:</i> Potentially significant <i>KOP Categories 1–6:</i> Potentially significant <i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant <u>Operation</u> <i>Typical Projects:</i> Potentially significant <i>KOP Categories 1–6:</i> Potentially significant <i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>	<p><u>Construction</u> Mitigation Measure WF-2: Prepare a Construction Fire Protection Plan. Detailed in Impact 3.19(b). <u>Operation</u> Mitigation Measure WF-3: Prepare a Fire Protection Plan. Detailed in Impact 3.19(b).</p>	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant <u>Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><u>Construction</u> <i>Typical Projects:</i> Significant and unavoidable <i>KOP Categories 1–6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable <u>Operation</u> <i>Typical Projects:</i> Significant and unavoidable <i>KOP Categories 1–6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
Hydrology and Water Quality				
<p>3.9(a): <i>Would the proposed project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?</i></p>	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–3, 5 and 6:</i> Less than significant <i>KOP Categories 4</i> No Impacts <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p>None required.</p>	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–3, 5, and 6:</i> Less than significant <i>KOP Category 4</i> No Impact <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–3, 5, and 6:</i> Less than significant <i>KOP Category 4:</i> No Impact <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>

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<p>3.9(b): Would the proposed project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?</p>	<p><u>Construction and Operation</u> Typical Projects: Less than significant KOP Categories 1–6: Less than significant Overall 2020 LA River Master Plan Implementation: Less than significant</p>	<p>None required.</p>	<p><u>Construction and Operation</u> Typical Projects: Less than significant KOP Categories 1–6: Less than significant Overall 2020 LA River Master Plan Implementation: Less than significant</p>	<p><u>Construction and Operation</u> Typical Projects: Less than significant KOP Categories 1–6: Less than significant Overall 2020 LA River Master Plan Implementation: Less than significant</p>
<p>3.9(c): Would the proposed project 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: Result in substantial erosion or siltation on or off site; Substantially increase the rate or</p>	<p><u>Construction</u> Common Elements Typical Projects: Frames 1 through 4 Less than significant Frames 5 through 9 Potentially significant Multi-Use Trails and Access Gateways Typical Projects: Frames 1 through 4 Less than significant</p>	<p><u>Construction</u> Typical Projects in Frames 5-9, KOP Categories 1 through 6, and Overall 2020 LA River Master Plan Mitigation Measure HYDRO-1a: Require Site-Specific Drainage Studies to Address Stormwater Management. As part of site design for all new developments, the applicants will prepare Drainage Report(s) for the appropriate implementing agency review and approval prior to issuance of a grading, building, site development, or any construction permits. All development, including interim conditions during construction and interim conditions with temporary improvements, within the project site is required to address stormwater management and implement stormwater control measures. Drainage report(s) will include, at a minimum, all of the following:</p>	<p><u>Construction</u> Common Elements Typical Projects: Frames 1 through 4 Less than significant Frames 5 through 9 Less than significant Multi-Use Trails and Access Gateways Typical Projects: Frames 1 through 4 Less than significant</p>	<p><u>Construction</u> Common Elements Typical Projects: Frames 1 through 4 Less than significant Frames 5 through 9 Significant and unavoidable Multi-Use Trails and Access Gateways Typical Projects: Frames 1 through 4 Less than significant</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
<p><i>amount of surface runoff in a manner that would result in flooding on or off site; Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; Impede or redirect flood flows?</i></p>	<p><i>Frames 5 through 9</i> Potentially significant <i>KOP Categories 1–6:</i> Potentially significant <i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant <u>Operation</u> <i>Common Elements Typical Projects:</i> <i>Frames 1 through 4</i> Less than significant <i>Frames 5 through 9</i> Potentially significant <i>Multi-Use Trails and Access Gateways:</i> <i>Frames 1 through 4</i> Less than significant <i>Frames 5 through 9</i> Potentially significant</p>	<ul style="list-style-type: none"> • Verification of existing stormwater and flood conveyance facilities, including size, elevation, material, capacity, and condition, including the existing stormwater collection system in the project area. • Hydrologic analysis of construction-period conditions and implementation of all temporary facilities necessary during construction to avoid increases in peak flows. • Hydrologic analysis of existing and proposed operational peak flows that accounts for all areas that will be disturbed by new development. • Hydraulic analysis for evaluating pipe capacity and sizing of new pipes. The capacity of existing pipes that are proposed for reuse and new pipes will be sized in accordance with the County’s methodology, as noted in the County Hydrology Manual or local municipal code, or otherwise approved by the County or City Engineer. • Applicants will implement all permanent facilities necessary, such as channel refurbishment and a bypass tunnel, as included in the <i>2020 LA River Master Plan</i> to avoid increases in operational peak flows. <p>Mitigation Measure HYDRO-1b: Require Stormwater Control Measures.</p> <p>Based on the results of the drainage report(s) in Mitigation Measure HYDRO-1a, measures during construction and operation may be required to ensure flood flows are not impeded and to minimize redirected flood flows. The measures will identify site-specific drainage facilities necessary to avoid flows exceeding the existing system during construction and implement</p>	<p><i>Frames 5 through 9</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant <u>Operation</u> <i>Common Elements Typical Projects:</i> <i>Frames 1 through 4</i> Less than significant <i>Frames 5 through 9</i> Less than significant <i>Multi-Use Trails and Access Gateways:</i> <i>Frames 1 through 4</i> Less than significant <i>Frames 5 through 9</i> Less than significant</p>	<p><i>Frames 5 through 9</i> Significant and unavoidable <i>KOP Categories 1–6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable <u>Operation</u> <i>Common Elements Typical Projects:</i> <i>Frames 1 through 4</i> Less than significant <i>Frames 5 through 9</i> Significant and unavoidable <i>Multi-Use Trails and Access Gateways:</i> <i>Frames 1 through 4</i> Less than significant <i>Frames 5 through 9</i> Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
	<p><i>KOP Categories 1-6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>	<p>the necessary flood-reduction strategies and capacity improvements. <u>Performance standards for stormwater control measures will be based on the County of Los Angeles Department of Public Works Stormwater Best Management Practice Design and Maintenance Manual, California Stormwater Quality Association’s BMP handbooks, and other similar guidance documents.</u> Specific measures include:</p> <ul style="list-style-type: none"> • If an extreme storm event is anticipated, then temporary stormwater control measures will be implemented to avoid increases in peak flows. Stormwater control measures include but are not limited to interim onsite detention facilities, capture and reuse measures, and/or other measures approved by the County, designed to maintain or reduce current, pre-development, surface runoff and stormwater discharge to the public storm drain system. • Necessary flood-reduction strategies and capacity improvements will be implemented. <p><u>A qualified hydrologist or equally qualified specialist will conduct a final review and approval of performance standards for stormwater control measures to ensure that impacts on stormwater are avoided or reduced.</u></p> <p><u>Operations</u></p> <p><i>Typical Projects in Frames 5-9; and KOP Categories 1 through 6, and Overall 2020 LA River Master Plan</i></p> <p>Mitigation Measure HYDRO-1a</p> <p>As described above.</p>	<p><i>KOP Categories 1-6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><i>KOP Categories 1-6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<p>Mitigation Measure HYDRO-1b As described above.</p>		
<p>3.9(d): In flood hazard, tsunami, or seiche zones, would the proposed project risk release of pollutants due to project inundation?</p>	<p><u>Construction and Operation</u> Typical Projects: Less than significant KOP Categories 1–6: Less than significant Overall 2020 LA River Master Plan Implementation: Less than significant</p>	<p>None required.</p>	<p><u>Construction and Operation</u> Typical Projects: Less than significant KOP Categories 1–6: Less than significant Overall 2020 LA River Master Plan Implementation: Less than significant</p>	<p><u>Construction and Operation</u> Typical Projects: Less than significant KOP Categories 1–6: Less than significant Overall 2020 LA River Master Plan Implementation: Less than significant</p>
<p>3.9(e): Would the proposed Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?</p>	<p><u>Construction and Operation</u> Typical Projects: No impacts KOP Categories 1–6: No impacts Overall 2020 LA River Master Plan Implementation: No impacts</p>	<p>None required.</p>	<p><u>Construction and Operation</u> Typical Projects: No impacts KOP Categories 1–6: No impacts Overall 2020 LA River Master Plan Implementation: No impacts</p>	<p><u>Construction and Operation</u> Typical Projects: No impacts KOP Categories 1–6: No impacts Overall 2020 LA River Master Plan Implementation: No impacts</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
Land Use and Planning				
<p>3.10(a): Would the proposed Project physically divide an established community?</p>	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–5:</i> Less than significant <i>KOP Category 6:</i> Potentially significant <i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant <u>Operation</u> <i>Typical Projects:</i> No Impact <i>KOP Categories 1–3:</i> No impacts <i>KOP Categories 4 and 5:</i> Less than significant</p>	<p><u>Construction</u> <i>KOP Category 6:</i> Mitigation Measure LU-1: Construction Management Plan. The implementing agency will require a construction management plan (CMP) be prepared that will include the following elements:</p> <ul style="list-style-type: none"> • No construction staging will be allowed within residential neighborhoods. • Construction workers will park in a specified off-site location and be shuttled to and from the construction site. Local residential neighborhoods will not be used for construction worker parking under any circumstances. • The CMP will provide a traffic control plan that identifies the location and timing of temporary closures and detours of public streets with the goal of maintaining traffic flow, especially during peak travel periods. The CMP would be site specific and include, at a minimum, signage to alert drivers to the construction zone, traffic control methods, traffic speed limitations, and alternative access and detour provisions during road closures. Local police and fire departments will be consulted during preparation of the CMP. • <u>Require signs to be posted at least 30 days prior to construction to inform community members that construction will begin, provide detour signage, and</u> 	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–5:</i> Less than significant <i>KOP Category 6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant <u>Operation</u> <i>Typical Projects:</i> No Impact <i>KOP Categories 1–3:</i> No impact <i>KOP Categories 4 and 5:</i> Less than significant</p>	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–5:</i> Less than significant <i>KOP Category 6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable <u>Operation</u> <i>Typical Projects:</i> No Impact <i>KOP Categories 1–3:</i> No impact <i>KOP Categories 4 and 5:</i> Less than significant</p>

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	<p><i>KOP Category 6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>	<p><u>wayfinding to nearby amenities during LA River pathway closure. See also REC-1.</u></p> <ul style="list-style-type: none"> Any temporary closure or removal of parking areas or roadways during construction will be temporary and will be restored upon completion of construction. Efforts will be made to minimize their removal or shorten the length of time that these facilities are inoperable to the extent possible. Construction hours and parking for construction vehicles will be implemented; freight and passenger rail services will be protected; and truck routes and construction for special events during project construction, bicycle and pedestrian access, and transit access will be maintained. Screening will be provided for all construction equipment to the maximum extent feasible. Alternative access to community facilities and neighborhood-serving commercial uses will be provided if access would be obstructed by construction activities. <p>Mitigation Measure LU-2: Consultation.</p> <p>During the site selection process, the project proponent will consult with the applicable municipality to determine whether the site is suitable for the proposed development and whether the project would physically divide an established community. This will be determined through aerial or site reconnaissance and comparison with the jurisdiction’s planned and existing land uses in the project area, which will then be confirmed, in writing, by the applicable jurisdiction. If it is determined that a significant impact could result, the</p>	<p><i>KOP Category 6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><i>KOP Category 6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<p>implementing agency will take one or more of the following actions:</p> <ul style="list-style-type: none"> • Select an alternate site that would be more appropriate for the proposed use and not likely to result in a significant impact. • Revise the project features to avoid the impact. <p><u>Operation</u> KOP Category 6</p> <p>Mitigation Measure LU-3: Alternative Connectivity.</p> <p>During the subsequent project design process, determination will be made whether the project design would result in a physical barrier to the community in the form of road closures, walls, or other project features that could disrupt connectivity within the community. If it is determined that physical barriers would result, the implementing entity <u>or person shall meet with the jurisdiction having authority of the site and will do one or more of the following:</u></p> <ul style="list-style-type: none"> • Redesign the project to avoid the impact. • Provide alternative connections that maintain connections across the community. This may include constructing off-site street connections, including alleys and other roadways, that maintain community connectivity and access. <p>Mitigation Measure LU-2: Consultation.</p> <p>Detailed above.</p>		

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<p>3.10(b): Would the proposed Project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?</p>	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–5:</i> Less than significant <i>KOP Category 6:</i> Potentially significant <i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant <u>Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1 and 2:</i> Potentially significant <i>KOP Categories 3–5:</i> Less than significant <i>KOP Category 6:</i> Potentially significant</p>	<p><u>Construction</u> <i>KOP Category 6</i> Mitigation Measure LU-1: Construction Management Plan. Detailed in Impact 3.10(a). Mitigation Measure LU-2: Consultation. Detailed in Impact 3.10(a). <u>Operation</u> <i>KOP Categories 1, 2, 6</i> Mitigation Measure LU-4: Site Selection Process. To avoid potential project inconsistency with applicable land use plans, the following will be implemented:</p> <ul style="list-style-type: none"> • During the site selection process, as specific projects under the KOP category are developed, the implementing agency will consult with the affected jurisdiction to determine if potential inconsistencies with land use plans and policies could occur. • Results of the consultation could include: <ul style="list-style-type: none"> ○ Selection of an alternative site ○ Revision or substitution of specific project components (alternative design) ○ Reduction in size of the project ○ Abandonment of the project • The results of the consultation will be documented in writing, with written concurrence from the affected jurisdiction, and incorporated into the <u>County’s implementing agency’s</u> project file. 	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–5:</i> Less than significant <i>KOP Category 6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable <u>Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1 and 2:</i> Significant and unavoidable <i>KOP Categories 3–5:</i> Less than significant <i>KOP Category 6:</i> Significant and unavoidable</p>	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–5:</i> Less than significant <i>KOP Category 6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable <u>Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1 and 2:</i> Significant and unavoidable <i>KOP Categories 3–5:</i> Less than significant <i>KOP Category 6:</i> Significant and unavoidable</p>

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	<p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Potentially significant</p>	<p><u>Operation</u></p> <p><i>Overall 2020 LA River Masterplan</i></p> <p>Mitigation Measure LU-2: Consultation Detailed in Impact 3.10(a).</p> <p>Mitigation Measure LU-3: Alternative Connectivity Detailed in Impact 3.10(a).</p> <p>Mitigation Measure LU-4: Site Selection Process As described above.</p>	<p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p>	<p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p>
Mineral Resources				
<p><i>3.11(a-b): Would the proposed Project result in the loss of availability of a known mineral resource or mineral resource recovery delineated on a local general plan, specific plan, or other land use plan site that would be of value to the region and the residents of the state?</i></p>	<p><u>Construction</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i></p>	<p>None required.</p>	<p><u>Construction</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i></p>	<p><u>Construction</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u></p> <p><i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i></p>

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	Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant		Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant	Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant
Noise				
<p><i>Impact 3.12(a): Would the proposed Project result in 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?</i></p>	<p><u>Construction</u></p> <p><i>Typical Projects – Common Elements – Cities of Maywood, Vernon, and Los Angeles)</i></p> <p>Potentially significant</p> <p><i>Typical Projects – Common Elements – (All Other Jurisdictions)</i></p> <p>Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways – Cities of Maywood, Vernon, Los Angeles, (Frames 4 & 6)</i></p> <p>Potentially significant</p>	<p><u>Construction</u></p> <p><i>Typical Projects – Common Elements (City of Maywood)</i></p> <p>Mitigation Measure NOI-1: Prepare Construction Noise Work and Mitigation Monitoring Plan.</p> <p>During final design the implementing agency will prepare a focused noise analysis for any project within the city, which identifies nearby noise sensitive receptors that could be affected, predicts anticipated construction-related noise levels, and identifies measures that will be implemented by the construction contractor in order to comply with the city’s standard. Measures that could be implemented include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Using equipment that generates lower noise levels than those outlined in Table 3.12 9 • Locating construction equipment far enough from noise-sensitive land uses such that noise attenuates to below the city’s standard • Designing and installing temporary sound barriers, which would provide attenuation below the city’s dBA standard 	<p><u>Construction</u></p> <p><i>Typical Projects-Common Elements (City of Maywood)</i></p> <p>Less than significant</p> <p><i>Typical Projects – Common Elements (Vernon)</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Common Elements (City of Los Angeles)</i></p> <p>Less than significant</p> <p><i>Typical Projects – Common Elements – (All Other Jurisdictions)</i></p> <p>Less than significant</p>	<p><u>Construction</u></p> <p><i>Typical Projects-Common Elements City of Maywood)</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Common Elements (Vernon)</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Common Elements (City of Los Angeles)</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Common Elements – (All Other Jurisdictions)</i></p> <p>Less than significant</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
	<p><i>Typical Projects – Multi Use Trails and Access Gateways– (All Other Jurisdictions)</i></p> <p>Less than significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Potentially significant</p> <p><u>Operation</u></p> <p><i>Typical Projects – Common Elements (Traffic):</i></p> <p>Less than significant</p> <p><i>Typical Projects – Common Elements (On-site) – (County of LA; Cities of Long Beach, Carson, Compton, Paramount, South Gate, Cudahy, Bell, Maywood, Vernon,</i></p>	<p>The implementing agency will also require noise monitoring during all phases of construction to confirm that the mitigation measures identified by the construction noise work plan and implemented by the construction contractor reduce construction noise to below the city’s threshold.</p> <p><u>Construction</u></p> <p><i>Typical Projects – Common Elements (City of Vernon)</i></p> <p>Mitigation Measure NOI-1: As described above.</p> <p>Mitigation Measure NOI-2: Obtain Conditional Use Permit and Implement its Requirements during Construction Activities.</p> <p>Prior to any construction within the City of Vernon, the implementing agency will apply for and obtain a conditional use permit, which will allow the Project to exceed the City of Vernon’s noise standard of 65 dBA.</p> <p><u>Construction</u></p> <p><i>Typical Projects – Common Elements (City of Los Angeles)</i></p> <p>Mitigation Measure NOI-3: Require Noise-Reducing Practices Be Incorporated into Construction Activities.</p> <p>Prior to any construction within the City of Los Angeles, the implementing agency will require the contractor to include the following noise-reducing practices:</p> <ul style="list-style-type: none"> • Use noise control devices, such as equipment mufflers, enclosures, and barriers. Natural and artificial barriers such as ground elevation changes and existing buildings can shield construction noise. 	<p><i>Typical Projects– Multi Use Trails and Access Gateways City of Maywood)</i></p> <p>Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways (Vernon)</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways (City of Los Angeles)</i></p> <p>Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways (All Frames)</i></p> <p>Less than significant</p> <p><i>KOP Categories 1–5:</i></p> <p>Less than significant</p> <p><i>KOP Category 6:</i></p> <p>Significant and unavoidable</p>	<p><i>Typical Projects– Multi Use Trails and Access Gateways City of Maywood)</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways (Vernon)</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways (City of Los Angeles)</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways (All Frames)</i></p> <p>Less than significant</p> <p><i>KOP Categories 1–5:</i></p> <p>Significant and unavoidable</p> <p><i>KOP Category 6:</i></p> <p>Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
	<p><i>Los Angeles, Glendale, Burbank)</i></p> <p>Potentially significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways – Typical Projects – Multi Use Trails and Access Gateways – (Cities of Maywood, Vernon, Los Angeles)</i></p> <p>Potentially significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways – (All other Jurisdictions)</i></p> <p>Less than significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Potentially significant</p>	<p>Stage construction operations as far from noise-sensitive uses as possible.</p> <ul style="list-style-type: none"> • Avoid residential areas when planning haul truck routes. • Maintain all sound-reducing devices and restrictions throughout the construction period. • Replace noisy equipment with quieter equipment (for example, use a vibratory pile driver instead of a conventional pile driver and rubber-tired equipment rather than track equipment). • Change the timing and/or sequence of the noisiest construction operations to avoid sensitive times of the day. <p><u>Construction</u></p> <p><i>Typical Projects – Multi-Use Trails and Access Gateways (City of Maywood)</i></p> <p>Mitigation Measure NOI-1: Prepare Construction Noise Work and Mitigation Monitoring Plan.</p> <p>As described above.</p> <p><u>Construction</u></p> <p><i>Typical Projects – Multi-Use Trails and Access Gateways (City of Vernon)</i></p> <p>Mitigation Measure NOI-2: Obtain Conditional Use Permit and Implement its Requirements during Construction Activities.</p> <p>As described above.</p>	<p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p> <p><u>Operation</u></p> <p><i>Typical Projects – Common Elements (Traffic):</i></p> <p>Less than significant</p> <p><i>Typical Projects – Common Elements (On-site) – (County of LA)</i></p> <p>Less than significant</p> <p><i>Typical Projects – Common Elements (On-site) – (City of Long Beach)</i></p> <p>Less than significant</p> <p><i>Typical Projects – Common Elements (On-site) – (Carson)</i></p> <p>Less than significant</p>	<p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p> <p><u>Operation</u></p> <p><i>Typical Projects – Common Elements (Traffic):</i></p> <p>Less than significant</p> <p><i>Typical Projects – Common Elements (On-site) – (County of LA)</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Common Elements (On-site) – (City of Long Beach)</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Common Elements (On-site) – (Carson)</i></p> <p>Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<p><u>Construction</u></p> <p><i>Typical Projects – Multi-Use Trails and Access Gateways (City of Los Angeles)</i></p> <p>Mitigation Measure NOI-3: Require Noise-Reducing Practices be incorporated into Construction Activities.</p> <p>As described above.</p> <p><u>Operation</u></p> <p><i>Typical Projects – Common Elements (County of LA; Cities of Long Beach, Carson, Compton, Paramount, <u>South Gate</u>, Cudahy, Bell, Maywood, Vernon, Los Angeles, Glendale, Burbank)</i></p> <p><u>Operations (Onsite)</u></p> <p>Mitigation Measure NOI-4: Prepare Focused Noise Study and Implement Findings to Reduce HVAC Noise.</p> <p>During final design of the Common Elements Typical Project, the implementing agency will design HVAC systems to comply with the applicable city’s municipal code standards. This could include but would not be limited to actions such as:</p> <ul style="list-style-type: none"> • Prepare a focused noise study to analyze HVAC noise, which will identify a location for HVAC systems at appropriate distances so as to not exceed a 30-minute noise level (within any 1 hour) of 50 dBA at the closest noise sensitive land use. • Design housings or shielding for HVAC systems that would reduce HVAC noise so as to not exceed a 30- 	<p><i>Typical Projects – Common Elements (On-site) – (Compton)</i></p> <p>Less than significant</p> <p><i>Typical Projects – Common Elements (On-site) – (Paramount)</i></p> <p>Less than significant</p> <p><i>Typical Projects – Common Elements (On-site) – (South Gate)</i></p> <p>Less than significant</p> <p><i>Typical Projects – Common Elements (On-site) – (Cudahy)</i></p> <p>Less than significant</p> <p><i>Typical Projects – Common Elements (On-site) – (Bell)</i></p> <p>Less than significant</p>	<p><i>Typical Projects – Common Elements (On-site) – (Compton)</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Common Elements (On-site) – (Paramount)</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Common Elements (On-site) – (South Gate)</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Common Elements (On-site) – (Cudahy)</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Common Elements (On-site) – (Bell)</i></p> <p>Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<p>minute noise level (within any 1 hour) of 50 dBA at the closest noise sensitive land use.</p> <p><u>Operations</u></p> <p><i>Typical Projects – Common Elements (City of South Gate)</i></p> <p>Mitigation Measure NOI-4: Prepare Focused Noise Study and Implement Findings to Reduce HVAC Noise.</p> <p>As described above.</p> <p>Mitigation Measure NOI-5: Prepare Focused Noise Study and Implement Findings.</p> <p>During final design of the Common Elements Typical Project, the implementing agency will prepare a focused noise study to determine the existing ambient baseline noise level by which to compare the operational noise level of the Common Elements Typical Project. The focused noise study will analyze the existing baseline noise level against operational noise, and, if it is determined that operational noise levels from the Common Elements would exceed the sound level limit, the implementing agency will provide measures or engineering best management practices to reduce exterior noise below the limit. These measures or best management practices could include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Locating the Common Elements Typical Project away from noise-sensitive receptors to reduce operational noise to below the existing baseline • Designing the Common Elements Typical Project to shield noise-sensitive receptors from noise-producing elements 	<p><i>Typical Projects – Common Elements (On-site) – (Maywood)</i></p> <p>Less than significant</p> <p><i>Typical Projects – Common Elements (On-site) – (Vernon)</i></p> <p>Less than significant</p> <p><i>Typical Projects – Common Elements (On-site) – (Los Angeles)</i></p> <p>Less than significant</p> <p><i>Typical Projects – Common Elements (On-site) – (Glendale)</i></p> <p>Less than significant</p> <p><i>Typical Projects – Common Elements (On-site) – (Burbank)</i></p> <p>Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways –</i></p>	<p><i>Typical Projects – Common Elements (On-site) – (Maywood)</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Common Elements (On-site) – (Vernon)</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Common Elements (On-site) – (Los Angeles)</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Common Elements (On-site) – (Glendale)</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Common Elements (On-site) – (Burbank)</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways –</i></p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<ul style="list-style-type: none"> Including sound-attenuating features such as soundwalls <p><u>Operation</u> <i>Typical Projects – Multi-Use Trails and Access Gateways (Maywood)</i></p> <p>Mitigation Measure NOI-1 As described above.</p> <p><u>Operation</u> <i>Typical Projects – Multi-Use Trails and Access Gateways (Vernon)</i></p> <p>Mitigation Measure NOI-2 As described above.</p> <p>Operation <i>Typical Projects – Multi-Use Trails and Access Gateways (Los Angeles)</i></p> <p>Mitigation Measure NOI-3 As described above.</p> <p><u>Construction</u> <i>KOP Categories 1 through 6</i></p> <p>As the location, based on Frame and jurisdiction is not known, the implementing agency will comply with relevant municipal code standards, time frames, and General Plan requirements related to construction of any project associated with any relevant KOP category. Additionally, the implementing agencies will incorporate Mitigation Measures NOI-1 through -3 as</p>	<p><i>(All other Jurisdictions)</i></p> <p>Less than significant <i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>	<p><i>(All other Jurisdictions)</i></p> <p>Less than significant <i>KOP Categories 1–6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<p>discussed above as mitigation within the cities of Maywood, Vernon, and Los Angeles.</p> <p><u>Operations</u></p> <p><i>KOP Categories 1 through 6</i></p> <p>Mitigation Measure NOI-6: Prepare a Noise Study.</p> <p>The implementing agency will prepare a focused noise study that analyzes the operational noise impacts of subsequent projects under the six KOP categories that include noise-producing components, such as, but not limited to, equestrian facilities and under- and overpasses or any other KOP-related project component. The focused noise study will include the quantification of noise-producing activities located on and originating from the subsequent project site. The focused noise study will determine the extent of impacts and whether these impacts would exceed any codified thresholds or guidance associated with the relevant jurisdiction. Should impacts be identified, the implementing agency will provide mitigation to reduce impacts to less-than-significant levels. Mitigation could include, but is not limited to, the following:</p> <ul style="list-style-type: none"> • Project design that would isolate noise producing features away from noise-sensitive receptors • Inclusion of noise-attenuating features such as sound walls, berms, acoustical shielding, etc., which would block the line of sight and provide noise reduction to surrounding noise-sensitive land uses <p><u>Construction and Operation</u></p> <p><i>Overall 2020 LA River Master Plan Implementation</i></p>		

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<p>Mitigation Measure NOI-1 through NOI-6 As described above.</p>		
<p><i>Impact 3.12(b): Would the proposed Project generate excessive groundborne vibration or groundborne noise levels?</i></p>	<p><u>Construction</u> <i>Typical Projects: Common Elements</i> Potentially significant <i>Typical Projects – Multi Use Trails and Access Gateways</i> Potentially significant <i>KOP Categories 1–6:</i> Potentially significant <i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant <u>Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant</p>	<p><u>Construction</u> Mitigation Measure NOI-7: Locate Project 200 feet or More from Occupied Structures or Prepare Vibration Study and Implement Findings. The implementing agency will locate any development of the Common Elements Typical Project outside of a distance of 200 feet from any occupied structure. If for some reason this is not possible, then during final design the implementing agency will prepare a focused vibration study that analyzes construction vibration sources and predicts vibration levels at nearby vibration sensitive land uses. If vibration levels are predicted to exceed the County’s 0.01 PPV threshold or any applicable city’s standards, the implementing agency will prescribe measures to reduce vibration to the greatest extent practical. Measures could include but are not limited to:</p> <ul style="list-style-type: none"> • Using less vibration-intensive construction equipment • Timing construction so that structures would not be occupied when high levels of vibration are expected • Informing residents of the timing of construction and that vibration may be noticeable during these times <p>Mitigation Measure NOI-8: Locate Project 400 feet or More from Occupied Structures or Prepare Vibration Study and Implement Findings. The implementing agency will locate any development of a Multi-Use Trails and Access Gateways Project</p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Less than significant <i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant <i>KOP Categories 1–6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable <u>Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant</p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Significant and unavoidable <i>Typical Projects – Multi Use Trails and Access Gateways:</i> Significant and unavoidable <i>KOP Categories 1–6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable <u>Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
	<p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>	<p>outside of a distance of 400 feet from any occupied structure (dependent on phase and construction equipment used). If for some reason this is not possible, during final design the implementing agency will prepare a focused vibration study that analyzes construction vibration sources and predicts vibration levels at nearby vibration sensitive land uses. If vibration levels would exceed the County’s 0.01 PPV threshold or any applicable city’s standards, the implementing agency will prescribe measures to reduce vibration to the greatest extent practical. Measures could include but are not limited to:</p> <ul style="list-style-type: none"> ● Using less vibration-intensive construction equipment ● Timing construction so that structures would not be occupied when high levels of vibration are expected ● Informing residents of the timing of construction and that vibration may be noticeable during these times <p>Mitigation Measure NOI-9: Prepare Vibration Study and Implement Findings.</p> <p>The implementing agency will, during final design, prepare a focused vibration study that analyzes construction vibration sources and predicts vibration levels at nearby vibration sensitive land uses. If vibration levels would exceed the County’s 0.01 PPV threshold or any other codified threshold, the implementing agency will prescribe measures to reduce vibration to the greatest extent practical. Measures could include, but are not limited to, the following:</p> <ul style="list-style-type: none"> ● Using less vibration-intensive construction equipment 	<p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>	<p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<ul style="list-style-type: none"> • Timing construction so that structures would not be occupied when high levels of vibration are expected • Informing residents of the timing of construction and that vibration may be noticeable during these times 		
<p><i>Impact 3.12(c) : Would the proposed Project be located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport and expose people residing or working in the project area to excessive noise levels?</i></p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p>None required.</p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>
Population and Housing				
<p><i>Impact 3.13(a): Would the proposed Project induce substantial unplanned population growth in an area, either directly (e.g., by proposing new</i></p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant</p>	<p>None required.</p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant</p>	<p><u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant</p>

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<i>homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?</i>	<i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant		<i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant	<i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant
<i>Impact 3.13(b): Would the proposed Project displace a substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere?</i>	<u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant	None required.	<u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant	<u>Construction and Operation</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant
Public Services				
<i>Impact 3.14(a): Would the proposed Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or</i>	<u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6: Police and Fire Protection:</i> Potentially significant	<u>Construction</u> Mitigation Measure LU-1: Construction Management Plan Detailed in Impact 3.10(a). <u>Operation</u> Mitigation Measure PS-1: Ensure Police and Fire Service Providers Have Adequate Resources.	<u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6: Police and Fire Protection:</i> Less than significant	<u>Construction</u> <i>Typical Projects:</i> Less than significant <i>KOP Categories 1–6: Police and Fire Protection:</i> Significant and unavoidable

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
<p><i>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 following public services: Fire Protection; Police Protection; Schools; Parks; Other Public Facilities?</i></p>	<p><i>KOP Categories 1–6: Schools, Parks, and Other Public Facilities:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p> <p><u>Operation</u> <i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6: Police and Fire Protection:</i> Potentially significant</p> <p><i>KOP Categories 1–6: Schools, Parks, and Other Public Facilities:</i> Less than significant</p>	<p>During subsequent project design and development, the implementing agency will regularly notify and coordinate with police and fire service providers that have jurisdiction over subsequent project sites on project construction design, activities, and scheduling—including any street or lane closures related to subsequent projects—to ensure police and fire service providers have adequate resources to continue to serve the project area within their respective required levels of service and response times once the subsequent project is constructed.</p>	<p><i>KOP Categories 1–6: Schools, Parks, and Other Public Facilities:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p> <p><u>Operation</u> <i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6: Police and Fire Protection:</i> Significant and unavoidable</p> <p><i>KOP Categories 1–6: Schools, Parks, and Other Public Facilities:</i> Less than significant</p>	<p><i>KOP Categories 1–6: Schools, Parks, and Other Public Facilities:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p> <p><u>Operation</u> <i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6: Police and Fire Protection:</i> Significant and unavoidable</p> <p><i>KOP Categories 1–6: Schools, Parks, and Other Public Facilities:</i> Less than significant</p>

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	<p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Potentially significant</p>		<p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p>	<p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p>
Recreation				
<p><i>Impact 3.15(a):</i> <i>Would the proposed Project 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?</i></p>	<p><u>Construction</u></p> <p><i>Typical Projects – Common Elements:</i></p> <p>Potentially significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i></p> <p>Potentially significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Potentially significant</p> <p><u>Operation</u></p>	<p><u>Construction</u></p> <p>Mitigation Measure REC-1: Minimize Disruption of Recreational Uses During Construction.</p> <p>As specific subsequent project and location information is identified during detailed design, the implementing agency will confirm the timing, duration, and areal extent of construction activities that would occur. If temporary closures of existing recreational facilities would be necessary for construction, the specific increase in use of other nearby recreational facilities will be evaluated. Factors to be considered in the evaluation include the duration of the closure, acreage and type of facility that would be unavailable due to the closure, and existing usage levels at the relevant nearby recreational facilities.</p> <p>If there is an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or is accelerated, the implementing agency will apply measures including, but not limited to, one or more of the following:</p>	<p><u>Construction</u></p> <p><i>Typical Projects – Common Elements:</i></p> <p>Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i></p> <p>Less than significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Less than significant</p> <p><u>Operation</u></p>	<p><u>Construction</u></p> <p><i>Typical Projects – Common Elements:</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i></p> <p>Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i></p> <p>Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p> <p><u>Operation</u></p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
	<p><i>Typical Projects – Common Elements:</i> Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<ul style="list-style-type: none"> • Minimize duration of construction period. • Modify construction phasing to limit disturbance of existing recreational facilities. • Avoid construction during peak use periods. • Post signage informing users of the duration of construction, with additional wayfinding to adjacent facilities with similar amenities. 	<p><i>Typical Projects – Common Elements:</i> Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><i>Typical Projects – Common Elements:</i> Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>
<p><i>Impact 3.15(b):</i> <i>Would the proposed Project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?</i></p>	<p><u>Construction</u></p> <p><i>Typical Projects – Common Elements:</i> Potentially significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i> Potentially significant</p>	<p><u>Construction and Operation</u></p> <p>Refer to mitigation measures identified in Sections 3.1, <i>Aesthetics</i>; 3.2, <i>Air Quality</i>; 3.3, <i>Biological Resources</i>; 3.4, <i>Cultural Resources</i>; 3.5, <i>Energy</i>; 3.6, <i>Geology, Soils, and Paleontological Resources</i>; 3.7, <i>Greenhouse Gas Emissions</i>; 3.8, <i>Hazards and Hazardous Materials</i>; 3.9, <i>Hydrology and Water Quality</i>; 3.10, <i>Land Use and Planning</i>; 3.11, <i>Mineral Resources</i>; 3.12, <i>Noise</i>; 3.13, <i>Population and Housing</i>; 3.14, <i>Public Services</i>; 3.16, <i>Transportation</i>; 3.17, <i>Tribal Cultural Resources</i>; 3.18, <i>Utilities and Service Systems</i>; and 3.19, <i>Wildfire</i>.</p>	<p><u>Construction</u></p> <p>Refer to the <u>significance after required mitigation identified in Sections 3.1 through 3.14 and 3.16 through 3.19 Wildfire.</u></p> <p><u>Operation</u></p> <p>Refer to the significance after required mitigation identified in</p>	<p><u>Construction</u></p> <p>Refer to the <u>significance after required mitigation identified in Sections 3.1 through 3.14 and 3.16 through 3.19 Wildfire.</u></p> <p><u>Operation</u></p> <p>Refer to the significance after required mitigation identified in Sections</p>

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	<p><i>KOP Categories 1–6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p> <p><u>Operation</u> <i>Typical Projects – Common Elements:</i> Potentially significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i> Potentially significant</p> <p><i>KOP Categories 1–6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>		<p>Sections 3.1 through 3.14 and 3.16 through 3.19 Wildfire.</p>	<p>3.1 through 3.14 and 3.16 through 3.19 Wildfire.</p>

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Transportation				
<p><i>Impact 3.16(a): Would the proposed Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?</i></p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Potentially significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i> Potentially significant</p> <p><i>KOP Categories 1–6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p> <p><u>Operation</u> <i>Typical Projects – Common Elements:</i> Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i> Less than significant</p>	<p><u>Construction</u> Mitigation Measure LU-1: Prepare and Implement Construction Management Plan. Detailed in Impact 3.10(a).</p> <p><u>Operation</u> None required.</p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u> <i>Typical Projects – Common Elements:</i> Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i> Less than significant</p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Significant and unavoidable</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i> Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p> <p><u>Operation</u> <i>Typical Projects – Common Elements:</i> Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i> Less than significant</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
	<p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>		<p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>
<p><i>Impact 3.16(b):</i> <i>Would the proposed Project conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b)?</i></p>	<p><u>Construction</u></p> <p><i>Typical Projects – Common Elements:</i> Potentially significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i> Potentially significant</p> <p><i>KOP Categories 1–6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>	<p><u>Construction</u></p> <p>Mitigation Measure LU-1: Prepare and Implement Construction Management Plan.</p> <p>Detailed in Impact 3.10(a).</p> <p><u>Operation</u></p> <p>Mitigation Measure TRA-1a. Determine VMT Based on Type of Subsequent Project.</p> <p>For any subsequent projects that include project elements that are identified in the VMT Impact Evaluation Matrix as having the potential to generate a significant VMT impact, the implementing agency will conduct the following two-step screening process:</p> <ul style="list-style-type: none"> • Step 1. Conduct a trip generation analysis to determine whether a project would generate a net increase of 110 or more daily trips, or determine whether the location is located within one-half mile of a major transit stop or high-quality transit corridor based on its County Transportation Impact Analysis Guidelines Sections 3.1.2.1 and 3.1.2.3. If the subsequent project is screened out once project design and location details are known, then no further actions are required. 	<p><u>Construction</u></p> <p><i>Typical Projects – Common Elements:</i> Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><u>Construction</u></p> <p><i>Typical Projects – Common Elements:</i> Significant and unavoidable</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i> Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>

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	<p><u>Operation</u></p> <p><i>Typical Projects – Common Elements:</i></p> <p>Potentially significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i></p> <p>Less than Significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Potentially significant</p>	<p>If the subsequent project is not screened out after Step 1, the implementing agency will move on to Step 2.</p> <ul style="list-style-type: none"> ● Step 2. Perform a VMT analysis for the subsequent project using the County’s VMT impact criteria that have been developed based on guidance from OPR and CARB. Per the criteria, project VMT impact thresholds vary depending on the project type, as follows: <ul style="list-style-type: none"> ○ For residential development land use projects, the project would generate residential VMT per capita exceeding 16.8 percent below the existing residential VMT per capita for the Baseline Area in which the project is located. ○ For office land use projects, the project would generate employment VMT per employee exceeding 16.8 percent below the existing employment VMT per employee for the Baseline Area in which the project is located. ○ For regional serving retail land use projects, entertainment projects, and/or event center land uses, the project would result in a net increase in existing Total VMT. Trips associated with these land uses are typically discretionary trips, which may be either substitute trips to other, closer destinations, or new trips entirely. A project-specific customized approach will be required to estimate VMT for such projects. The methodology should be developed in consultation with and approved by Public Works staff at the outset of the study. ○ For unique land uses in which a land use project does not fit into any of the above categories, a project-specific customized approach may be 	<p><u>Operation</u></p> <p><i>Typical Projects – Common Elements:</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i></p> <p>Less than Significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p>	<p><u>Operation</u></p> <p><i>Typical Projects – Common Elements:</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i></p> <p>Less than Significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<p>required to estimate daily trips and VMT, but may be based on the existing employment trip element using an approach similar to that for office projects, above. The methodology and thresholds to be used in such cases should be developed in consultation with and approved by Public Works staff at the outset of the study.</p> <p>If the subsequent project cannot be screened out but the VMT is determined to not exceed the threshold based on the applicable guideline and project type, then no further action is needed.</p> <p>If the subsequent project cannot be screened out and the VMT is determined to exceed the threshold based on the applicable guideline and project type, then Mitigation Measure TRA-1b will be implemented:</p> <p><u>If the subsequent project cannot be screened out and the VMT is determined to exceed the threshold based on the applicable guideline and project type, then Mitigation Measure TRA-1b will be required and implemented.</u></p> <p>Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT.</p> <p>The implementing agency (County or other jurisdictional agency) will implement a subsequent project-specific program utilizing transportation demand management (TDM) strategies and neighborhood or site enhancements to reduce VMT, and any other appropriate strategies to address identified impacts and reduce VMT to the River Corridor.</p> <p>The program to reduce VMT will be based on the suite of eligible TDM strategies included in the County</p>		

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		<p>Guidelines or other measures with substantial evidence, or, if the subsequent project is located in an incorporated city, the program will be based on that city's <u>mitigation measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise) on the local jurisdiction's</u> list of qualifying VMT mitigation strategies. Specific measures can include but are not limited to:</p> <ul style="list-style-type: none"> • Increasing transit accessibility • Relocating a project in order to be adjacent to transit • Pricing any provided parking at river access sites to discourage vehicle trips to the River Corridor • <u>Providing bicycle parking</u> • Implementation of neighborhood or site enhancements such as pedestrian network improvements (for example, high-visibility crosswalks, continuous sidewalks, and Americans with Disabilities Act [ADA]-compliant directional curb cuts at intersections), and traffic calming measures such as speed humps or chicanes 		
<p><i>Impact 3.16(c)/(d): Would the proposed Project substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses</i></p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Potentially significant <i>Typical Projects – Multi Use Trails and Access Gateways</i></p>	<p><u>Construction</u> Mitigation Measure LU-1: Prepare and Implement Construction Management Plan. Detailed in Impact 3.10(a). <u>Operation</u> None required.</p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Less than significant <i>Typical Projects – Multi Use Trails and Access Gateways</i></p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Significant and unavoidable <i>Typical Projects – Multi Use Trails and Access Gateways</i></p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
<p><i>(e.g., farm equipment); or result in inadequate emergency access?</i></p>	<p>Potentially significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Potentially significant</p> <p><u>Operation</u></p> <p><i>Typical Projects – Common Elements:</i></p> <p>Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i></p> <p>Less than significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Less than significant</p>		<p>Less than significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Less than significant</p> <p><u>Operation</u></p> <p><i>Typical Projects – Common Elements:</i></p> <p>Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i></p> <p>Less than significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Less than significant</p>	<p>Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i></p> <p>Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p> <p><u>Operation</u></p> <p><i>Typical Projects – Common Elements:</i></p> <p>Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i></p> <p>Less than significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Less than significant</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
Tribal Cultural Resources				
<p><i>Impact 3.17(a), Would the proposed Project cause a substantial adverse change in the significance of a TCR defined in PRC Section 21074 as a site, feature, place, or 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 that is either of the following:</i></p> <p><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</i></p>	<p><u>Construction</u></p> <p><i>Typical Projects – Common Elements:</i></p> <p>Potentially significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i></p> <p>Potentially significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Potentially significant</p> <p><u>Operation</u></p> <p><i>Typical Projects – Common Elements:</i></p> <p>Potentially significant</p>	<p><u>Construction</u></p> <p>Mitigation Measure CR-1a: Conduct Cultural Resources Investigations for Historical/Built Archaeological, and Tribal Cultural Resources to Determine Presence of Resources.</p> <p>Detailed in Impact 3.4(a).</p> <p>Mitigation Measure CR-1b: Conduct Cultural Resources Investigations for Historical/Built Archaeological, and Tribal Cultural Resources and Implement Findings.</p> <p>Detailed in Impact 3.4(a).</p> <p>Mitigation Measure CR-4a: Retain a Qualified Archaeologist.</p> <p>Detailed in Impact 3.4(b).</p> <p>Mitigation Measure CR-4b: Avoid Significant Archaeological Sites or TCRs through Establishment of Environmentally Sensitive Areas.</p> <p>Detailed in Impact 3.4(b).</p> <p>Mitigation Measure CR-4c: Provide Archaeological and Native American Monitoring and Establish Archaeological Monitoring Plan.</p> <p>Detailed in Impact 3.4(b).</p> <p>Mitigation Measure CR-4d: Develop and Implement an Archaeological Evaluation and Treatment Plan to Evaluate Potentially Significant Archaeological Discoveries.</p>	<p><u>Construction</u></p> <p><i>Typical Projects – Common Elements:</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i></p> <p>Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i></p> <p>Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p> <p><u>Operation</u></p> <p><i>Typical Projects – Common Elements:</i></p> <p>Significant and unavoidable</p>	<p><u>Construction</u></p> <p><i>Typical Projects – Common Elements:</i></p> <p>Significant and unavoidable</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways</i></p> <p>Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i></p> <p>Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p> <p><u>Operation</u></p> <p><i>Typical Projects – Common Elements:</i></p> <p>Significant and unavoidable</p>

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<p><i>Resources Code Section 5020.1(k)?</i></p> <p><i>A resource determined by the lead agency to be significant pursuant to criteria in PRC Section 5024.1(c). In applying this criteria, the lead agency will consider the significance of the resource to a California Native American tribe?</i></p>	<p><i>Typical Projects – Multi Use Trails and Access Gateways</i></p> <p>Potentially significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Potentially significant</p>	<p>Detailed in Impact 3.4(b).</p> <p>Mitigation Measure CR-5: Temporarily Halt Ground Disturbance for Unanticipated Discoveries per SOI Standards.</p> <p>Detailed in Impact 3.4(b).</p> <p>Mitigation Measure TCR-1: Conduct Native American Monitoring.</p> <p>If determined necessary via consultation, in addition to Mitigation Measure CR-4c Native American monitoring requirements, Native American monitoring will be conducted by the tribe that identified the TCR through AB 52 consultation. Native American monitors will be present during construction activities in native sediments and will observe all ground-disturbing activities conducted within 100 feet of the TCR. Should unanticipated discoveries be made during Native American monitoring, then the unanticipated discoveries protocol described in Mitigation Measure CR-5 will be enacted. This includes halting ground-disturbing activities for a reasonable period of time, consulting with the lead agency and Native American representatives (if the find is Native American in origin), developing a mitigation plan, and potentially developing and implementing a data recovery plan. In the event of an unanticipated discovery of human remains, the monitor will follow Section 7050.5 of the Health and Safety Code (Mitigation Measure CR-7), described in Section 3.4.2.2 of the PEIR.</p>	<p><i>Typical Projects – Multi Use Trails and Access Gateways</i></p> <p>Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i></p> <p>Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p>	<p><i>Typical Projects – Multi Use Trails and Access Gateways</i></p> <p>Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i></p> <p>Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p>

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		<p><u>Operation</u></p> <p>Mitigation Measure TCR-2: Avoid TCRs during Project Operations through Establishment of Environmentally Sensitive Areas.</p> <p>If physical portions of previously identified TCRs are left in place after project construction, then Environmentally Sensitive Areas will be established to protect any remaining physical portions of the TCR from further direct or indirect affects that may result as part of project operations. The establishment of Environmentally Sensitive Areas will be conducted in coordination and consultation with Native American tribes.</p> <p>Mitigation Measure TCR-3: Temporarily Halt Ground Disturbance for Unanticipated TCR Discoveries during Operations.</p> <p>If TCRs are discovered inadvertently during project operations, work will be temporarily halted in the area and within 100 feet of the find. The implementing agency will notify the consulting Native American tribe to assess the find and develop the appropriate treatment measures in consultation with the implementing agency and Native American tribes.</p>		

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
Utilities/Service Systems				
<p><i>Impact 3.18-1(a): Would the proposed Project require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?</i></p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Less than significant <i>Typical Projects – Multi Use Trails and Access Gateways</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant <u>Operation</u> <i>Typical Projects – Common Elements:</i> Less than significant <i>Typical Projects – Multi Use Trails and Access Gateways</i> Less than significant</p>	<p><u>Construction:</u> None required. <u>Operations</u> <i>KOP Categories 1 through 6 and Overall 2020 LA River Master Plan</i> Mitigation Measure UTIL-1: Prepare and Implement Utilities Plan. During design, the implementing agency will prepare a utilities plan that:</p> <ul style="list-style-type: none"> Identifies the location of existing utilities and connections and new/expanded infrastructure that will be required to connect to existing services Quantifies demand and generation factors for construction of the new/expanded infrastructure on a project-specific basis and determine whether supply/capacity can meet demand Identifies project modifications that will minimize any significant environmental impact on utilities <p>As part of the utilities plan, the implementing agency will prepare a utilities report that compares the expected operational demand and generation for the various utility resources against existing supply and infrastructure to determine whether sufficient capacity exists to accommodate the Project; if any insufficiency is identified, the implementing agency will modify the Project to avoid the impact in consultation with the affected utility provider(s). Modifications to the Project could include the following site-specific conservation</p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Less than significant <i>Typical Projects – Multi Use Trails and Access Gateways</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable <u>Operation</u> <i>Typical Projects – Common Elements:</i> Less than significant <i>Typical Projects – Multi Use Trails and Access Gateways</i> Less than significant</p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Less than significant <i>Typical Projects – Multi Use Trails and Access Gateways</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable <u>Operation</u> <i>Typical Projects – Common Elements:</i> Less than significant <i>Typical Projects – Multi Use Trails and Access Gateways</i> Less than significant</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
	<p><i>KOP Categories 1–6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>	<p>features above those required by the applicable codes and ordinances:</p> <ul style="list-style-type: none"> ● On-site wastewater treatment ● On-site recycled water infrastructure ● On-site solid waste recycling ● Solar panels ● Use of alternative energy such as biofuels 	<p><i>KOP Categories 1–6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>	<p><i>KOP Categories 1–6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>
<p><i>Impact 3.18(b):</i> <i>Would the proposed Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?</i></p>	<p><u>Construction</u> <i>Typical Projects –</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p> <p><u>Operation</u> <i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–3:</i> Less than significant</p> <p><i>KOP Category 4:</i> No Impact</p>	<p><u>Construction</u> None required.</p> <p><u>Operation</u> <i>KOP Category 6 and Overall 2020 LA River Master Plan</i> Mitigation Measure UTIL-2: Prepare Water Supply Assessment. The implementing agency will prepare a water supply assessment in accordance with the requirements of SB 610.</p>	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p> <p><u>Operation</u> <i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–3:</i> Less than significant</p> <p><i>KOP Category 4:</i> No Impact</p>	<p><u>Construction</u> <i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p> <p><u>Operation</u> <i>Typical Projects:</i> Less than significant</p> <p><i>KOP Categories 1–3:</i> Less than significant</p> <p><i>KOP Category 4:</i> No Impact</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
	<p><i>KOP Category 5:</i> Less than significant</p> <p><i>KOP Category 6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>		<p><i>KOP Category 5:</i> Less than significant</p> <p><i>KOP Category 6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>	<p><i>KOP Category 5:</i> Less than significant</p> <p><i>KOP Category 6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>
<p><i>Impact 3.18(c):</i> <i>Would the proposed Project result in a determination by the wastewater treatment provider that serves or may serve the Project that it does not have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?</i></p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> No Impact</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> No Impact</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p> <p><u>Operation</u></p>	<p><u>Construction</u> None required.</p> <p><u>Operation</u> <i>KOP Category 6 and Overall 2020 LA River Master Plan</i> Mitigation Measure UTIL-1: Prepare and Implement Utilities Plan. As described above.</p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> No Impact</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> No Impact</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p> <p><u>Operation</u></p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> No Impact</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> No Impact</p> <p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p> <p><u>Operation</u></p>

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	<p><i>Typical Projects – Common Elements:</i> Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant</p> <p><i>KOP Categories 1–5:</i> Less than significant</p> <p><i>KOP Category 6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>		<p><i>Typical Projects – Common Elements:</i> Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant</p> <p><i>KOP Categories 1–5:</i> Less than significant</p> <p><i>KOP Category 6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>	<p><i>Typical Projects – Common Elements:</i> Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant</p> <p><i>KOP Categories 1–5:</i> Less than significant</p> <p><i>KOP Category 6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>
<p><i>Impact 3.18(d): Would the proposed Project 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</i></p>	<p><u>Construction</u></p> <p><i>Typical Projects – Common Elements:</i> Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant</p>	<p><u>Construction</u></p> <p><i>KOP Category 6 and Overall 2020 LA River Master Plan</i></p> <p>Mitigation Measure UTIL-3: Recycle Construction Materials and Reduce Waste.</p> <p>Implementing agencies will require construction contractors to recycle construction materials and divert inert solids (asphalt, brick, concrete, dirt, fines, rock, sand, soil, and stone) from disposal in a landfill, according to local, regional, and State regulations and ordinances. Implementing agencies will incentivize</p>	<p><u>Construction</u></p> <p><i>Typical Projects – Common Elements:</i> Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant</p>	<p><u>Construction</u></p> <p><i>Typical Projects – Common Elements:</i> Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant</p>

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<p><i>solid waste reduction goals?</i></p>	<p><i>KOP Categories 1–5:</i> Less than significant</p> <p><i>KOP Category 6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p> <p><u>Operation</u></p> <p><i>Typical Projects – Common Elements:</i> Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant</p> <p><i>KOP Categories 1–5:</i> Less than significant</p> <p><i>KOP Category 6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>	<p>construction contractors with waste minimization goals in bid specifications.</p> <p><u>Operation</u></p> <p><i>KOP Category 6 and Overall 2020 LA River Master Plan</i></p> <p>Mitigation Measure UTIL-4: Divert Solid Waste.</p> <p>For every project under KOP Category 6, the implementing agency will include one or more of the following actions to reduce the amount of solid waste generated from operation of the Project:</p> <ul style="list-style-type: none"> ● Provide on-site recycling containers both outside and indoors on each floor of the development. ● Ensure that all contracts for landscape maintenance include provisions for recycling/composting of green waste. ● Provide for regular collection of recyclable material and green waste for diversion from landfill. ● Include signage throughout the project site encouraging the reuse and recycling of waste. ● Provide incentives for project operators to reduce and divert solid waste from operation of the project; these incentives could include rebates to property owners for identified volume levels of recycled waste per development and innovative changes to standard operating procedures. 	<p><i>KOP Categories 1–5:</i> Less than significant</p> <p><i>KOP Category 6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u></p> <p><i>Typical Projects – Common Elements:</i> Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant</p> <p><i>KOP Categories 1–5:</i> Less than significant</p> <p><i>KOP Category 6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><i>KOP Categories 1–5:</i> Less than significant</p> <p><i>KOP Category 6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p> <p><u>Operation</u></p> <p><i>Typical Projects – Common Elements:</i> Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant</p> <p><i>KOP Categories 1–5:</i> Less than significant</p> <p><i>KOP Category 6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
<p><i>Impact 3.18(e): Would the proposed Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?</i></p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Less than significant <i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u> <i>Typical Projects – Common Elements:</i> Less than significant <i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant</p>	<p>None required.</p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Less than significant <i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u> <i>Typical Projects – Common Elements:</i> Less than significant <i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant</p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Less than significant <i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u> <i>Typical Projects – Common Elements:</i> Less than significant <i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant</p>

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	<p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>		<p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>
Wildfire				
<p><i>Impact 3.19(a): Would the Project substantially impair an adopted emergency response plan or evacuation plan.</i></p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Potentially significant <i>Typical Projects – Multi Use Trails and Access Gateways</i> Potentially significant <i>KOP Categories 1–6:</i> Potentially significant <i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant <u>Operation</u> <i>Typical Projects – Common Elements:</i> Less than significant</p>	<p><u>Construction</u> Mitigation Measure WF-1: Construction Coordination with Emergency and Fire Services The implementing agency and construction contractor will regularly notify and coordinate with Los Angeles County and/or local jurisdictions’ emergency departments on project construction design, activities, and scheduling. For future projects with substantial construction periods (e.g., more than 10 months), the following measures will be implemented as applicable to minimize construction impacts on emergency response requirements of relevant police and fire departments.</p> <ul style="list-style-type: none"> • Prior to the start of construction, consult the fire station(s) serving the project area and review phasing, road/lane closure, and detour plans. The fire station(s) may then identify alternative fire and emergency medical response routes. • Prior to the start of construction, consult the police station(s) serving the project area, as appropriate, of project-related lane and/or road closures and detour plans. The police station(s) may then identify alternative police emergency response routes. • If determined to be necessary by the relevant police and/or fire service providers, implement one or 	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Less than significant <i>Typical Projects – Multi Use Trails and Access Gateways</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant <u>Operation</u> <i>Typical Projects – Common Elements:</i> Less than significant</p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Significant and Unavoidable <i>Typical Projects – Multi Use Trails and Access Gateways</i> Significant and Unavoidable <i>KOP Categories 1–6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable <u>Operation</u> <i>Typical Projects – Common Elements:</i> Less than significant</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
	<p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Potentially Significant</p>	<p>more of the following applicable traffic control measures capable of reducing the temporary adverse effects on police and emergency vehicle travel during project construction:</p> <ul style="list-style-type: none"> ○ Use flag persons to direct traffic. ○ Post “No Parking” signs along the affected area. ○ Install temporary signals or signs to direct traffic or other equivalent traffic control measures. <p><u>Operation</u> None required.</p>	<p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p>	<p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and Unavoidable</p>
<p><i>Impact 3.19(b): Would the Project due to slope, prevailing winds, and other factors, exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.</i></p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Potentially significant <i>Typical Projects – Multi Use Trails and Access Gateways</i> Potentially significant <i>KOP Categories 1–6:</i> Potentially significant</p>	<p><u>Construction</u> Mitigation Measure WF-2: Prepare a Construction Fire Protection Plan. For construction projects that are proposed in or adjacent to areas designated as Very High FHSZs, prior to construction, the implementing agency will prepare a construction fire protection plan. The construction fire protection plan will include, but will not be limited to, the following measures to address potential ignition sources during construction:</p> <ul style="list-style-type: none"> ● Parking for workers’ vehicles and equipment will be designated away from dry brush and other ignition sources. ● Vehicle idling will be prohibited. ● Specify that personnel must be trained in the practices of the fire safety plan relevant to their duties. Construction and maintenance personnel will be trained and equipped to extinguish small fires to 	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Less than significant <i>Typical Projects – Multi Use Trails and Access Gateways</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant</p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Significant and unavoidable <i>Typical Projects – Multi Use Trails and Access Gateways</i> Significant and unavoidable <i>KOP Categories 1–6:</i> Significant and unavoidable</p>

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	<p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p> <p><u>Operation</u> <i>Typical Projects – Common Elements:</i> Potentially significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Potentially significant</p> <p><i>KOP Categories 1–6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>	<p>prevent them from growing into more serious threats.</p> <ul style="list-style-type: none"> Prohibit smoking in wildland areas, with smoking limited to paved areas or areas cleared of all vegetation. During high fire risk conditions, designated vehicles will carry fire-prevention equipment, such as water, a shovel, and/or a fire extinguisher, on the construction site at all times. Fireproof mats or shields will be used during welding or other construction activities that could produce sparks during high fire risk conditions. Demonstrate compliance with applicable plans and policies established by State agencies. <p><u>Operations</u></p> <p>Mitigation Measure WF-3: Prepare a Fire Protection Plan.</p> <p>For projects that are proposed in areas designated as Very High FHSZs, the implementing agency will prepare a fire protection plan (FPP) for the project prior to commencing operation of the facility. The FPP will be prepared to ensure that projects developed within Very High FHSZs are in compliance with current regulatory codes and that impacts resulting from wildland fire hazards are adequately mitigated. The FPP will include, but will not be limited to, the following:</p> <ul style="list-style-type: none"> Measures to address specific location, topography, geology, level of flammable vegetation, and climate of the project site Measures consistent with applicable fire codes 	<p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u> <i>Typical Projects – Common Elements:</i> Significant and unavoidable</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>	<p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p> <p><u>Operation</u> <i>Typical Projects – Common Elements:</i> Significant and unavoidable</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>

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		<ul style="list-style-type: none"> • A vegetation management plan that includes measures such as reducing flammable vegetation around the property’s structure and installing sprinklers that activate in the case of fire • <u>Consultation with all affected jurisdictions, including applicable regulatory and resource agencies</u> <p>In addition, the following elements will be included in the FPP:</p> <ul style="list-style-type: none"> • Emergency services – availability and travel time • Access for emergency services and evacuation of students and faculty (primary and, if required, additional access) • Firefighting water supply • Fire sprinkler system • Ignition resistant construction • Defensible space, ornamental landscaping, and vegetation management 		
<p><i>Impact 3.19(c): Would the Project 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</i></p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Potentially significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Potentially significant</p>	<p><u>Construction</u> Mitigation Measure WF-2: Prepare a Construction Fire Protection Plan. Detailed in Impact 3.19(b)</p> <p><u>Operation</u> Mitigation Measure WF-3: Prepare a Fire Protection Plan. Detailed in Impact 3.19(b)</p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Less than significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Less than significant</p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Significant and unavoidable</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
<p><i>or ongoing impacts on the environment.</i></p>	<p><i>KOP Categories 1–6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p> <p><u>Operation</u> <i>Typical Projects – Common Elements:</i> Potentially significant</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Potentially significant</p> <p><i>KOP Categories 1–6:</i> Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p>		<p><i>KOP Categories 1–6:</i> Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u> <i>Typical Projects – Common Elements:</i> Significant and unavoidable</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>	<p><i>KOP Categories 1–6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p> <p><u>Operation</u> <i>Typical Projects – Common Elements:</i> Significant and unavoidable</p> <p><i>Typical Projects – Multi Use Trails and Access Gateways:</i> Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i> Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
<p><i>Impact 3.19(d) Would 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.</i></p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Potentially significant <i>Typical Projects – Multi Use Trails and Access Gateways</i> Potentially significant <i>KOP Categories 1–6:</i> Potentially significant <i>Overall 2020 LA River Master Plan Implementation:</i> Potentially significant</p> <p><u>Operation</u> <i>Typical Projects – Common Elements:</i> Potentially significant <i>Typical Projects – Multi Use Trails and Access Gateways</i></p>	<p><u>Construction</u> Mitigation Measure WF-4: Prepare Post-Fire Risk Reduction Plan.</p> <p>This measure is required to ensure that if a project is in Very High FHSZs or an area that was recently burned by wildfire, then the implementing agency will prepare a post-fire risk reduction plan. The plan will focus on the specific construction site and be finalized prior to the beginning of construction. The post-fire risk reduction plan will implement one or more of the following applicable measures:</p> <ul style="list-style-type: none"> • Treat all wildfire burned areas within the construction area to control stormwater runoff prior to winter rains. • Restore wildfire areas within the construction area by planting native vegetation cover or encouraging the re-growth of native species using best practices as soon as possible to aid in control of stormwater runoff. • Remove dead, woody vegetation along watercourses following a catastrophic fire, as directed by local fire officials. • Post-fire, implement slope stabilization measure by planting native vegetation cover as soon as possible to aid in landslide control, as directed by local fire officials. • Ensure excess storm flow is properly diverted away from important property improvements or unstable slopes. 	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Less than significant <i>Typical Projects – Multi Use Trails and Access Gateways</i> Less than significant <i>KOP Categories 1–6:</i> Less than significant <i>Overall 2020 LA River Master Plan Implementation:</i> Less than significant</p> <p><u>Operation</u> <i>Typical Projects – Common Elements:</i> Less than significant <i>Typical Projects – Multi Use Trails and Access Gateways</i></p>	<p><u>Construction</u> <i>Typical Projects – Common Elements:</i> Significant and unavoidable <i>Typical Projects – Multi Use Trails and Access Gateways</i> Significant and unavoidable <i>KOP Categories 1–6:</i> Significant and unavoidable <i>Overall 2020 LA River Master Plan Implementation:</i> Significant and unavoidable</p> <p><u>Operation</u> <i>Typical Projects – Common Elements:</i> Significant and unavoidable <i>Typical Projects – Multi Use Trails and Access Gateways</i></p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
	<p>Potentially significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Potentially significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Potentially significant</p>	<ul style="list-style-type: none"> • Check drainage systems and clear out culverts, roof gutters, street gutters, infiltration and detention basins, concrete waterways, etc., to allow water to drain, as directed by local fire officials. • Remove potentially toxic materials, ideally before rain washes toxic runoff into storm drains and waterways, as directed by local fire officials. • Minimize foot traffic, equipment, and disturbance on burned landscapes. <p>Mitigation Measure GEO-1: Conduct a Site-Specific Geotechnical Study and Implement Recommendations for Load-Bearing Subsequent Projects Prior to Construction Activities.</p> <p>Detailed in Impact. 3.6(a).</p> <p>Mitigation Measure HYDRO-1a: Require Site-Specific Drainage Studies to Address Stormwater Management.</p> <p>Detailed in Impact 3.9(c).</p> <p><u>Operation</u></p> <p>Mitigation Measure WF-4: Prepare Post-Fire Risk Reduction Plan.</p> <p>As described above</p> <p>Mitigation Measure GEO-1: Conduct a Site-Specific Geotechnical Study and Implement Recommendations for Load-Bearing Subsequent Projects Prior to Construction Activities.</p> <p>Detailed in Impact. 3.6(a).</p>	<p>Less than significant</p> <p><i>KOP Categories 1–6:</i></p> <p>Less than significant</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Less than significant</p>	<p>Significant and unavoidable</p> <p><i>KOP Categories 1–6:</i></p> <p>Significant and unavoidable</p> <p><i>Overall 2020 LA River Master Plan Implementation:</i></p> <p>Significant and unavoidable</p>

Environmental Impact	Significance before Mitigation	Mitigation Measures (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise)	Significance after Mitigation (when carried out by County)	Significance after Mitigation (when not carried out by County)
		<p>Mitigation Measure HYDRO-1a: Require Site-Specific Drainage Studies to Address Stormwater Management.</p> <p>Detailed in Impact 3.9(c).</p>		

3.2.2 Changes to Chapter 1, Introduction

Changes to Section 1.3.1.1, Page 1-11

1.3.1.1 Enforceability of Mitigation Measures

The analyses in this ~~this~~ PEIR includes impact determinations under CEQA for the *2020 LA River Master Plan* that are applicable to all 18 jurisdictions in the study area, including the County and non-County jurisdictions (17 cities). Except for significant and unavoidable impacts, all identified significant environmental effects of the proposed *2020 LA River Master Plan* can be avoided or reduced to a less-than-significant level if the mitigation measures identified in this PEIR are implemented. These mitigation measures will be implemented for subsequent projects that are carried out by the County (i.e., the County is directly undertaking the proposed Project). Because some later activities under the *2020 LA River Master Plan* would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. Therefore, where this PEIR concludes a less-than-significant impact for later activities carried out by the County, the impact would be significant and unavoidable when these activities are not carried out by the County. However, the identification of a significant and unavoidable program-level impact in this PEIR does not preclude the finding of a future less-than-significant impact for individual projects that will tier from the PEIR.

3.2.3 Changes to Chapter 2, Project Description

Changes to Section 2.5.1.1, Page 2-10

Common Elements Typical Project

The Common Elements Typical Project includes the following elements: pavilions, cafés, hygiene facilities, restrooms, benches, emergency call boxes, water fountains, trash and recycling, bike racks, environmental graphics, lighting, planting, stairs/ramps, guardrails, fences and gates, stormwater best management practices (BMPs), ~~and~~ art/performance spaces, and recreation areas (Figure 2-14 at the end of this chapter). In the Common Elements Typical Project, it is assumed these elements could be implemented individually or in any combination at a given site with a size of up to an area of 3 acres or along 1 mile (extra small/small project size). For purposes of the CEQA analysis, it is assumed that the Common Elements Typical Project includes implementation of all ~~17-18~~ elements at a given location and could attract up to 500 visitors.

Changes to Section 2.5.1.2, Page 2-13

KOP Category 2: Channel Modifications

The existing LA River channel comprises 13 different channel configurations that vary in shape, width, and depth. Some sections have a rectangular section with vertical sides, while other segments

are trapezoidal with tapered sides. Historically, modifications to the channel have primarily been made to increase the capacity of the channel. In some areas of the LA River, modifying the existing channel could be advantageous for flood risk, access, and/or ecological function. Channel modifications may include terracing the banks, constructing dams or deployable barriers, modifying the channel for erosion protection, and redirecting water flow. Other channel modifications include changing the materiality of the channel (e.g., adding or removing concrete depending on capacity requirements). Depending on the channel modification implemented, benefits may include improving access and safety, making places for people and habitat, and improving channel capacity to reduce flood risk. Any channel modification requires hydraulic analysis to ensure flood risk is not increased.

The following design components could be constructed under KOP Category 2: terraced bank, check dams and deployable barriers, levees, armored channels/vertical walls, daylighted storm drains, removed/added concrete, bridge pier modifications, channel texturing/grooving/smoothing, fishing amenities, and installation of access ramps.

Typical cross-sections of channel modifications are shown on Figure 2-21 at the end of this chapter (the figure shows select design components under this KOP category). Design components under this KOP category could serve a range of functions, including flood management, recreational uses, and ecological uses. Examples of recreational and ecological uses include amphitheaters, small planting trays, parks, fishing areas, wildlife ramps, and wetland terraces. Examples of flood management uses include channel smoothing/texturing/grooving, concrete bottom, and replacement of underground drainage pipes with storm drain daylighting.

KOP Category 3: Crossings and Platforms

Given its width and length, the LA River channel can separate communities and be an obstacle for connectivity. Crossings can connect existing or proposed communities or assets on one side of the river with existing or proposed communities or assets on the other side of the river. Crossings and platforms would typically include multi-use bridges for pedestrian, bike, and equestrian access, and they would connect communities to nearby parks and community facilities. Platforms are wider than crossings and can create space for parks, recreation, and habitats above the channel in addition to providing cross-river connectivity. Platforms can also host a range of habitat typologies, including riparian and upland conditions, and can allow for wildlife migration. Crossings and platforms can connect people to the river, creating new spaces for gathering and panoramic views of the river and surroundings. Any channel modifications required for crossing and platforms would require hydraulic analysis to ensure flood risk is not increased.

The following design components could be constructed under KOP Category 3: bridges (pedestrian, bike, equestrian, habitat/wildlife, and multi-use), cantilevers, fishing amenities, and platforms.

A typical cross-section of crossings and platforms is shown on Figure 2-22 at the end of this chapter (the figure shows select design components under this KOP category). Examples of recreational uses for this KOP category include recreational fields, parks, fishing areas, and channel overlooks. Examples of ecological uses include water features and connections for habitat communities.

KOP Category 4: Diversions

Historically, water flow in the LA River has varied greatly based on seasonal rainfall and groundwater conditions, and diversions for flooding and irrigation were common. Today, water

flows in the LA River are highly engineered with dams, reservoirs, and spreading grounds regulating wet-weather events, while dry-weather flows consist mostly of treated wastewater discharged from water reclamation plants. Any modification to the LA River channel or its water flow requires hydraulic analysis to ensure flood risk is not increased and to consider the downstream impacts of altering the flow rate on other uses of the water, such as ecosystem function.

The following design components could be constructed under KOP Category 4: pumps, diversion pipe/tunnel/channel, overflow weirs, underground gallery, side channel, storm drain interceptors, and wetlands. Typical cross-sections of diversions are shown on Figure 2-23 at the end of this chapter (the figure shows select design components under this KOP category).

In addition to reducing flood risk and benefiting local water supply reliability, diversions can also provide opportunities for treatment and reuse of water for groundwater recharge, habitat features, or recreational opportunities during smaller storm events, or in the dry season when flows are reduced. Examples of recreational uses include side channels that can provide for flood management during storm events and educational purposes during dry events.

KOP Category 5: Floodplain Reclamation

Historically, the LA River had a vast floodplain and the river would commonly shift its course after major floods. In the 1930s, USACE channelized the river and replaced the shifting floodplain to prevent further flooding. This ultimately allowed for future development and urbanization. Currently, the historic floodplain of the LA River is almost entirely developed. Any floodplain modification requires hydraulic analysis to ensure flood risk is not increased. Floodplain reclamation in the LA River include wetlands, naturalized banks, braided channels, fields, storage, and side channels. Typical cross-sections of floodplain reclamation are shown on Figure 2-24 at the end of this chapter (the figure shows select design components under this KOP category).

Currently, there are a limited number of opportunities along the LA River for floodplain reclamation at any scale, and all the opportunities identified in the *2020 LA River Master Plan's* opportunity analysis only allow for small-scale reclamation that would not have a role in flood-risk reduction but could have significant benefits for ecosystem function. Due to development and urbanization in the watershed, large-scale floodplain reclamation is not currently feasible without resulting in significant impacts on existing residents, businesses, transportation corridors, and other vital infrastructure.

Reclaiming the floodplain would reconnect the hydrologic relationship between the river and its floodplain, which has the potential to enhance ecological function, create park space, and improve water quality, among other benefits. Examples of recreational uses include boardwalk platforms, fishing areas, and a farmer's market. Examples of ecological uses include a naturalized bank and a wider channel for decreased flood risk to support habitat communities.

KOP Category 6: Off-Channel Land Assets

Given some of the limitations of what can be located within the LA River ROW, off-channel land assets can be used for projects that are essential to the *2020 LA River Master Plan* but cannot be located in the channel or adjacent ROW. In the KOP category, off-channel land assets refer to projects that would exist beyond the fenceline (Figure 2-2 at the end of this chapter). Off-channel land assets combined with ROW improvements can further ensure projects are multi-benefit, addressing multiple needs. Off-channel land assets include affordable housing, cultural centers,

urban agriculture/composting, water storage, water treatment facilities, dry wells, spreading grounds, purple pipe connections, storm drain daylighting, injection wells, fishing amenities, solar panels, fields, and parks.

Typical cross-sections off-channel land assets are shown on Figure 2-25 at the end of this chapter (the figure shows select design components under this KOP category). Off-channel land assets combined with ROW improvements can further ensure projects are multi-benefit, addressing multiple needs. Examples of recreational uses include a playground, recreational field, fishing areas, and arts and culture facilities. Examples of ecological uses include orchards, composting centers, community gardens, and ponds.

Changes to Chapter 2, Figure 2-11

Figure 2-11, *Frame 7 – East Valley, Jurisdictions and Notable Features with Representative Cross-Section*, was revised to show Walt Disney Studios in Frame 7, as shown on the following page.

3.2.4 Changes to Chapter 3, CEQA Environmental Impact Assessment

3.2.5 Changes to Section 3.0, Introduction to the Impact Analysis

Changes to Section 3.0.1.4, Page 3-3

3.0.1.4 County and Non-County Impact Determinations

The analysis in this chapter includes impact determinations under CEQA for the *2020 LA River Master Plan* that are applicable to all 18 jurisdictions in the study area, including the County and non-County jurisdictions (17 cities). Except for significant and unavoidable impacts, all identified significant environmental effects of the proposed *2020 LA River Master Plan* can be avoided or reduced to a less-than-significant level if the mitigation measures identified in this PEIR are implemented. These mitigation measures will be implemented for subsequent projects that are carried out by the County (i.e., the County is directly undertaking the project). Because some later activities under the *2020 LA River Master Plan* would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. Therefore, where this PEIR concludes a less-than-significant impact for later activities carried out by the County, the impact would be significant and unavoidable when these activities are not carried out by the County.

Changes to Section 3.0.2.2, Page 3-4

3.0.2.2 Regulatory Setting and Approach to Cumulative Impacts Analysis

According to State CEQA Guidelines Section 15130(a)(1), a “cumulative impact” consists of an impact that is created as a result of the combination of the project evaluated in the environmental impact report (EIR) together with other projects causing related impacts. As stated in State CEQA Guidelines Section 15130(a)(1), the cumulative impacts discussion in an EIR need not discuss impacts that do not result in part from the project evaluated in the EIR. Therefore, those thresholds of significance that result in no adverse impacts from a proposed project are not required to be subjected to cumulative impact analysis.

Section 15355 of the State CEQA Guidelines defines cumulative impacts as two or more individual effects that, when considered together, are considerable and may compound or increase other environmental impacts. Cumulative impacts can result from individually minor, but collectively significant, projects occurring over a period of time (Section 15355(b)). Section 15130 of the State CEQA Guidelines stipulates that EIRs must consider the significant environmental effects of a proposed project as well as its contribution to cumulative impacts when the project’s incremental effect is cumulatively considerable. Per Section 15065(a)(3), *cumulatively considerable* means that the incremental effects of an individual project are significant when viewed in connection with the

effects of past projects, the effects of other current projects, and the effects of probable future projects. The standards for “significant” or “cumulatively considerable” are based on the established significance thresholds for each resource area. Per Sections 15130(b)(1)(B) and 15130(d), consistency with the projections or requirements of previously approved local, regional, statewide, or planning documents may also be a guide to determining whether a project’s impact is cumulatively significant. The term *cumulative condition* is used in discussion of each resource topic’s cumulative impact. Cumulative condition is used to describe the cumulative context, which can be loosely defined as the area within which an environmental document considers potential cumulative effects, and is also important in defining a cumulative impact.

3.2.6 Changes to Section 3.1, Aesthetics

Changes to Section 3.1.2.1, Page 3.1-12

Starting at river mile 27.8, Griffith Park within the City of Los Angeles and City of Burbank begins on the west bank, extending into Frame 7.

Changes to Section 3.1.2.1, Figure 3.1-7, Page 3.1-14

Figure 3.1-7. Typical Views of the LA River in Frame 7

 <p>Photo 1: Equestrian trail that crosses the LA River in the City of Burbank along the Mariposa Equestrian Bridge</p>	 <p>Photo 2: Equestrian trail along the LA River near the Los Angeles Equestrian Center</p>
<div style="border: 1px solid black; padding: 5px; margin: 10px auto; width: fit-content;"> <p><i>Note: Photo 3 has been deleted.</i></p> </div> <p>Photo 3: Photo of the LA River adjacent to residential development near where US 101 crosses the LA River</p>	<p style="text-align: center;"><i>Table cell is intentionally blank.</i></p>

Source: OLIN 2020; Los Angeles County Public Works 2020.

Changes to Section 3.1.2.1, Page 3.1-14

However, there are several notable aesthetic resources such as parks, recreational areas, and open spaces, many of which offer elevated views of the LA River. The largest open space is Griffith Park within the Cities of Los Angeles and Burbank on the ~~east-west~~ bank of the LA River from approximately river mile 32 to 34.5.

Changes to Section 3.1.2.1, Page 3.1-15

Adjacent to Griffith Park on the west is a block of privately held open space associated with the Hollywood Reservoir in the City of Los Angeles. As with Griffith Park, expansive views of the LA River are primarily only available from elevated vantage points, as the LA River is separated at the ground level by Forest Lawn Drive. Across the LA River on the ~~west~~east bank is Warner Bros. Studios in the City of Burbank. The studio uses, including associated offices and surface parking, directly abut the LA River directly as no ROW exists.

Lakeside Golf Club in the City of Burbank lies along the LA River from mile 34.6 to 35.6 along the ~~west~~east bank. While portions of the Golf Club afford views of the LA River, trees line the perimeter of the Lakeside Golf Club adjacent to the LA River and therefore direct visual access to the LA River is limited.

Changes to Section 3.1.2.2, Page 3.1-32

Paramount Municipal Code

Chapter ~~15.040~~ of the Paramount Municipal Code (City of Paramount 2017) adopts the Los Angeles County Building Code, Los Angeles County Residential Code, and the Los Angeles County Green Building Standards Code. These codes include regulations pertaining to height, area, maintenance of all buildings, structures, and real property.

Changes to Section 3.1.3.3, Page 3.1-58

Impact 3.1(a): Would the proposed Project have a substantial adverse effect on a scenic vista?

Typical Projects

Common Elements

Construction

A scenic vista can be described as a designated expansive view of a highly valued landscape for the benefit of the public. Public vantage points, such as roads and trails, allow scenic views to be seen by many people. The type and quality of scenic vistas along and adjacent to the LA River vary by frame. Frame 1 includes expansive views of coastal areas and has Ocean Boulevard as a locally designated scenic route. Undeveloped hillsides, ridgelines that are primarily located in Frames 5, 6, and 7 offer panoramic scenic views, open space areas, and parks located throughout all the frames provide a scenic backdrop to the urban environment of the LA River. Notable open space areas include Elysian Park in Frame 6, Griffith Park in Frames 6 and 7, and the Sepulveda Basin in Frame 9. I-110 is designated as a State Scenic Highway, National Civil Engineering Landmark, and National Scenic Byway and is listed in the National Register of Historic Places. A portion of I-110 crosses over the LA River near ~~Griffith~~Elysian Park and the Arroyo Seco Confluence near the border of Frames 5 and 6.

Because specific locations of the Common Elements Typical Project have not been established at this point, the discussion remains at a qualitative level.

Changes to Section 3.1.3.3, Page 3.1-59

Apply the following mitigation measure, which is described in Section 3.10, *Land Use and Planning*.

Mitigation Measure LU-1: ~~Prepare and Implement~~ Construction Management Plan.

Changes to Section 3.1.3.3, Page 3.1-61

Apply the following mitigation measure, which is described in Section 3.10, *Land Use and Planning*.

Mitigation Measure LU-1: ~~Prepare and Implement~~ Construction Management Plan.

Changes to Section 3.1.3.3, Page 3.1-62

Apply the following mitigation measure, which is described in Section 3.10, *Land Use and Planning*.

Mitigation Measure LU-1: ~~Prepare and Implement~~ Construction Management Plan.

Changes to Section 3.1.3.3, Page 3.1-66

Apply the following mitigation measure, which is described in Section 3.10, *Land Use and Planning*.

Mitigation Measure LU-1: ~~Prepare and Implement~~ Construction Management Plan.

Changes to Section 3.1.3.3, Page 3.1-67

Impact 3.1(b): Would the proposed Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

This section discusses whether the proposed Project would substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway. I-110 is designated as a State Scenic Highway, National Civil Engineering Landmark, and National Scenic Byway and is listed in the National Register of Historic Places. A portion of I-110 that is elevated over 30 feet crosses the LA River near Griffith-Elysian Park and the Arroyo Seco Confluence near the border of Frames 5 and 6. No other scenic highways are immediately adjacent to the LA River for other frames and no impact would occur; therefore, the following discussion is focused on Frames 5 and 6.

Changes to Section 3.1.3.3, Page 3.1-77

Apply the following mitigation measure, which is described in Section 3.10, *Land Use and Planning*.

Mitigation Measure LU-1: ~~Prepare and Implement~~ Construction Management Plan.

Changes to Section 3.1.3.3, Page 3.1-79

Apply the following mitigation measure, which is described in Section 3.10, *Land Use and Planning*.

Mitigation Measure LU-1: ~~Prepare and Implement~~ Construction Management Plan.

Changes to Section 3.1.3.3, Page 3.1-84

Apply the following mitigation measure, which is described in Section 3.10, *Land Use and Planning*.

Mitigation Measure LU-1: ~~Prepare and Implement~~ Construction Management Plan.

Changes to Section 3.1.3.3, Page 3.1-90

This change represents a minor clarification to the Draft PEIR by reiterating that because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. These changes are not substantive (i.e., new significant information not previously analyzed).

3.1.3.3 Cumulative Impacts

The geographic context for an analysis of cumulative impacts on aesthetics is approximately 3 miles from the outer boundaries of the LA River channel. The geographic context was established because it represents the approximate envelope from which the Project would be visible and potential cumulative visual impacts could occur. A description of the regulatory setting and approach to cumulative impacts analysis is provided in Section 3.0.2.

Additionally, as described in Section 3.0.1.4 of this Draft PEIR, because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. Therefore, where this PEIR concludes a less-than-significant impact with mitigation for later activities carried out by the County, the impact has been identified as significant and unavoidable when these activities are not carried out by the County.

The County has committed to adopt the mitigation in regard to later activities carried out by the County; other public agencies similarly can and should adopt the mitigation because it is feasible and is in their best interest to reduce potentially significant impacts with mitigation on later

activities. In particular, those agencies that utilize the PEIR for later CEQA analyses can reasonably be expected to implement the mitigation or, if they do not, to prepare a subsequent EIR that explains why the mitigation is infeasible.

Criteria for Determining Significance of Cumulative Impacts

The proposed Project would have the potential to result in a cumulatively considerable impact on aesthetics if it would have impacts that are individually limited but if, in combination with other projects within the cumulative geographic context, it would have a substantial adverse effect on a scenic vista; substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway; or 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, the proposed Project would have the potential to result in a cumulatively considerable impact if it would conflict with applicable zoning and other regulations governing scenic quality, or create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

Baseline Cumulative Condition

Past and present development in the County has resulted in localized obstruction of scenic vistas and focal views, impacts on scenic highways and corridors, and degradation of visual quality as open space has been converted to urban uses. However, visual improvements have also occurred, such as more infill on underused or vacant sites within the urban fabric; new, attractive development that replaces degraded buildings; and roadway and transit improvements that enhance the streetscapes in communities. Implementation of development, infrastructure, and other projects in the County has the potential to degrade the visual character or quality of the County where open space is the baseline condition; this, when considered in combination with other development within the Southern California Association of Governments (SCAG) region and nearby areas, constitutes a baseline cumulative condition with respect to the visual character of the region. The anticipated new growth and development would change the character of the region over time, potentially damage scenic resources, and introduce new sources of nighttime light and glare, thereby contributing to the baseline cumulative condition of the SCAG region (SCAG 2020). With regard to light and glare, the PEIR for the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) concluded that even with implementation of mitigation, impacts of growth in the region would result in significant and unavoidable impacts by introducing new sources of light and glare. Past and present development has contributed to substantial light and glare effects in the urbanized portions of the region, and reasonably foreseeable development would continue to add new sources of light and glare. Individual jurisdictions' general plans also include goals and policies to reduce light and glare. However, given that the greater Los Angeles region is densely developed and highly urbanized, there is a baseline cumulative condition in the region with respect to light and glare.

Over time, development would result in residential, commercial, and industrial growth, leading to potential outward expansion of development and certainly densification of development in existing areas. This growth could adversely affect scenic vistas and specific scenic resources, alter visual character and quality in some neighborhoods and communities, change the overall landscape of the cities and communities, and result in new sources of light and glare. As such, there is a baseline cumulative condition with respect to aesthetics and visual quality in the project study area.

Contribution of the Project to Cumulative Impacts

The *2020 LA River Master Plan* would not affect scenic highways or contribute to a cumulative loss of scenic vistas or focal views. Temporary construction impacts from the project could affect the visual quality and character of the local neighborhoods where the construction would occur. Some projects would cover more area than others, but the same general construction equipment and activities would be involved, e.g., the use of backhoes, trucks, hand-held power equipment, and generators. As noted, some projects would be larger than others and include a wide variety of project components. Because the location, design details, and construction phasing of subsequent projects under the 2020 LA River Master Plan are not known, it is possible that construction activities could obstruct views of scenic resources. However, these effects would be short-term for the majority of the projects, and mitigation would reduce temporary construction impacts of the proposed Project to a less-than-significant level when carried out by the County. Mitigation measures (Mitigation Measures AES-1, LU-1, and REC-1) would reduce construction impacts on visual quality or quality of public views of the site and its surroundings to a less-than-significant level in urbanized areas. As described in Chapter 3, CEQA Environmental Impact Assessment, because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. Cumulative impacts on aesthetics would be significant and unavoidable for later activities that are not carried out by the County.

Scenic views within the LA River are limited in nature, with the viewshed largely consisting of an urban hardscape with limited scenic resources. Where limited scenic vistas are available, views are of larger scenic visual elements or panoramic views of the Pacific Ocean, ridgelines, hillsides, or large open park and greenspace areas that encompass a large viewscape. Once constructed, projects under the *2020 LA River Master Plan* would only encompass a small portion of the LA River viewshed and would contribute to enhanced viewing opportunities for users to experience the vistas. The *2020 LA River Master Plan* would be subject to local design guidelines as well as local jurisdictions' general plans. In addition, the *2020 LA River Master Plan* is consistent with most, if not all, goals and policies identified in the applicable jurisdictions' general plans. The *2020 LA River Master Plan* would improve the visual quality of the study area. Mitigation Measure AES-2 would minimize any obstruction of scenic vistas. Therefore, the proposed Project would not make a cumulatively considerable contribution to the cumulative impact when later activities are carried out by the County. Cumulative impacts on aesthetics would be significant and unavoidable for later activities that are not carried out by the County.

All of the projects envisioned in the 2020 LA River Master Plan could potentially introduce new sources of light and glare on surrounding light-sensitive land uses, such as residential development, that may adversely affect day or nighttime views in the area. However, the 2020 LA River Master Plan is proposed in a setting in which there are numerous existing sources of light and glare, including LA River Trail safety lighting, nearby rail and freeway activity, and nearby residential, industrial, and commercial buildings on adjacent streets. The proposed Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area during construction. During operation, recreational field lighting and other structure lighting would introduce new sources of light and glare. 2020 LA River Master Plan projects would follow the Design Guidelines. As described above, the Design Guidelines include lighting standards to minimize lighting and glare impacts that could adversely affect day or nighttime views in the area. Nevertheless, 2020 LA River Master Plan project components could potentially introduce new

sources of light and glare on surrounding light-sensitive land uses, such as residential development, that may adversely affect day or nighttime views in the area. However, all lighting fixtures would be shielded to avoid spill light onto adjacent neighborhoods, and non-glare surfaces would be maximized per local general plan policies and standards. Therefore, the proposed Project would not make a cumulatively considerable contribution to a cumulative impact with regard to light and glare when carried out by the County. Cumulative aesthetics impacts on light and glare would be significant and unavoidable for later activities that are not carried out by the County.

3.2.7 Changes to Section 3.2, Air Quality

Changes to Section 3.2.2.1, Table 3.2-1, Page 3.2-8

The following changes represent minor clarifications providing more recent ambient data in the Air Quality Setting section of the Draft PEIR and are not substantive (i.e., new significant information not previously analyzed).

Table 3.2-1. Ambient Air Quality Data in Los Angeles County (2018~~6~~–2020~~18~~)

Pollutant Standards	Long Beach – Webster Street (Frame 1) and North Long Beach Boulevard (Frame 2)			Los Angeles – North Main Street (Frame 5)			Reseda – Gault Street (Frame 9) ^h		
	2018 16	2019 017	2020 018	2018 016	2019 017	2020 018	2018 016	2019 2017	2020 2018
<i>Ozone (O₃)</i>									
Maximum 1-hour concentration (ppm)	0.0740 79	0.0750 082	-0.074	0.098 0.103	0.093 0.116	0.185 0.098	0.120 122	0.12 20.1 40	0.142 0.120
Maximum 8-hour concentration (ppm)	0.0630 59	0.0640 068	-0.063	0.074 0.078	0.072 0.086	0.076 0.074	0.101 0.098	0.09 40.1 14	0.115 0.101
Number of days standard exceeded ^a	-	-	-	-	-	-	-	-	-
CAAQS 1-hour (>0.09 ppm)	00	00	-0	22	06	142	149	1426	3314
CAAQS 8-hour (>0.070 ppm)	00	00	-0	44	216	224	4923	3467	6250
NAAQS 8-hour (>0.070 ppm)	00	00	-0	44	214	224	4923	3464	6249
<i>Carbon Monoxide (CO)</i>									
Maximum 8-hour concentration (ppm)	2.12 2	2.12 6	-2.1	1.61 3	1.61 8	1.41 6	2.11 9	2.22 5	1.72 1
Maximum 1-hour concentration (ppm)	4.73 3	2.43 9	-4.7	1.91 8	1.82 0	1.81 9	3.42 4	2.63 0	2.03 4
Number of days standard exceeded ^a	-	-	-	-	-	-	-	-	-
NAAQS 8-hour (≥9 ppm)	00	00	-0	00	00	00	00	00	00
CAAQS 8-hour (≥9.0 ppm)	00	00	-0	00	00	00	00	00	00
NAAQS 1-hour (≥35 ppm)	00	00	-0	00	00	00	00	00	00
CAAQS 1-hour (≥20 ppm)	00	00	-0	00	00	00	00	00	00
<i>Nitrogen Dioxide (NO₂)</i>									
State maximum 1-hour concentration (ppb)	8575	7189	-85	7064	6980	6170	5755	6462	5057
State second-highest 1-hour concentration (ppb)	8273	7188	-82	6963	6980	5969	5554	5662	4755

Pollutant Standards	Long Beach - Webster Street (Frame 1) and North Long Beach Boulevard (Frame 2)			Los Angeles - North Main Street (Frame 5)			Reseda - Gault Street (Frame 9) ^h		
	20182016	20192017	20202018	20182016	20192017	20202018	20182016	20192017	20202018
Annual average concentration (ppb)	1718	1618	17	1820	1820	1718	1213	1013	1012
Number of days standard exceeded ^a	-	-	-	-	-	-	-	-	-
CAAQS 1-hour (180 ppb)	00	00	0	00	00	00	00	00	00
<i>Particulate Matter (PM₁₀)</i>									
National ^b maximum 24-hour concentration (µg/m ³)	8475.0	15679.0	6284.0	6864.0	6264.6	8468.2	--	--	--
National ^b second-highest 24-hour concentration (µg/m ³)	6758.0	7473.0	5467.0	6657.0	5747.8	5566.1	--	--	--
State ^c maximum 24-hour concentration (µg/m ³)	8375.3	15579.0	6183.0	8174.6	9496.2	18581.2	--	--	--
State ^c second-highest 24-hour concentration (µg/m ³)	6758.5	7473.0	5467.0	7667.6	6576.5	14776.2	--	--	--
National annual average concentration (µg/m ³)	3331.9	3033.5	3232.7	3025.8	2325.7	3330.2	--	--	--
State annual average concentration (µg/m ³) ^d	3331	3331	3333	34*	34*	3434	--	--	--
Number of days standard exceeded ^{a,e}	-	-	-	-	-	-	-	-	-
NAAQS 24-hour (>150 µg/m ³)	00	10	00	00	00	00	--	--	--
CAAQS 24-hour (>50 µg/m ³)	48	410	34	3121	1540	3431	--	--	--
<i>Particulate Matter (PM_{2.5})</i>									
National ^f maximum 24-hour concentration (µg/m ³)	8029.3	55.3	79.6	6144.3	4454.9	17561.4	3930.0	3035.2	7438.9
National ^f second-highest 24-hour concentration (µg/m ³)	4628.9	54.7	46.4	4439.8	3349.2	9043.8	3126.4	2731.2	3631.0
State ^g maximum 24-hour concentration (µg/m ³)	--	--	--	6549.4	4461.7	17565.3	6441.5	1216.13	8063.7
State ^g second-highest 24-hour concentration (µg/m ³)	--	--	--	4949.1	3354.9	9048.7	4237.4	3357.5	4042.1

Pollutant Standards	Long Beach - Webster Street (Frame 1) and North Long Beach Boulevard (Frame 2)			Los Angeles - North Main Street (Frame 5)			Reseda - Gault Street (Frame 9) ^h		
	2018 2016	2019 2017	2020 2018	2018 2016	2019 2017	2020 2018	2018 2016	2019 2017	2020 2018
National annual average concentration (µg/m ³)	1210.3	110.9	111.5	1311.7	1112.0	1412.8	9.1	99.7	11*
State annual average concentration (µg/m ³)	--	--	--	1312.0	1116.3	1416.0	16.9	916.8	1115.8
Measured number of days standard exceeded ^a	-	-	-	-	-	-	-	-	-
NAAQS 24-hour (>35 µg/m ³)	0	--	--	62	16	126	10	00	3*

Source: EPA 2018b, CARB 2020b.

Notes:

ppb = parts per billion; µg/m³ = micrograms per cubic meter; * = insufficient data available to determine the value; - = data not available.

^a An exceedance is not necessarily related to a violation of the standard

^b National statistics are based on standard conditions data. In addition, national statistics are based on samplers using federal reference or equivalent methods.

^c State statistics are based on approved local samplers and local conditions data.

^d State criteria for ensuring that data are sufficiently complete for calculating valid annual averages are more stringent than the national criteria.

^e Measurements usually are collected every 6 days.

^f National statistics are based on samplers using federal reference or equivalent methods.

^g State statistics are based on local approved samplers.

^h The monitoring station nearest Frame 9 that collects PM₁₀ data is the Los Angeles station (Frame 5).

Changes to Section 3.2.2.2, Page 3.2-20

City of Paramount General Plan

Adopted in 2007, the *Paramount General Plan* primarily focuses on the need to continue cooperation with agencies charged with improving air quality in the region and ensure that development mitigates potential air quality impacts (City of Paramount 2007). Relevant air quality policies are as follows:~~None of the policies in the *Paramount General Plan* directly address air quality.~~

- **Resource Management Element Policy 21:** The City of Paramount will continue to cooperate with the other agencies that are charged with improving air and water quality in the region.
- **Implementation Element:** The City of Paramount will continue to participate in the regional planning efforts being undertaken by the South Coast Air Quality Management District (SCAQMD) and the Southern California Association of Governments (SCAG) to develop and implement strategies to improve regional air quality. The City of Paramount will continue to work with the SCAQMD and SCAG and the surrounding cities in improving air quality.

Changes to Section 3.2.3.3, Page 3.2-52

The following change to this impact discussion represents a minor clarification to the Draft PEIR. As concluded in the Draft PEIR, the impact is significant and unavoidable. This clarification is not substantive (i.e., the change to the mitigation does not result in a new or worsened impact), and the significance conclusion would remain the same.

The specific location and design details of the Common Elements Typical Project are currently unknown. As such, it is not possible to analyze the effect of project-generated traffic on LOS for unknown intersections or daily traffic volume for unknown roadways in the project area. However, it is unlikely that 1-hour or 8-hour CO concentrations generated along project vicinity roadways would ~~not~~ exceed CAAQS for CO.

Changes to Section 3.2.3.3, Page 3.2-64

KOP Categories 2 through 6

Construction and Operations

As described in Chapter 2, *Project Description*, KOP Categories 2 through 6 and their design components could provide a range of recreation and ecological uses,~~some of which.~~ Some of these KOP categories would involve uses that, according to SCAQMD's *CEQA Air Quality Handbook*, are typically associated with odor complaints. KOP Categories 2 and 3 would have no land uses associated with odor complaints,~~while KOP Categories 4 and 6 would.~~ KOP Categories 4, 5, and 6 would have design components including water treatment facilities, which is a land use associated with odor complaints. KOP Category 6 would also include urban agriculture/composting, a land use

associated with odor complaints. However, the community gardens envisioned under the 2020 LA River Master Plan would not operate at the scale or intensity of commercial farming operations that are typically associated with odor complaints. Furthermore, it is important to note that SCAQMD Rule 402 prohibits the discharge of air contaminants that cause nuisance or annoyance to the public, including odors. Also, SCAQMD maintains both a toll-free phone line (1-800-CUT-SMOG) and a web-based platform (<https://www.aqmd.gov/nav/online-services/complaints>) for reporting complaints related to air quality, including odors. As such, proposed project improvements would be designed to meet Rule 402 standards. Consequently, mandatory compliance with SCAQMD Rule 402, and the ability for the public to report complaints to SCAQMD, would ensure that KOP Categories 2 through 6 would not result in emissions leading to significant odors.

Changes to Section 3.2.3.3, Page 3.2-67

Baseline Cumulative Condition

The cumulative plans and programs within the Basin would result in the production of significant regional or localized emissions. The regional growth that would occur over the project implementation period would increase both mobile and stationary emission sources and contribute to an adverse cumulative air quality impact. According to the *Los Angeles County General Plan*, the Basin is designated nonattainment for ozone, PM₁₀, PM_{2.5}, and lead (Los Angeles County only) under the CAAQS and NAAQS, and nonattainment for NO₂ under the CAAQS. Construction of cumulative projects will further degrade the regional air quality.

3.2.8 Changes to Section 3.3, Biological Resources

Changes to Section 3.3.2.1, Table 3.3-3, Page 3.3-13

The following change includes the addition of the mountain lion (Puma concolor) under State-listed mammals. The change represents a minor clarification in the Biological Resources Setting section of the Draft PEIR and is not substantive (i.e., new significant information not previously analyzed).

Table 3.3-3. Special-Status Wildlife Species with Potential to Occur within the 2020 LA River Master Plan Frames

Species	Frame								
	1	2	3	4	5	6	7	8	9
Federally Listed Marine Species									
White abalone (<i>Haliotis sorenseni</i>) (FE)	√								
Black abalone (<i>Haliotis cracherodii</i>) (FE)	√								
Loggerhead sea turtle (<i>Caretta caretta</i>) (FE)	√								
Green turtle (<i>Chelonia mydas</i>) (FT)	√								
Leatherback sea turtle (<i>Dermochelys coriacea</i>) (FT)	√								
Olive Ridley sea turtle (<i>Lepidochelys olivacea</i>) (FT)	√								
Guadalupe fur seal (<i>Arctocephalus townsendii</i>) (FT, FP)	√								

Species	Frame								
	1	2	3	4	5	6	7	8	9
Federally and State-listed Birds									
Western snowy plover (<i>Charadrius alexandrinus nivosus</i>) (FT, CSC)	√	√							
Light-footed Ridgway's Rail (<i>Rallus obsoletus levipes</i>) (FE, SE, FP)	√	√							
California least tern (<i>Sterna antillarum browni</i>) (FE, SE, CSC)	√	√							
Southwestern willow flycatcher (<i>Empidonax traillii extimus</i>) (FE, SE)						√	√	√	√
Least Bell's vireo (<i>Vireo bellii pusillus</i>) (FE, SE)						√	√	√	√
Federally Listed Fish									
Tidewater goby (<i>Eucyclogobius newberryi</i>) (FE, CSC)	√								
Federally Listed Birds									
Coastal California gnatcatcher (<i>Poliopitila californica californica</i>) (FT, CSC)						√	√	√	
Federally Listed Amphibians									
Arroyo toad (<i>Anaxyrus californicus</i>) (FE, CSC)						√	√		√
California red-legged frog (<i>Rana draytonii</i>) (FT, CSC)						√	√		√
State-listed Invertebrates									
Crotch's bumble bee (<i>Bombus crotchii</i>) (CE)		√				√	√	√	√
State-listed Birds									
Belding's savannah sparrow (<i>Passerculus sandwichensis beldingi</i>) (SE)	√								
Bald eagle (<i>Haliaeetus leucocephalus</i>) (SE, FP, BGEPA)	√	√	√	√	√	√	√	√	√
Golden eagle (<i>Aquila chrysaetos</i>) (FP, BGEPA)					√	√	√	√	√
Tricolored blackbird (<i>Agelaius tricolor</i>) (FT, CSC)		√				√	√	√	√
State-listed Mammals									
Mountain lion (<i>Puma concolor</i>) (SC)						√	√		
State Species of Special Concern and Fully Protected Species									
Birds									
Burrowing owl (<i>Athene cunicularia</i>) (CSC)	√	√	√	√	√	√	√	√	√
American peregrine falcon (<i>Falco peregrinus anatum</i>) (FP)	√	√	√	√	√	√	√	√	√
Yellow rail (<i>Coturnicops noveboracensis</i>) (CSC)	√	√				√			√
Yellow-breasted chat (<i>Icteria virens</i>) (CSC)		√				√	√	√	√
California brown pelican (<i>Pelecanus occidentalis californicus</i>) (FP)	√								
Black skimmer (<i>Rynchops niger</i>) (CSC)	√	√							
Yellow warbler (<i>Setophaga petechia</i>) (CSC)						√	√	√	√
Mammals									
Pallid bat (<i>Antrozous pallidus</i>) (CSC)	√	√	√	√	√	√	√	√	√
Townsend's big-eared bat (<i>Corynorhinus townsendii</i>) (CSC)	√	√	√	√	√	√	√	√	√
Spotted bat (<i>Euderma maculatum</i>) (CSC)	√	√	√	√	√	√	√	√	√
Western mastiff bat (<i>Eumops perotis californicus</i>) (CSC)	√	√	√	√	√	√	√	√	√

Species	Frame								
	1	2	3	4	5	6	7	8	9
Western red bat (<i>Lasiurus blossevillii</i>) (CSC)	√	√	√	√	√	√	√	√	√
Western yellow bat (<i>Lasiurus xanthinus</i>) (CSC)	√	√	√	√	√	√	√	√	√
Big free-tailed bat (<i>Nyctinomops macrotis</i>) (CSC)	√	√	√	√	√	√	√	√	√
San Diego black-tailed jackrabbit (<i>Lepus californicus bennettii</i>) (CSC)		√			√	√	√	√	√
San Diego desert woodrat (<i>Neotoma lepida intermedia</i>) (CSC)					√	√	√	√	√
American badger (<i>Taxidea taxus</i>) (CSC)					√	√	√	√	√
Southern grasshopper mouse (<i>Onychomys torridus ramona</i>) (CSC)					√	√	√	√	√
Los Angeles pocket mouse (<i>Perognathus longimembris brevinasus</i>) (CSC)					√	√	√	√	√
Reptiles									
Southern California legless lizard (<i>Anniella stebbinsi</i>) (CSC)		√			√	√	√	√	√
California glossy snake (<i>Arizona elegans occidentalis</i>) (CSC)		√			√	√	√	√	√
Coastal whiptail (<i>Aspidoscelis tigris stejnegeri</i>) (CSC)		√			√	√	√	√	√
Western pond turtle (<i>Emys marmorata</i>) (CSC)	√	√	√	√	√	√	√	√	√
Coast horned lizard (<i>Phrynosoma blainvillii</i>) (CSC)					√	√	√	√	√
Two-striped garter snake (<i>Thamnophis hammondi</i>) (CSC)		√				√	√		√
Amphibians									
Western spadefoot (<i>Spea hammondi</i>) (CSC)					√	√	√	√	√
Coastal range newt (<i>Taricha torosa</i>) (CSC)						√	√		√

Federal Classifications

FE: Federally Endangered; FT: Federally Threatened; BGEPA: Protected under the Bald Eagle/Golden Eagle Protection Act

California State Classifications

SE: State Endangered; ST: State Threatened; CSC: California Species of Special Concern; FP: Fully Protected; CE: Candidate Endangered

Changes to Section 3.3.2.1, Page 3.3-38

The following change includes the addition of a habitat and wildlife connectivity discussion in relation to mountain lions. This change represents a minor clarification to the Biological Resources Geographic Setting section of the Draft PEIR and is not substantive (i.e., new significant information not previously analyzed).

Frame 6

One mapped wildlife linkage documented in the *Missing Linkages: Restoring Connectivity to the California Landscape* project (Penrod et al. 2001) occurs within Frame 6—the “Griffith Park–Verdugo Hills” linkage. This linkage is composed of Verdugo Wash, which is an approximate 9.5-mile concrete-lined channel that starts in the Verdugo Hills and flows into the LA River near Griffith Park. Verdugo Wash is highly limited in wildlife connectivity function and value, especially for terrestrial

and aquatic wildlife, because it lacks an earthen bottom, vegetation, and direct connectivity to surrounding habitats, and because of a dam (Verdugo Debris Basin, maintained by LACFCD) located in its upper reach just upstream of the Oakmont Country Club. However, at the confluence with the LA River, Verdugo Wash contains some refuge and breeding habitat within riparian vegetation.

One CEHC Large Natural Landscape Block (i.e., large landscape blocks greater than 10,000 acres with habitat and conservation value) is in Frame 6 at Griffith Park. Additionally, areas identified by the CEHC (Spencer et al. 2010b) as Small Natural Areas occur throughout Frame 6 both within the riverbed and the surrounding urban matrix. CEHC Potential Riparian Connections also occur and include the entire LA River. Note that no areas identified as CEHC Essential Connectivity Areas occur within Frame 6 (or anywhere in the LA River) (Figure 3.3-25).

In this region, the river channel is also concrete-lined, although it contains earthen bottom sufficient to support vegetated habitat (e.g., herbaceous vegetation and trees) within the riverbed. The river channel and associated vegetation facilitate connectivity of habitats for the species that use them, including fish (nonnative), bats, resident and migratory birds, and possibly reptiles and amphibians. Due to the existence of an earthen bottom and vegetation, the river in this frame contains higher quality connectivity function and value than other non-vegetated regions of the LA River. It supports habitats important for movement, migration, stopover, overwintering, and breeding of fish and wildlife species using them. Associated infrastructure such as bridges and culverts may also contain habitat features such as ledges, crevices, and hinges, which may provide nesting or roosting habitat for species such as birds and bats.

Outside of the river channel, various areas contain habitat that support species movement, migration, stopover, overwintering, and breeding. These include trees and vegetation in local parks, greenbelts, and landscaping; remnant habitat patches; and larger habitat blocks such as within Elysian Park and Griffith Park (discussed further below in Frame 7).

Frame 7

One CEHC Large Natural Landscape Block occurs in Frame 7 at Griffith Park (Figure 3.3-25). Additionally, areas identified by the CEHC as Small Natural Areas occur throughout Frame 7 within the riverbed and the surrounding urban matrix. CEHC Potential Riparian Connections also occur and include the entire LA River. Note that no areas identified as CEHC Essential Connectivity Areas occur within Frame 7 (or anywhere in the LA River) (Figure 3.3-25).

In this region, the river channel is concrete-lined and largely lacks soft bottom and vegetation within the riverbed. Associated infrastructure such as bridges and culverts may also contain habitat features such as ledges, crevices, and hinges, which may provide nesting or roosting habitat for species such as birds and bats. Although the riverbed is highly developed, it likely provides at least some connectivity for species moving or migrating through the region, particularly for aerial species such as bats and birds and urban-adapted species such as coyote and raccoon.

Outside of the river channel, various areas contain habitats that support species movement, migration, stopover, overwintering, and breeding. These include trees and vegetation in local parks, greenbelts, and landscaping; remnant habitat patches; and larger habitat areas in Griffith Park. Despite constraints due to urban areas and roads, sufficient open space and habitat connectivity remains within the area for one adult male mountain lion to occur within Griffith Park. A connection between Griffith Park and the larger area of the Santa Monica Mountains is maintained through the

Santa Monica Mountains National Recreation Area. Mountain lions are known in the Santa Monica Mountains, with 95 mountain lions being studied in this mountain range.

Changes to Section 3.3.2.2, Page 3.3-48

Regional

Southern California Association of Governments – Regional Transportation Plan/Sustainable Communities Strategy

Connect SoCal is the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) adopted by the Southern California Association of Governments (SCAG). Its core vision is to build on and expand land use and transportation strategies over several planning cycles to increase mobility options and achieve a more sustainable growth pattern (SCAG 2020). As a part of the promotion of a green region, one of the goals of the RTP/SCS is to preserve, enhance, and restore regional wildlife connectivity.

Changes to Section 3.3.2.2, Table 3.3-11, Page 3.3-86

Table 3.3-12. City Tree Ordinances (Modifications to City of Paramount Portion Only)

Ordinance or Law	Protected Trees	Guidelines	Frames
City of Paramount			
<p>Municipal Code Chapter 38, Article 7 Sections 38-154-38-158</p>	<p>All trees in any public ROWs or on public lands</p>	<p>Trees and Parkway Landscaping (abbreviated). See Sections 38-154-38-158 for details, including permits, protection, and prohibitions. No person shall remove, cut, trim, or prune, injure or interfere with any parkway tree, public right-of-way tree, or park tree without the proper permits. The city representative may cause to be removed, any tree or part thereof which is in an unsafe condition or which by reason of its nature is damaging to sewers, electric power lines, gas lines, water lines, or other public improvements, or is affected with any fungus, disease, insect, or other pest.</p>	<p>Frame 3</p>
<p>Municipal Code Chapter 12.32 Sections 32.040-32.050</p>	<p>Trees and Parkway Landscaping</p>	<p>Public Tree Care (abbreviated). See Chapter 12.32 Sections 040-050 for details, including planting of indigenous trees to the area and/or suitable for local climate. The trees should be spaced appropriately to provide shade on pedestrian paths and to create a safe and functional environmental for pedestrians</p>	<p>Frame 3</p>

Ordinance or Law	Protected Trees	Guidelines	Frames
		<p><u>and cyclists. All trees should be pruned, trimmed, and thinned as deemed necessary by the City representative. It is unlawful for any person to top any public-right-of-way tree, park tree, or parkway tree. No person shall remove, cut, trim, or prune, injure or interfere with any parkway tree, public right-of-way tree, or park tree. All parkways shall be landscaped with live turf, drought tolerant plants, compost, mulch, and artificial turf, or any combination thereof</u></p>	
<p><u>Municipal Code Chapter 17.44 Section 270</u></p>	<p><u>Tree Trimming Standards</u></p>	<p><u>Tree Trimming Standards (abbreviated).</u> Chapter 17.44 Section 270 states that the owners of private property zoned commercial or industrial shall properly maintain and provide adequate water to any tree planted on his or her property; comply with professionally accepted pruning, trimming, or thinning standards for all trees on the property; and not permit severe trimming, topping, heading back, stubbing, or pollarding of any tree on the property.</p>	<p><u>Frame 3</u></p>
<p><u>Municipal Code Chapter 17.96 Section 030(g)</u></p>	<p><u>Landscape requirements</u></p>	<p><u>Landscape Requirements:</u> All established healthy plant material shall be saved and protected. If development precludes retention of plant material, then adequate replacement material (based upon type and size of existing plant material) shall be required to mitigate the plant material removed.</p>	<p><u>Frame 3</u></p>

Changes to Section 3.3.3.3, Page 3.3-110

The following changes to this impact discussion are based on minor technical changes that include mountain lion and do not result in substantive changes because MM-BIO-1, as presented in the Draft PEIR, would apply to all affected species and would require a site-specific literature review, which will consider, at a minimum, the proposed subsequent project, site location, GIS information, and known sensitive biological resources. No changes to the Draft PEIR's conclusion would occur, and new or worsened impacts would not occur.

Special-Status Mammals

Within Frame 6, 132 special-status mammals were found to have potential to occur: mountain lion (*Puma concolor*), pallid bat, Townsend's big-eared bat, spotted bat, western mastiff bat, western red bat, western yellow bat, big free-tailed bat, San Diego black-tailed jackrabbit, San Diego desert woodrat, southern grasshopper mouse, Los Angeles pocket mouse, and American badger. The

evolutionary significant unit (ESU) in southern and central California mountain lion is a candidate for listing as threatened or endangered under the CESA. The other special-status mammals noted here All are State species of special concern.

Direct permanent impacts due to the construction of the Common Elements and Multi-Use Trails and Access Gateways Typical Projects on mountain lion could include the entrapment of mountain lions (most likely juvenile individuals) in open or excavated areas, which could result in mortality or injury, and changes in the vegetative cover, which could reduce the amount and quality of suitable habitat for the species.

Indirect temporary construction impacts on mountain lion could include an increase in invasive plant species, which could reduce habitat suitability. Attraction of opportunistic species (e.g., raccoons, coyotes) to construction activities due to trash from construction could increase attraction of mountain lion prey species and could lead to conflicts with humans, which could lead to euthanizing mountain lions for public safety. Mountain lion hunting and feeding behavior is known to be altered by human activity. If the Common Elements and Multi-Use Trails and Access Gateways Typical Projects were to occur near suitable habitat for this species, construction noise could interfere with behaviors for this species, especially females with kittens. Indirect temporary construction impacts on mountain lions could occur due to noise.

Indirect permanent impacts on mountain lions may include the inadvertent introduction of invasive (i.e., noxious) weeds, which can reduce habitat suitability.

Construction impacts on special-status bats within Frame 6 of Common Elements Typical Projects and Multi-use Trails and Access Gateways Typical Projects would be similar to those discussed for Frame 1. Construction impacts on San Diego black-tailed jackrabbit would be similar to those described for Frame 2. Construction-related impacts on San Diego desert woodrat, southern grasshopper mouse, Los Angeles pocket mouse, and American badger would be similar to those described for Frame 5.

Changes to Section 3.3.3.3, Page 3.3-112

The following changes to this impact discussion are based on minor technical changes that include mountain lion and do not result in substantive changes because MM-BIO-1, as presented in the Draft PEIR, would apply to all affected species and would require a site-specific literature review, which will consider, at a minimum, the proposed subsequent project, site location, GIS information, and known sensitive biological resources. No changes to the Draft PEIR conclusions would occur, and new or worsened impacts would not occur.

Special-Status Mammals

Within Frame 7, ~~132~~ special-status mammals were found to have potential to occur: mountain lion, pallid bat, Townsend's big-eared bat, spotted bat, western mastiff bat, western red bat, western yellow bat, big free-tailed bat, San Diego black-tailed jackrabbit, San Diego desert woodrat, southern grasshopper mouse, Los Angeles pocket mouse, and American badger. All are State species of special concern, with the exception of mountain lion, which is listed candidate for listing as threatened or endangered under the CESA.

Construction-related impacts on special-status bats for Typical Projects within Frame 7 would be similar to those discussed above for Frame 1. Construction impacts on San Diego black-tailed jackrabbit would be similar to those described above for Frame 2. Construction-related impacts on San Diego desert woodrat, southern grasshopper mouse, Los Angeles pocket mouse, and American badger would be similar to those described in Frame 5. Construction-related impacts on mountain lion would be similar to those described above for Frame 6.

Changes to Section 3.3.3.3, Page 3.3-115

The following change represents a minor clarification to mitigation in the Draft PEIR by including performance standards requiring a qualified botanist to conduct multiple rare plant surveys, as needed if during the literature review it is determined that potential biological resources exist in the individual subsequent project area. These changes merely clarify the mitigation described in the Draft PEIR. Additionally, as concluded in the Draft PEIR, the impact would be less than significant for later activities when carried out by the County and significant and unavoidable for later activities when not carried out by the County. These clarifications are not substantive (i.e., the change to the mitigation does not result in a new or worsened impact), and the significance conclusion would remain the same.

Mitigation Measure BIO-1: Conduct Literature Review, Habitat Assessment, and Project Surveys.

The purpose of BIO-1 is to begin the process of making a determination of whether or not the proposed individual subsequent project would have a significant environmental impact on biological resources. BIO-1 is the first step, and in some cases, the final step, in reaching the goal of a no impact, less-than-significant impact, or significant impact determination for each of the six biological thresholds of significance (see Section 3.3.3.2, *Criteria for Determining Significance*).

During the design of individual subsequent projects and prior to construction, the implementing agency will employ a qualified biologist to review the proposed subsequent project. The qualified biologist will conduct a site-specific literature review, which will consider, at a minimum, the proposed subsequent project, site location, GIS information, and known sensitive biological resources. If appropriate, the literature review will include a review of the California State Wildlife Action Plan, focusing on Chapter 5.5, South Coast Province, and Chapter 6, Anadromous Fish (CDFW 2015), and the City of Los Angeles Department of Sanitation 2020 Biodiversity Report (LASAN 2020). The review will assess the site for special-status plants and/or wildlife, aquatic resources, sensitive natural communities, wildlife corridors or nurseries, biological resources protected by local ordinances policies such as protected trees, or other regulated biological resources pursuant to CEQA, FESA, or CESA could be affected by the project. In some cases, a literature review will be sufficient for the biologist to make a no impact and/or a less-than-significant impact determination for all six of the thresholds of significance (Section 3.3.3.2) of biological resources. In this case, no further work will be required, and a summary report stating the basis for these findings, identifying each threshold of significance with a CEQA finding, will be the only requirement.

If, during the literature review, it is determined that potential biological resources exist in the individual subsequent project area that could be affected, then a habitat assessment survey will

be required unless a qualified biologist determines that a field review/habitat assessment is not needed. If needed, this survey will consist of a site visit conducted by a qualified biologist, where the proposed subsequent project and adjacent buffer (as appropriate for the target species relative to the potential project direct and indirect impacts) will be assessed for candidate, sensitive, or special-status plants and/or wildlife, aquatic resources, sensitive natural communities, wildlife corridors or nurseries, biological resources protected by local ordinances policies, such as protected trees or other regulated biological resources, while identifying and mapping all vegetation communities and land-cover types (initial study). If suitable habitat is present for candidate, sensitive, or special-status plants or animals and could not be avoided, then focused protocol surveys may be required, as determined by a qualified biologist, with appropriate reporting.

To determine presence/absence or to accurately identify rare plants, a qualified botanist shall conduct multiple rare plant surveys throughout the growing season for any given year, as needed. Surveys shall occur during the time of year when rare plants are more likely to be visually detectable. Rare plant surveys performed during a low precipitation year shall be supplemented with one or two additional rare plant surveys over a number of years, depending on the rare plant species, annual weather patterns, and whether the project area was recently disturbed (e.g., fire).

If aquatic resources are present and could not be avoided, a jurisdictional delineation per Mitigation Measure BIO-21a may be required. Mitigation Measure BIO-1 will include an analysis of all of the biological resources identified in the thresholds of significance, with a determination made regarding significance for each threshold. Reporting will include regulatory assessment, construction and operation impact analyses, and identification and implementation of appropriate measures based on the presence of biological resources. Impact analyses will also include appropriate assessment of project-specific disturbances (e.g., recreational effects, night lighting, noise).

If, following the literature review and project surveys, it is determined that the project will not directly or indirectly affect any species listed as endangered, threatened, or candidate by CDFW or USFWS, then the impact will be less than significant for listed species, and no further mitigation for listed species will be required. If, however, it is determined that impacts on federally or State-listed plant or animal species will occur and therefore will be considered significant, then Mitigation Measure BIO-2 will be required and implemented to reduce impacts to less-than-significant levels.

Mitigation Measure BIO-2: Avoid or Minimize Effects on Federally or State-Listed Species, Consult with Wildlife Agencies, and Implement Permit Requirements.

The implementing agency will avoid “take” of species, if applicable/occurring, within the action area (i.e., project area and buffer for species that USFWS and CDFW list as endangered, threatened, or candidate). The *action area* is a FESA term that refers to the area directly and indirectly affected by the proposed action and is based on the range of impacts (e.g., ground disturbance, water quality, air quality, lighting, noise). If avoidance of take is not possible, then the implementing agency will initiate the process of consultation with the wildlife agencies (i.e., USFWS, NMFS and/or CDFW, as appropriate based on species habitat present).

During informal consultation, it may be determined that the proposed action is not likely to affect any federally listed species or critical habitat in the project area, with no requirement to

consult formally with the USFWS, this will complete the consultation process. If the proposed action may affect listed species or critical habitat, and the action has a federal nexus, then Section 7 of the FESA process applies. Under FESA Section 7, the project proponent will need to prepare a Biological Assessment (BA) to assist the USFWS in its determination of the project's effect on species and/or critical habitat. If the action is likely to adversely affect a listed species, then a request for formal consultation is submitted. Pursuant to FESA, formal consultation may last up to 90 days, after which the USFWS has 45 days to prepare a Biological Opinion (BO). These timelines may be extended through a request from USFWS. The conclusion of the BO will state whether or not the proposed action is likely to:

1. Jeopardize the continued existence of the listed species; and/or
2. Result in the destruction or adverse modification of critical habitat that appreciably diminishes the value of critical habitat as a whole for the conservation of the listed species.

If the action is reasonably certain not to jeopardize the continued existence of the listed species or diminish the value of critical habitat as a whole for the species, then the BO will include an incidental take statement with the BO. *Incidental take* is subject to the terms and conditions provided in the incidental take statement. Examples of terms and conditions included within a typical BO are included below.

FESA section 10(a)(1)(B) consultation occurs for non-federal actions. An HCP is prepared by the project proponent and accompanies the application for an ITP. The USFWS prepares the ITP and a BO. The elements of the HCP are made binding through the ITP. The timelines for HCP completion are project-specific.

If a species is listed by both FESA and CESA, Fish and Game Code Section 2080.1 allows an applicant who has obtained a federal incidental take statement (FESA Section 7 consultation) or a federal ITP (FESA § 10(a)(1)(B)) to request that the Director of CDFW find the federal documents consistent with CESA. If the federal documents are consistent with CESA, a consistency determination is issued, and no further authorization or approval is necessary under CESA.

For species that are listed by CDFW, but not the USFWS, as endangered, threatened, candidate, or a rare plant, and where take would occur, the project proponent will apply for a State ITP under Section 2081(b) of the Fish and Game Code. CDFW typically requires that the project proponent seek a 2081(b) ITP rather than a 2080.1 consistency determination because of inconsistencies between FESA and CESA, particularly conditions of approval. For example, FESA does not prohibit the take of listed plants on private lands, whereas CESA does. When the 2081(b) ITP is issued, terms and conditions will be specified by CDFW within the 2081(b) ITP, and these terms and conditions will ensure that the items 1 through 5 below are met.

1. The authorized take must be incidental to an otherwise lawful activity.
2. The impacts of the authorized take must be minimized and fully mitigated.
3. The measures required to minimize and fully mitigate the impacts of the authorized take:
 - a. Are roughly proportional in extent to the impact of the taking on the species;
 - b. Maintain the applicant's objective to the greatest extent possible; and

- c. May be successfully implemented by the applicant.
- 4. Adequate funding is provided to implement the required minimization and mitigation measures and monitor compliance with the effectiveness of the measures.
- 5. Issuance of the permit will not jeopardize the continued existence of the CESA-listed species.

As a part of the above described processes, examples of mitigation for impacts on listed species through the following pathways are included below:

- If suitable habitat for listed species is present within the action area, the project will be designed to avoid impacts (direct and indirect). Through the avoidance of impacts on listed species, the project proponent will avoid the FESA/CESA permitting process.
 - Informal consultation with the wildlife agencies may be required to complete the process.
- For impacts on federally listed species and a federal permit or federal funding is involved, Section 7 consultation (if available through federal nexus) will be required. This may include consistency determination from CDFW for State-listed species.
 - A “May Affect and Is Likely to Adversely Affect” BA will be prepared and submitted to USFWS, and initiation of formal consultation will be requested. The BA will include applicant proposed mitigation measures that are often included in the required Terms and Conditions in the BO. These conditions depend on the species under consideration, as well as severity of the project impacts, but typically include avoidance and minimization measures, as well as compensatory mitigation to reduce take to the extent feasible.
 - Conservation measures or similar requirements may be required within the BO that specify conservation, minimization, and compensation measures to avoid, minimize, or offset effects to listed species. Examples include:
 - Biological monitoring
 - Worker environmental awareness program (WEAP) training
 - Minimization of construction-related impacts
 - Preconstruction clearance surveys
 - Weed management surveys
 - Compensation for loss of habitat
 - Protection of lands in perpetuity
 - Mitigation ratios for impacts (e.g., 1:1 mitigation for suitable habitat, 3:1 for riparian habitat, 5:1 for critical habitat)
 - Permanent protection and management of compensation lands
 - Costs to acquire and manage lands
 - Financial assurances

- Terms and Conditions within the Incidental Take Statement in the BO will include mitigation measures for listed species. Examples include:
 - Immediate notification of wildlife agencies in the event of the permit's listed species being killed or injured as a result of project activities
 - Re-initiation of consultation if more than a specified number of listed species are killed or injured as a result of project activities
 - Reporting requirements
- For impacts on federally listed species for which no federal permit or federal funding is involved, Section 10(a)(1)(B)) consultation (if no federal nexus) will be required. This may include consistency determination from CDFW for State-listed species.
 - Applicant-prepared HCP that includes mitigation measures:
 - Preservation (via acquisition or conservation easement) of existing habitat
 - Enhancement or restoration of degraded or former habitat
 - Creation of new habitat
 - Establishment of buffer areas around existing habitats
 - Restrictions to access
 - The USFWS then issues an ITP and prepares a BO, and the HCP mitigation measures become legally binding. USFWS ITP measures will be similar to those described above for Section 7.
- For impacts on State-listed species, a 2081 (b) ITP will be issued. The BO conservation measures are often included in the BO in order to meet CESA requirements and allow CDFW to make a consistency determination. For this reason, the 2081 (b) ITP requirements are often similar to the BO conservation measures and may include other measures, such as:
 - CNDDDB Observations (reporting of any CNDDDB species)
 - Traffic speed limits
 - Habitat acquisition, permanent protection, and perpetual management of compensatory habitat

In addition to the measures listed above, additional measures may be required through agency consultations and/or permits that are deemed necessary for the recovery of a listed species.

As outlined in Mitigation Measures BIO-1 and BIO-2, if If it is determined that there is suitable habitat present for special-status species of nesting birds, raptors, or eagles, or if construction involves non-incidental take of migratory birds that are not special-status, and if construction is to occur during the nesting season within suitable habitat, then the following mitigation measures will be required and implemented.

Changes to Section 3.3.3.3, Page 3.3-120

The following changes represent minor clarifications to mitigation in the Draft PEIR by including a minimum no-disturbance buffer for fully protected bird species and specific measures to implement if burrowing owls are detected and cannot be avoided. These changes merely clarify the mitigation described in the Draft PEIR, as Mitigation Measures BIO-3a through BIO-3d(iii), are stepped mitigation from Mitigation Measures BIO-1 and BIO-2. Additionally, as concluded in the Draft PEIR, the impact would be less than significant for later activities when carried out by the County and significant and unavoidable for later activities when not carried out by the County. These clarifications are not substantive (i.e., the change to the mitigation does not result in a new or worsened impact), and the significance conclusion would remain the same.

Mitigation Measure BIO-3a: Conduct Preconstruction Nesting Bird Surveys.

Prior to any ground-disturbing activity, including vegetation removal or structure disturbance/demolition, during the bird breeding season (February 1 to August 31), a qualified biologist will conduct nesting bird surveys within 7 days prior to construction for any activities that could disturb nesting birds within the subsequent project area and its 500-foot buffer area for nesting birds and active nests (i.e., nests with eggs or young) of non-raptor species listed under the MBTA or CFGC. A minimum 0.5-mile no-disturbance buffer around each nest of California fully protected bird species—American peregrine falcon, bald eagle, California brown pelican, and California least tern—will be required.

If active bird nests are observed, the biologist will establish an appropriate ESA buffer based on the species, work activities, and the tolerance of the species to disturbance. No entry or work will occur within the ESA nest buffer unless approved by the qualified biologist. The ESA nest buffer will be maintained until nestlings have fledged and are no longer reliant on the nest or parental care for survival, or the biologist determines that the nest has been abandoned.

Mitigation Measure BIO-3b: Conduct Preconstruction Raptor Nest Surveys.

If construction is scheduled to occur during the breeding season for raptors (January 1 to September 1), then no more than 7 days before the start of the activities, a qualified biologist will conduct a pre-construction survey for nesting raptors in areas where suitable habitat is present within the project area and up to a 500-foot buffer, as determined by a qualified biologist. If active raptor nests are found, then the biologist will delineate an ESA buffer of sufficient size or utilize a buffer as determined by regulatory authorizations for species listed under the FESA or CESA, around the nest. The ESA buffer will be maintained until the young have fledged from the nest and are no longer reliant on the nest or parental care for survival or until such time as the biologist determines that the nest has been abandoned. A minimum 0.5-mile no-disturbance buffer around each nest of California fully protected bird species will be required.

Mitigation Measure BIO 3c: Active Eagle Nest Avoidance Measures.

If an occupied nest (as defined by Pagel et al. 2010) is detected within 4 miles of the work areas, the implementing agency will notify USFWS and CDFW and will follow the specified line-of-sight

and no line-of-sight no-work buffer requirements during the breeding season to ensure that construction activities do not result in injury or disturbance to eagles. A minimum 0.5-mile no-disturbance buffer around bald eagle nests (California fully protected bird species) will be required. The implementing agency in coordination with the project biologist, will coordinate with the USFWS regarding any modifications to these proposed buffers. It is not anticipated that activities during operations would disturb eagle nesting, but should operations activities have the potential to disturb eagle nesting, then this measure will be required.

- The no-work buffer will be maintained throughout the breeding season or until the young have fledged and are no longer dependent on the nest or parental care that includes nest use for survival.
- Buffers around occupied nests may be reduced if a qualified biologist determines that smaller buffers would be sufficient to avoid impacts on nesting eagles.

As described in Mitigation Measures BIO-1 and BIO-2, if it is determined that suitable habitat is present for burrowing owls, then the following mitigation measure will be required and implemented.

Mitigation Measure BIO-3d(i): Conduct Burrowing Owl Preconstruction Surveys.

Prior to any ground-disturbing activity or any activity that could disturb burrowing owl burrows or nesting, a qualified biologist will conduct protocol-level surveys for burrowing owl within suitable habitat located in the work area or extending 500 feet from the boundary of the work area, where access is available. Surveys will be conducted in accordance with guidelines in the *CDFW Staff Report on Burrowing Owl Mitigation* (CDFG 2012).

If occupied burrowing owl burrows are detected and cannot be avoided, then the following two mitigation measures will be required and implemented.

Mitigation Measure BIO-3d(ii): Implement Burrowing Owl Avoidance and Relocation Measures.

Prior to any ground-disturbing activity or activities that could disturb burrowing owls, CDFW will be contacted. Avoidance of occupied burrowing owl burrows (with an appropriate buffer) is the preferred minimization measure. However, if avoidance is not possible, burrowing owls may be excluded by a qualified burrowing owl biologist with experience conducting burrowing owl passive relocations. In coordination with CDFW, the biologist will prepare a Burrowing Owl Exclusion Plan. Burrowing owl exclusions will only occur during the non-nesting season and only after a qualified biologist has determined that burrowing owls are not nesting. The plan will be submitted to approval by CDFW prior to implementation. The Burrowing Owl Exclusion Plan will be prepared in accordance with guidelines in the *CDFW Staff Report on Burrowing Owl Mitigation* (CDFG 2012).

Mitigation Measure BIO-3d(iii): Implement Burrowing Owl Mitigation Management Plan

Prior to any ground-disturbing activity or activities that could disturb burrowing owls, a Burrowing Owl Mitigation Management Plan will be prepared and approved by CDFW. The Burrowing Owl Mitigation Management Plan will be prepared by a qualified biologist and will be prepared in accordance with guidelines in the *CDFW Staff Report on Burrowing Owl Mitigation* (CDFG 2012).

As described in Mitigation Measures BIO-1 and BIO-2, if it is determined that suitable habitat is present for bats, then the following mitigation measure will be required and implemented to avoid potentially significant impacts.

Mitigation Measure BIO-3e: Conduct Preconstruction Special-Status Bat Surveys.

No earlier than 30 days prior to the start of ground-disturbing activities or activities that could disturb bat roost sites in a work area, a qualified bat biologist will conduct a visual and acoustic survey (over the course of one day and one evening at a minimum) for roosting bats in the work area and extending a distance deemed appropriate by the qualified biologist from the boundary of the work area, where access is available. Such surveys will be conducted only in those areas in which bridges, abandoned structures, or trees with large cavities or dense foliage are present. The qualified bat biologist will also visually inspect for crevice dwelling birds (e.g., nesting, overwintering swifts) and note any observations.

As described in Mitigation Measures BIO-1 and BIO-2, if bat roost sites are identified and could be disturbed, then the following mitigation measure will be required and implemented.

Mitigation Measure BIO-3f: Implement Bat Avoidance and Relocation Measures.

Prior to any ground-disturbing activity or activities that could disturb bat roost sites, a qualified bat biologist will survey for active bat colonies, such as hibernacula or maternity roosts. If active hibernacula or maternity roosts are identified in the work area or in the buffer area (as defined by the qualified bat biologist, based on site conditions, planned work, and anticipated indirect impacts on bats), they will be avoided. If avoidance is not feasible, then a qualified bat biologist with experience conducting bat evictions, exclusion, and mitigation will prepare a mitigation plan detailing the eviction, exclusion, and relocation of the bat colony and will provide for construction of an alternative bat roosting habitat outside of the work area. Alternative bat habitat may be required to be constructed and installed up to 2 years prior to any bat eviction and exclusion and must be approved by CDFW.

The qualified bat biologist will implement the mitigation plan for a period of time determined by the qualified bat biologist to be sufficient for the bats to adjust to the disturbance before the commencement of any ground-disturbing activities that would occur within the buffer area of the hibernacula. All bat colony and roost management will be conducted in accordance with accepted exclusion and deterrent techniques. If non-breeding or non-hibernating individuals or groups of bats are found roosting within the work area, cannot be avoided, and would be affected by the proposed Project, then the following will be required and implemented:

- **Implement Bat Exclusion and Deterrence Measures.** A qualified biologist will facilitate the eviction of the bats by either opening the roosting area to change the lighting and airflow conditions or installing one-way doors or other appropriate methods. To the extent feasible, the roosts will remain undisturbed by project activities for a minimum of 1 week after implementing eviction and exclusion activities. Evictions will not occur to active maternity or hibernacula.

As described in Mitigation Measures BIO-1 and BIO-2, if it is determined that suitable habitat is present for American badgers, and impacts on badgers could not be avoided and would therefore be significant, then the following mitigation measure will be required and implemented.

Mitigation Measure BIO-3g: Conduct Preconstruction Surveys for American Badger.

Prior to ground disturbance, the implementing agency will require a qualified biologist to conduct preconstruction surveys for American badger den sites within suitable habitat located within the project site. These surveys will be conducted no less than 14 days and no more than 30 days prior to the start of ground-disturbing activities in the project site. As required by CDFW, the biologist will establish a no-work buffer around occupied maternity dens throughout the pup-rearing season (February 15 through July 1) and an ESA buffer around occupied dens during other times of the year. If non-maternity dens are found and cannot be avoided during construction activities, they will be monitored for badger activity. If the biologist determines that dens may be occupied, passive den exclusion measures (outside the pupping season) will be implemented for 3 to 5 days to discourage the use of these dens prior to disturbance activities.

As described in Mitigation Measures BIO-1 and BIO-2, if it is determined that sensitive habitat (e.g., wetlands, habitat for special-status species, wildlife movement corridors, nest sites) is present, and the impacts of the project have been determined to be potentially significant, then the following mitigation measure will be required and implemented.

Changes to Section 3.3.3.3, Page 3.3-122

The following changes represent minor clarifications to mitigation in the Draft PEIR by including prohibited materials and actions in the ESAs, specific actions to take if wildlife becomes entangled in fencing, and additional steps for the biological monitor to take to protect special-status species. These changes merely clarify the mitigation described in the Draft PEIR. Additionally, as concluded in the Draft PEIR, the impact would be less than significant for later activities when carried out by the County and significant and unavoidable for later activities when not carried out by the County. These clarifications are not substantive (i.e., the change to the mitigation does not result in a new or worsened impact), and the significance conclusion would remain the same.

Mitigation Measure BIO-4: Identify Work Areas and Environmentally Sensitive Areas.

Prior to any ground-disturbing activity, the implementing agency will require the construction area, including access roads and staging areas, to be delineated through the use of construction flagging and signage under the supervision of a qualified biologist. To prevent the inadvertent disturbance of habitat, vehicle traffic and construction personnel will be restricted to established roads, construction areas, and other designated areas. Any ESAs, such as wetlands, habitat for special-status species, wildlife movement corridors, and/or nest sites, will be delineated, and no access will be allowed into these areas. Delineation of ESAs will include fencing, flagging, and other methods of demarcation sufficient to prevent entry into the ESA. Prohibited materials shall include, but are not limited to, spikes, glass, razor, or barbed wire. Use of chain link and steel stake fence shall be avoided or minimized. Fences shall not have any slack that may cause wildlife entanglement. No grading or fill activity of any type will be permitted within the ESA. No grading or fill activity of any type will be permitted within ESAs. In addition, no construction activities, materials, or equipment will be allowed within ESAs. All construction equipment will be operated in a manner to prevent accidental damage to nearby preserved areas. Construction personnel will strictly limit their activities, vehicles, equipment, and construction materials to the limits of disturbance and designated staging areas and routes of

travel. Silt fence barriers will be installed at the ESA boundary to prevent accidental deposition of fill material in areas where vegetation is immediately adjacent to planned grading activities. ESA fencing and exclusion fencing will remain in place and be maintained until project construction is completed. If, during the project phase, wildlife becomes entangled in construction fencing, work must immediately stop, a qualified biologist notified, and dead or injured wildlife documented immediately. If injury or mortality involves a special-status species, the qualified biologist will notify CDFW and USFWS within three calendar days of the incident or finding. Work in the immediate area will only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or mortality.

Equipment storage, fueling, and staging areas will be located on upland sites with minimal risks of direct drainage into riparian areas or other sensitive natural communities. These designated areas will be located in such a manner as to prevent any runoff from entering sensitive habitat. Necessary precautions will be taken to prevent the release of cement or other toxic substances into surface waters. Project-related spills of hazardous materials will be reported to appropriate regulating entities including, but not limited to, the applicable jurisdictional city and RWQCB and will be cleaned up immediately and contaminated soils removed to approved disposal areas.

If sensitive biological resources are identified within the project footprint or surrounding buffer, but will not be affected by the proposed Project, then those resources must be marked clearly with permanent signage to promote avoidance of the resource by the public and operations and maintenance staff.

As described in Mitigation Measures BIO-1 and BIO-2, if there is ground disturbance that could result in the establishment of invasive plant species, and this impact has been determined to be potentially significant, then the following mitigation measure would be required and implemented.

Mitigation Measure BIO-5: Prepare and Implement Weed Abatement Plan.

Prior to construction on all projects, a weed abatement plan will be prepared and implemented by the project proponent to minimize the spread and importation of nonnative plant material during and after construction and will include the following:

- Any exotic species removed during construction will be properly handled to prevent sprouting or regrowth. Methods will be developed to avoid spreading exotic plant seeds during plant removal and ensure plants will be removed prior to flowering, if feasible.
- An herbicide use protocol will be included within the weed abatement plan. Anyone using herbicides will be required to complete a "Report of Chemical Spray Form" per the LA County Department of Public Works BMP Manual (Public Works 2010). Hazardous waste management practices will apply to the use of all herbicides. The application of all herbicides will be performed by a licensed applicator. A qualified biologist will review the herbicide use protocol referencing the Cal-IPC's Best Management Practices (BMPs) for Wildland Stewardship (Cal-IPC 2015).
- Construction equipment will be cleaned of mud or other debris that may contain invasive plants and/or seeds and inspected to reduce the potential of spreading noxious weeds before mobilizing to the site and before leaving the site or at the nearest staging area during the course of construction. Cleaning of equipment will occur in a designated area distant from ESA fencing.

- Trucks carrying loads of vegetation removed from the project footprint will be covered and disposed of in accordance with applicable laws and regulations.
- Only certified weed-free straw, mulch, and/or fiber rolls will be used for erosion control. Fill material will be obtained from weed-free sources.
- After construction, any disturbed areas remaining as bare ground will be returned to original grade (unless the design incorporated permanent grade changes), soils will be decompacted, and areas will be revegetated with native hydroseed and/or container plantings to match existing sensitive habitats as detailed in design plans or a project-specific restoration plan. All revegetated areas will avoid the use of species listed in Cal-IPC's California Invasive Plant Inventory.

As described in Mitigation Measures BIO-1 and BIO-2, if it is determined that special-status plants, wildlife, and/or aquatic resources, sensitive habitat, or protected trees have the potential to be present at the project site, then the following mitigation measures will be required and implemented.

Mitigation Measure BIO-6: Conduct Biological Monitoring During Construction.

In sensitive areas or adjacent to special-status plants, ~~special-status~~ wildlife, ~~and/or~~ aquatic resources, sensitive habitat, and protected trees, a biological monitor will be required to monitor construction activities for the duration of construction activities to ensure that practicable measures are being employed to avoid incidental disturbance of habitat and special-status species outside of the project footprint.

Biological monitoring will include items such as monitoring activities associated with the installation of protective barriers (e.g., ESAs fencing, silt fencing, sandbags, fencing); ensuring that the removal of vegetation near sensitive biological resources is limited to the proposed disturbance area; monitoring of active bird nests; ensuring that all food related trash items are enclosed in sealed containers and removed from the site; ensuring that construction employees strictly limit their activities, vehicles, equipment and construction materials to the proposed project footprint, designated staging areas, and approved routes of travel, with construction areas being the minimal area necessary to complete the proposed Project as specified in construction plans; ensuring that equipment storage, fueling, and staging is located in upland sites to protect riparian habitats and other sensitive habitats; ensuring that brush, loose soils, and other debris materials will not be stockpiled within stream channels or on banks; checking potential wildlife pitfalls; contacting CDFW (and USFWS as appropriate) regarding any dead or injured federally or State-listed wildlife; and disposal of road-killed animals.

The biological monitor will conduct WEAP training to train construction contractors and other site personnel. The purpose of WEAP training is to provide training regarding the avoidance and minimization measures for biological resources, the laws and regulations related to biological resources, and the fines and penalties for violating those laws.

The biological monitor will monitor construction within the vicinity of any riparian habitats or other sensitive natural community areas prior to and during vegetation removal to ensure that vegetation removal, best management practices (BMPs), ESAs, and all avoidance and minimization measures are properly implemented. ESA fencing will be inspected by the biological monitor at a frequency necessary to ensure that it is in place and properly maintained.

Where impacts on special-status wildlife are unavoidable, the biological monitor will protect special-status wildlife and allow special-status wildlife to move away on its own if possible. If not possible, special-status wildlife will be relocated to adjacent appropriate habitat on site or to suitable habitat adjacent habitat. If relocation of special-status wildlife is to occur, species-specific relocation plans and handling permits may be required. Special-status wildlife will only be captured by a qualified biologist with appropriate handling permits (as required).

As part of this effort, the biological monitor will document compliance with applicable avoidance and minimization measures, including measures set forth in regulatory authorizations.

Changes to Section 3.3.3.3, Page 3.3-125

The following changes represent minor clarifications to mitigation in the Draft PEIR by including sensitive wildlife and habitat features in the Operations Recreation Plan. These changes merely clarify the mitigation described in the Draft PEIR. Additionally, as concluded in the Draft PEIR, the impact would be less than significant for later activities when carried out by the County and significant and unavoidable for later activities when not carried out by the County. These clarifications are not substantive (i.e., the change to the mitigation does not result in a new or worsened impact), and the significance conclusion would remain the same.

Mitigation Measure BIO-9: Prepare and Implement Construction Best Management Practices and Operations Recreation Plan.

Construction BMPs

The implementing agency will require all construction contractors to prepare and implement a construction BMP plan and stipulate the requirement in construction bid documents. The construction BMP plan will include, at a minimum, the following measures.

- All construction contractors and all construction personnel will be responsible for promptly cleaning up any fuel or other hazardous materials spills, and any leaks from equipment will be stopped and repaired immediately. Vehicle and equipment fluids that are no longer in use will be transported to an appropriate offsite disposal location. Fuel and lubricant storage and dispensing locations will be constructed to fully contain spilled materials until disposal can occur. Hazardous waste, including used motor oil, hydraulic fluid, and coolant, will be stored and transferred in a manner consistent with applicable regulations and guidelines.
- Dust-control measures will be implemented by the contractor to reduce excessive dust emissions. Dust-control measures will be carried out during periods of grading or other activities that will disturb soils and may include wetting work areas, using soil binders on dirt roads, and wetting or covering stockpiles.
- Fire-suppression capability, including extinguishers, shovels, and water tankers, will be available on site whenever construction occurs during the fire season (as determined by the Los Angeles County fire department) to help minimize the chance of human-caused wildfires. Activities that may produce sparks, including welding or grinding, will use protective gear, such as shields and protective mats, to reduce fire risks.

- Available ESA data and information will be reviewed prior to placement of deposition and stockpiling of any material, such as erodible materials, vegetation, loose soils, or other debris material. No erodible materials will be deposited into aquatic features (e.g., rivers, channels, drainages, ditches, drains, ponds, lakes) or areas demarcated.
- Construction and maintenance activities will be timed during sensitive periods with ESA fencing, and materials will not be stockpiled within such areas.

Operations Recreation Plan

The Operations Recreation Plan will include requirements for the following measures (as applicable) to be implemented for areas of the *2020 LA River Master Plan* where recreational opportunities will be created:

- Signage requiring pets to be on leash
- Pet dropping/waste bag dispensers and disposal stations
- Foot-wiping stations with signage explaining the purpose of the station (to prevent the spread of invasive weeds that degrade natural habitats that species depend on)
- Wildlife-proof waste bins
- Educational interpretive kiosks/signage (e.g., how to respect wildlife and habitats, stay on trail signs, identifying sensitive areas, pick up trash and fishing line, pick up after pets; opportunities to view wildlife)
- Incorporation of signage to avoid ESAs around sensitive wildlife/habitat features
- Sensitive wildlife and habitat features
 - Trail design – where avoidance is not feasible and where necessary, a project could incorporate into design the modification of trails, spatial arrangement of trails, trail dimensions, access points, and recreational structures to avoid and minimize impacts on sensitive wildlife and/or habitat features
 - Setbacks and restrictions – where avoidance is not feasible and where necessary, a project could incorporate into design setbacks that consider alert and flight initiation distances for sensitive wildlife with respect to the type and intensity of proposed recreational uses, could include restrictions of the size of gathering areas at pavilions, etc.
- Seasonal closures during sensitive periods (will occur if there were a significant biological impact that could not be mitigated except through avoidance)
- Improvement (i.e., restoration) of affected habitat areas
- Seasonal restrictions on certain uses (e.g., no kayaking during least Bell's vireo nesting if vireo are present)
- Prevention of fertilizer runoff
- Management of unauthorized uses through coordination with local resources
- Proper handling of any exotic plant species removed during operations and maintenance activities to prevent sprouting or regrowth; development of methods to ensure that exotic

plant seeds are not spread during plant removal and that plants will be removed prior to flowering, if feasible

As outlined in Mitigation Measures BIO-1 and BIO-2, if it is determined that there is the potential for special-status wildlife, including special-status mammals, reptiles, or amphibians, that could become entrapped in construction materials or excavations, then the following mitigation measures Mitigation Measure BIO-10 or BIO-11 will be required and implemented.

Mitigation Measure BIO-10: Prevent Entrapment in Construction Materials and Excavations.

Any excavated steep-sided holes, pits, or trenches more than 12 inches deep with sidewalls steeper than 45 degrees will be covered with plywood or similar materials at the end of the day or have escape ramps, with at least one ramp per 100 feet of trenching, and slopes of escape ramps of no greater than 3:1. All construction pipe, culverts, or other structures with a diameter of 3 inches or greater that are stored overnight will either be elevated at least 1 foot above the ground, screened, or covered each night.

Mitigation Measure BIO-11: Restrict Monofilament Materials.

The implementing agency will restrict the use of monofilament materials. Plastic monofilament netting (i.e., erosion control wattles or matting) or similar material will be prohibited as part of erosion-control activities. Alternative materials that could be used include, but are not limited to, geotextiles, fiber rolls, geomembranes, tackified hydroseeding compounds, loose-weave mesh, such as jute, hemp, and coconut (i.e., coir) fiber, and rice straw wattles (e.g., Earthsaver ~~wattles~~; biodegradable, photodegradable, burlap).

As outlined in Mitigation Measures BIO-1 and BIO-2, if it is determined that special-status birds (or those protected by the MBTA and CFGC) and special-status mammals, reptiles, or amphibians have the potential to occur, then the following mitigation measures Mitigation Measure BIO-12 will be required and implemented.

Mitigation Measure BIO-12: Implement Best Practices for Night Lighting.

Construction and/or facility lighting will be designed to minimize or lessen the attraction of birds, bats, or their prey to the project site. Best practices for lighting for avian species conflict with those for bats. Best practices for avian species include using non-steady burning lights (e.g., red, dual red, and white strobe-like flashing lights) using motion or heat sensors and switches to reduce the time when lights are illuminated, using appropriate shielding to reduce horizontal or skyward illumination, and avoiding the use of high-intensity lights (e.g., sodium vapor, quartz, halogen). Best practices for lighting for bat species include avoiding green and red lights, as these interfere with migration patterns. White lighting tends to attract prey species and increase foraging. Lighting adjacent to wildlife areas should be limited to an upper limit of 3,000 on the Kelvin color temperature scale and shielded to prevent light from entering the wildlife area.

Night lighting will be designed for best practices for both avian and bat species, while also considering special-status reptiles and amphibians. Some design measures could include construction and facility lighting designed to prevent casting light toward surrounding wildlife habitats and the riverbed and using non-steady burning lights and avoiding green and red lights.

Mitigation Measure BIO-13: Avoid Bird and Bat Entrapment in Poles.

Biological monitors will ensure that any installed poles, whether temporary or permanent, will not have openings that could entrap birds or bats. Construction contractors will be required to seal and cap all openings in poles or provide for escape routes (i.e., openings accommodating escape for various species). Installation of poles will not begin until it is demonstrated that the poles can be adequately capped and/or sealed on installation.

As outlined in Mitigation Measures BIO-1 and BIO-2, if it is determined that special-status wildlife, nesting birds, raptors, or eagles could occur, then the following mitigation measure will be Mitigation Measure BIO-14 will be required and implemented.

Changes to Section 3.3.3.3, Page 3.3-134

The following changes to this impact discussion are based on minor technical changes that include mountain lion and do not result in substantive changes because Mitigation Measure MM-BIO-1, as presented in the Draft PEIR, would apply to all affected species and would require a site-specific literature review, which will consider, at a minimum, the proposed subsequent project, site location, GIS information, and known sensitive biological resources. No changes to the Draft PEIR conclusions would occur, and new or worsened impacts would not occur.

Special-Status Mammals

Operations impacts Typical Projects on special-status bats within Frame 6 would be similar to those discussed above for operations in Frame 1. Operations impacts on San Diego black-tailed jackrabbit for Typical Projects for operations would be similar to those described for this species in Frame 2. Operations-related impacts on San Diego desert woodrat, southern grasshopper mouse, Los Angeles pocket mouse, and American badger would be similar to those described for these species in operations in Frame 5. Operations-related impacts on mountain lion would include the inadvertent poisoning of mountain lion prey (and therefore mountain lions) during rodent control programs. The attraction of mountain lions to human-occupied areas and therefore roads could occur through uncovered trash, which attracts mountain lion prey (raccoons, coyotes, etc.). Mountain lions are at risk of vehicle collisions and human conflict (death due to public safety removal) in urban areas.

Changes to Section 3.3.3.3, Page 3.3-135

The following changes to this impact discussion are based on minor technical changes that include mountain lion and do not result in substantive changes because Mitigation Measure MM-BIO-1, as presented in the Draft PEIR, would apply to all affected species and would require a site-specific literature review, which will consider, at a minimum, the proposed subsequent project, site location, GIS information, and known sensitive biological resources. No changes to the Draft PEIR conclusions would occur, and new or worsened impacts would not occur.

Special-Status Mammals

Operations impacts for Typical Projects to special-status bats within Frame 7 would be similar to those discussed for operations in Frame 1. Operations impacts on San Diego black-tailed jackrabbit would be similar to those described for operations in Frame 2. Operations-related impacts on San Diego desert woodrat, southern grasshopper mouse, Los Angeles pocket mouse, and American badger would be similar to those described for operations in Frame 5. Operations-related impacts on mountain lion would be similar to those described for operations in Frame 6.

Changes to Section 3.3.3.3, Page 3.3-137

Mitigation Measure BIO-17: Prepare and Implement Pest Management Plan.

The implementing agency will require that a pest management plan be developed by a qualified biologist. To prevent the inadvertent poisoning of raptors and non-target animals during operations, pest-control measures will prohibit the use of rodenticides. Other methods of rodent control, such as resetting lethal rat traps (<https://goodnature.co.nz/>), will be used. As a part of the pest-management plan, the use of neonicotinoid pesticides will be prohibited, as these are known to be harmful to bumble bees.

To avoid the spread of invasive species and encourage the use of native plant species, the following mitigation measure will be required and implemented.

Mitigation Measure BIO-18: Prohibit Use of Invasive Species during Operations.

The implementing agency will require landscape plans to prioritize the use of native plant species and will prohibit the use of invasive, nonnative plant species. The invasive plant species on the California Invasive Plant Council (CAL-IPC) list (<https://www.cal-ipc.org/plants/inventory>) The invasive plant species listed on the Invasive Species of California website (<http://ice.ucdavis.edu/invasives/home/species>) will be prohibited within or adjacent to the LA River or within wildlife corridors or sensitive habitat.

Changes to Section 3.3.3.3, Page 3.3-145

The following changes to this impact discussion are based on minor technical changes that include a habitat and wildlife connectivity discussion in relation to mountain lion. This change represents a minor clarification of the Draft PEIR. Additionally, as concluded in the Draft PEIR, the impact would be less than significant for later activities when carried out by the County and significant and unavoidable for later activities when not carried out by the County. These clarifications are not substantive (i.e., the change to the mitigation does not result in a new or worsened impact), and the significance conclusion would remain the same.

Special-Status Mammals

Direct and indirect operations effects on mammals of KOP Categories 1, 3, 4, and 5 would include the operations impacts described for the Typical Projects.

The operation of KOP Category 1 could provide roosting sites for special-status bat species, which could be beneficial. Light towers would provide increased night lighting impacts on special-status bats.

Operation of these KOP categories could provide habitat corridors (i.e., crossings and platforms could provide beneficial effects by providing connections between large habitat blocks), planted vegetated buffers, and connections between large habitat blocks that would provide beneficial effects to special-status mammals. These beneficial effects could occur due to the conversion of urban land cover features to wetlands and habitat features. Providing essential habitat components, such as an increase in available ground water or surface water, could be beneficial to special-status mammals, unless water quality is poor; then this could be a negative impact. If areas are intended to function as habitat corridors, design would be important to prevent unintended deleterious consequences to special-status species. It is unlikely that the habitat corridors would function to provide habitat linkages for mountain lion without other large-scale connectivity projects in the area for this species. The only potential linkage site is currently in the vicinity of Griffith Park.

The impacts of KOP Category 5 during operations have the potential for small-scale beneficial effects to special-status mammals. Although floodplain reclamation opportunities in the LA River are limited, the conversion of urban or similar land cover types to floodplains, naturalized banks, braided channels, could provide real benefits to special-status mammals in the region. This would be realized through the conversion of urban land cover (or similar) habitat types to suitable foraging and/or roosting habitat for special-status mammals. The level of benefit will depend on the individual KOP Category 5 designs. The temporary removal of vegetation and land cover of urban components during construction of wetlands and habitat features could have direct or indirect impacts on special-status mammals.

Changes to Section 3.3.3.3, Page 3.3-154

Direct and indirect operations impacts on special-status mammals from KOP Category 6 would be as described for operation of the Typical Projects in Frames 1 and 6.

Changes to Section 3.3.3.3, Page 3.3-163

The following changes represent a minor clarification to mitigation in the Draft PEIR by including measures to protect sensitive natural communities and native trees. These changes merely clarify the mitigation described in the Draft PEIR as requested by the California Department of Fish and Wildlife. Additionally, as concluded in the Draft PEIR, the impact would be less than significant for later activities when carried out by the County and significant and unavoidable for later activities when not carried out by the County. These clarifications are not substantive (i.e., the change to the mitigation does not result in a new or worsened impact), and the significance conclusion would remain the same.

Mitigation Measures

Mitigation Measure BIO-20a: Avoid Riparian and Sensitive Natural Communities.

Prior to construction, mapped riparian and sensitive natural communities will be delineated using ESA staking in the field and removal or disturbance of riparian habitats or other sensitive natural communities will be avoided.

Mitigation Measure BIO-20b: Protect Against Tree Diseases, Pests, and Pathogens.

To protect sensitive natural communities and native trees, when deemed necessary by a qualified biologist or arborist, prior to tree removal, a certified arborist will evaluate trees for infectious tree diseases such as sudden oak death (*Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*).

If a certified arborist determines that trees are affected by infectious pests or diseases, the arborist will prepare an Infectious Tree Disease Management Plan or develop a list of preventative measures to be implemented. A plan/list will provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees will not be transported from a project area without first being treated using best available management practices described in the Infectious Tree Disease Management Plan or list of preventative measures.

If possible, and as much as possible, all tree material, especially infected tree material, will be left on site (e.g., the material could be chipped for use as ground cover or mulch).

During all tree removal activities, pruning and power tools will be cleaned and disinfected prior to use to prevent introducing pathogens from known infested areas, and after use to prevent the spread of pathogens to new areas.

As outlined in Mitigation Measures BIO-1 and BIO-2, if the proposed Project cannot avoid direct impacts on either riparian habitats or other sensitive natural communities, then the following mitigation measure Mitigation Measure BIO-20c will be required and implemented.

Mitigation Measure BIO-20cb: Implement Riparian Mitigation and Restoration.

Prior to start of construction, the implementing agency will mitigate permanent impacts on riparian habitats or other sensitive natural communities at a ratio the resource agencies

determine, through payment into an agency-approved in-lieu fee mitigation program, applicant-sponsored mitigation site, or other approved mitigation method as determined during the project-specific environmental document or permitting phase. Onsite restoration of temporarily affected riparian habitats or other sensitive natural communities will occur in-kind at their current locations on completion of construction and will consist of returning affected areas to original contour grades, decompacting the soil, and replanting with a plant palette composed of native species found onsite prior to disturbance.

Changes to Section 3.3.3.3, Page 3.3-165

Mitigation Measures

Apply the following mitigation measures, which are described above.

Mitigation Measure BIO-1: Conduct Literature Review and Project Surveys and Mitigation.

Mitigation Measure BIO-4: Identify Work Areas and Environmentally Sensitive Areas.

Mitigation Measure BIO-5: Prepare and Implement Weed Abatement Plan.

Mitigation Measure BIO-6: Conduct Biological Monitoring During Construction.

Mitigation Measure BIO-9: Prepare and Implement Construction Best Management Practices and Operations Recreation Plan.

Mitigation Measure BIO-20a: Avoid Riparian and Sensitive Natural Communities.

Mitigation Measure BIO-20b: Protect Against Tree Diseases, Pests, and Pathogens.

Mitigation Measure BIO-20cb: Implement Riparian Mitigation and Restoration.

Changes to Section 3.3.3.3, Page 3.3-168

Mitigation Measures

Apply the following mitigation measures, which are described above.

Mitigation Measure BIO-1: Conduct Literature Review and Project Surveys and Mitigation.

Mitigation Measure BIO-4: Identify Work Areas and Environmentally Sensitive Areas.

Mitigation Measure BIO-5: Prepare and Implement Weed Abatement Plan.

Mitigation Measure BIO-6: Conduct Biological Monitoring During Construction.

Mitigation Measure BIO-9: Prepare and Implement Construction Best Management Practices and Operations Recreation Plan.

Mitigation Measure BIO-20a: Avoid Riparian and Sensitive Natural Communities.

Mitigation Measure BIO-20b: Protect Against Tree Diseases, Pests, and Pathogens.

Mitigation Measure BIO-20c**b: Implement Riparian Mitigation and Restoration.**

Changes to Section 3.3.3.3, Page 3.3-170

Mitigation Measures

Apply the following mitigation measures, which are described above.

Mitigation Measure BIO-1: Conduct Literature Review and Project Surveys and Mitigation.

Mitigation Measure BIO-4: Identify Work Areas and Environmentally Sensitive Areas.

Mitigation Measure BIO-5: Prepare and Implement Weed Abatement Plan.

Mitigation Measure BIO-6: Conduct Biological Monitoring During Construction.

Mitigation Measure BIO-9: Prepare and Implement Construction Best Management Practices and Operations Recreation Plan.

Mitigation Measure BIO-20a: Avoid Riparian and Sensitive Natural Communities.

Mitigation Measure BIO-20b: Protect Against Tree Diseases, Pests, and Pathogens.

Mitigation Measure BIO-20c**b: Implement Riparian Mitigation and Restoration.**

Changes to Section 3.3.3.3, Page 3.3-175

Mitigation Measures

Mitigation Measure BIO-21a: Conduct a Jurisdictional Delineation.

Prior to the start of project construction with aquatic resources present within or directly adjacent to the limits of disturbance, a formal jurisdictional delineation will be performed within the proposed project footprint and appropriate surrounding buffer to identify and map all wetlands and jurisdictional aquatic resources subject to the jurisdiction of the USACE, SWRCB or RWQCB, CDFW, and, if the project footprint is within the Coastal Zone, the CCC or appropriate city or county. A desktop review and/or field review may be sufficient to determine if a formal delineation is needed.

~~If any wetlands and/or jurisdictional aquatic resources are identified, then implement the following mitigation measures:~~

As outlined in Mitigation Measure BIO-21a, if any wetlands and/or jurisdictional aquatic resources are identified, then Mitigation Measure BIO-21b, c, d, or e will be required and implemented.

Mitigation Measure BIO-21b: Flag Wetland ESA.

If wetlands or jurisdictional aquatic resources are identified within the project footprint, but will not be affected by the project, then those resources must be clearly marked for avoidance using flagging, fencing, or other appropriate avoidance method prior to project implementation.

Changes to Section 3.3.3.3, Page 3.3-184

The following changes to this impact discussion are based on minor technical changes to include a habitat and wildlife connectivity discussion. This change represents a minor clarification of the Draft PEIR. Additionally, as concluded in the Draft PEIR, the impact would be less than significant for later activities when carried out by the County and significant and unavoidable for later activities when not carried out by the County. These clarifications are not substantive (i.e., new significant information not previously analyzed), and the significance conclusion would remain the same.

Typical Projects**Common Elements and Multi-use Trails and Access Gateways Typical Projects**

Below is a brief overview of the Wildlife Corridors, Linkages, and Local Connectivity Areas, and nursery and reproductive sites within Frames 1 through 9. The specific Wildlife Corridors, Linkages, and Local Connectivity Areas located within each frame are discussed in Section 3.3.2.1, *Wildlife Movement and Connectivity*, as are details on existing wildlife, vegetation, and habitats.

One mapped wildlife linkage, the “Griffith Park–Verdugo Hills” linkage is documented in Frame 6 by the *Missing Linkages: restoring connectivity to the California landscape* project (Penrod et al. 2001). This linkage is composed of Verdugo Wash, an approximately 9.5-mile concrete-lined channel that starts in the Verdugo Hills and flows into the LA River at Griffith Park. Verdugo Wash is limited greatly in wildlife connectivity function and value, especially for terrestrial and aquatic wildlife, due to a dam (i.e., Verdugo Debris Basin) located in its upper reach, just upstream of the Oakmont Country Club, and because it lacks any earthen bottom and vegetation or direct connectivity to surrounding habitats. However, at the confluence with the LA River, Verdugo Wash contains some refuge and breeding habitat within riparian vegetation.

One CEHC identified Large Natural Landscape Block occurs in Frame 6 at Griffith Park. Additionally, areas identified in the CEHC as Small Natural Areas occur throughout all frames both within the riverbed and the surrounding urban matrix. CEHC Potential Riparian Connections also occur in the study area and include the entire LA River. Note that no areas identified as CEHC Essential Connectivity Areas occur within the study area (Figure 3.3-25).

The river channel is predominantly concrete-lined and contains limited connectivity between the river and large intact habitat areas; however, the channel does have an earthen bottom in some areas sufficient to support vegetated habitat (e.g., herbaceous vegetation and trees) within the riverbed. The river channel and associated vegetation may facilitate connectivity of habitats for the species that are present within or access habitat within the riverbed, including fish, bats, resident and migratory birds, reptiles, amphibians, and mammals. However, due to the highly developed nature of the riverbed (i.e., concrete-lined channelization), not all species will have equal access to or use of the riverbed and associated habitats. For example, mammalian species using the riverbed

and associated habitat may be skewed toward species with smaller home ranges and more urban adapted species such as coyotes and raccoons. Due to the highly developed nature of the riverbed and its lack of connectivity to surrounding large intact habitat areas, it is lacking in connectivity structure and function for other species that require large, contiguous habitat areas and are not urban-adapted, such as mountain lion. The riverbed does not support these species' habitat and movement because their access to the riverbed would be detrimental and should not be facilitated. For example, if a mountain lion accessed the riverbed and was unable to find its way back to a safe habitat area, it may become lost and, while seeking refugia habitat, could become trapped in an urban matrix, resulting in likely human-wildlife conflict that often results in mortality (e.g., wildlife-vehicle collisions and depredation permits).

~~The river channel is predominantly concrete-lined, although it contains earthen bottom in some areas sufficient to support vegetated habitat (e.g., herbaceous vegetation and trees) within the riverbed. The river channel and associated vegetation facilitates connectivity of habitats for the species that utilize them, including fish, bats, resident and migratory birds, and possibly reptiles and amphibians. Areas of the river with earthen bottoms and vegetation contain higher quality connectivity function and value than other non-vegetated regions of the LA River and support habitat important for movement, migration, stopover, overwintering, and breeding of fish and wildlife species utilizing them. Associated infrastructure, like bridges and culverts, may also contain habitat features such as ledges, crevices, and hinges, which may provide nesting or roosting habitat for bird and bat species.~~

Outside of the river channel, various areas contain habitat that support species movement, migration, stopover, overwintering, and breeding, such as trees and vegetation in local parks, greenbelts, and landscaping, remnant habitat patches, and larger habitat blocks, such as those within Elysian Park, Griffith Park, and the Sepulveda Basin.

Changes to Section 3.3.3.3, Page 3.3-186

The following changes represent a minor clarification to mitigation in the Draft PEIR by requiring a biologist to review all proposed and permanent project elements. These changes merely clarify the mitigation described in the Draft PEIR. Additionally, as concluded in the Draft PEIR, the impact would be less than significant for later activities when carried out by the County and significant and unavoidable for later activities when not carried out by the County. These clarifications are not substantive (i.e., the change to the mitigation does not result in a new or worsened impact), and the significance conclusion would remain the same.

Mitigation Measures

Mitigation Measure BIO-23: Maintain Connectivity in Subsequent Project Design, Construction, and Operation.

All subsequent projects will be planned in coordination with a qualified biologist with demonstrated expertise in wildlife connectivity and wildlife crossing design in order to ensure that all projects, during design, construction, operations, and maintenance, at a minimum maintain current existing ecological connectivity function and value and prevent unintended deleterious consequences to wildlife species, connectivity, and nursery sites. The qualified

biologist will provide recommendations and design alternatives that can be implemented to avoid impacts on connectivity and nursery sites, prevent wildlife-human conflicts, and avoid other effects on connectivity and nursery site function and value. If project components are intended to have ecological function and/or maintain wildlife connectivity, then the qualified biologist will participate in their planning and design. The biologist will review all proposed temporary and permanent project elements—such as fencing, gates, and guardrails—for potential impacts on wildlife through trapping, entanglement, collisions, etc., and as potential barriers to connectivity and movement.

Changes to Section 3.3.3.3, Page 3.3-209

This change represents a minor clarification to the Draft PEIR by reiterating that because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. These changes are not substantive (i.e., new significant information not previously analyzed).

Cumulative Impacts

The geographic context for an analysis of cumulative impacts on biological resources would be the greater Los Angeles region, including Los Angeles County, which encompasses a variety of habitats of concern, including wetlands and sensitive natural communities, that could be affected by cumulative projects. A description of the regulatory setting and approach to cumulative impacts analysis is provided in Section 3.0.2.

Additionally, as described in Section 3.0.1.4 of this Draft PEIR, because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. Therefore, where this PEIR concludes a less-than-significant impact with mitigation for later activities carried out by the County, the impact has been identified as significant and unavoidable when these activities are not carried out by the County.

The County has committed to adopt the mitigation in regard to later activities carried out by the County; other public agencies similarly can and should adopt the mitigation because it is feasible and is in their best interest to reduce potentially significant impacts with mitigation on later activities. In particular, those agencies that utilize the PEIR for later CEQA analyses can reasonably be expected to implement the mitigation or, if they do not, to prepare a subsequent EIR that explains why the mitigation is infeasible.

Criteria for Determining Significance of Cumulative Impacts

The proposed Project would have the potential to result in a cumulatively considerable impact on biological resources if, in combination with other projects within the greater Los Angeles region, it would 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 CDFW or USFWS; have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS; have a substantial adverse effect on state or federally protected

wetlands (e.g., marshes, vernal pools, coastal wetlands) through direct removal, filling, hydrological interruption, or other means; 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; conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP.

Baseline Cumulative Condition

Present and future regional growth involving the construction of development and infrastructure projects occurring over time would have the potential to result in the loss of species and/or habitats and natural communities. While the general plans of the various jurisdictions along the river's extent attempt to reduce biological effects through implementation of goals and policies regarding the use of open space and targeting growth within developed areas, the potential growth that may be pushed out to other areas could result in the loss of habitat for plants and animals, including some sensitive species. In this context, growth and development are considered to generate significant cumulative impacts on biological resources. Although direct impacts on special-status species and the loss of sensitive habitats would be mitigated, due to the loss of common habitats and diminished resource availability, impacts on special-status species would be cumulatively significant. In addition, the impediment of wildlife movement is cumulatively significant (Los Angeles County 2014).

Activities conducted under transportation projects included in the 2020–2045 RTP/SCS (SCAG 2020) would include the conversion of natural landscapes containing sensitive biological resources into paved roads, which would result in increased access to other undeveloped areas from the extension of transportation infrastructure through rural areas. This increased access could indirectly increase manufacturing and institutional development as a result of increased transportation access within the area, resulting in further habitat fragmentation. The incremental impacts of all of the transportation projects and land use strategies included in the 2020–2045 RTP/SCS on biological resources would be expected to result in a significant cumulative impact with regard to biological resources because these projects would contribute to an increase in habitat fragmentation and development on native habitats. These impacts are considered to contribute to significant cumulative impacts related to State-sensitive plant communities, migratory corridors, nursery sites, and local policies and ordinances as a result of an incremental net loss of habitat and protected trees and vegetation (SCAG 2020).

Any future related development within the greater Los Angeles region would be subject to all required laws, permits, ordinances, and plans to reduce impacts on biological resources. Reasonably foreseeable future programs and projects would be required to implement biological avoidance and minimization measures when obtaining relevant permits, including implementation of BMPs during construction. Future development would most likely include site-specific mitigation and be expected to comply with all applicable regulations, such as the MBTA. Development projects causing impacts on wetlands and riparian habitats would be subject to mitigation and the permit requirements of the USACE, the CDFW, and RWQCB. In addition, the policies and implementation measures within the respective cumulative plans, which aim for sustainable development, would help to preserve, replace, restore, or compensate for the loss of biological resources. Although direct impacts on special-status species and the loss of sensitive habitats would generally be mitigated on a case-by-case basis, impacts on biological resources would be considered cumulatively significant.

Contribution of the Proposed Project to Cumulative Impacts

The proposed Project would be located in a primarily urban landscape. There is habitat within the LA River channel, marine habitat in Frame 1, and adjacent nesting habitat. Some in-channel modifications would occur under the *2020 LA River Master Plan*, which would be subject to Section 401 and 404 of the CWA. Although sensitive wildlife species would be affected through the potential removal of foraging habitat, such species are adapted to living in a heavily developed and disturbed urban setting. Construction noise is common throughout the project area and unlikely to harm or harass such species.

Construction impacts like increased noise may have a significant impact on sensitive and resident wildlife species that occur within the project area; however, implementation of mitigation measures BIO-1 through BIO-24 would ensure that any impact associated with habitat interference, wetlands, or protected species would be less than significant, when carried out by the County, by providing detailed guidance on how to comply with the MBTA, avoiding any destruction of active nests, and complying with the CFGC and other applicable requirements. Implementation of and compliance with the mitigation measures would ensure that the species' normal behavior and chances for long-term survival would not be adversely affected by construction activities when carried out by the County. As described in Chapter 3, CEQA Environmental Impact Assessment, because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. Cumulative impacts on biological resources would be significant and unavoidable for later activities that are not carried out by the County.

The general plans for the jurisdictions along the LA River include goals and policies protecting biological resources. With implementation of the proposed mitigation measures and consistency with general plan goals and policies, the construction and operations of the *2020 LA River Master Plan* would have a less-than-significant effect when carried out by the County, either directly or through habitat modifications, on any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. When later activities are carried out by the County, cumulative impacts on biological resources would be less than significant and would be significant and unavoidable for later activities that are not carried out by the County.

It is anticipated that the construction and operations under the *2020 LA River Master Plan* would have a less-than-significant effect, either directly or through habitat modifications, on or conflict with the provisions of an adopted HCP, natural community conservation plan, or other approved local, regional, or state HCP.

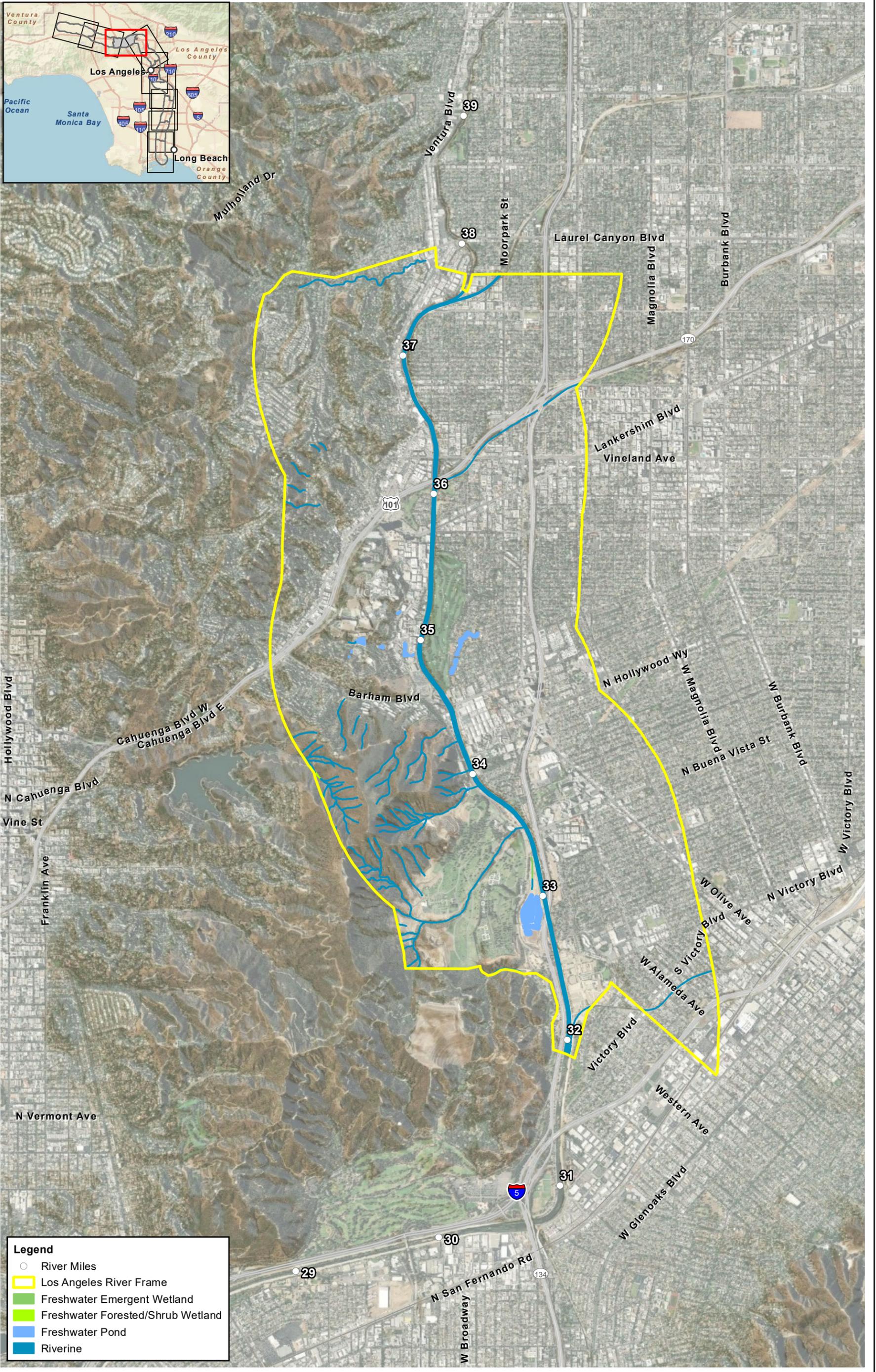
The proposed Project would not reduce habitat, but rather would increase it. Implementation of the *2020 LA River Master Plan* with the implementation of mitigation measures BIO-1 through BIO-24 would potentially have beneficial permanent direct effects on wildlife connectivity and nursery sites with creation and restoration of native upland and wetland habitats, enhancements to wildlife connectivity, and features supporting nursery sites. Implementation of the *2020 LA River Master Plan* would not result in a cumulatively considerable contribution to biological impacts when carried out by the County. Cumulative impacts on biological resources would remain significant and unavoidable.

Changes to Section 3.3-1, Figure 3.3-41

Figure 3.3-41, *National Wetland Inventory within Frame 7*, was revised to remove the identification of a fresh water pond on the Forest Lawn Memorial-Park. There is only a decorative fountain in that location. The revised figure is included on the following page.

Changes to Section 3.3-1, Figure 3.3-45

Figure 3.3-45, *National Wetland Inventory Impacts within Frame 7*, was revised to remove the identification of a fresh water pond on the Forest Lawn Memorial-Park. There is only a decorative fountain in that location. The revised figure is included on the following page.



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Legend

- River Miles
- ▭ Los Angeles River Frame
- ▭ Freshwater Emergent Wetland
- ▭ Freshwater Forested/Shrub Wetland
- ▭ Freshwater Pond
- ▭ Riverine

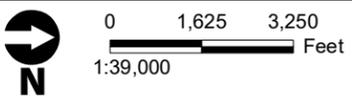


Figure 3.3-41
National Wetland Inventory within Frame 7

Source: NWI;
 County of Los Angeles; ESRI

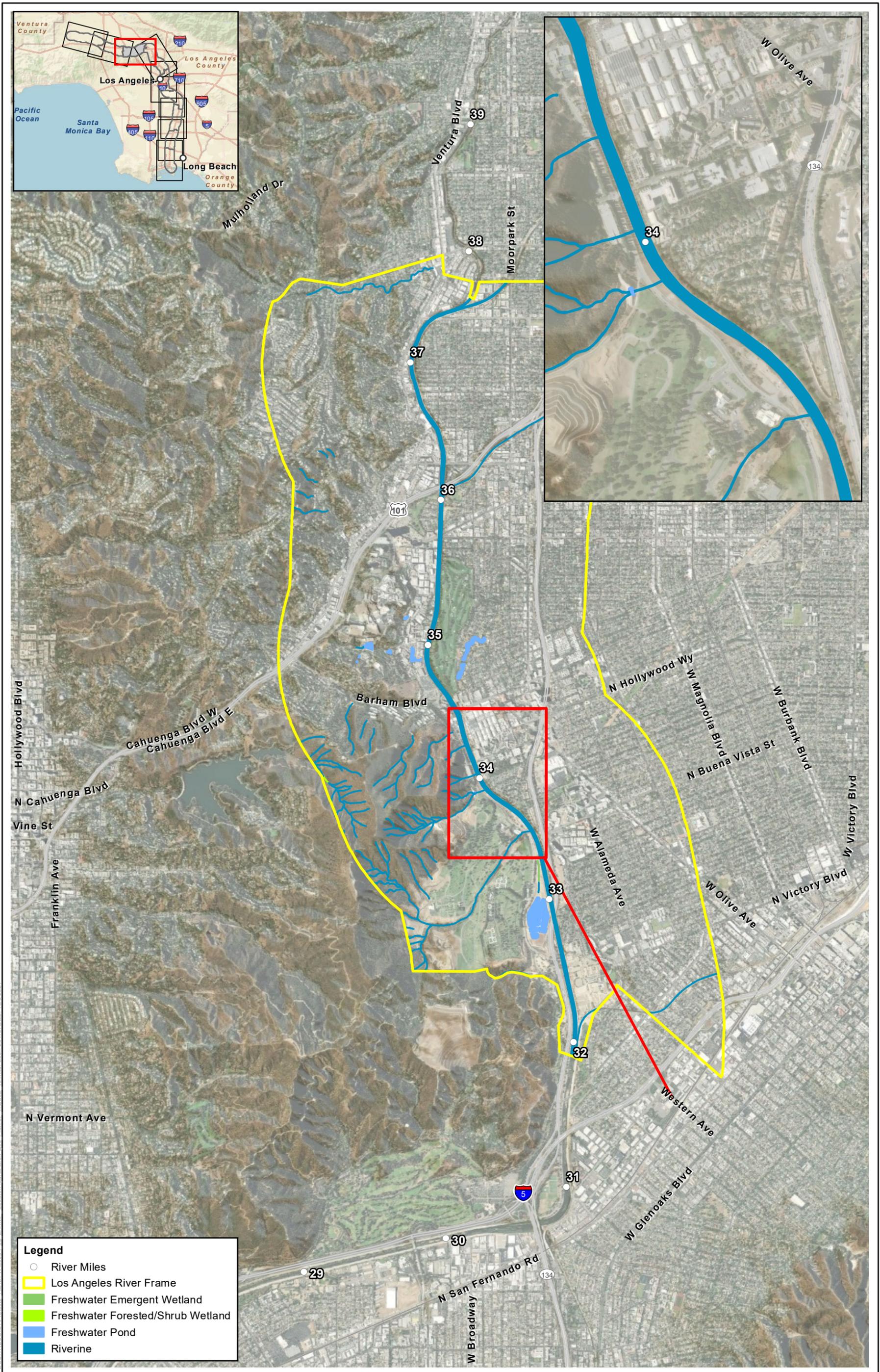


Figure 3.3-45
National Wetland Inventory Impacts within Frame 7

Source: NWI;
County of Los Angeles; ESRI

3.2.9 Changes to Section 3.4, Cultural Resources

Changes to Section 3.4.2.2, Page 3.4-29

Regional

Los Angeles County

In unincorporated areas of Los Angeles County, the county's Historic Preservation program establishes the criteria and procedures for the designation, preservation and maintenance of landmarks and historic districts. The ~~Historic Preservation~~Cultural Heritage Ordinance (HPOCHO) was adopted by the County Board of Supervisors in 2015; as of 2020, there are only three properties listed on the Los Angeles County Historical Landmarks Registry, none of which are designated historic districts.

Changes to Section 3.4.2.2, Page 3.4-32

City of Los Angeles (Frames 1, 5, 6, 7, 8, and 9)

The City of Los Angeles has a ~~historic preservation~~cultural heritage ordinance: Ordinance No. 185472 (passed in 1962), which amended the Los Angeles Administrative Code to clarify the criteria for designation of local historic resources, known as Historic-Cultural Monuments (HCMs). It established the Cultural Heritage Commission and related rules and qualifications, and provided the definition of an HCM:

“...any site (including significant trees or other plant life located on the site), building or structure of particular historic of cultural significance to the City of Los Angeles.”

HCMs may be designated by the City Council after a recommendation by the Cultural Heritage Commission if meets one or more of the following criteria: (Section 22.171.7, revised 2018)

1. Is identified with important events of national, state, or local history or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state, city, or community;
2. Is associated with the lives of historic personages important to national, state, city, or local history; or
3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

In addition to HCMs, the city has an ordinance that establishes local historic districts, known as Historic Preservation Overlay Zones (HPOZs). The HPOZ program began in 1983, and to date more than 20 HPOZs have been designated throughout the city. The Los Angeles Municipal Code, Ordinance No. 184903, Section 12.20.3, established that each HPOZ would have a historic resources survey, which would identify contributing and non-contributing elements, included a context statement, and established the criteria for consideration as Contributing Element:

1. Adds to the Historic architectural qualities or Historic associations for which a property is significant because it was present during the period of significance, and possesses historic integrity reflecting its character at that time; or
2. Owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community, or city; or
3. Retaining the building, structure, Landscaping, or Natural Feature, would contribute to the preservation and protection of an historic place or area of historic interest in the City (Section F[3][C]).

Section 3, *Archaeological and Paleontological*, of Chapter II, *Resource Conservation and Management*, in the Conservation Element of City of Los Angeles General Plan states that the city has a primary responsibility in protecting significant archaeological resources. Under the Archaeological and Paleontological objective, policy, and program, the policy is to continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition, or property modification activities.

Changes to Section 3.4.3.2, Page 3.4-52

Burbank (Frame 7)

There are eight officially designated historic resources in the city, and the City of ~~Glendale~~ Burbank maintains a list of potentially significant properties. The city's historic preservation ordinance provides for the City of ~~Glendale~~ Burbank Planning Department to maintain this inventory of potentially significant historic places, structures, and improvements. Only one designated historic resource is located in the project study area, and it is listed in the table below.

Changes to Section 3.4.4.1, Page 3.4-53

This change represents a minor clarification to the methods description in the Cultural Resources section of the Draft PEIR and is not substantive (i.e., new significant information not previously analyzed).

3.4.4.1 Methods

This analysis is a program-level assessment of potential impacts on important cultural resources that could occur as a result of implementation of the proposed program. The analysis qualitatively evaluates the impacts of the proposed Project on existing aesthetic resources as a result of the construction and operations of the proposed Project. The impacts and mitigation measures identified in this section address types of activities that could significantly impact cultural resources including archaeological sites, historic buildings and structures, and locations of importance to Native Americans.

As this is a program-level analysis, no formal records search was conducted, instead location-specific historical research was completed. The identification of potential historical resources has been completed through a series of steps. If a municipality was identified in the regulations presented in Section 3.4.2.2, *Thresholds of Significance*, to have a historical register or to have

conducted surveys of historical resources, a desktop search was completed to obtain that material. Please see 3.4.3.1 *Identification Efforts and Methods* for more details.

~~The analysis determines if there is the potential for impacts on existing resources in the 18 jurisdictions in the study area during construction and operation. Data from jurisdictions' respective general plans, design guidelines, and municipal codes, as well as site visits to the LA River in March 2020, were used to evaluate impacts on scenic vistas and resources, visual quality, and light and glare. Impacts associated with Typical Projects (i.e., the Common Elements and Multi-Use Trails and Access Gateways), the six kit of parts (KOP) categories, and related design components—as well as the 2020 LA River Master Plan in its entirety—are analyzed qualitatively at a program level. Where the two Typical Projects or the six KOP categories have similar impacts related to a specific criterion, the discussion is combined. Where differences between the Typical Projects or the KOP categories are identified, the impact analysis is presented separately.~~

Changes to Section 3.4.4.3, Page 3.4-55

Mitigation Measure CR-1a: Conduct a Cultural Resources Assessment for Historical/Built Archaeological and Tribal Cultural Resources to Determine the Presence of Resources.

For later activities under the *2020 LA River Master Plan*, during design and prior to construction, the implementing agency will conduct a cultural resources assessment to determine the potential for presence of historical/built, archaeological, and tribal cultural resources.

As part of this assessment, the implementing agency will identify sensitive historical resources that physically may be outside the construction area, but could be affected by changes in noise levels or alterations to visual continuity, if these features are important to the significance of the historical resources. During the design phase of the Project, the implementing agency will conduct a records search/literature review. The records search will be conducted at the South Coastal Central Information Center and will cover a quarter-mile around the location-specific project study area. The records search will provide background information on cultural surveys and site identification and will be supplemented by reviewing the maps/tables of identified historical resources. For the literature review, additional background research conducted online and in person will be conducted.

Required information sources will include, at a minimum:

- NRHP National Park Service online website (<https://www.nps.gov/subjects/nationalregister/database-research.htm> and <https://www.nps.gov/subjects/nationalregister/database-research.htm>)
- Office of Historic Preservation (https://ohp.parks.ca.gov/?page_id=30338)
 - California Historical Landmarks
 - California Points of Historical Interest
 - California Historical Resource Inventory System
 - California Register of Historical Resources (CRHR)
 - Built Environment Resource Directory (BERD)

- Local historical societies
- Local registers and general plans
- Sacred Land File Search at Native American Heritage Commission

Supplemental information sources that could be consulted include:

- Sanborn maps (available at the Los Angeles Public Library)
- Historic U.S. Geological Survey (USGS) quadrangles
- Historic aerial maps
- Ethnographic data
- Surface geological data

In addition to conducting literature review and searches, the implementing agency tiering from the PEIR will coordinate with the applicable California Native American Tribe, to verify the presence/absence of tribal cultural resources (TCRs) in the API. The California Native American Tribe will identify TCRs and provide substantial documentation of the TCR per PRC Section 5024.1. All TCR documentation and information obtained during consultation will be confidential and not included in public documents.

If, following the records search, literature review, sacred land file search, and coordination with the tribe, it is determined that there are no historical/built, archaeological, and TCRs present in the API, then the impact would be less than significant and no further action is required.

As outlined in CR-1a, if, ~~if~~ following the records search, literature review, sacred land file search, and coordination with the tribe, it is determined that historical/built, archaeological, or TCRs are present in the API, then Mitigation Measure CR-1b would be required and implemented.

Mitigation Measure CR-1b: Conduct Cultural Resources Investigations for Historical/Built Archaeological and Tribal Cultural Resources, and Implement Findings.

- **Conduct Field Survey of API:** The implementing agency will hire qualified architectural historians and/or historians and archaeologists to physically inspect the API, verify the presence or absence of known historical resources, and document potentially historical resources. This will be accomplished through intensive pedestrian surveys, photo-documentation, and written notes, at a minimum.
- **Record and Identify Cultural Resources:** Each historical resource and archaeological site that has been previously identified will be recorded with an updated California Natural Resources Agency – Department of Parks and Recreation DPR form (Continuation Sheet, DPR 523-L). Newly identified historical resources and archaeological sites will be recorded on DPR 523A (Primary Record), DPR 523B (Building, Structure, Object Record), and DPR 523J (Location Map), with recordation on DPR 523D (District Record), DPR 523E (Linear Feature Record), and DPR 523L (Continuation Sheet) completed as appropriate. DPR forms will be completed by a qualified architectural historian, historian, or archaeologist.
- **Prepare Technical Report and Evaluate Identified Resources:** The report will include the background, research, methods, results, and evaluation of any identified cultural resources. All cultural resources identified in the project area will be evaluated for their inclusion in the CRHR and, if determined to be historical resources (eligible), then a

determination of impacts would occur. Each technical report, which includes proposed subsurface work elements, will need to include a buried site sensitivity analysis, which assesses the potential for the location-specific subsequent project study area to contain buried cultural deposits. For areas determined to be sensitive for buried deposits, archaeological monitoring will be required.

If, following the physical survey of the API, and eligibility determination, it is determined that the later activity *would not* cause an adverse change in the significance of a significant historical resource, then the impact would be less than significant, and no further action is required.

As outlined in CR-1b, if, following the physical survey of the API, and eligibility determination, it is determined that the later activity *would* cause an adverse change in the significance of a significant historical resource, then the impact would be significant and Mitigation Measures CR-2a through CR-2c will be required and implemented.

Changes to Section 3.4.4.3, Page 3.4-74

Baseline Cumulative Condition

Historic and archaeological resources are important parts of the region's identity. These resources are nonrenewable and irreplaceable. Cumulative land use and transportation projects located in the Southern California region would have the potential to result in a cumulative impact associated with the loss of cultural resources. Due to the regional scale of the cumulative plans and programs in the Los Angeles region and the potentially large number of cultural resources that could be disturbed as a result of their implementation, a significant cumulative impact would result through the physical demolition, destruction, relocation, or alteration of a resource or its immediate surroundings such that the significance of the historical resource would be materially impaired (SCAG 2020). These projects are regulated by federal, state, and local regulations, including PRC Section 5097, the Mills Act, State Health and Safety Code 18950–18962, and the SOI's *Standards for Rehabilitation and Standards for the Treatment of Historic Properties*, and they are required to comply with the regulations. City, County, and regional goals and policies also aim to preserve and protect significant cultural resources to the extent practicable. Even with regulations in place, individual historical resources could still be affected or degraded (e.g., from demolition, destruction, alteration, structural relocation) as a result of new private or public development or redevelopment and implementation of land use strategies under cumulative plans and projects (SCAG 2020). Notification and inventory of archaeological resources, implementation of an unanticipated discovery plan, and compliance with the PRC and the California Health and Safety Code mandatory processes that are required to be followed in the event of a discovery of any human remains would help mitigate potentially significant impacts, but they are expected to remain significant when considered cumulatively due to the large number of archaeological resources within the greater Los Angeles region and the likelihood of yielding undiscovered human remains (SCAG 2020). Therefore, a baseline cumulative condition exists for cultural resources.

3.2.10 Changes to Section 3.5, Energy

Changes to Section 3.5.3.3, Page 3.5-55

Cumulative Impacts

The geographic context for an analysis of cumulative impacts related to energy would be the collective geographic area covered by the individual service providers. This would include the service areas for SCE, LADWP, and individual jurisdictions' energy providers. This extends beyond the study area to help accurately identify any existing baseline cumulative condition for energy in the greater County area. A description of the regulatory setting and approach to cumulative impacts analysis is provided in Section 3.0.2, *Cumulative Impacts*.

Criteria for Determining Significance of Cumulative Impacts

The proposed Project would have the potential to result in a cumulatively considerable impact related to energy, if, in combination with other projects within the greater Los Angeles region, it would result in the wasteful, inefficient, or unnecessary consumption of energy.

Baseline Cumulative Condition

Cumulative growth and development in the greater Los Angeles region would result in additional demand, resulting in increased consumption of electricity and natural gas. The anticipated power and natural gas demands for the buildout of the *City of Los Angeles Framework Plan* would be considered to be cumulatively significant in the context of future growth in Los Angeles County. Cumulative electricity demands within the County in 2035 would total about 15.1 billion kilowatt hours per year (15,100 gigawatt hours per year). Cumulative natural gas demands in 2035 would total about 232 million therms per year (61.6 million cubic feet of natural gas per day). These demand projections are within the forecasts for the individual utility providers and these cumulative impacts are considered to be less than significant.

Implementation of the Los Angeles County General Plan and the general plans of individual jurisdictions in the study area, as well as transportation projects included in the 2020 Regional Transportation Plan/Sustainable Communities Strategy, when taken into consideration with other development and infrastructure projects within the SCAG region and surrounding areas, would have the potential to increase the consumptive use of energy, constituting a significant cumulative impact. Therefore, there is a baseline cumulative condition related to energy.

3.2.11 Changes to Section 3.6, Geology, Soils, and Paleontological Resources

Changes to Section 3.6.3.3, Page 3.6-58

Mitigation Measure GEO-2: Conduct Paleontological Resources Investigations.

During design of individual subsequent projects and prior to construction, the implementing agency will conduct paleontological resource investigations consistent with SVP Guidelines. This process will include:

- Conducting a paleontological records search through the Los Angeles County Natural History Museum to identify previously recorded paleontological localities and the presence of sensitive deposits in the proposed project study area
- Reviewing project design and maximum depths and extents of project ground disturbance components
- Reviewing publicly available geotechnical reports for information concerning subsurface deposits and deposit depths across the project area
- Identifying the potential for sensitive paleontological deposits underlying the proposed Project that project implementation could affect
- Determining whether impacts on sensitive deposits, if present, would be significant

If no sensitive deposits are identified or if they are sufficiently deeper than the proposed project excavations and would not be encountered during construction, no further steps will be required.

If sensitive deposits are identified and could be affected by the proposed Project, ~~implement~~ Mitigation Measure GEO-3 will be required and implemented.

Changes to Section 3.6.3.3, Page 3.6-59

Mitigation Measure GEO-4: Avoid/Minimize Impacts on Paleontological Resources During Operations.

If significant paleontological resources and sensitive deposits with the potential to contain significant paleontological resources are identified within a project area during design/planning of individual projects (Mitigation Measures GEO-2 and GEO-3), and deposits that are sensitive for significant paleontological resources remain exposed at or near the ground surface or become exposed during project operations, then an avoidance and minimization plan will be prepared to avoid/minimize potential impacts during operations. This plan may include, but not be limited to:

- Securing sensitive deposits from accessibility through the development of Environmentally Sensitive Areas

- Preparing an operations and maintenance plan to minimize degradation and exposure of sensitive deposits
- Designing and developing interpretive exhibits to provide education and understanding of the importance of avoiding and protecting sensitive deposits and paleontological resources

If significant impacts on a newly exposed or existing significant paleontological resource cannot be avoided, then Mitigation Measure GEO-3 will ~~need to~~ be required and implemented.

Changes to Section 3.6.3.3, Page 3.6-63

This change represents a minor clarification to the Draft PEIR by reiterating that because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. These changes are not substantive (i.e., new significant information not previously analyzed).

Cumulative Impacts

The geographic context for an analysis of cumulative impacts on geology, soils, and paleontological resources is the greater Los Angeles region, as it is composed of similar soil types, is a seismically active region, and was heavily settled by Native Americans, and the area contains abundant paleontological resources. A description of the regulatory setting and approach to cumulative impacts analysis is provided in Section 3.0.2.

Additionally, as described in Section 3.0.1.4 of this Draft PEIR, because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. Therefore, where this PEIR concludes a less-than-significant impact with mitigation for later activities carried out by the County, the impact has been identified as significant and unavoidable when these activities are not carried out by the County.

The County has committed to adopt the mitigation in regard to later activities carried out by the County; other public agencies similarly can and should adopt the mitigation because it is feasible and is in their best interest to reduce potentially significant impacts with mitigation on later activities. In particular, those agencies that utilize the PEIR for later CEQA analyses can reasonably be expected to implement the mitigation or, if they do not, to prepare a subsequent EIR that explains why the mitigation is infeasible.

Criteria for Determining Significance of Cumulative Impacts

The proposed Project would have the potential to result in a cumulatively considerable impact on geology and soils, if, in combination with other projects within the greater Los Angeles region, it would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: 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, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides; result in substantial soil erosion or the loss of topsoil; 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 an onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse; 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; have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal where sewers are not available for the disposal of waste water, or directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Baseline Cumulative Condition

As discussed in the *Los Angeles County General Plan Update Draft Environmental Impact Report* (2014), most of Southern California, including the cumulative programs and projects in the greater Los Angeles region, is in an area of relatively high seismic activity, and buildout and development of the cumulative programs and projects in the County would expose additional people and new infrastructure to the effects of earthquakes, seismically related ground failure, liquefaction, and seismically induced landslides.

Future cumulative development in the surrounding area would be subject to local, State, and federal regulations pertaining to geology and soils, including the CBC and, in the County area, Los Angeles County Building Code requirements. These regulations contain requirements for development in areas that are subject to Seismic Design Categories E and F. In addition, cumulative projects would be subject to the Alquist-Priolo Earthquake Fault Zone Act, which restricts development on active fault traces. Adherence to these regulations and standard engineering conditions would help reduce cumulative impacts related to geology and soils (Los Angeles County 2014). Implementation of transportation projects and land use strategies included in the 2020 Regional Transportation Plan/Sustainable Communities Strategy within the Southern California Association of Governments (SCAG) region would contribute to cumulative significant impacts with regard to the potential to expose additional people and infrastructure to the effects of earthquakes, seismic related ground failure, liquefaction, and seismically induced landslides due to thousands of acres of land subject to severe peak ground acceleration, potential liquefaction, and potential earthquake-induced landslides within 500 feet of major SCAG projects; tens of thousands of acres subject to moderate or high soil erosion within 500 feet of major SCAG projects; and several miles being within the Alquist-Priolo EFZ (SCAG 2020). In addition, expansive soils and paleontological resources are present throughout the SCAG region, and larger transportation projects and regional land use strategies in particular may result in significant cumulative impacts where projects are within areas of expansive soils and such resources. Even with implementation of mitigation measures, these cumulative impacts would remain significant (SCAG 2020). Therefore, there is a baseline cumulative condition with respect to geology, soils, and paleontological resources.

Contribution of the Project to Cumulative Impacts

The *2020 LA River Master Plan* project area could be subject to strong seismic ground shaking or unstable soil conditions. Construction activities would not be expected to be at depths sufficient to cause significant geologic events (e.g., fault rupture, landslides, seismic ground shaking, liquefaction) or exacerbate geologic conditions because Mitigation Measure GEO-1 would be implemented. Geologic conditions in the area would remain unchanged as a result of the proposed Project when carried out by the County. However, landslide- and liquefaction-prone areas as well as areas with collapsible soils could expose workers to geologic hazards. The proposed Project would comply with all applicable regulations and would be consistent with goals and policies contained in the applicable general plans. As described in Chapter 3, CEQA Environmental Impact Assessment, because

some later activities under the 2020 LA River Master Plan would not be carried out by the County. the County cannot enforce or guarantee that the mitigation measures would be incorporated. Cumulative impacts on geology, soils, and paleontological resources would be significant and unavoidable for later activities that are not carried out by the County.

Construction activities could exacerbate erosion conditions by exposing soil or adding water to the soil, either from irrigation or runoff from new impervious surfaces. BMPs, such as silt fences, straw wattles, sediment traps, gravel sandbag barriers, or other effective BMPs, would be implemented to control runoff and erosion during construction activities. Implementation of erosion and sediment control BMPs would prevent substantial soil erosion and sedimentation. Construction activities associated with the proposed Project would not create a geologic hazard by causing or accelerating instability related to erosion, and adherence to Construction General Permit requirements would reduce potential impacts during construction to less-than-significant levels. Therefore, impacts related to geology and soils would not be cumulatively considerable when carried out by the County. Cumulative impacts related to geology and soils would be significant and unavoidable for later activities that are not carried out by the County.

The 2020 LA River Master Plan could occur in or near undiscovered fossil resources (e.g., within Quaternary alluvium deposits, at depths of up to 3 feet; younger alluvium, at depths greater than 5 feet; and areas of older alluvium or paleontologically sensitive surface bedrock). The proposed Project would require notification and inventory of paleontological resources and implementation of an unanticipated discovery plan to mitigate potentially significant impacts (Mitigation Measures GEO-2, GEO-3, and GEO-4) when carried out by the County. Therefore, the 2020 LA River Master Plan would not make a cumulatively considerable contribution to impacts on paleontological resources when carried out by the County. Cumulative paleontological impacts would be significant and unavoidable for later activities that are not carried out by the County.

3.2.12 Changes to Section 3.7, Greenhouse Gas Emissions

Changes to Section 3.7.3.3, Page 3.7-31

Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.

Implementing agencies will require implementation of the following GHG emissions reduction strategies:

- **Energy**
 - **Energy-efficient Appliances in Buildings.** New construction will use only ENERGY STAR rated appliances for appliance types that are offered ENERGY STAR ratings.
 - **Electric Space and Water Heating for Buildings.** New construction will employ electric and water heating. Where natural gas appliances need to be installed, these appliances will be an ENERGY STAR certified gas water heater) or be powered by renewable natural gas.
 - **Building Energy.** New construction will implement one or more of the Design Guidelines related to building energy consumption.

- Use renewable energy sources (solar, wind, water, and renewable natural gas).
 - Optimize building orientation for solar exposure, diffused daylight, and passive ventilation.
 - Optimize high thermal performance.
 - Use high-albedo roof and paving materials to mitigate heat gain.
 - Use green roof and pervious paving.
 - Implement building energy best practices from the following standards: United States Green Building Council's LEED, United States Department of Energy Better Buildings Initiative, ENERGY STAR, Dark Sky, Cradle-to-Cradle, and Green Globes.
- **Area**
 - **Electric Landscaping Equipment.** Maintenance and operations activities that use landscaping equipment (e.g., lawn mowers, trimmers) for new construction will employ electric landscaping equipment.
 - **Water Use**
 - **Water Conservation and Efficiency.** New construction will implement one or more of the Design Guidelines related to indoor and outdoor water conservation and efficiency.
 - Install systems for on-site water retention, detention, and filtration.
 - Capture 100 percent of on-site rainfall for the 85 percent rain event.
 - Reuse rainwater and greywater.
 - Create bioswales or treatment basins to collect stormwater runoff.
 - Install low-flow water fixtures that exceed the requirements of codes and ordinances.
 - Public bathroom faucet aerators with a flow rate of 0.4 gallon per minute
 - Rotating sprinkler nozzles for landscape irrigation 0.5 to 1.0 gallons per minute, or
 - Drip/subsurface irrigation (i.e., micro-irrigation)
 - **Wastewater Generation**
 - **Waste Reductions.** New construction will implement one or more of the Design Guidelines related to minimization and recycling of waste generation.
 - Use locally sourced, recycled, and recyclable materials with low-embodied energy.
 - Use green cleaning products and integrated building management.
 - Regularly monitor building systems and optimize usage.

As discussed in Section 3.16, *Transportation*, the Common Elements Typical Project was determined to have the potential to generate a significant VMT impact. If, as part of Mitigation Measure TRA-1a, the subsequent project cannot be screened out using the County's VMT impact criteria and the VMT is determined to exceed the threshold based on applicable guideline and project type, then Mitigation Measure TRA-1b will be required and implemented.

Changes to Section 3.7.3.3, Page 3.7-71

This change represents a minor clarification to the Draft PEIR by reiterating that because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. These changes are not substantive (i.e., new significant information not previously analyzed).

Cumulative Impacts

The analysis of greenhouse gas emissions is cumulative by its nature, and the geographic context is global. The preceding analysis addresses all cumulative impacts of the proposed Project, and a separate cumulative discussion is not required.

However, as described in Section 3.0.1.4 of this Draft PEIR, because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. Therefore, where this PEIR concludes a less-than-significant impact with mitigation for later activities carried out by the County, the impact has been identified as significant and unavoidable when these activities are not carried out by the County.

The County has committed to adopt the mitigation in regard to later activities carried out by the County; other public agencies similarly can and should adopt the mitigation because it is feasible and is in their best interest to reduce potentially significant impacts with mitigation on later activities. In particular, those agencies that utilize the PEIR for later CEQA analyses can reasonably be expected to implement the mitigation or, if they do not, to prepare a subsequent EIR that explains why the mitigation is infeasible.

3.2.13 Changes to Section 3.8, Hazards and Hazardous Materials

Changes to Section 3.8.3.3, Page 3.8-42

Impact 3.8(a): Would the proposed Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Typical Projects

Common Elements and Multi-Use Trails and Access Gateways

Construction

As Typical Projects contain the same features regardless of the frame in which they are built, the following discussion applies to Common Elements Typical Projects and Multi-Use Trails and Access

Gateways Typical Projects in all frames. As such, construction activities arising from a Typical Project under all frames would involve routine transport, use, and disposal of hazardous materials such as solvents, paints, oils, and grease, materials that are typically used in construction projects. Such transport, use, and disposal would be compliant with applicable regulations such as those described under Section 3.8.2.2, *Regulatory*, which include regulations from RCRA, OSHA, the U.S. Department of Transportation, and others. The regulations mentioned cover hazardous materials-related topics such as proper personal protective equipment, transport, handling, and disposal.

Although solvents, paints, oils, grease, fuel, and other materials would be transported, used, and disposed of during the construction of Typical Projects, these materials are typically used in construction projects and would not represent the transport, use, and disposal of acutely hazardous materials. Moreover, these hazardous materials are generally used in small amounts and any potential construction-related hazardous releases or emissions would be from such commonly used materials as those previously mentioned and would not include substances listed in 40 CFR 355 Appendix A, *Extremely Hazardous Substances and Their Threshold Planning Quantities*. Releases involving common construction hazardous materials would be small and localized, and spills that may occur would be contained and cleaned according to the Safety Data Sheet¹ (SDS) in the appropriate manner (OSHA 2012). A hazardous material SDS would include accidental release cleanup measures such as appropriate techniques for neutralization, decontamination, cleaning or vacuuming, and adsorbent materials.

The Common Elements Typical Project would disturb up to 3 acres, and the larger Multi-use Trails and Access Gateways Typical Project would be up to 5 miles long. Projects requiring greater than 1 acre of soil disturbance would be required to obtain NPDES coverage under the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Order No. 2009-0009-DWQ. The Construction General Permit would require the development and implementation of a SWPPP, which includes BMPs to regulate and prevent contamination of stormwater runoff. Construction BMPs can include the following:

- Maintenance activities, maintenance schedules, and long-term inspection procedures
- Controls for reducing or eliminating the discharge of pollutants
- Procedures for the proper disposal of waste (EPA 2018)

Additionally, as discussed in Section 3.9, *Hydrology and Water Quality*, all construction activities must comply with the County or Long Beach Municipal Separate Storm Sewer System (MS4) Permit or the MS4.

Transport, use, and disposal of hazardous materials during construction of all Typical Projects would be conducted according to all applicable regulations and requirements of a Construction General Permit (as required); therefore, construction of Typical Projects is not expected to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

¹ SDS include information such as the properties of a chemical; the physical, health, and environmental health hazards; protective measures; and safety precautions for handling, storing, and transporting the chemical. In addition, OSHA requires that SDS preparers provide specific minimum information as detailed in Appendix D of 29 CFR 1910.1200.

Changes to Section 3.8.3.3, Page 3.8-47

Mitigation Measure HAZ-1: Conduct Project-Level Hazardous Materials Sites Assessment for Construction of Subsequent Projects Involving Soil Disturbance and Implement Measures.

To avoid exposure of construction personnel, the public, or the environment to contaminated media and/or hazardous building materials, prior to construction activities associated with any subsequent project involving ground disturbance, the implementing agency will be required to retain a professional hazardous materials specialist specializing in hazardous materials impact assessment to conduct a project-level analysis to verify the presence or absence of hazardous materials conditions (including Cortese List sites) in the vicinity of the construction site and if there is potential for existing hazardous materials conditions to affect construction activities.

This assessment will consist of a search for environment-related information present in publicly accessible databases. The information will be reviewed to determine if the construction footprint or adjacent properties are listed in the aforementioned databases.

If the construction footprint or adjacent properties are listed in the databases, the professional hazardous materials specialist will determine the potential risk to construction workers, the public, or the environment from construction activities (to be documented in a technical memo). The determination of risk would consider, among other factors, regulatory status, the type of project, type of contaminated property, distance and direction to the project, and appropriate measures. If the hazardous materials specialist concludes that the subsequent project would not 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, then no further action would be required.

If a site is considered a risk to construction workers, the public, or the environment, implementing agency will implement measures to reduce risk, including one or more of the following:

- Implement engineering controls and best management practices (BMPs) during construction to minimize human exposure to potentially contaminated soils during construction. Engineering controls and construction BMPs could include, but are not limited to, the following:
 - Contractor employees working on site handling potentially contaminated media will be certified in the Occupational Health and Safety Administration's 40-hour Hazardous Waste Operations and Emergency Response training.
 - Contractors will water or mist soil as it is being excavated and stockpiled or loaded onto transportation trucks.
 - Contractors will place any stockpiled soil in areas shielded from prevailing winds or cover stockpiles with staked and/or anchored sheeting.
- Conduct a soil and/or groundwater sampling program to determine the type and extent of contaminants. The sampling program could include:
 - A scope of work for preparation of a health and safety plan that specifies pre-field activity marking of boring locations and obtaining utility clearance, and field activities,

- such as identifying appropriate sampling procedures, health and safety measures, chemical testing methods, and quality assurance/quality control procedures
- Necessary permits for well installation and/or boring advancement
 - A soil sampling and analysis plan in accordance with the scope of work
 - Laboratory analyses conducted by a State-certified laboratory
 - Disposal processes, including transport by a State-certified hazardous material hauler to a State-certified disposal or recycling facility licensed to accept and treat hazardous waste
- Implement a soil management plan. The purpose of a soil management plan is to provide administrative, procedural, and analytical guidance to expedite and clarify decisions and actions if contaminated soils are encountered. Typically, procedures and protocols are included to ensure that contaminated soil is excavated properly and efficiently, and that unacceptable risks are not posed to human health or the environment from contaminated soils. Additionally, the soil management plan would contain procedures for handling, stockpiling, screening, and disposing of the excavated soil. The soil management plan is a site-specific technical plan that could be required depending on other screening activities conducted (listed above) and is not included as part of this EIR.
 - If dewatering would be necessary in areas where contaminated groundwater exists, then dewatering procedures could be subject to permit requirements of the National Pollutant Discharge Elimination System (NPDES). Discharges of treated or untreated groundwater generated from dewatering operations or other applicable wastewater discharges not specifically covered in other general or individual NPDES permits are currently regulated under a regional general permit, General Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2013-095, NPDES No. CAG994004)
 - Conduct an asbestos and lead-based paint survey for any structures built prior to 1980 (the use of asbestos in buildings and structures was common prior to 1980) and planned for demolition as part of subsequent projects. An asbestos survey would be conducted in accordance with the South Coast Air Quality Management District (Rule 1403), Cal OSHA (CCR, Title 8, Section 1529), and the National Emission Standards for Hazardous Air Pollutants for Asbestos Surveys (40 CFR Part 61, Subpart M). CCR, Title 8, Section 1532.1, "Lead," and Cal OSHA requirements should be followed when handling materials containing lead.

With the implementation of the above measures and coordination with the appropriate oversight agency (such as DTSC, as necessary), the potential upset and accident conditions associated with construction activities would be reduced.

Changes to Section 3.8.3.3, Page 3.8-70

Baseline Cumulative Condition

In general, cumulative impacts related to hazards and hazardous materials are most often associated with commercial or industrial land uses, compared with residential uses. Implementation of projects and plans that do not substantially increase the potential for industrial activity are not considered to generate cumulatively significant impacts within the County (City of Los Angeles 1995). Continued growth and development in the Southern California region, including the implementation of transportation improvements, and the anticipated increased mobility from implementation of the 2020–2045 RTP/SCS may result in greater exposure of local populations to various hazards and may create a significant hazard to the public or the environment as a result of increased hazardous materials transport. Any future development would be required to comply with applicable federal, State, and local regulations related to hazardous materials. Required compliance with these regulations would minimize contribution of cumulative impacts related to the hazardous materials sites, and impacts would not be cumulatively significant (SCAG 2020).

Contribution of the Project to Cumulative Impacts

There is no baseline cumulative condition with respect to hazardous materials; therefore, ~~with implementation of Mitigation Measure HAZ-1, Mitigation Measure WF-2, and Mitigation Measure WF-3,~~ the proposed Project would not make a cumulatively considerable contribution to hazards and hazardous materials impacts. As such, the impact would not be cumulatively significant.

3.2.14 Changes to Section 3.9, Hydrology and Water Quality

Changes to Section 3.9.2.1, Page 3.9-4

Table 3.9-1. Beneficial Uses of Waterbodies with Potential to Be Affected by the Project

Waterbody	Frame	Designated Beneficial Uses
LA River Estuary (ends at Willow St.)	<u>1</u>	IND, NAV, COMM, EST, MAR, RARE, MIRG, SPWN, SHELL, WET, REC1, REC2
LA River Reach 1 (Estuary to Carson St.)	<u>1 and 2</u>	MUNp*, INDp, PROCp, GWR, WARM, MAR, WILD, RARE, MIGRp, SPWNp, SHELLp; REC1s; REC2 ^{av}
LA River Reach 2 (Carson St. to Figueroa St.)	<u>2, 3, 4, and 5</u>	MUNp*, INDp, GWR, WARM, WILDp, REC1s, REC2 ^{av}
LA River Reach 3 (Figueroa St. to Riverside Dr.)	<u>5 and 6</u>	MUNp*, INDp, GWR, WARM, WILD, WET, REC1, REC2 ^{av}
LA River Reach 4 (Riverside Dr. to Sepulveda Dam)	<u>7 and 8</u>	MUNp*, INDp, GWR, WARM, WILD, WET, REC1, REC2 ^{av}
LA River Reach 5 (Sepulveda Dam to Balboa Blvd.)	<u>8 and 9</u>	MUNp*, INDp, GWR, WARM, WILD, WET, REC1, REC2 ^{av}
LA River Reach 6 (above Balboa Blvd.)	<u>9</u>	MUNp*, INDp, GWR, WARM, WILD, WET, REC1, REC2 ^{av}

Source: Los Angeles Regional Water Board 2014

Key:	EST: Estuarine Habitat
COMM: Commercial and Sport Fishing	MIGR: Fish Migration
IND: Industrial Service Supply	MAR: Marine Habitat
MIGR: Migration of Aquatic Organisms	MUN: Municipal and Domestic Supply
NAV: Navigation	RARE: Rare, Threatened, or Endangered Species
SHELL: Shellfish Harvesting	SPWN: Spawning, Reproduction, and/or Early Development
WET: Wetland Habitat	REC1: Water Contact Recreation
WILD: Wildlife Habitat	REC2: Non-contact Water Recreation

* Designated under SWRCB Resolution No. 88-63 and Resolution No. 89-03. Some designations may be considered for exemption at a later date.

p: Potential beneficial use

s: Access prohibited by Public Works

av: The High Flow Suspension applies to water contact recreational activities associated with the swimmable goal as expressed in the CWA and regulated under the REC-1 and REC-2 uses, and the associated bacteriological objectives. Water quality objectives set to protect other recreational uses associated with the fishable goal as expressed in the CWA and regulated under the REC-1 use and other REC-2 uses (e.g., uses involving the aesthetic aspects of water) shall remain in effect at all times for waters where the (av) footnote appears.

Changes to Section 3.9.2.2, Page 3.9-19

Water Quality Control Plan, Los Angeles Region

Porter-Cologne authorizes the Regional Water Boards to adopt, review, and revise policies for all waters of the State (including surface water and groundwater) and directs them to develop regional basin plans. The relevant regional basin plan is the *Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*. Section 13170 of the California Water Code also authorizes the SWRCB to adopt basin plans on its own initiative. Regional Water Boards are required, by law, to develop, adopt, and implement a basin plan for the entire region. Water quality standards are set forth in the regional Basin Plan. According to Section 13050 of the California Water Code, basin plans consist of designation or establishment of beneficial uses to be protected, water quality objectives to protect those uses, and a program of implementation needed for achieving the objectives for the waters within a specified area. Because beneficial uses, together with their corresponding water quality objectives, can be defined per federal regulations as water quality standards, the basin plans are regulatory references for meeting the state and federal requirements for water quality control.

Los Angeles County Municipal Stormwater NPDES Permit CWA Section 402 mandates permits for municipal stormwater discharges, which are regulated under the NPDES General Permit for MS4s. Phase I MS4 Permit regulations cover medium-sized municipalities (between 100,000 and 250,000 people) and large municipalities (more than 250,000 people).

On November 8, 2012, the Los Angeles Regional Water Board adopted Order No. R4-2012-175 (NPDES Permit No. CAS004001), Waste Discharge Requirements for MS4 Discharges Within the Coastal Watersheds of Los Angeles County, Except Those Discharges Originating from the City of Long Beach MS4 (County MS4 Permit). The County MS4 Permit became effective December 28, 2012. Order No. R4-2012-175 is the fourth iteration of the stormwater permit for MS4s in Los Angeles County, which includes LACFCD, County, and 84 incorporated cities (including the City of Los Angeles) within the County watersheds, excluding the City of Long Beach. This permit requires runoff issues to be addressed during major phases of urban development (planning, construction,

and operation) to reduce the discharge of pollutants from stormwater to the maximum extent practicable, effectively prohibit non-stormwater discharges, and protect the beneficial uses of receiving waters. The County MS4 Permit requires implementation of a Stormwater Quality Management Plan (SQMP), discussed below.

The County MS4 Permit includes TMDL provisions designed to ensure that Los Angeles County achieves waste load allocations and meets other requirements of TMDLs covering receiving waters affected by the County's MS4 discharges. The County MS4 Permit also contains provisions that allow the permit to be modified, revoked, reissued, or terminated under certain circumstances. For example, provisions may be incorporated as a result of future amendments to the Basin Plan, such as a new or revised water quality objective or the adoption or reconsideration of a TMDL, including program implementation.

The County MS4 Permit allows permittees the flexibility to develop Watershed Management Programs (WMPs) or Enhanced Watershed Programs (EWMPs) to implement the requirements of the permit on a watershed scale through customized strategies, control measures, and BMPs. An EWMP provides guidance for municipalities throughout Los Angeles County to simultaneously comply with federal and state water quality mandates; improve the quality of rivers, creeks, and beaches; and address current and future regional water supply challenges. EWMPs identify current and future multi-benefit projects that will capture, treat, and use or infiltrate as much stormwater as possible.

The Upper Los Angeles River EWMP is the largest of all the EWMPs in the Los Angeles region, representing 485 square miles of watershed and over 50 miles of mainstem LA River from its headwaters to just above the estuary. The EWMP uses a multi-pollutant approach that maximizes the retention and use of urban runoff as a resource for groundwater recharge and irrigation, while also creating additional benefits for the communities in the Upper Los Angeles River watershed. The EWMP Plan determined a network of control measures or BMPs that would achieve required pollutant reductions while also providing multiple benefits to the community and leveraging sustainable green infrastructure practices. The Upper Los Angeles River Management Group's EWMP was approved April 20, 2016.

Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties

Discharges of treated or untreated groundwater generated from permanent or temporary dewatering operations or other applicable wastewater discharges not specifically covered in other general or individual NPDES permits are currently regulated under a regional general permit, General Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2018-0125, NPDES No. CAG994004).

Construction dewatering wastes (except stormwater) are regulated as low-threat discharges to surface waters. An NOI and report of waste discharge must be submitted to the Los Angeles Regional Water Board to comply with this general permit. Consistent with State Board Recycled Water Policy and to obtain coverage under Order R4-2018-0125, the discharger would investigate the feasibility of conservation, reuse, and injection of the groundwater, and/or alternative wastewater disposal methods. Discharges are authorized under the terms and conditions of this order, and an

appropriate monitoring and reporting program would be determined. For new discharges, the discharge would not commence until receipt of a written determination of eligibility for coverage under this general permit or until an individual NPDES permit is issued by the Regional Water Board.

Based on the depth to groundwater, it is not anticipated that the proposed Project would require groundwater dewatering during construction or be subject to the requirements of this general permit. In the event that groundwater is encountered during construction, it would be covered under the NPDES Construction General Permit.

Changes to Section 3.9.3.3, Page 3.9-38

In the event that dewatering for an individual project site is required, the SWPPP would include a dewatering plan, which would establish measures to prevent and minimize sediment and contaminant releases into groundwater during excavation. Dewatering activities would be required to comply with the NPDES Construction General Permit, Los Angeles Regional Water Board WDRs for discharges of groundwater (Order No. R4-2018-0125), and local dewatering requirements to prevent potential water quality impacts on surface waters or ensure proper treatment measures are implemented prior to discharge. As needed, individual projects would require individual NPDES permits issued by the Los Angeles Regional Water Board related to project dewatering. Discharges are authorized under the terms and conditions of Order No. R4-2018-0125, and an appropriate monitoring and reporting program would be determined for each individual project. In the event of dewatering during construction activities or before dewatering to surface water via a storm drain, the contractor would obtain coverage under the NPDES Construction General Permit from the Los Angeles Regional Water Board. Coverage under the NPDES Construction General Permit typically includes dewatering activities as authorized non-stormwater discharges, provided that dischargers prove the quality of water to be adequate and not likely to affect beneficial uses. All requirements of dewatering would be met to ensure water quality is not affected.

Changes to Section 3.9.3.3, Page 3.9-40

With implementation of stormwater BMPs and compliance with NPDES Construction General Permit post-construction stormwater standards, the County MS4 Permit, and other local water quality requirements, degradation of surface water and groundwater quality from operations of the Common Elements Typical Project would be minimized. In addition, the Common Elements Typical Project would be consistent with the water quality provisions in the Basin Plan. The Public Works LID Standards Manual provides guidance for the implementation of stormwater quality control measures and the recommended design methodology to manage stormwater in Los Angeles County. Implementation of stormwater BMPs such as rain gardens, vegetated swales, infiltration strips, and stormwater planters, as well as planting buffers and permeable materials, would reduce stormwater runoff flows and associated pollutants and treat stormwater runoff. In addition, the NPDES Construction General Permit emphasizes runoff reduction through on-site stormwater reuse, interception, evapotranspiration, and infiltration through non-structural controls and conservation design measures (e.g., downspout disconnection, soil quality preservation/enhancement, interceptor trees). Post-construction measures must also meet requirements of the NPDES

Construction General Permit post-construction stormwater standards and the County's runoff rates and volumes for permanent post-construction stormwater BMPs for water quality protection. Furthermore, the Common Elements Typical Project would be designed to manage flows and associated polluted runoff leaving project sites to levels required by the County Hydrology Manual. It would be designed and maintained in accordance with County, city, and Los Angeles Regional Water Board water quality requirements, such as the County MS4 Permit, and general plan policies. Therefore, operation of the Common Elements Typical Project would not violate any water quality standards or degrade water quality.

Changes to Section 3.9.3.3, Page 3.9-42

Operations

Similar to the Common Elements Typical Project, the Multi-Use Trails and Access Gateways Typical Project could result in an increase in impervious surfaces at specific locations, which could cause increased runoff rates and volumes, increased pollutant loading, and increased potential for erosion and sedimentation. However, operation of the Multi-Use Trails and Access Gateways Typical Project would comply with the County MS4 permit, the County LID Ordinance and Public Works LID Standards Manual, relevant general plan policies, and local stormwater management programs, as required. Additional stormwater BMPs could be implemented for multi-use trails to manage and treat stormwater runoff, as required by local MS4 requirements and the *2020 LA River Master Plan*. The Design Guidelines include a variety of recommended stormwater BMPs such as rain gardens, vegetated swales, vegetated filter/infiltration strips, infiltration trenches, stormwater planters, and tree well filters. BMP methods would be implemented depending on the available space and soil suitability for infiltration at the project site. Swales would be installed along paved trails or other linear projects to convey water slowly. Infiltration strips and trenches are ideal for smaller spaces such as narrow rights-of-way. Tree well filters also work effectively with linear landscapes such as trails. New trails, particularly those that are paved with impervious materials, would slope to drain away from the river channel toward a bioswale or other BMP areas. Larger gateways may include vegetation buffers and other vegetated areas, providing treatment of stormwater before it enters the river. Implementation of stormwater BMPs, habitat corridors, and other vegetated areas would allow water to percolate into the ground, filtering potential contaminants, reducing the discharge of pollution, and minimizing adverse effects on groundwater quality. The Design Guidelines also encourage the use of permeable paving, filtration and percolation of stormwater, and on-site water retention or detention to mitigate or eliminate water pollution and reduce runoff.

Impacts on surface water and groundwater quality would be minimized through 1) compliance with the NPDES Construction General Permit, County MS4 Permit, provisions in the Basin Plan, and other local water quality requirements, and 2) consideration and encouragement of the recommended stormwater BMPs included in the Design Guidelines, ~~impacts on surface water and groundwater quality would be minimized.~~ Therefore, the Multi-Use Trails and Access Gateways Typical Project would not violate any water quality standards or degrade water quality.

Changes to Section 3.9.3.3, Page 3.9-61

The following changes represent a minor clarification to mitigation in the Draft PEIR by including performance standards and requiring a qualified hydrologist or equally qualified specialist to review performance standards. These changes merely clarify the mitigation described in the Draft PEIR. Additionally, as concluded in the Draft PEIR, the impact would be less than significant for later activities when carried out by the County and significant and unavoidable for later activities when not carried out by the County. These clarifications are not substantive (i.e., the change to the mitigation does not result in a new or worsened impact), and the significance conclusion would remain the same.

Mitigation Measure HYDRO-1b: Require Stormwater Control Measures.

Based on the results of the drainage report(s) in Mitigation Measure HYDRO-1a, measures during construction and operation may be required to ensure flood flows are not impeded and to minimize redirected flood flows. The measures will identify site-specific drainage facilities necessary to avoid flows exceeding the existing system during construction and implement the necessary flood-reduction strategies and capacity improvements. Performance standards for stormwater control measures will be based on the County of Los Angeles Department of Public Works Stormwater Best Management Practice Design and Maintenance Manual, California Stormwater Quality Association's BMP handbooks, and other similar guidance documents. Specific measures include:

- If an extreme storm event is anticipated, then temporary stormwater control measures will be implemented to avoid increases in peak flows. Stormwater control measures include but are not limited to interim onsite detention facilities, capture and reuse measures, and/or other measures approved by the County, designed to maintain or reduce current, pre-development, surface runoff, and stormwater discharge to the public storm drain system.
- Necessary flood-reduction strategies and capacity improvements will be implemented.

A qualified hydrologist or equally qualified specialist will conduct a final review and approval of performance standards for stormwater control measures to ensure that impacts on stormwater are avoided or reduced.

Changes to Section 3.9.3.3, Page 3.9-91

This change represents a minor clarification to the Draft PEIR by reiterating that because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. These changes are not substantive (i.e., new significant information not previously analyzed).

Cumulative Impacts

The geographic context for an analysis of cumulative impacts on hydrology and water quality would be the LA River Watershed because drainage and water quality impacts are a result of all

waterbodies that are part of the watershed that contribute to downstream impacts. A description of the regulatory setting and approach to cumulative impacts analysis is provided in Section 3.0.2.

Additionally, as described in Section 3.0.1.4 of this Draft PEIR, because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. Therefore, where this PEIR concludes a less-than-significant impact with mitigation for later activities carried out by the County, the impact has been identified as significant and unavoidable when these activities are not carried out by the County.

The County has committed to adopt the mitigation in regard to later activities carried out by the County; other public agencies similarly can and should adopt the mitigation because it is feasible and is in their best interest to reduce potentially significant impacts with mitigation on later activities. In particular, those agencies that utilize the PEIR for later CEQA analyses can reasonably be expected to implement the mitigation or, if they do not, to prepare a subsequent EIR that explains why the mitigation is infeasible.

Changes to Section 3.9.3.3, Page 3.9-90

This change represents a minor clarification to the Draft PEIR by reiterating that because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. These changes are not substantive (i.e., new significant information not previously analyzed).

Baseline Cumulative Condition

Further urbanization in the greater Los Angeles region and implementation of transportation improvements and land use strategies would result in a continuing increase in stormwater runoff, water quality degradation, and exposure of persons and property to floodplain hazards.

Cumulative growth and development would generate additional pollutants from residential, commercial, industrial, and transportation facilities. The increase in impervious surface areas would increase urban runoff, resulting in the transport of greater quantities of contaminants to receiving waters that may currently be impaired (SCAG 2020). Paved surfaces and drainage conduits can accelerate the velocity of runoff, concentrating peak flows in downstream areas faster than under natural conditions. In addition, the increase in impervious areas could decrease groundwater recharge, increase runoff rates and/or volumes, place structures within flood zones, and expose additional people and property to risks associated with dam inundation, seiche, tsunami, and/or mudflow. Population growth could contribute incrementally to depleted groundwater supplies due to substantial additional demands for potable water such that there would be a net deficit in aquifer volume or a lowering of local groundwater level (SCAG 2020). It is not anticipated that cumulative projects in the County would contribute incrementally by placing housing within a 100-year flood hazard area due to compliance with flood safety requirements and flood management plans (Los Angeles County 2014); however, the placement of regional projects within a 100-year flood hazard area would impede or redirect flows when considered cumulatively (SCAG 2020).

The Los Angeles County General Plan Update EIR (Los Angeles County 2014) notes that buildout in the County would involve soil disturbance, construction, and operation of developed land uses that could each generate pollutants affecting stormwater. Although specific impacts may not rise to significant runoff or pollutant levels, the cumulative effect would be significant.

However, various regulatory requirements are in place to minimize these effects, including the CWA, compliance with which is administered by the Los Angeles RWQCB. Other requirements involve preparing and implementing stormwater pollution prevention plans pursuant to the Statewide General Construction Permit, complying with the County MS4 Permit, improving flood management facilities and design requirements to raise structures above flood zones, and complying with recommendations in geotechnical reports to minimize mud flows (SCAG 2020). Even with compliance with water quality, drainage, and flood safety regulations and policies, impacts on hydrology and water quality would be cumulatively significant. Therefore, there is a baseline cumulative condition related to hydrology and water quality.

Contribution of the Project to Cumulative Impacts

One of the primary objectives of the *2020 LA River Master Plan* is to promote healthy, safe, clean water. Construction activities could result in short-term water quality degradation associated with soil erosion and subsequent sediment transport, generation of pollutants, or accidental spills that could temporarily contaminate runoff, surface water, or groundwater. However, BMPs, as required in a SWPPP, would be required during construction to reduce erosion and restrict non-stormwater discharges from the construction site as well as release of hazardous materials. In addition, Mitigation Measures HYDRO-1a and b would reduce potential project impacts related to erosion, runoff, and potential flooding, to less-than-significant levels when carried out by the County. As described in Chapter 3, CEQA Environmental Impact Assessment, because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. Cumulative impacts on hydrology and water quality would be significant and unavoidable for later activities that are not carried out by the County.

The proposed Project would not affect the County's ability to implement or enforce its goals or policies or otherwise be inconsistent with regulatory requirements related to the minimization of water quality impacts. The Project would comply with the NPDES Construction General Permit, Long Beach MS4 Permit and County MS4 Permit and their associated provisions, and other local water quality and LID requirements and stormwater ordinances. Therefore, implementation of the *2020 LA River Master Plan* would not violate any water quality standards or degrade water quality and several components would likely improve water quality.

Implementation of the proposed Project would not deplete groundwater supply or interfere with groundwater recharge. Irrigation supply and system components would comply with local jurisdictions' LID requirements, County water sources, conservation standards, and the current CALGreen. Recycled or reclaimed water would be used for irrigation, where possible. *2020 LA River Master Plan* implementation would provide groundwater resource benefits and would not substantially decrease groundwater supplies, interfere with groundwater recharge, or impede sustainable groundwater management of the basin. Furthermore, the *2020 LA River Master Plan* would be consistent with goals and policies identified in the applicable general plans related to hydrology and water quality. The proposed Project would not make a cumulatively considerable contribution to a cumulative impact on hydrology and water quality when carried out by the County.

Cumulative hydrology and water quality impacts would be significant and unavoidable for later activities that are not carried out by the County.

3.2.15 Changes to Section 3.10, Land Use and Planning

Changes to Section 3.10.3.3, Page 3.10-10

[Immediately following Table 3.10-1]

Rim of the Valley Trail Corridor Master Plan

The *Rim of the Valley Trail Corridor Master Plan*, published June 28, 1990, addresses the Rim of the Valley Trail and the interlocking system of wildlife habitats and corridor connections between the Santa Monica, Santa Susana, Sespe and the San Gabriel Mountains. The Master Plan has 10 components that aim at providing connections through these different mountain ranges as well as provide trails and trailhead access, campsites and open space areas, and to provide information and access to knowledge for the biological and cultural diversity of the areas included.

Table 3.10-1 summarizes *Rim of the Valley Trail Corridor Master Plan* policies and objectives regarding land use and recreation that are relevant to the proposed Project. It should be noted that there are numerous objectives that relate to campgrounds and specific trails and parks. Only policies relevant to land use compatibility and recreation are included in this section.

Table 3.10-2. Rim of the Valley Trail Corridor Master Plan Relevant Policies and Objectives

<u>Objective</u>	<u>Policies and Objectives</u>
<u>Wildlife Habitat</u>	<u>Preservation, restoration and enhancement of significant habitat areas important to:</u> 1) Conserve biological diversity; 2) minimize impacts to sensitive, threatened and endangered species; 3) maintain scenic resources; and contribute to recreational resources which enhance resident’s quality of life.
<u>Trails and Corridors</u>	<u>All trails in the Corridor have two objectives:</u> 1) To provide opportunities for lineal recreation in a natural setting; 2) to ensure continuity throughout the system. <u>The objectives for the main Rim of the Valley Trail are:</u> 1) to provide the major physical link among the ecologically and aesthetically important areas in the Rim Trail System; 2) expand with diversity of recreation opportunity within the Rim Trail system with the opportunity to go from the access point to the Rim Trail and return by a different route. <u>The objective of a local trail is to:</u> 1) provide trail access within and through the urban areas. A local trail may have no direct connection to the Rim of the Valley Trail, need not provide a naturalistic setting and may be generally outside the Corridor boundary.
<u>Programs</u>	<u>The objectives for any proposed program, and the criteria on which it can be judged are to:</u> 1) Provide support for existing and proposed wildlife and recreation projects within the Rim of the Valley Corridor; Stimulate coordination of planning efforts and standards for improvement and management; provide information on the Rim of the Valley Trail system, parks, and wildlife habitat;

Objective	Policies and Objectives
	<u>increase understanding and appreciation of the environmental resources of the Corridor.</u>

Source: Santa Monica Mountains Conservancy 1990.

Changes to Section 3.10.3.4, Page 3.10-18

[Immediately following table previously numbered as Table 3.10-2]

Long Beach Local Coastal Program (LCP)

The Local Coastal Program for Long Beach, completed in late 1979, is an element of the Long Beach General Plan. The coastal zone in the City of Long Beach encompasses over 3,100 acres and a population in excess of 42,000 residing in nearly 22,000 dwelling units. It is the most intensely developed part of the City. The LCP represents the commitment of Long Beach to provide continuing protection and enhancement of the resources within the coastal zone. The LCP recognizes that certain resource areas will require further public attention to ensure such protection and enhancement. Included in this concern are (a) Lands that have a history or potential of productive agricultural use; (b) Areas where unused and/or subdivided lots require consolidation or redesign to permit appropriate land uses; (c) Sensitive coastal resource areas which are suffering some form of deterioration or development pressure; (d) Degraded or less than pristine wetlands of any size; and I Areas which are appropriate for well-designed visitor-commercial and recreation facilities.

Long Beach Port Master Plan

The Port of Long Beach Port Master Plan (PMP) was last comprehensively updated and certified in 1990. In the ensuing 30 years, the Long Beach Harbor District (Harbor District) has undergone a number of major physical changes. More importantly, the maritime industry that the Port serves has changed dramatically the Port’s role as a steward of other public resources (e.g., recreation and wildlife). Updated in 2019, the Draft Port Master Plan Update is based on the Port of Long Beach Strategic Plan, which envisions the Port as a facilitator of international trade with a commitment to operational excellence, environmental stewardship, safety, security, and community partnership. Once certified by the California Coastal Commission, the PMP Update would be Amendment #20.

The major long-range planning goals of the Port Master Plan are:

1. Accommodate forecast demand for diverse cargoes.
2. Develop modern terminal facilities with efficient operations.
3. Integrate green port policy and land use planning.
4. Protect and enhance the coast for the benefit of all port users and communities.

The PMP Update also contains five plan elements that include (1) Public Access and Recreation, (2) Environment and Sustainability, (3) Climate Change Adaptation, (4) Transportation and Circulation, (5) Navigation, (6) Terminal Operations, (7) Rail Operation, and (8) Oil Operations.

Changes to Section 3.10.4.3, Page 3.10-31

The following changes represent a minor clarification to mitigation in the Draft PEIR by requiring signs to be posted at least 30 days prior to construction to inform community members. These changes merely clarify the mitigation described in the Draft PEIR. Additionally, as concluded in the Draft PEIR, the impact would be less than significant for later activities when carried out by the County and significant and unavoidable for later activities when not carried out by the County. These clarifications are not substantive (i.e., the change to the mitigation does not result in a new or worsened impact), and the significance conclusion would remain the same.

Mitigation Measure LU-1: Construction Management Plan.

The implementing agency will require a construction management plan (CMP) be prepared that will include the following elements:

- No construction staging will be allowed within residential neighborhoods.
- Construction workers will park in a specified off-site location and be shuttled to and from the construction site. Local residential neighborhoods will not be used for construction worker parking under any circumstances.
- The CMP will provide a traffic control plan that identifies the location and timing of temporary closures and detours of public streets with the goal of maintaining traffic flow, especially during peak travel periods. The CMP will be site specific and include, at a minimum, signage to alert drivers to the construction zone, traffic control methods, traffic speed limitations, and alternative access and detour provisions during road closures. Local police and fire departments will be consulted during preparation of the CMP.
- Require signs to be posted at least 30 days prior to construction to inform community members that construction will begin, provide detour signage, and wayfinding to nearby amenities during LA River pathway closure. See also REC-1.
- Any temporary closure or removal of parking areas or roadways during construction will be temporary and will be restored upon completion of construction. Efforts will be made to minimize their removal or shorten the length of time that these facilities are inoperable to the extent possible.
- Construction hours and parking for construction vehicles will be implemented; freight and passenger rail services will be protected; and truck routes and construction for special events during project construction, bicycle and pedestrian access, and transit access will be maintained. Screening will be provided for all construction equipment to the maximum extent feasible.
- Alternative access to community facilities and neighborhood-serving commercial uses will be provided if access is obstructed by construction activities.

Changes to Section 3.10.4.3, Page 3.10-34

The following changes represent a minor clarification to mitigation in the Draft PEIR by stating that during project design the implementing agency or person implementing the project shall meet with the jurisdiction that has authority over the project site. These changes merely clarify the mitigation described in the Draft PEIR. Additionally, as concluded in the Draft PEIR, the impact would be less than significant for later activities when carried out by the County and significant and unavoidable for later activities when not carried out by the County. These clarifications are not substantive (i.e., the change to the mitigation does not result in a new or worsened impact), and the significance conclusion would remain the same.

Mitigation Measure LU-3: Alternative Connectivity.

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

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

Changes to Section 3.10.4.3, Page 3.10-35

Significance after Required Mitigation

Impacts would be less than significant for overall 2020 LA River Master Plan implementation KOP Category 6 for later activities when carried out by the County.

Impacts would be significant and unavoidable for overall 2020 LA River Master Plan implementation KOP Category 6 for later activities when not carried out by the County.

~~For all other KOP Categories, n~~ No impacts would occur for all KOP Categories.

Changes to Section 3.10.4.3, Page 3.10-40

The following changes represent a minor clarification to mitigation in the Draft PEIR. These changes merely clarify the mitigation described in the Draft PEIR. Additionally, as concluded in the Draft PEIR, the impact would be less than significant for later activities when carried out by the County and significant and unavoidable for later activities when not carried out by the County. These clarifications are not substantive (i.e., the change to the mitigation does not result in a new or worsened impact), and the significance conclusion would remain the same.

Mitigation Measure LU-4: Site Selection Process.

To avoid potential project inconsistency with applicable land use plans, the following will be implemented:

- During the site selection process, as specific projects under the KOP category are developed, the implementing agency will consult with the affected jurisdiction to determine if potential inconsistencies with land use plans and policies could occur.
- Results of the consultation could include:
 - Selection of an alternative site
 - Revision or substitution of specific project components (alternative design)
 - Reduction in size of the project
 - Abandonment of the project

The results of the consultation will be documented in writing, with written concurrence from the affected jurisdiction, and incorporated into the ~~County's implementing agency's~~ project file.

Changes to Section 3.10.4.3, Page 3.10-54

Baseline Cumulative Condition

The development patterns encouraged by the 2020–2045 RTP/SCS, where implemented by local jurisdictions, would influence the distribution of growth in existing urbanized areas or suburban town centers and opportunity areas such as in high-quality transit areas, including livable corridors and neighborhood mobility areas. To accommodate growth, the 2020–2045 RTP/SCS includes transportation and land use strategies that encourage higher densities in areas with infill potential and existing infrastructure; emphasizes an increase in transportation mode choice such as transit, walking, and biking; promote diverse housing choices; support implementation of sustainability policies; and promote a green region and other benefits.

As noted in the PEIR for the 2020–2045 SCAG RTP/SCS, physical division of an established community could occur as a result of real or perceived barriers to pedestrians, bicyclists, and motorists. Long-term impacts could result from the completion of new or expanded roadways or

transit facilities in existing communities. The PEIR found that land use impacts could be significant and unavoidable even with implementation of mitigation on a regional basis.

Local land use plans and policies guide development within a particular jurisdiction. Past, present, and reasonably foreseeable development within the applicable jurisdictions along the river's extent may have resulted in some site-specific physical division of an established community or inconsistencies with land use plans and policies; however, all local jurisdictions require design review for all projects and consideration of consistency with its land use plans. Therefore, the impact with regard to land use would not be cumulatively significant. On a local level, there is no baseline cumulative condition with regard to land use. Therefore, the proposed Project would not make a cumulatively considerable contribution to land use and planning.

Local land use plans and policies guide development within a particular jurisdiction. Past, present, and reasonably foreseeable development within the applicable jurisdictions along the river's extent may have resulted in some site-specific physical division of an established community or inconsistencies with land use plans and policies; however, all local jurisdictions require design review for all projects and consideration of consistency with its land use plans. Therefore, the impact with regard to land use would not be cumulatively significant. On a local level, there is no baseline cumulative condition with regard to land use.

Contribution of the Project to Cumulative Impacts

The proposed Project would not physically divide an established community. Project impacts with regard to land use compatibility would be less than significant, and the Project would be generally consistent with land use plans and policies. As there is no baseline cumulative condition with regard to land use, the proposed Project would not make a cumulatively considerable contribution to land use and planning impacts.

3.2.16 Changes to Section 3.11, Mineral Resources

Changes to Section 3.11.3.3, Page 3.11-16

Baseline Cumulative Condition

Important local mineral resources include construction materials and minerals of historical significance, including precious gemstones and metals. Aggregate resources include rock, sand, and gravel, which are important for the construction and manufacturing of concrete. Further urbanization in the County could result in development on lands containing aggregate resources. Significant potential deposit sites have been identified by the State Geologist along the floodplain from the San Fernando Valley through downtown Los Angeles. Development generally results in a demand for minerals, especially construction aggregate. As noted, the general plans of the Cities of Long Beach, Los Angeles, Maywood, Commerce, and Glendale contain policies that relate to mineral and gas resources. These goals and policies provide for conservation and maintenance of mineral resource lands. Development in these jurisdictions would be expected to be consistent with these goals and policies. The remaining jurisdictions have no goals and policies pertaining to mineral resources, as they do not contain significant sources of aggregate minerals or oil and gas.

California is the largest producer of sand and gravel in the nation, and the greater Los Angeles area is the nation's leading producer for its geographical size. The County has high quantities of sand and gravel, which are located close to the market. Sand and gravel deposits follow the LA River flood plain, coastal plain, and other water bodies and courses. As noted, above, the primary cause for loss of availability of mineral resources in the County is by placement of incompatible land uses that either directly or indirectly make the resource inaccessible for future extraction. Mining operations require an adequate setback from these land uses due to a variety of environmental issues associated with mining activities, which include, but are not limited to, noise, traffic, air quality, and visual resources impacts. Future development in areas containing mineral and oil and gas resources would be consistent with applicable general plan policies concerning conservation of these natural resources. At the local level, the County screens development projects for the potential loss of availability of mineral resources using MRZ classification data within the County GIS mapping applications. Existing policies would prevent incompatible development adjacent to mineral resource sites that could impair extraction or redevelopment of productive mineral resource sites. Because of these policies and screening procedures, there is no baseline cumulative condition relative to mineral resources in the County.

3.2.17 Changes to Section 3.12, Noise

Changes to Section 3.12.3.3, Page 3.12-147

This change represents a minor clarification to the Draft PEIR by reiterating that because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. These changes are not substantive (i.e., the change to the mitigation does not result in a new or worsened impact).

Cumulative Impacts

The geographic context for an analysis of cumulative noise impacts is confined to 0.5 mile from the study area boundary (or 1.5 miles from the river on each side). Noise diminishes 6 dB with a doubling of distance from the source, and would, therefore, not be readily perceptible or a disturbance outside that radius. Buildout of the *Los Angeles County General Plan* would encompass future development within the study area plus 0.5-mile radius for cumulative development. A description of the regulatory setting and approach to cumulative impacts analysis is provided in Section 3.0.2.

Additionally, as described in Section 3.0.1.4 of this Draft PEIR, because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. Therefore, where this PEIR concludes a less-than-significant impact with mitigation for later activities carried out by the County, the impact has been identified as significant and unavoidable when these activities are not carried out by the County.

The County has committed to adopt the mitigation in regard to later activities carried out by the County; other public agencies similarly can and should adopt the mitigation because it is feasible and is in their best interest to reduce potentially significant impacts with mitigation on later

activities. In particular, those agencies that utilize the PEIR for later CEQA analyses can reasonably be expected to implement the mitigation or, if they do not, to prepare a subsequent EIR that explains why the mitigation is infeasible.

Criteria for Determining Significance of Cumulative Impacts

The proposed Project would have the potential to result in a cumulatively considerable impact on noise, if, in combination with other projects within the defined geographic context, it would result in 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. This impact would occur if: any project construction activity would take place outside the codified hours of construction specified by any city or County government codes; any project construction activity generates maximum noise levels that exceed 75 dBA at any offsite residential receptor (based on the City of Los Angeles Municipal Code); the 1-hour Leq from project construction activities would exceed existing ambient exterior noise levels by 5 dBA or more at a noise-sensitive use (based on the L.A. CEQA Thresholds Guide); any project operations activity would generate noise related to the Project that would exceed the limits specified in any jurisdiction's municipal code; the Project would generate excessive groundborne vibration or groundborne noise levels; or the Project would be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport and expose people residing or working in the project area to excessive noise levels.

Baseline Cumulative Condition

The greater Los Angeles region is a developed, urban area. The study area and its surroundings are subject to existing high levels of ambient noise. Development of new residential, commercial, or industrial structures as well as transportation projects could increase both stationary and mobile sources of noise from heating, ventilation, and air-conditioning and other equipment, as well as vehicles. Construction activities could also generate significant cumulative noise and vibration effects if in proximity to one another or in combination with operational or vehicular noise. Cumulative projects would be required to comply with applicable land use compatibility classifications and noise ordinances. However, buildout of the *County of Los Angeles General Plan* would also result in substantial noise level increases throughout the County. Implementation of general plan policies would reduce impacts to the extent feasible. However, impacts related to noise land use compatibility are considered significant because of the anticipated level of buildout of the *Los Angeles County General Plan*.

Additionally, vibration generated by construction equipment has the potential to be substantial and exceed the FTA criteria for human annoyance and structural damage, which would be significant. Implementation of the applicable general plans in the study area, when taken into consideration with all other infrastructure and development projects that may occur in the region between 2016 and 2040, would result in significant cumulative impacts from the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. Both construction and operation activities would expose people to excessive groundborne vibration or groundborne noise levels, constituting a significant impact. Therefore, there is a baseline cumulative condition related to noise and vibration.

Contribution of the Project to Cumulative Impacts

The *2020 LA River Master Plan* would comply with jurisdictional thresholds and requirements for both construction and operations incumbent within the municipal codes, general plans, and planning documents as it relates to noise. Inclusion of ~~mitigation measures would help reduce impacts.~~ Mitigation Measures NOI-1, NOI-2, NOI-3, NOI-4, NOI-5, NOI-6, NOI-7, NOI-8, and NOI-9 would reduce potential project impacts when carried out by the County. As described in Chapter 3, *CEQA Environmental Impact Assessment*, because some later activities under the *2020 LA River Master Plan* would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. Cumulative impacts on noise would be significant and unavoidable for later activities that are not carried out by the County.

The cumulative noise and vibration impacts would be localized to the area where construction activities would take place. Noise and vibration effects diminish substantially as distance between the source and receptors widens. Noise generated by a stationary noise source, or “point source,” decreases by approximately 6 dBA over hard surfaces (e.g., reflective surfaces, such as parking lots or smooth bodies of water) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces, such as soft dirt, grass, or scattered bushes and trees) for each doubling of the distance. ~~Implementation of Mitigation Measures NOI-1, NOI-2, NOI-3, NOI-4, NOI-5, NOI-6, NOI-7, NOI-8, and NOI-9 would further help reduce potential project impacts.~~

Therefore, the Project would not make a cumulatively considerable contribution to cumulative noise and vibration impacts when later activities are carried out by the County. Cumulative impacts on noise would be significant and unavoidable for later activities that are not carried out by the County.

3.2.18 Changes to Section 3.13, Population and Housing

Changes to Section 3.13.2.1, Page 3.13-5

Homelessness and homeless people living in public rights-of-way or in natural open space or recreational areas are a concern throughout the State of California, the County, and specifically near the LA River. A number of homeless encampments are located along the LA River—currently, more than 78,500 people experiencing homelessness live in communities along the LA River (Los Angeles Homeless Services Authority 2020). No counts of the population within the fence line were identified, but anecdotally sizable encampments exist in multiple locations along the corridor and have been the subject of multiple news accounts. They are not just visitors to the river; they may live in the channel or along the river banks, with no other refuge in inclement weather or at night. Homeless and housed people face many of the same risks along the river: risk from flooding, from heat, from violent crime, and from the remoteness of available emergency services. The unsheltered population, however, is more vulnerable and they tend to lack the same resources and safety net that other users of the LA River have.

Changes to Section 3.13.3.3, Page 3.13-39

Baseline Cumulative Condition

Past projects in the County (cities and unincorporated areas) have converted undeveloped and agricultural land to urban uses, resulting in residential and employment population increases. The planning documents, such as general plans prepared by cities, would be subject to regional plans such as SCAG's RCP and the RTP/SCS. The general plans of County jurisdictions have been prepared to be consistent with the population forecast of the regional planning documents. Therefore, these projects would accommodate anticipated future growth, not induce new growth. Since cumulative projects would be required to comply with applicable land use plans governing regional growth, a significant cumulative impact would not occur.

Contribution of the Project to Cumulative Impacts

As there is no significant baseline cumulative condition with respect to population and housing, the proposed Project would not make a cumulatively considerable contribution to population and housing impacts.

3.2.19 Changes to Section 3.14, Public Services

Changes to Section 3.14.2.2, Page 3.14-2

City of Paramount (Frame 3)

City of Paramount Fire Code

Chapter ~~8.0819~~ of the Paramount Municipal Code adopts Title 32 of the Los Angeles County Code as the Fire Code of the City of Paramount. No further information is provided.

Changes to Section 3.14.3.3, Page 3.14-59

Baseline Cumulative Condition

Cumulative growth within the greater Los Angeles region would result in increased demand and a need for fire and police services to serve new development and populations. Many areas within the region already have inadequate public services for the existing populations and commercial businesses. Further growth, including implementation of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), would exacerbate existing needs as well as the expanded needs of cumulative programs and plans (SCAG 2020). In order to maintain adequate service capacity, the construction or expansion of public service facilities would be required, which would have the potential to result in an adverse impact on the environment. Although the majority of cumulative projects would involve discretionary actions and therefore would be required to demonstrate compliance with CEQA prior to approval, they would incrementally increase the need for public services. These impacts would be largely mitigated through local municipal and school

district developer fees to fund the development of new or expansion of existing public service facilities. However, the incremental increases would have the potential to result in significant cumulative impacts. Therefore, there is a baseline cumulative condition with respect to public services.

3.2.20 Changes to Section 3.15, Recreation

Changes to Section 3.15.2.1, Page 3.15-2

Regional Trails

Trails along the LA River currently provide access to 30 of 51 miles of the river. The County-maintained portion of the LA River Trail runs 16.7 miles along the LA River (Los Angeles County Public Works 2021). Additionally, Los Angeles County Department of Recreation operates and maintains the approximately 10-mile multi-use trail that runs from Imperial Highway south to Willow Street. The longest continuous segments of the LA River Trail are a 16-mile stretch between Imperial Highway and the mouth of the LA River at Long Beach and a 7-mile stretch along the Glendale Narrows. In the San Fernando Valley, the trail becomes more fragmented.

Figure 3.15-1 (Figures 3.15-1.1 through Figure 3.15-1.9) shows the parks, open space, and recreational facilities throughout the study area by frame for Frames 1 through 9 as discussed in detail below. Figure 3.15-2 (Figures 3.15-2.1 through Figure 3.15-2.9) shows the existing river trails and access points to the LA River.

Changes to Section 3.15.2.1, Page 3.15-3

Table 3.15-1. Los Angeles County Park Classifications

Park Type	Classifications
Local Park System	
Community Parks	<ul style="list-style-type: none"> ● Acres per Thousand Population: 4/1,000 ● Suggested Acreage: 10 to 20 acres ● Service Area: 1 to 2 miles ● <u>Passive park amenities include but are not limited to: informal open play areas, children’s play apparatus, family and group picnic areas with overhead shelters, and barbecues.</u> ● <u>Active sports activities include but are not limited to: lighted sports fields, basketball courts, and tennis courts.</u> ● <u>Additional amenities may include aquatics complex, skate park, arena soccer, roller hockey, community gardens, and dog parks.</u> ● <u>Park facilities include but are not limited to: public restrooms, concession building, community buildings, maintenance building, onsite parking, and information kiosks.</u> <p>Can Include: informal open play areas, children’s play apparatus, family and group picnic areas with overhead shelters, barbecues, lighted sports fields,</p>

Park Type	Classifications
	basketball courts, tennis courts, aquatics complex, skate park, arena soccer, roller hockey, community gardens, dog parks
Neighborhood Parks	<ul style="list-style-type: none"> ● Acres per Thousand Population: 4/1,000 ● Suggested Acreage: 3 to 10 acres ● Service Area: 1/2 mile ● <u>Passive park amenities include but are not limited to: informal open play areas, children’s play apparatus, group picnic areas with overhead shelters, and barbecues.</u> ● <u>Active park amenities include but are not limited to: practice sports fields and basketball, tennis, and volleyball courts.</u> ● <u>Park facilities include but are not limited to: public restroom, onsite parking, and information kiosks.</u> <p>Can Include: informal open play areas, children’s play apparatus, family picnic areas with overhead shelters, barbecues, practice sports fields, basketball, tennis, and volleyball courts</p>
Pocket Parks	<ul style="list-style-type: none"> ● Acres per Thousand Population: 4/1,000 ● Suggested Acreage: less than 3 acres ● Service Area: 1/4 mile ● <u>Passive park amenities include but are not limited to: picnic areas and seating areas.</u> ● <u>Active park amenities include but are not limited to: children’s play apparatus.</u> <p>Can Include: picnic areas, seating areas, children’s play apparatus</p>
Park Node	<ul style="list-style-type: none"> ● Acres per Thousand Population: 4/1,000 ● Suggested Acreage: 1/4 acre or less ● No service radius area ● <u>Amenities Can Include: plazas, rest areas, playgrounds, landmarks, and public art installations</u>
Regional Park System	
Community Regional Parks	<ul style="list-style-type: none"> ● Acres per Thousand Population: 6/1,000 ● Suggested Acreage: 20 to 100 acres ● Service Area: up to 20 miles ● <u>Passive park amenities include but are not limited to: informal open play areas, children’s play apparatus, group picnic areas with overhead shelters, and barbecues.</u> ● <u>Active sports activities include but are not limited to: lighted sports fields, basketball courts, and tennis courts.</u> ● <u>Additional amenities may include one or more of the following features: multiple sports facilities, aquatics center, fishing lake, community building and gymnasium, and scenic views and vistas.</u> ● <u>Park facilities include but are not limited to: public restrooms, concession building, community buildings, maintenance building, onsite parking, and information kiosks.</u> <p>Can Include: informal open play areas, children’s play apparatus, family and group picnic areas with overhead shelters, barbecues, lighted sports fields, basketball courts, tennis courts, multiple sports facilities, aquatics center, fishing lake, community building, gymnasium, views and vistas</p>
Regional Parks	<ul style="list-style-type: none"> ● Acres per Thousand Population: 6/1,000 ● Suggested Acreage: greater than 100 acres

Park Type	Classifications
	<ul style="list-style-type: none"> • Service Area: 25+ miles • <u>Passive park amenities include but are not limited to: group picnic areas with overhead shelters and barbecues.</u> • <u>Additional amenities may include one or more of the following features: lakes; wetlands; auditoriums; water bodies for swimming, fishing, and boating; and sports fields.</u> <p><u>Can Include: group picnic areas with overhead shelters and barbecues, lakes, wetlands, auditoriums, water bodies and campgrounds, water bodies for swimming, fishing and boating, and sports fields</u></p>
Special Use Facilities	<ul style="list-style-type: none"> • Acres per Thousand Population: 6/1,000 • No size criteria • No assigned service radius area • <u>Generally, single purpose facilities. Can include passive features such as: wilderness parks, nature preserves, botanical gardens, and nature centers.</u> • <u>Active uses can include: performing arts, water parks, skate parks, golf driving ranges, and golf courses.</u> <p><u>Can Include: wilderness parks, nature preserves, botanical gardens, nature centers, performing arts, water parks, aquatic facilities, skate parks, golf driving ranges, and golf courses</u></p>

Source: Los Angeles County 2016.

Changes to Section 3.15.2.1, Page 3.15-5

The following changes represent minor clarifications providing more recent park data in the Recreation Setting section of the Draft PEIR and are not substantive (i.e., new significant information not previously analyzed).

Table 3.15-4. Parks and Recreational Resources within Frame 1

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
Park Nodes (<1/4 acre)					
24	Loma Vista Park	City of Long Beach	0.14	Playground	0.27
<u>47</u>	<u>Locust Tot Lot</u>	<u>City of Long Beach</u>	<u>0.09</u>	<u>Playground</u>	<u>0.86</u>
Mini Parks (<2 acres)					
14	East Village Arts Park	City of Long Beach	0.09	Park benches, open space	<u>1.030.91</u>
15	Fellowship Park	City of Long Beach	0.37	Playground	1.04
30	Officer Daryle W Black Memorial Park	City of Long Beach	0.14	Playground	1.04
29	Mini-Parks at 1st Place through 15th Place	City of Long Beach	1.51 <u>0.50</u>	No amenities	1.350

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
Pocket Parks (<3 acres)					
1	14th Street Park and Playground	City of Long Beach	1.66	Basketball, fitness zone, playground	0.53
2	21st to Hill Mini Park	City of Long Beach	0.91	Playground	0.08
9	Cressa Park	City of Long Beach	0.61	Walking trail	0.07
23	Lincoln Park	City of Long Beach	4.55 2.81	Picnic area	0.59
31	Promenade Square	City of Long Beach	0.52	Open space area, playgrounds	0.8376
35	Seaside Park	City of Long Beach	2.30	Soccer, picnic area, playground, restroom	0.45
40	Tanaka Park	City of Long Beach	1.62	Basketball, playground	0.31
Neighborhood Parks (~8 acres)					
4	Admiral Kidd Park	City of Long Beach	12.49	Basketball, soccer, fitness zone, playground, community center, restroom	0.56
12	Drake Park	City of Long Beach	6.15	Tennis, basketball, soccer, skate park, picnic areas, playground, splash pad, community center, restroom	0.15
16	Golden Shore Marine Biological Reserve Park	City of Long Beach	7.4091	Interpretative signage and viewing scopes	0.04
18	Harry Bridges Memorial Park	City of Long Beach	4.6114	Restroom	0.8125
20	Hudson Park	City of Long Beach	11.23	Baseball, soccer, playground, restroom	0.81
26	Marina Green	City of Long Beach	7.8118 63	Restrooms	0.9247
32	Rainbow Harbor Esplanade	City of Long Beach	6.9082 3	Eight public piers, Restrooms	0.4915
Community Parks (~35 acres)					
7	Cesar E. Chavez Park	City of Long Beach	9.07	Basketball, playgrounds, gym, community center, restroom	0.13
8	Cesar E. Chavez Park Terminus	City of Long Beach	15.11	No amenities	0.08

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
38	Silverado Park	City of Long Beach	11.73	Tennis, basketball, baseball, multipurpose field, skate park, playground, pool, gym, community center, restroom	0.31
42	Veterans Park	City of Long Beach	14.824 3.02	Tennis, basketball, multipurpose field, playground, community center, restroom	0.73
Greenway Parks (No acreage designation)					
3	34th Street Greenbelt (Wrigley Greenbelt)	City of Long Beach	0.94	Walking trail	0.06
10	Daisy Greenbelt	City of Long Beach	2.32	Green space	0.35
34	Santa Cruz Park	City of Long Beach	2.3640	Green space, benches	0.21
43	Victory Park	City of Long Beach	5.8071	Green space, park benches	0.6156
3	34th Street Greenbelt (Wrigley Greenbelt)	City of Long Beach	0.949.8	Walking trail	0.06
<u>50</u>	<u>Chavez Wetlands</u>	<u>City of Long Beach</u>	<u>8.26</u>	<u>Green space</u>	<u>0.05</u>
Special Use Parks (No acreage designation)					
11	Downtown Marina Mole	City of Long Beach	9.735.1 7	Restrooms	0.8233
13	Drake Chavez Soccer Fields and Parkway	City of Long Beach	7.93	Soccer	0.07
17	Golden Shore RV Resort	City of Long Beach	6.185.1 6	Picnic area, pool and spa, recreation room, sand volleyball court, horseshoes, shuffleboard, children's playground, hot showers, barbecue pits, restrooms	0.04
25	Long Beach Aquarium of the Pacific	City of Long Beach	8.19	No amenities	0.4415
28	Michael K Green Skate Park	City of Long Beach	0.43	Skate park	0.68
33	Rainbow Lagoon Park	City of Long Beach	12.124 1.74	Grassy areas and paths	0.7241
36	Shoreline Aquatic Park	City of Long Beach	10.676	Grassy area, benches, picnic tables	0.4211

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
39	South Shore Launch Ramp	City of Long Beach	6.54	Boat launch, restrooms, dock space, wash down stations	0.1106
41	Terrace Theater	City of Long Beach	2.56	Indoor performing arts theater	0.8766
5	Alamitos Beach	City of Long Beach	23.185 6.47	Restroom, volleyball courts	1.24086
6	California Coastal National Monument	City of Long Beach	9.5075 50	No amenities	1.30081
19	Harvey Milk Promenade	City of Long Beach	0.20	Chess tables	0.80
21	Hudson Park Community Garden	City of Long Beach	1.53	Community garden	0.90
22	K-9 Corner Dog Park	City of Long Beach	0.08	Dog park	0.68
27	Mary Molina Community Garden	City of Long Beach	0.15	Community garden	0.52
37	Shoreline Park Bikepath	City of Long Beach	2.8994	Bike path	0.3610
44	Willow and Golden N	City of Long Beach	9.9008 9	Green space	0.087
45	Willow and Golden S	City of Long Beach	1.120	Green space	0.09
<u>48</u>	<u>Seaside Dog Zone</u>	<u>City of Long Beach</u>	<u>0.18</u>	<u>Dog park</u>	<u>1.02</u>
<u>49</u>	<u>Pike Park</u>	<u>City of Long Beach</u>	<u>0.18</u>	<u>Dog park</u>	<u>0.66</u>
Total approximate recreation acreage:			346.31		

Source: Los Angeles County, Department of Recreation 2020.

Changes to Section 3.15.2.1, Page 3.15-10

The following changes represent minor clarifications providing more recent park data in the Recreation Setting section of the Draft PEIR and are not substantive (i.e., new significant information not previously analyzed).

Table 3.15-7. Parks and Recreational Resources within Frame 2

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
Mini Parks (<2 acres)					
5348	Arbor Street Park	City of Long Beach	0.43	Green space	0.6973
561	Burton W Chace Park	City of Long Beach	0.29	Playground, splash pad	0.316
Pocket Parks (<3 acres)					
550	Baker Street Park	City of Long Beach	1.34	Playground, picnic areas, path	0.17
6055	Grace Park	City of Long Beach	1.11	Playground	0.638
6358	North Community Garden	City of Long Beach	0.68	Community garden	0.337
Neighborhood Parks (~8 acres)					
5449	Atlantic Plaza Park	City of Long Beach	6.57136	Tennis, recreation center, green space, benches	0.97102
572	Coolidge Park	City of Long Beach	7.18	Basketball court, softball field, playground, dog park, picnic area, community center, youth recreation, restroom	0.193
583	DeForest Park	City of Long Beach	27.567	Tennis, basketball, multipurpose field, playground, community center, restrooms	0.005
594	Dominguez Park	City of Carson	7.63	Tennis, basketball, baseball, soccer, multipurpose field, fitness zone, picnic areas, playground, pool, community centers, senior center, restroom	0.48

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
<u>6257</u>	Los Cerritos Park	City of Long Beach	7.73	Tennis, picnic area, playground, restroom	0.29
Community Parks (~35 acres)					
<u>6156</u>	Houghton Park	City of Long Beach	26.15	Tennis, basketball, soccer, multipurpose fields, skate park, picnic area, playgrounds, community center, restrooms	<u>0.2934</u>
<u>6459</u>	Scherer Park	City of Long Beach	<u>23.575-18</u>	Tennis, basketball, playgrounds, dog park, community center, restroom	<u>0.6342</u>
Greenway Parks (No acreage designation)					
<u>650</u>	Sleepy Hollow Greenbelt	City of Long Beach	<u>1.42-56</u>	Green space	<u>0.2934</u>
<u>661</u>	South Street Parkway	City of Long Beach	1.44	Grassy area	<u>0.0813</u>
Not Classified (No acreage designation)					
<u>5146</u>	51st Street Greenbelt	City of Long Beach	1.02	Green space	<u>0.0711</u>
<u>5247</u>	72nd Street Staging Area	City of Long Beach	2.96	Equestrian center, trails, restrooms	<u>0.037</u>
<u>672</u>	Wrigley Heights Dog Park	City of Long Beach	1.71	Dog park	0.18
<u>683</u>	C David Molina Park	City of Long Beach	<u>3.293</u>	Sports field, playground, restroom facility, walking path	<u>0.0811</u>
<u>69</u>	<u>Virginia Country Club</u>	<u>City of Long Beach</u>	<u>177.15</u>	<u>Country Club</u>	<u>0.09</u>
<u>71</u>	<u>Gayle Carter Uptown Dog Park</u>	<u>City of Long Beach</u>	<u>1.48</u>	<u>Dog park</u>	<u>0.67</u>
Total approximate recreational acreage:			120.82		

Source: Los Angeles County, Department of Recreation 2020.

Changes to Section 3.15.2.1, Page 3.15-14

The following changes represent minor clarifications providing more recent park data in the Recreation Setting section of the Draft PEIR and are not substantive (i.e., new significant information not previously analyzed).

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

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
Park Nodes (<1/4 acre)					
894	River Pocket Park	City of Cudahy	0.24	Path, benches, informational boards	0.084
Mini Parks (No acreage designation)					
7769	Garfield Park	City of Paramount	0.79	Multipurpose field, picnic area, playground	0.749
Pocket Parks (<3 acres)					
780	Hollydale Community Park	City of South Gate	1.01	Basketball, baseball, multipurpose field, picnic area, playground, community center, restroom	0.715
9385	Temple Park	City of Downey	0.36	Playground	0.7781
9486	Triangle Park	City of South Gate	0.57	Benches, grassy areas	0.4036
Neighborhood Parks (3 to 10 acres)					
7264	Circle Park	City of South Gate	4.40	Basketball, baseball, soccer, playgrounds, restrooms	0.2841
7365	Clara Park Expansion	City of Cudahy	7.02	Basketball, soccer, fitness center, picnic areas, playground, gym, community center, senior center, restroom	0.6056
7466	Crawford Park	City of Downey	2.27	Basketball, playground	0.826
7567	Cudahy Park	City of Cudahy	8.33	Tennis, basketball, baseball, multipurpose field, skate park, playground, splash pad, community center, restroom	0.084

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
7668	East Rancho Dominguez Park	City of Compton	5.49	Tennis, basketball, soccer, picnic area, playground, gym, community center, senior center, restroom	0.3329
8072	John D Ham Park	City of Lynwood	8.91	Trails, basketball, baseball, multipurpose field, fitness zones, playground, community center, restroom	0.6763
8173	Kelly Park	City of Compton	4.32	Basketball, baseball, multipurpose field, playground, community center	0.5046
8375	Meadows Park	City of Paramount	0.65	Picnic areas, playground	0.6670
8577	Parque Dos Rios	City of South Gate	7.01	Green space	0.073
9082	Salud Park	City of Paramount	9.17	Multipurpose field, fitness zones	0.4854
Community Parks (10 to 20 acres)					
7886	Ralph C. Dills Park	City of Paramount	11.7026	Trails, multipurpose fields, fitness zones, playgrounds, restroom	0.005
8779	Ricardo Lara Linear Park	City of Lynwood	4.611289	Trails, fitness zones, picnic areas, playgrounds, dog park	0.7268
9284	Spane Park	City of Paramount	4.21	Basketball, multipurpose field, playgrounds, community center, restroom	0.238
Community Regional Parks (20 to 100 acres)					
791	Hollydale Regional Park	City of South Gate	48.04	Trails, tennis, basketball, baseball, soccer, fitness zone, picnic area, playgrounds, dog park, restrooms	0.015

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
9183	South Gate Park	City of South Gate	83.18968	Trails, tennis, basketball, baseball, skate park, picnic areas, playgrounds, pool, gym, community centers, senior center, restrooms	0.5248
Special Use Parks (No acreage designation)					
8476	Orange Avenue Splash Zone	City of Paramount	0.27	Splash pad, restroom	0.306
Not Classified (No acreage designation)					
7264	Circle Park	City of South Gate	0.20	Basketball, baseball, soccer, playgrounds, restrooms	0.372
8274	Los Amigos Golf Course	City of Downey	146.26	Golf course	0.4852
80	Rio Hondo Golf Club	City of Downey	101	Golf course	1.03
9587	Unnamed site	City of Paramount	10.26	No amenities	0.3641
9688	Washington Ave Park	City of Compton	0.36	Tennis, basketball, fitness zones, playgrounds, splash pads, restrooms	0.373
Total approximate recreational acreage:			370.52		

Source: Los Angeles County, Department of Recreation 2020.

Changes to Section 3.15.2.1, Page 3.15-19

The following changes represent minor clarifications providing more recent park data in the Recreation Setting section of the Draft PEIR and are not substantive (i.e., new significant information not previously analyzed).

Table 3.15-13. Parks and Recreational Resources within Frame 4

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
Park Nodes (<1/4 acre)					
10092	Benito Juarez Park	City of Maywood	0.08	Soccer, skate park, playground	0.95

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
11103	Pine Avenue Park	City of Maywood	0.15	Playground	0.268
Pocket Parks (<3 acres)					
10294	Darwell Park	City of Bell Gardens	0.26	Picnic area, playground	0.858
10395	Freedom Park	City of Huntington Park	0.789	Multipurpose fields	0.979
95103	Freedom Park Athletic Field	City of Huntington Park	1.570.18	Basketball, multipurpose field, playground, splash pad, community center, restroom	0.979
10496	Gallant Park	City of Bell Gardens	0.26	Playground	0.5963
10597	Julia Russ Asmus Park	City of Bell Gardens	0.76	Basketball, picnic area, playground, restroom	0.0912
10698	Marlow Park	City of Bell Gardens	0.98	Basketball, playground, restroom	0.148
10799	Maywood Activity Park	City of Maywood	2.40	No amenities	0.1719
11001	Neighborhood Youth Center	City of Bell Gardens	0.867	Basketball, multipurpose field, picnic area, playground, gym, community center, restroom	0.4953
11203	Pixley Park	City of Maywood	0.42	Basketball, playground	0.745
11405	Treder Park	City of Bell	0.711.43	Picnic area, senior center, restroom	0.979
Neighborhood Parks (3 to 10 acres)					
10799	Maywood Park	City of Maywood	3.05	Baseball, playground, pool, splash pad, gym, community center, restroom	0.167
1094	Maywood Riverfront Park	City of Maywood	5.15	Trails, basketball, picnic areas, playground, restroom	0.05
11507	Veterans Park	City of Bell	3.26	Basketball, baseball, picnic areas, playground, splash pad, community center, restroom	0.4036

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
Community Parks (10 to 20 acres)					
994	Bell Gardens Sports Center	City of Bell Gardens	10.528.98	Baseball, soccer, fitness zone, playground, restroom	0.904
Not Classified (No acreage designation)					
9789	Bandini Park	City of Commerce	3.320.20	Basketball, baseball, multipurpose field, fitness zone, picnic areas, playground, pool, community center	1.064
980	Bell Gardens Golf Course at Ford Park	City of Bell Gardens	11.202.79	No amenities	0.8993
10193	Biancini Park	City of Bell	12.450.18	Benches, grassy areas	1.010.98
11305	Pritchard Field	City of Bell	1.76	No amenities	0.162
Total approximate acreage:			44.67		

Source: Los Angeles County, Department of Recreation 2020.

Changes to Section 3.15.2.1, Page 3.15-22

The following changes represent minor clarifications providing more recent park data in the Recreation Setting section of the Draft PEIR and are not substantive (i.e., new significant information not previously analyzed).

Table 3.15-16. Parks and Recreational Resources within Frame 5

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
Park Nodes (<1/4 acre)					
1180	Aliso-Pico Recreation Center	City of Los Angeles	0.23	Tennis, basketball, baseball, volleyball, auditorium, playground, community centers	0.31
13022	Egret Park	City of Los Angeles	0.06	Viewpoint, interpretive displays	0.02
14537	Ord and Yale Street Park	City of Los Angeles	0.24	No amenities	0.82

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
15042	Ross Valencia Community Park	City of Los Angeles	0.09	No amenities	0.97
Pocket Parks (<3 acres)					
11608	1st and Broadway Civic Center Park	City of Los Angeles	1.96	Bicycle parking, outdoor seating, walking paths	0.86
12113	Alpine Recreation Center	City of Los Angeles	1.494.32	Basketball, picnic areas, playgrounds, gyms, community centers, restrooms	0.79
12315	Arts District Park	City of Los Angeles	0.512	Playground, picnic area	0.36
12517	Budokan Little Tokyo Recreation Center	City of Los Angeles	0.79	Community center	0.80
13123	El Pueblo de Los Angeles Historical Monument	City of Los Angeles	2.03	Nature center, interpretive center	0.54
1380	Lincoln Heights Recreation Center	City of Los Angeles	1.59	Basketball, playgrounds, community center, senior center, restroom	0.54
1391	Lincoln Heights Youth Center	City of Los Angeles	0.74	Community center, gym, roller hockey rink	0.80
14335	Lou Costello Recreation Center	City of Los Angeles	1.72	Basketball, baseball, multipurpose field, playground, pool, gym, senior center, restroom	0.68
14739	Prospect Park	City of Los Angeles	2.70	Playground	0.50
15143	San Julian Park	City of Los Angeles	0.29	Picnic areas	0.88
15244	Sixth and Gladys Street Park	City of Los Angeles	0.34	Basketball, fitness zone, picnic area, playground	0.77
15345	State Street Recreation Center	City of Los Angeles	2.62	Basketball, baseball, multipurpose field, fitness zone, playground, gym, community center	0.79
Neighborhood Parks (3 to 10 acres)					
12416	Boyle Heights Sports Center Park	City of Los Angeles	7.22	Basketball, baseball, soccer, playground, track field, picnic	0.63

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
				area, community center	
1280	Downey Playground and Recreation Center	City of Los Angeles	4.51 9.03	Basketball, baseball, playgrounds, pools, gyms	0.05 1.3
14436	Mount Olympus Park	City of Los Angeles	6.22 8.91	No amenities	0.90
14638	Pecan Playground	City of Los Angeles	4.28	Basketball, baseball, multipurpose field, playground, pool, gym, restroom	0.39
Community Regional Parks (20 to 100 acres)					
13527	Hollenbeck Park	City of Los Angeles	20.47	Multipurpose field, fitness zone, skatepark, picnic area, playground, community center, barbecue pits, restrooms	0.48
14234	Los Angeles State Historic Park	City of Los Angeles	32.02	Pathways, restrooms, picnic area	0.07
14032	Lincoln Park Recreation Center/Senior Citizen Center	City of Los Angeles	0.45 43.25	Tennis, basketball, baseball, multipurpose field, fitness zone, skatepark, picnic area, playgrounds, pool, senior center, gym, restrooms	0.98
Regional Parks (>100 acres)					
13224	Elysian Park	City of Los Angeles	575.96 0.54	Tennis, basketball, baseball, multipurpose field, picnic areas, playgrounds, hiking trail, community center, restrooms	0.03
Special Use Parks (No acreage designation)					
1494	Roosevelt High School Pool	City of Los Angeles	1.47 50	Pool	0.97
Not Classified (No acreage designation)					
11709	Albion Riverside Park	City of Los Angeles	6.19 12.39	Multi-purpose athletic fields, walking paths, adult fitness zones,	0.04 1.2

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
				children's play area, picnic area	
1194	Aliso Triangle	City of Los Angeles	0.04	No amenities	0.31
12214	Arroyo Seco	City of Los Angeles	14.87 16.46	No amenities	0.05
12618	City Hall Park	City of Los Angeles	1.92	No amenities	0.79
12719	Confluence Park	City of Los Angeles	0.40	No amenities	0.10
1294	East Los Angeles Park	City of Los Angeles	0.08 32	Picnic area	1.03
13325	Grand Park	Los Angeles County	5.11 9.32	Picnic area, splash pad, restrooms	0.89
13426	Heritage Square	City of Los Angeles	3.93 8.43	No amenities	0.88
13628	Los Angeles Youth Athletic Club	City of Los Angeles	4.60	No amenities	0.04
13729	Lacy Street Neighborhood Park	City of Los Angeles	0.40	Picnic area	0.40
14133	Los Angeles River	City of Los Angeles	0.70	No amenities	0.00
1480	Ramon Garcia Recreation Center	City of Los Angeles	5.69 0.13	Basketball, baseball, multipurpose field, picnic area, playground, gym, community center	1.02
15446	Wellness Center Park and Fitness Center	City of Los Angeles	17.42 30.65	Picnic areas, playground, gardening area, wellness center, outdoor exercise equipment	0.90
Total approximate recreational acreage:			151.27		

Source: Los Angeles County, Department of Recreation 2020.

Changes to Section 3.15.2.1, Page 3.15-27

The following changes represent minor clarifications providing more recent park data in the Recreation Setting section of the Draft PEIR and are not substantive (i.e., new significant information not previously analyzed).

Table 3.15-19. Parks and Recreational Resources within Frame 6

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
Park Nodes (<1/4 acre)					
1580	Cypress Park Library	City of Los Angeles	0.18	Community center	0.37
18375	Oso Park	City of Los Angeles	0.21	No amenities	0.05
19082	Steelhead Park	City of Los Angeles	0.22	Amphitheater	0.02
Pocket Parks (<3 acres)					
15648	Cerritos Park	City of Glendale	0.89 1.36	Picnic area, playground, splash pad, restroom	0.89
15749	Chevy Chase Park	City of Los Angeles	1.18	Basketball, playground, gym, restroom	0.41
16355	Elysian Valley Gateway Park	City of Los Angeles	0.32	Picnic area	0.02
16456	Elysian Valley Recreation Center	City of Los Angeles	2.00 1	Basketball, baseball, soccer, playground, gym	0.10
16757	Glenhurst Park	City of Los Angeles	0.29	Playground	0.12
1691	Griffith Manor Park	City of Glendale	2.80	Basketball, playground	0.54
17264	Harvard Mini-Park	City of Glendale	0.29	Picnic area, playground	0.85
17466	Juntos Park	City of Los Angeles	1.64	Playground, splash pad, restroom	0.69
1791	Milford Mini-Park	City of Glendale	0.26	Playground	0.68
18577	Pacific Park and Community Center	City of Glendale	2.51 5.30	Basketball, baseball, soccer, picnic areas, playgrounds, splash pads, gyms, community centers, restrooms	0.52

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
Neighborhood Parks (3 to 10 acres)					
1594	Cypress Recreation Center	City of Los Angeles	3.49	Basketball, baseball, soccer, multipurpose field, picnic area, playground, gym, community center, restroom	0.14
16557	Fremont Park	City of Glendale	7.7290	Tennis, basketball, playgrounds, pool, restroom	0.60
1780	Marsh Park/Lewis MacAdams Riverfront Park	City of Los Angeles	4.76	Restrooms, picnic grounds, grassy areas, playgrounds, trail, fitness zones, outdoor classrooms, pavilion	0.03
18274	North Atwater Park	City of Los Angeles	5.367	Basketball, baseball, multipurpose fields, picnic areas, playgrounds, restrooms	0.04
18678	Pelanconi Park	City of Glendale	3.089	Basketball, baseball, playground, restroom	0.43
1880	Silver Lake Meadows Park	City of Los Angeles	8.80	Benches, path, grassy area	0.63
19183	Sunnynook Park	City of Los Angeles	3.52	Informational signage, path	0.03
Community Parks (10 to 20 acres)					
16658	Glassell Park and Recreation Center	City of Los Angeles	12.5966	Tennis, basketball, baseball, multipurpose field, fitness zone, picnic, playground, pool, gym, community center, restroom	0.83
Community Regional Parks (20 to 100 acres)					
18779	Rio de Los Angeles State Park	City of Los Angeles	54.77	Tennis, basketball, baseball, soccer, multipurpose field, picnic area, playground, splash pad, restroom	0.03
Regional Parks (>100 acres)					
16254	Elysian Park	City of Los Angeles	505.5075.96	Tennis, basketball, baseball, multipurpose field, picnic areas, playgrounds, community center, restrooms, horseshoe pits, jogging path, hiking trail	0.03

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
17062	Griffith Park	City of Los Angeles	4,066.031 <u>991.50</u>	Tennis, baseball, soccer, fitness zone, picnic area, playgrounds, pools, dog park, gym, senior center, restrooms	0
Special Use Parks (No acreage designation)					
18476	Pacific Community Pool	City of Glendale	3.22046	Pools	0.57
Not Classified (No acreage designation)					
15547	Arroyo Seco	City of Los Angeles	16.46027		0.42
16052	Glassell Park Community Garden <u>Drew Street Park</u>	City of Los Angeles	0.12	No amenities	0.85
16153	Elyria Canyon Park	City of Los Angeles	35.90	Trails and picnic tables	0.64
1680	Greayer's Oak Park	City of Los Angeles	0.60	Grassy area	0.92
17163	Griffith Park Central Service Yard	City of Los Angeles	28.2930	No amenities – area used as equipment storage for park maintenance.	0.03
17365	Heritage Square	City of Los Angeles	8.430	Historic structures and exhibits at open-air architecture museum	1.05
17567	Los Angeles River and Trail	City of Los Angeles	8.23	Trail	0.00
17668	Los Angeles River Center and Gardens	City of Los Angeles	6.69	Park benches, picnic tables, lawn area, self-serve bicycle staging area, restrooms, community center	0.13
17769	Los Feliz Golf Course	City of Los Angeles	11.80	Golf course	0.03
1780	Marsh Street Skate Park	City of Los Angeles	4.76029	Skate park	0.036
18072	Glendale Narrows Riverwalk	City of Glendale	3.545	Equestrian facility, interpretive displays, picnic tables, public art project, trail for bicyclists and pedestrians	0.03
18173	Natural Park	City of Los Angeles	0.41044	No amenities	0.03
1894	Silver Lake Reservoir	City of Los Angeles	117.7797 <u>08</u>	Trail	0.43

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
19284	Travel Town Museum	City of Los Angeles	10.388.44	Train museum	0.07
19385	Unnamed site – Mountains Recreation and Conservation Authority	City of Los Angeles	0.40	No amenities	0.9001
19486	Unnamed site – Mountains Recreation and Conservation Authority	City of Glendale	0.061.99	No amenities	0.013
Total approximate recreation acreage:			2,820.90		

Source: Los Angeles County, Department of Recreation 2020.

Changes to Section 3.15.2.1, Page 3.15-32

The following changes represent minor clarifications providing more recent park data in the Recreation Setting section of the Draft PEIR and are not substantive (i.e., new significant information not previously analyzed).

Table 3.15-22. Parks and Recreational Resources within Frame 7

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
Pocket Park (<3 acres)					
19587	Abraham Lincoln Park	City of Burbank	1.71	Playground	0.84
1994	El Paseo Cahuenga Park	City of Los Angeles	1.55	Path	0.76
202194	Johnny Carson Park	City of Burbank	12.782.44	Trails, fitness zone, playgrounds, restroom	0.0816
206198	Mountain View Park	City of Burbank	2.49	Tennis, basketball, playgrounds, restroom	0.18
Neighborhood Parks (3 to 10 acres)					
21305	Verdugo Park	City of Burbank	1.486.93	Tennis, basketball, playgrounds, pools, gym, community center, restroom	0.98
21406	Woodbridge Park	City of Los Angeles	4.30	Fitness zone, picnic areas, playground	0.35

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
Community Parks (10 to 20 acres)					
207 199	North Weddington Park	City of Los Angeles	10.16	Basketball, baseball, playground, community center	0.03
208 0	South Weddington Park	City of Los Angeles	14.04	Baseball, restrooms	0.03
Community Regional Parks (20 to 100 acres)					
200 192	Fryman Canyon Park	City of Los Angeles	64.847.8 0	Fitness course, trail	0.95
Regional Parks (>100 acres)					
201 193	Griffith Park	City of Los Angeles	4,066.03 361.90	Tennis, baseball, soccer, fitness zones, picnic areas, playgrounds, pools, dog parks, gyms, senior centers, restrooms	0
Not Classified (No acreage designation)					
196 88	Cahuenga Pass-Oakshire Open Space	City of Los Angeles	16.950.0 7	No amenities	1.00
197 189	Cahuenga Peak Phase 1	City of Los Angeles	130.511 27.89	No amenities	0.45
198 0	Campo De Cahuenga	City of Los Angeles	0.73	No amenities	0.23
202 194	Johnny Carson Park	City of Burbank	12.782.4 1	Trails, fitness zone, playgrounds, restroom	0.1608
195 203	Los Angeles City Water Resource Parkland	City of Los Angeles	1.45	No amenities	0.9172
196 204	Los Angeles City Water Resource Parkland	City of Los Angeles	1.79	<u>No amenities</u>	0.7291
197 205	Los Angeles Department of Water and Power	City of Los Angeles	166.505 4.34	<u>No amenities</u>	0.769
210 02	Unnamed site - Mountains Recreation and Conservation Authority	City of Los Angeles	9.06	No amenities	0.8966
211 03	Unnamed site - Mountains Recreation and Conservation Authority	City of Los Angeles	0.68	No amenities	0.6676

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
212 04	Unnamed site – Mountains Recreation and Conservation Authority	City of Los Angeles	1.089	No amenities	0.7689
Total approximate recreational acreage:			636.12		

Source: Los Angeles County, Department of Recreation 2020.

Changes to Section 3.15.2.1, Page 3.15-35

The following changes represent minor clarifications providing more recent park data in the Recreation Setting section of the Draft PEIR and are not substantive (i.e., new significant information not previously analyzed).

Table 3.15-24. Parks and Recreational Resources within Frame 8

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
Pocket Parks (<3 acres)					
206	Coldwater Canyon Open Space Park	City of Los Angeles	2.034	Trails	0.91
223 14	Moorpark Park	City of Los Angeles	2.413	Playground	0.23
Neighborhood Parks (3 to 10 acres)					
224 16	Oak Forest West	City of Los Angeles	9.686 1.48	No amenities	0.88
225 17	Sherman Oaks Castle Park	City of Los Angeles	4.987	Miniature golf, arcade, batting cages	0.01
226 18	Studio City Park	City of Los Angeles	9.310	Tennis, basketball, baseball, fitness zone, playground, community center	0.35
227 19	Teichman Family Magnolia Park	City of Los Angeles	3.876	Basketball	0.06
Community Parks (10 to 20 acres)					
218 0	Dixie Canyon Park	City of Los Angeles	9.124 8.29	Trails	0.81
216 08	Coldwater Canyon Park	City of Los Angeles	41.743 31.78	Picnic areas, play areas, water feature, shaded arbor, jogging track, grassy area	0.85
217 09	Deervale-Stone Canyon Park	City of Los Angeles	79.402 17.03	Trails	0.81

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
219 1	Fossil Ridge Park	City of Los Angeles	57.3623 12	Trails	0.91
220 12	Libbit Park/Encino Little League	City of Los Angeles	24.543	Baseball	0.61
221 13	Longridge Park	City of Los Angeles	54.3723 6.23	Trails	0.72
231 23	Van Nuys Sherman Oaks Recreation Center	City of Los Angeles	65.5549	Tennis, basketball, baseball, soccer, fitness zone, picnic area, playgrounds, pools, community center, senior center, restroom	0.22
Regional Parks (>100 acres)					
224	Wilacre Park	City of Los Angeles	128	Restrooms, drinking fountains, picnic area	0.35
233 25	Woodley Avenue Park	City of Los Angeles	119.836 0.09	Fitness zones, picnic area, playground, restrooms	1.00
Not Classified (No acreage designation)					
222 14	Los Angeles Riverfront Park	City of Los Angeles	6.2	No amenities	0.00
228 0	Unnamed site – Mountains Recreation and Conservation Authority	City of Los Angeles	48.3657 796	No amenities	0.4895
229 1	Unnamed site – Mountains Recreation and Conservation Authority	City of Los Angeles	2.71856	No amenities	0.8358
230 22	Unnamed site – Mountains Recreation and Conservation Authority	City of Los Angeles	2.5769	No amenities	0.5883
Total approximate recreational acreage:			399.71		

Source: Los Angeles County, Department of Recreation 2020.

Changes to Section 3.15.2.1, Page 3.15-38

The following changes represent minor clarifications providing more recent park data in the Recreation Setting section of the Draft PEIR and are not substantive (i.e., new significant information not previously analyzed).

Table 3.15-27. Parks and Recreational Resources within Frame 9

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
Pocket Parks (<3 acres)					
2342 6	Aliso Creek Park	City of Los Angeles	1.711	No amenities	0.02
2380	Caballero Creek Park	City of Los Angeles	1.533	No amenities	0.01
2413 3	Jesse Owens Mini Park	City of Los Angeles	1.666	Restroom	0.99
Neighborhood Parks (3 to 10 acres)					
2423 4	John Quimby Park	City of Los Angeles	4.26	Tennis, basketball, playground	0.15
2453 7	Runnymede Recreation Center	City of Los Angeles	5.93	Tennis, playground, restroom	0.71
2504 2	Tarzana Recreation Center	City of Los Angeles	5.572	Baseball, fitness zone, playground, community center	0.82
2524 4	West Valley Park	City of Los Angeles	8.8005	Playground	0.22
Community Parks (10 to 20 acres)					
2403 2	Hjelte Sports Center	City of Los Angeles	14.7217	Baseball, restrooms	0.32
2491	Shadow Ranch Park	City of Los Angeles	1.412332	Basketball, baseball, soccer, fitness zone, playground, community center	0.96
Community Regional Parks (20 to 100 acres)					
2362 8	Balboa Sports Center	City of Los Angeles	81.87487 6	Tennis, basketball, baseball, soccer, playground, gym, restrooms	0.02
2443 6	Reseda Park and Recreation Center	City of Los Angeles	29.80	Tennis, basketball, baseball, picnic area, playground, pool, community center, senior center, restroom	0.01
2480	Sepulveda Garden Center	City of Los Angeles	24.09	Picnic area, community center, restroom	0.62

Map ID	Park/Facility Name	Location	Size (acres)	Amenities	Distance to LA River (miles)
Regional Parks (>100 acres)					
2433 5	Lake Balboa Park	City of Los Angeles	110.97	Baseball, picnic areas, playground, restrooms	0.03
2463 8	Sepulveda Basin Recreation Area	City of Los Angeles	268.3940	Baseball, soccer, multipurpose fields, fitness zones, dog parks, senior centers, restrooms	0.01
2534 5	Woodley Avenue Park	City of Los Angeles	119.84	Fitness zone, picnic area, playground, restrooms	0.40
Not Classified (No acreage designation)					
2352 7	Balboa Golf Course and Encino Golf Course	City of Los Angeles	320.934	Golf course	0.03
2372 9	Bell Creek Park	City of Los Angeles	0.0137	No amenities	0.96
2391	Canoga Park Senior Citizen Center	City of Los Angeles	0.77	Senior center	0.56
2473 9	Sepulveda Basin Wildlife Reserve	City of Los Angeles	327.324	Trails, amphitheater	0.02
2514 3	Van Nuys Golf Course	City of Los Angeles	36.51563 0	Golf course	0.71
2544 6	Woodley Lakes Golf Course	City of Los Angeles	209.189	Golf course	0.04
Total approximate recreational acreage:			1,575.17		

Source: Los Angeles County, Department of Recreation 2020.

Changes to Section 3.15.2.2, Page 3.15-41

Regional

Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment

The *Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment* (Los Angeles County 2016) documents existing parks and recreation facilities in cities and unincorporated communities and uses that data to determine the scope, scale, and location of park need in Los Angeles County. The County was divided into 188 approved Study Areas for the purposes of the analysis. The results of the Parks and Recreation Needs Assessment were intended to help inform planning and decision-making regarding future funding of park projects within the County. This information is used to present an estimate of park need within each of the frames in Section 3.15.2.2.

County of Los Angeles Trails Manual

The goal of the County of Los Angeles Trails Manual (County of Los Angeles Department of Parks and Recreation 2013) is to establish well-defined trail types, guidelines, and priorities to facilitate the development of high-quality trails that benefit the public. It provides guidance to County departments that interface with trail planning, design, development, and maintenance of hiking, equestrian, and mountain biking trails. The manual includes guidelines for implementation of multi-use trails within unincorporated County areas and recognizes the existence of the broader regional trail network in the County and surrounding counties that provides access to recreational resources operated by Federal, State, and local agencies. The manual sets the guidelines for reviewing plans and specifications for trails that are provided in conjunction with land use planning and the entitlement process for projects proposed for development within the County. Proposed developments are reviewed for consistency with the trails manual.

Changes to Section 3.15.2.2, Page 3.15-43

Long Beach Local Coastal Program (LCP)

The Local Coastal Program for Long Beach, completed in late 1979, is an element of the Long Beach General Plan. The coastal zone in the City of Long Beach encompasses over 3,100 acres and a population in excess of 42,000 residing in nearly 22,000 dwelling units. It is the most intensely developed part of the City. The LCP represents the commitment of Long Beach to provide continuing protection and enhancement of the resources within the coastal zone. The LCP recognizes that certain resource areas will require further public attention to ensure such protection and enhancement. Included in this concern are (a) Lands that have a history or potential of productive agricultural use; (b) Areas where unused and/or subdivided lots require consolidation or redesign to permit appropriate land uses; (c) Sensitive coastal resource areas which are suffering some form of deterioration or development pressure; (d) Degraded or less than pristine wetlands of any size; and I Areas which are appropriate for well-designed visitor-commercial and recreation facilities.

City of Long Beach Sustainable City Action Plan

The City of Long Beach City Council adopted the Long Beach Sustainable City Action Plan in 2010. The plan includes measurable goals and actions to guide operational, policy, and financial decisions to make the city more sustainable. There are several sustainability goals in the plan that apply to the proposed Project, as listed in Table 3.15-30 below.

Uptown Open Space Vision Plan

Focusing on the 9th City Council of Long Beach, the Uptown Open Space Plan provides a framework for sustainably expanding public open space access for residents in the area. The focus is on a greener community with an emphasis on recreation and park space. The Uptown Open Space Vision Plan is considered an amendment to the Open Space Element of the Long Beach General Plan. Key elements were identified from other approved plans in the City and therefore there are no specific goals or policies to add to Table 3.15-30 for this plan.

DeForest Vision Plan

Currently unavailable, the DeForest Vision Plan is expected to be adopted by the City in 2020 or 2021. The Plan aims at developing parkland and recreational facilities in the DeForest

neighborhood. There are no goals or policies to note to Table 3.15-30 as the plan is not currently available.

Drake Chavez Vision Plan

In 2019 the Drake Vision Plan was adopted by the City Council of Long Beach to develop Cesar E. Chavez Park to Drake Park via recreational facilities. The Vision Plan serves as a visionary document to guide future improvements at the acquired, undeveloped park parcels as well as future improvements to Drake and Cesar E. Chavez Parks to address the needs of the community. No goals or policies are identified in the plan that can be added to Table 3.15-30.

Communities of Excellence in Nutrition, Physical Activity and Obesity Prevention (CX3) Pedestrian Plan

The CX3 Pedestrian Plan was adopted by the City of Long Beach City Council in 2017 and covers ten neighborhoods in Central and West Long Beach. The intention of the plan is twofold: 1-assess existing conditions of the CX3 areas and identify paths for improving the pedestrian environment, and 2-lay out a framework of tools, project types, policies and programs for improving the CX3 neighborhoods. Key elements, goals and policies were identified from other approved plans in the City and therefore there are no specific goals or policies to add to Table 3.15-30 for this plan.

Table 3.15-30. City of Long Beach Goals, Policies, and Objectives

Plan/Element	Goals, Policies, and Objectives
<i>City of Long Beach General Plan</i>	
Open Space and Recreation Element	<ul style="list-style-type: none"> ● Goal/Objective 1.2: Preserve, keep clean, and upgrade beaches, bluffs, water bodies, and natural habitats, including the ecological preserves at El Dorado Nature Center and the DeForest Nature Area. ● Goal/Objective 1.3: Improve appropriate access to natural environments. ● Goal/Objective 1.4: Design and manage natural habitats to achieve environmental sustainability. <ul style="list-style-type: none"> ○ Policy 1.2: Protect and improve the community’s natural resources, amenities and scenic values including nature centers, beaches, bluffs, wetlands and water bodies. ● Goal/Objective 4.5: Make all recreation resources environmentally friendly and socially and economically sustainable. ● Goal/Objective 4.6: Increase recreation resources and supplement publicly owned recreation resources with privately owned recreation resources. ● Goal/Objective 4.7: Fully maintain public recreation resources. ● Goal/Objective 4.10: Provide access to recreation resources for all individuals in the community. <ul style="list-style-type: none"> ○ Policy 4.4: Ensure that the general plan and zoning are consistent for all recreation open space locations and uses. ○ Policy 4.9: Encourage the provision of non-City-owned recreation resources to supplement what the City is able to provide.

Plan/Element	Goals, Policies, and Objectives
City of Long Beach Parks, Recreation, and Marine Strategic Plan	
City of Long Beach Parks, Recreation, and Marine Strategic Plan	<ul style="list-style-type: none"> • Strategy 1.2: Focus on improving the level of safety within City Parks and Recreational Facilities. • Strategy 2.1: Focus on improving the condition of Department Parks and Recreational Facilities. • Strategy 2.2: Establish lifetime use opportunities. Recreation programs and facilities will be designed to develop and serve a lifetime user through active, passive, and educational experiences.
City of Long Beach Local Coastal Plan	
Transportation and Access Policies	<p>Transportation and Access Policies</p> <ol style="list-style-type: none"> 1. Increase reliance on public transit. 2. Decrease reliance on automobiles. 3. Provide slightly more parking. 4. Increase pedestrian and bicycle access opportunities. <p>Park Dedication Policy: No parkland which has been dedicated or designated within the Coastal Zone shall be committed to another use unless the City replaces such parkland on an acre-for-acre basis within or adjacent to the Coastal Zone with the approval of the California Coastal Commission. Such replacement parkland Page II – 20 must provide similar recreational opportunities and be accessible to the same population through private or affordable public transportation. Replacement park land shall be developed prior to or concurrent with the commencement of the development which displaces it, and shall also be dedicated or designated in perpetuity.</p>
Park Dedication Policy	<p>No parkland which has been dedicated or designated within the Coastal Zone shall be committed to another use unless the City replaces such parkland on an acre-for-acre basis within or adjacent to the Coastal Zone with the approval of the California Coastal Commission. Such replacement parkland Page II – 20 must provide similar recreational opportunities and be accessible to the same population through private or affordable public transportation. Replacement park land shall be developed prior to or concurrent with the commencement of the development which displaces it, and shall also be dedicated or designated in perpetuity.</p>
City of Long Beach Sustainable City Action Plan	
Sustainability Goals	<ol style="list-style-type: none"> 2) At least 5 million square feet of privately developed LEED certified (or equivalent) green buildings by 2020 5) Create at least 6 new community gardens by 2012 6) Plant at least 10,000 trees in Long Beach by 2020

Sources: City of Long Beach 2002, 2003.

Long Beach Local Coastal Program (LCP)

The Local Coastal Program for Long Beach, completed in late 1979, is an element of the Long Beach General Plan. The coastal zone in the City of Long Beach encompasses over 3,100 acres and a

population in excess of 42,000 residing in nearly 22,000 dwelling units. It is the most intensely developed part of the City. The LCP represents the commitment of Long Beach to provide continuing protection and enhancement of the resources within the coastal zone. The LCP recognizes that certain resource areas will require further public attention to ensure such protection and enhancement. Included in this concern are (a) Lands that have a history or potential of productive agricultural use; (b) Areas where unused and/or subdivided lots require consolidation or redesign to permit appropriate land uses; (c) Sensitive coastal resource areas which are suffering some form of deterioration or development pressure; (d) Degraded or less than pristine wetlands of any size; and I Areas which are appropriate for well-designed visitor-commercial and recreation facilities.

Changes to Section 3.15.3.3, Page 3.15-63

The following changes represent a minor clarification to mitigation in the Draft PEIR by requiring signs to be posted at least 30 days prior to construction to inform community members. These changes merely clarify the mitigation described in the Draft PEIR. Additionally, as concluded in the Draft PEIR, the impact would be less than significant for later activities when carried out by the County and significant and unavoidable for later activities when not carried out by the County. These clarifications are not substantive (i.e., the change to the mitigation does not result in a new or worsened impact), and the significance conclusion would remain the same.

Mitigation Measure REC-1: Minimize Disruption of Recreational Uses During Construction.

As specific subsequent project and location information is identified during detailed design, the implementing agency will confirm the timing, duration, and areal extent of construction activities that would occur. If temporary closures of existing recreational facilities would be necessary for construction, the specific increase in use of other nearby recreational facilities will be evaluated. Factors to be considered in the evaluation include the duration of the closure, acreage and type of facility that would be unavailable due to the closure, and existing usage levels at the relevant nearby recreational facilities.

If there is an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or is accelerated, the implementing agency will apply measures including, but not limited to, one or more of the following:

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

Changes to Section 3.15.3.3, Page 3.15-83

This change represents a minor clarification to the Draft PEIR by reiterating that because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. These changes are not substantive (i.e., new significant information not previously analyzed).

Baseline Cumulative Condition

Past and present development in the County has resulted in increased population that has, in turn, increased demand for neighborhood, community, and regional parks and recreational facilities. The County has a goal of 6 acres of regional parkland per 1,000 residents and 4 acres per 1,000 residents for community and local facilities.

Implementation of development, infrastructure, and other projects in the County has the potential to increase population to the point where overuse and deterioration of existing parks and recreational facilities could occur. As noted in the EIR for the *Los Angeles County General Plan (2014)*, the deterioration that would occur to local parks and recreational facilities from regional population growth may be offset with funding from new development such as in-lieu fees for parks or donation of parkland pursuant to the Quimby Act. As discussed, the Quimby Act is a funding mechanism for parkland acquisition for jurisdictions. As allowed by this act, most cities in the County have park dedication ordinances as part of their municipal codes. The park dedication ordinances require most residential subdivisions to dedicate parkland or pay in-lieu fees (or both, in some circumstances) to enable the jurisdictions to acquire local parkland at ratios between 3 acres and 5 acres per 1,000 residents. In order to accommodate future demand for parks and recreational facilities from population growth in the Los Angeles County region, additional parks and recreational facilities will be developed and constructed throughout the region. Other cumulative projects, such as schools or residential projects in adjacent jurisdictions, would increase the need for recreational facilities in the region.

Cumulative development would still incrementally increase the need for new or expanded facilities, which would have the potential to result in adverse environmental effects. However, as discussed, existing regulations do not ensure that the funding for parkland acquisition would be proportional to increases in population. As noted, the County sets minimum requirements of parkland per 1,000 residents. As a result, there is an inherent deficit between the ratio of local parkland the County would like to maintain and the amount of parkland it can provide in accordance with County Code Section 21.24.340. Enforcement of existing parkland dedication requirements would serve to reduce the potential for a deficit of facilities by allowing for adequate funding for the acquisition of additional parkland and expanding existing parks and recreational facilities. Therefore However, although much of the demand for local parkland can be accommodated, a deficit of parkland would remain compared to the County's goal.

Grants from State and county bond sources are available to fund parks and recreational facilities in urban areas and funding for maintenance of those facilities would be provided through property assessments and taxes. Other regulations including the Mello-Roos Community Facilities Act of 1982 and the Landscaping and Lighting Act of 1972 would serve as supplemental sources of funding for parkland. ~~Enforcement of existing parkland dedication requirements would serve to reduce the~~

~~potential for deterioration of facilities by allowing for adequate funding for the provision and maintenance of recreational facilities.~~ While existing regulations, general plan update policies, and implementation programs address in part the need for parkland acquisition and maintenance, considering the deficit of parkland compared to the County goal, a baseline cumulative condition with respect to recreation exists in the County.

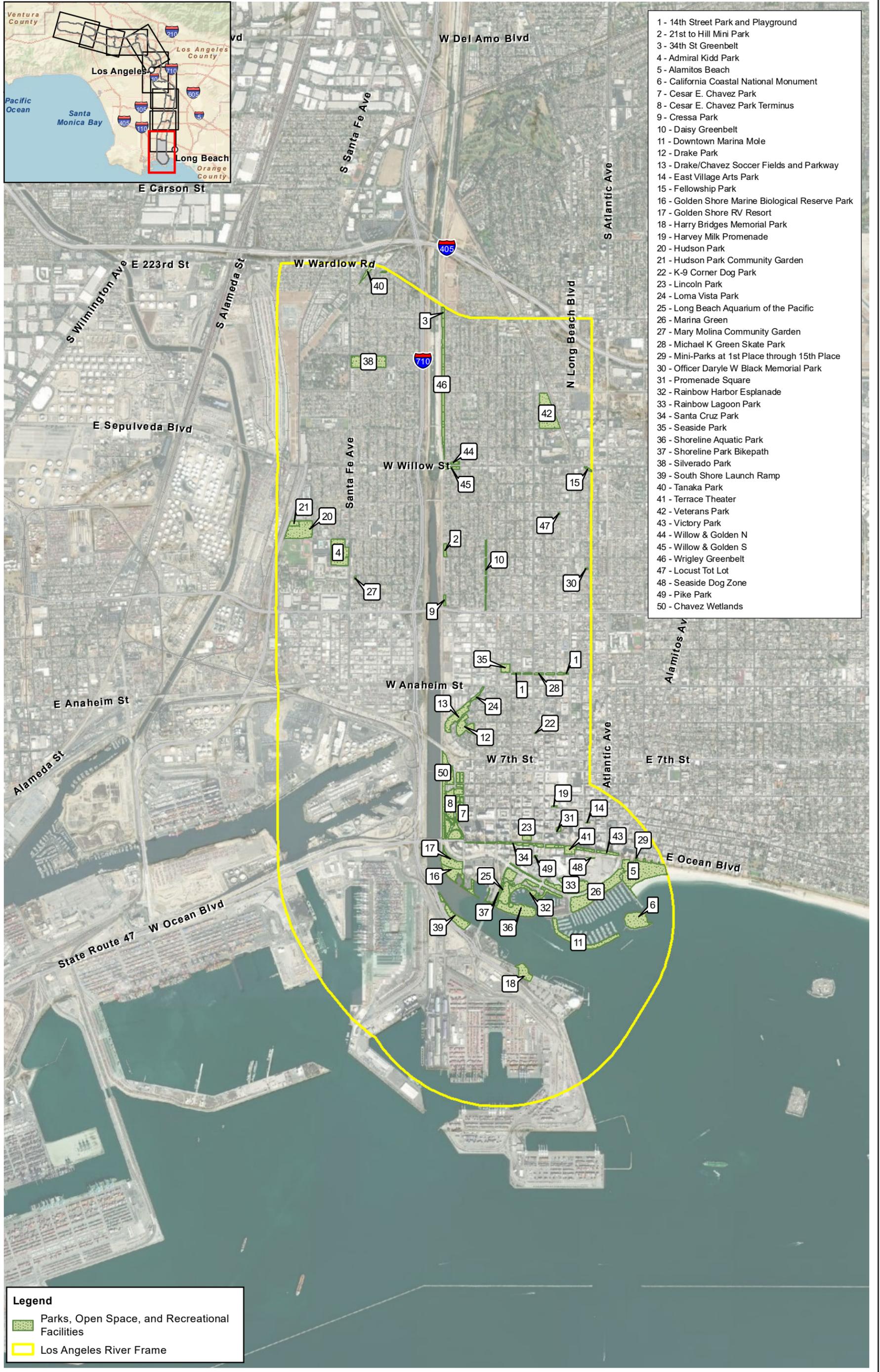
Contribution of the Project to Cumulative Impacts

The proposed Project would increase opportunities for recreation for residents and visitors. The Project would provide additional recreational trails and multi-use facilities as well as connectivity to the existing County and local trail networks. Therefore, the proposed Project would add to the current inventory of parks and recreational facilities within the County. ~~As there is no current cumulative condition with respect to recreation in the County, the~~ The proposed Project would not make a contribution to a cumulative impact on recreation; in fact, the proposed Project would result in a beneficial contribution to recreational opportunities within Los Angeles County.

Changes to Section 3.16, Figure 3.15-1

The following change represents a minor clarification providing more recent park data in the Recreation Setting section of the Draft PEIR and is not substantive (i.e., new significant information not previously analyzed).

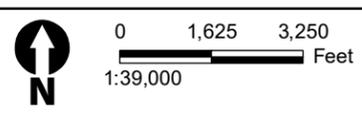
Figure 3.15-1, *Parks, Open Space, and Recreational Facilities*, was updated with more recent data on parks and recreation in the City of Long Beach, as shown on the following pages.



- 1 - 14th Street Park and Playground
- 2 - 21st to Hill Mini Park
- 3 - 34th St Greenbelt
- 4 - Admiral Kidd Park
- 5 - Alamos Beach
- 6 - California Coastal National Monument
- 7 - Cesar E. Chavez Park
- 8 - Cesar E. Chavez Park Terminus
- 9 - Cressa Park
- 10 - Daisy Greenbelt
- 11 - Downtown Marina Mole
- 12 - Drake Park
- 13 - Drake/Chavez Soccer Fields and Parkway
- 14 - East Village Arts Park
- 15 - Fellowship Park
- 16 - Golden Shore Marine Biological Reserve Park
- 17 - Golden Shore RV Resort
- 18 - Harry Bridges Memorial Park
- 19 - Harvey Milk Promenade
- 20 - Hudson Park
- 21 - Hudson Park Community Garden
- 22 - K-9 Corner Dog Park
- 23 - Lincoln Park
- 24 - Loma Vista Park
- 25 - Long Beach Aquarium of the Pacific
- 26 - Marina Green
- 27 - Mary Molina Community Garden
- 28 - Michael K Green Skate Park
- 29 - Mini-Parks at 1st Place through 15th Place
- 30 - Officer Daryle W Black Memorial Park
- 31 - Promenade Square
- 32 - Rainbow Harbor Esplanade
- 33 - Rainbow Lagoon Park
- 34 - Santa Cruz Park
- 35 - Seaside Park
- 36 - Shoreline Aquatic Park
- 37 - Shoreline Park Bikepath
- 38 - Silverado Park
- 39 - South Shore Launch Ramp
- 40 - Tanaka Park
- 41 - Terrace Theater
- 42 - Veterans Park
- 43 - Victory Park
- 44 - Willow & Golden N
- 45 - Willow & Golden S
- 46 - Wrigley Greenbelt
- 47 - Locust Tot Lot
- 48 - Seaside Dog Zone
- 49 - Pike Park
- 50 - Chavez Wetlands

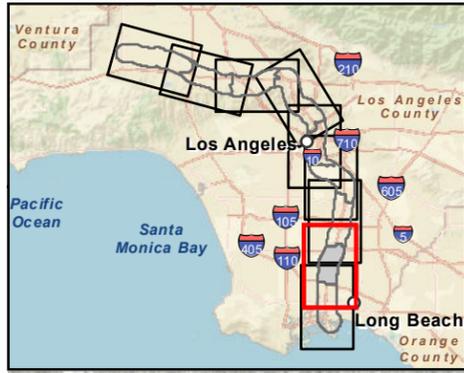
Legend

- Parks, Open Space, and Recreational Facilities
- Los Angeles River Frame

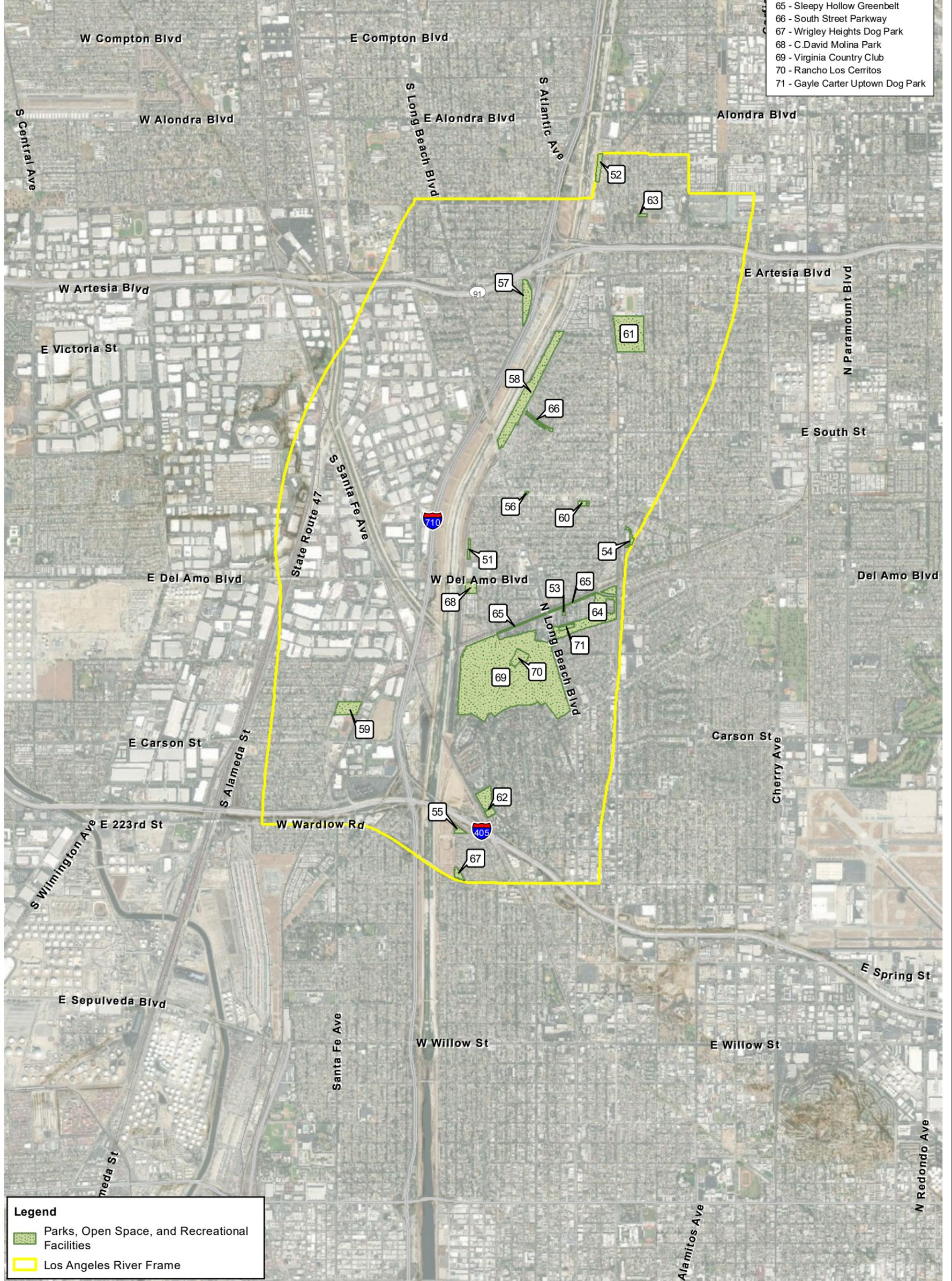


**Figure 3.15-1.1 - Frame 1
Parks, Open Space, and Recreational Facilities
2020 LA River Master Plan PEIR**

Source: County of Los Angeles; ESRI

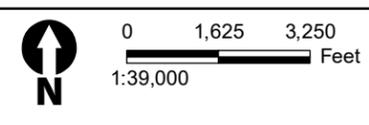


- 51 - 51st St Greenbelt
- 52 - 72nd Street Staging Area
- 53 - Arbor Street Park
- 54 - Atlantic Plaza Park
- 55 - Baker Street Park
- 56 - Burton W. Chace Park
- 57 - Coolidge Park
- 58 - DeForest Park
- 59 - Dominguez Park
- 60 - Grace Park
- 61 - Houghton Park
- 62 - Los Cerritos Park
- 63 - North Community Garden
- 64 - Scherer Park
- 65 - Sleepy Hollow Greenbelt
- 66 - South Street Parkway
- 67 - Wrigley Heights Dog Park
- 68 - C. David Molina Park
- 69 - Virginia Country Club
- 70 - Rancho Los Cerritos
- 71 - Gayle Carter Uptown Dog Park



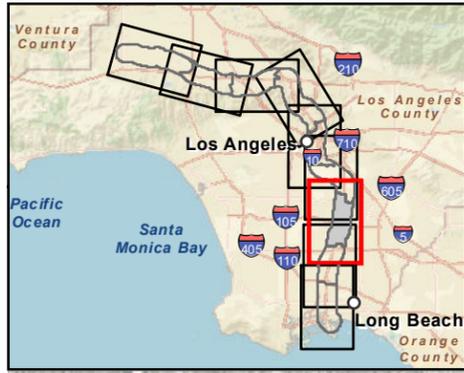
Legend

- Parks, Open Space, and Recreational Facilities
- Los Angeles River Frame

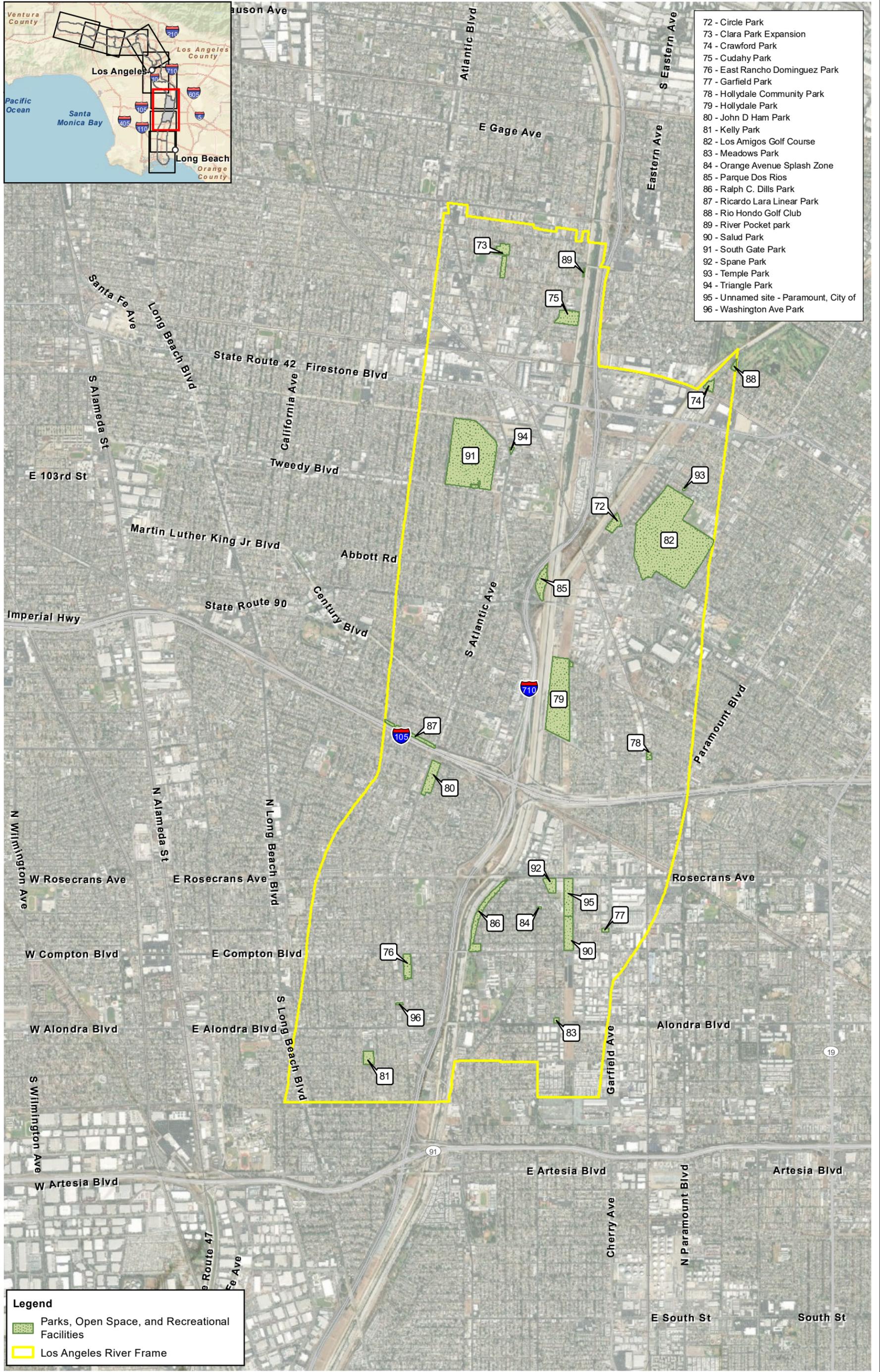


**Figure 3.15-1.2 - Frame 2
Parks, Open Space, and Recreational Facilities
2020 LA River Master Plan PEIR**

Source: County of Los Angeles; ESRI

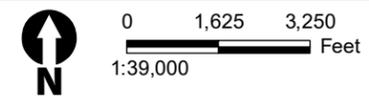


- 72 - Circle Park
- 73 - Clara Park Expansion
- 74 - Crawford Park
- 75 - Cudahy Park
- 76 - East Rancho Dominguez Park
- 77 - Garfield Park
- 78 - Hollydale Community Park
- 79 - Hollydale Park
- 80 - John D Ham Park
- 81 - Kelly Park
- 82 - Los Amigos Golf Course
- 83 - Meadows Park
- 84 - Orange Avenue Splash Zone
- 85 - Parque Dos Rios
- 86 - Ralph C. Dills Park
- 87 - Ricardo Lara Linear Park
- 88 - Rio Hondo Golf Club
- 89 - River Pocket park
- 90 - Salud Park
- 91 - South Gate Park
- 92 - Spane Park
- 93 - Temple Park
- 94 - Triangle Park
- 95 - Unnamed site - Paramount, City of
- 96 - Washington Ave Park

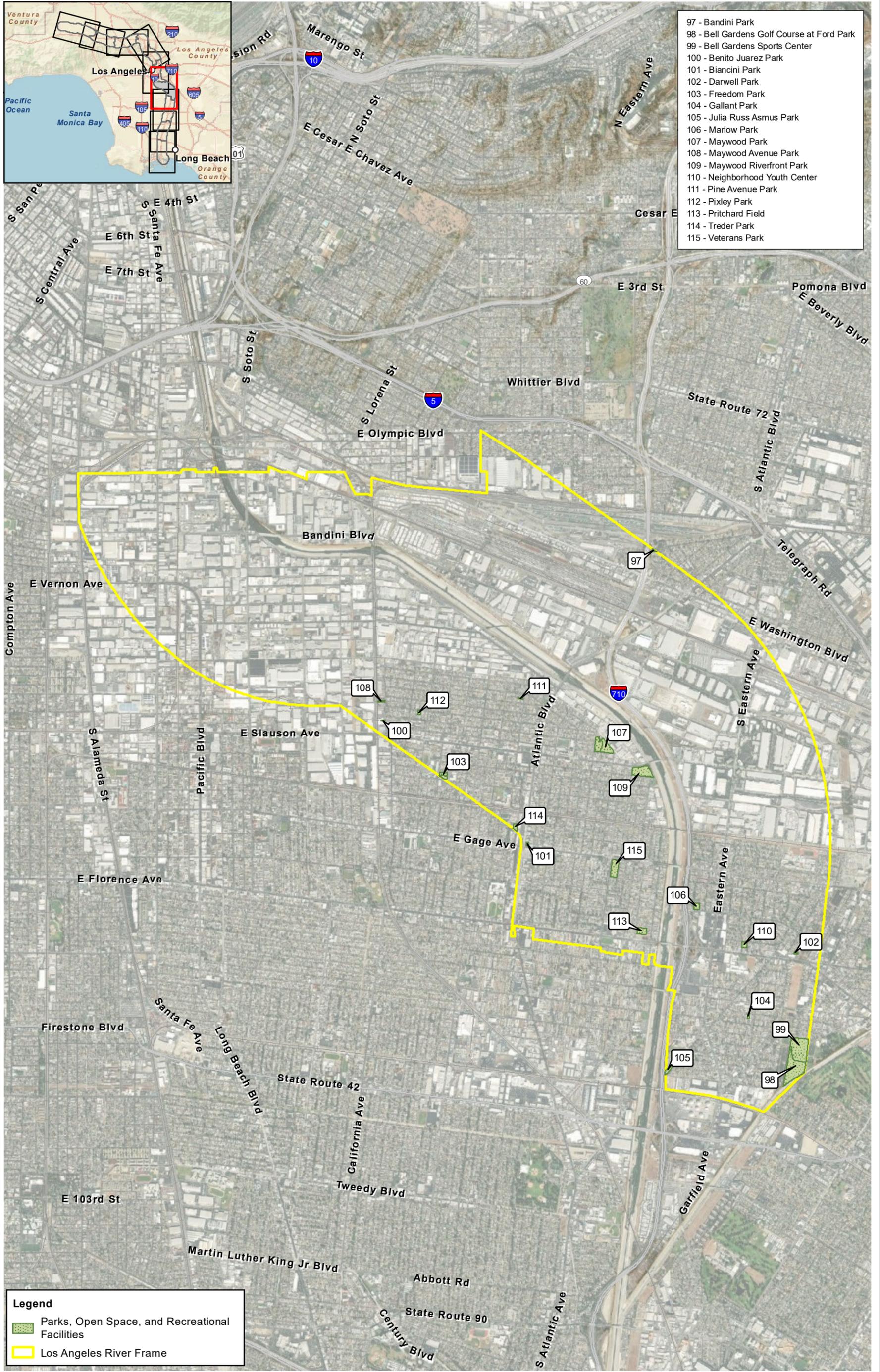


Legend

- Parks, Open Space, and Recreational Facilities
- Los Angeles River Frame

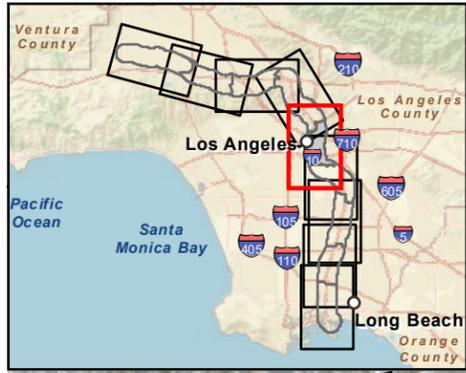


**Figure 3.15-1.3 - Frame 3
Parks, Open Space, and Recreational Facilities
2020 LA River Master Plan PEIR**

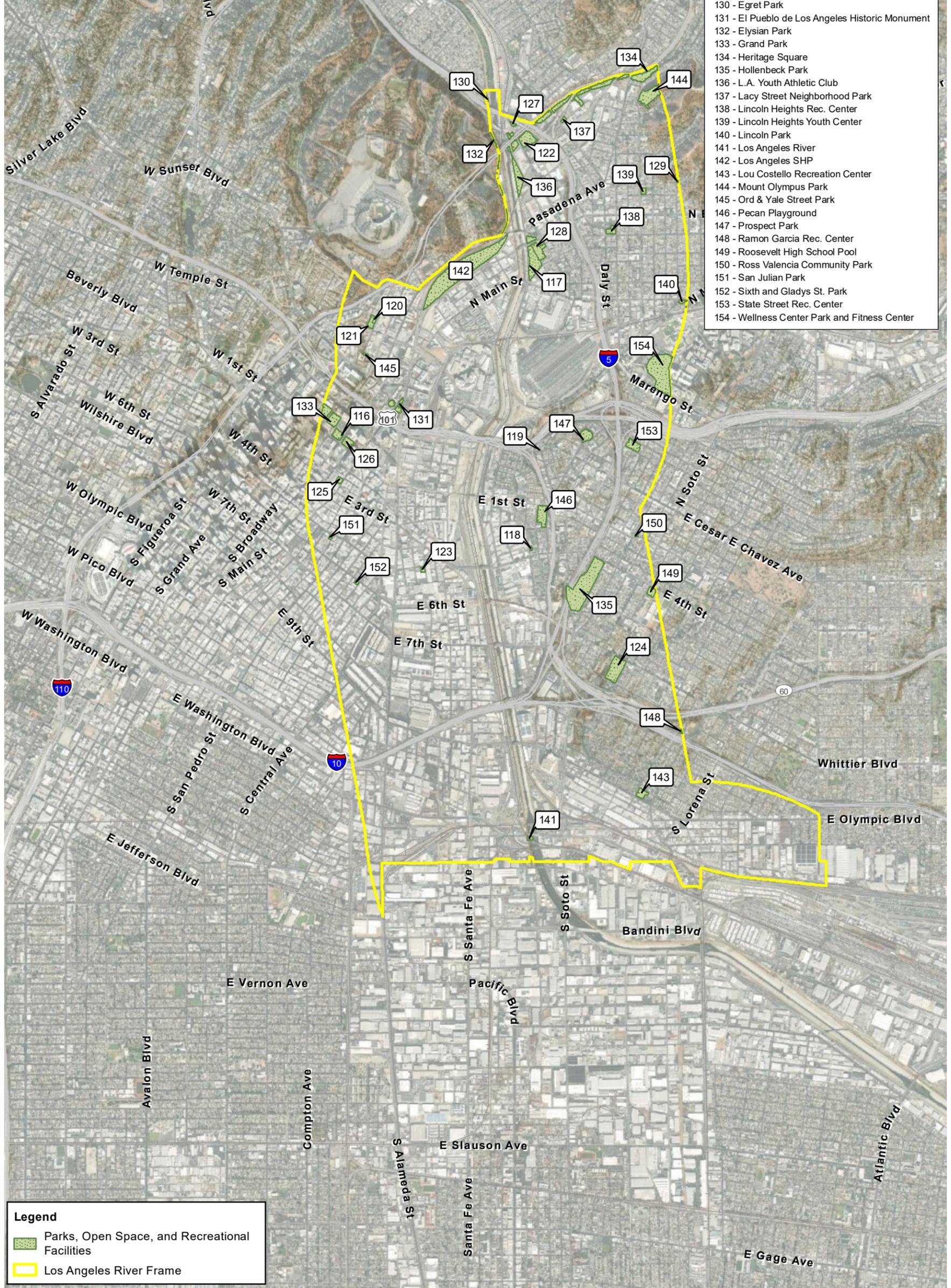


**Figure 3.15-1.4 - Frame 4
Parks, Open Space, and Recreational Facilities
2020 LA River Master Plan PEIR**

Source: County of Los Angeles; ESRI



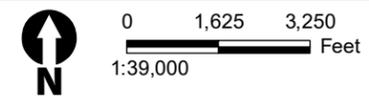
- 116 - 1st and Broadway Civic Center Park
- 117 - Albion Riverside Park
- 118 - Aliso-Pico Recreation Center
- 119 - Aliso Triangle
- 120 - Alpine Park
- 121 - Alpine Recreation Center
- 122 - Arroyo Seco
- 123 - Arts District Park
- 124 - Boyle Heights Sports Center Park
- 125 - Budokan Little Tokyo Recreation Center
- 126 - City Hall Park
- 127 - Confluence Park
- 128 - Downey Playground and Rec. Center
- 129 - East Los Angeles Park
- 130 - Egret Park
- 131 - El Pueblo de Los Angeles Historic Monument
- 132 - Elysian Park
- 133 - Grand Park
- 134 - Heritage Square
- 135 - Hollenbeck Park
- 136 - L.A. Youth Athletic Club
- 137 - Lacy Street Neighborhood Park
- 138 - Lincoln Heights Rec. Center
- 139 - Lincoln Heights Youth Center
- 140 - Lincoln Park
- 141 - Los Angeles River
- 142 - Los Angeles SHP
- 143 - Lou Costello Recreation Center
- 144 - Mount Olympus Park
- 145 - Ord & Yale Street Park
- 146 - Pecan Playground
- 147 - Prospect Park
- 148 - Ramon Garcia Rec. Center
- 149 - Roosevelt High School Pool
- 150 - Ross Valencia Community Park
- 151 - San Julian Park
- 152 - Sixth and Gladys St. Park
- 153 - State Street Rec. Center
- 154 - Wellness Center Park and Fitness Center



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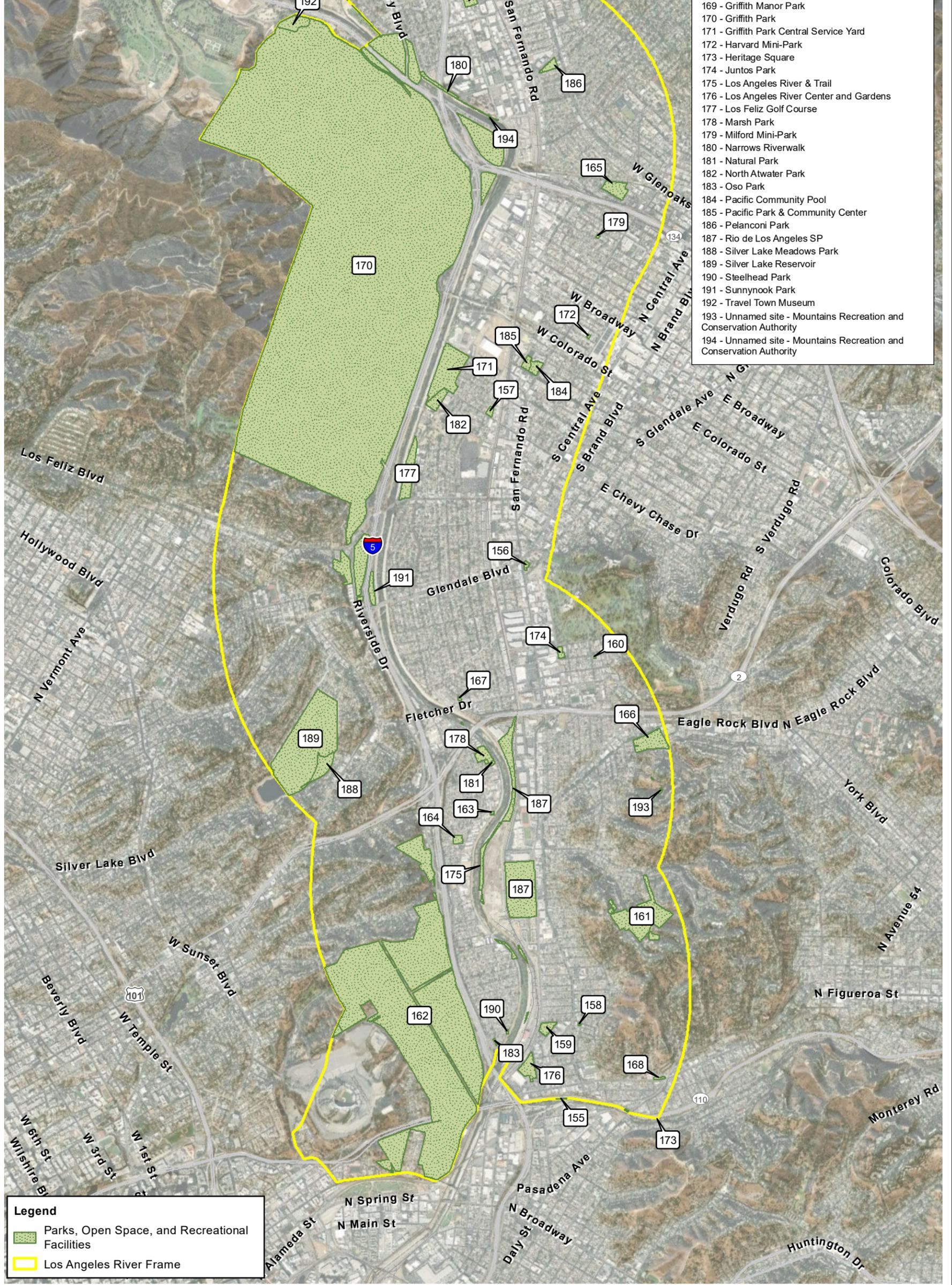
Legend

- Parks, Open Space, and Recreational Facilities
- Los Angeles River Frame



**Figure 3.15-1.5 - Frame 5
Parks, Open Space, and Recreational Facilities
2020 LA River Master Plan PEIR**

Source: County of Los Angeles; ESRI



- 155 - Arroyo Seco
- 156 - Cerritos Park
- 157 - Chevy Chase Park
- 158 - Cypress Park Library
- 159 - Cypress Recreation Center
- 160 - Drew Street Park
- 161 - Elyria Canyon Park
- 162 - Elysian Park
- 163 - Elysian Valley Gateway Park
- 164 - Elysian Valley Rec. Center
- 165 - Fremont Park
- 166 - Glassell Park and Rec. Center
- 167 - Glenhurst Park
- 168 - Greayer's Oak Park
- 169 - Griffith Manor Park
- 170 - Griffith Park
- 171 - Griffith Park Central Service Yard
- 172 - Harvard Mini-Park
- 173 - Heritage Square
- 174 - Juntos Park
- 175 - Los Angeles River & Trail
- 176 - Los Angeles River Center and Gardens
- 177 - Los Feliz Golf Course
- 178 - Marsh Park
- 179 - Milford Mini-Park
- 180 - Narrows Riverwalk
- 181 - Natural Park
- 182 - North Atwater Park
- 183 - Oso Park
- 184 - Pacific Community Pool
- 185 - Pacific Park & Community Center
- 186 - Pelanconi Park
- 187 - Rio de Los Angeles SP
- 188 - Silver Lake Meadows Park
- 189 - Silver Lake Reservoir
- 190 - Steelhead Park
- 191 - Sunnynook Park
- 192 - Travel Town Museum
- 193 - Unnamed site - Mountains Recreation and Conservation Authority
- 194 - Unnamed site - Mountains Recreation and Conservation Authority

Legend

- Parks, Open Space, and Recreational Facilities
- Los Angeles River Frame

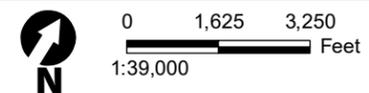
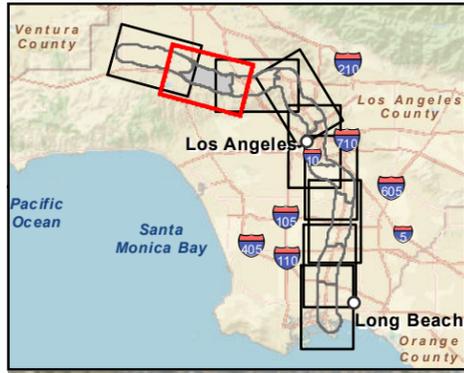
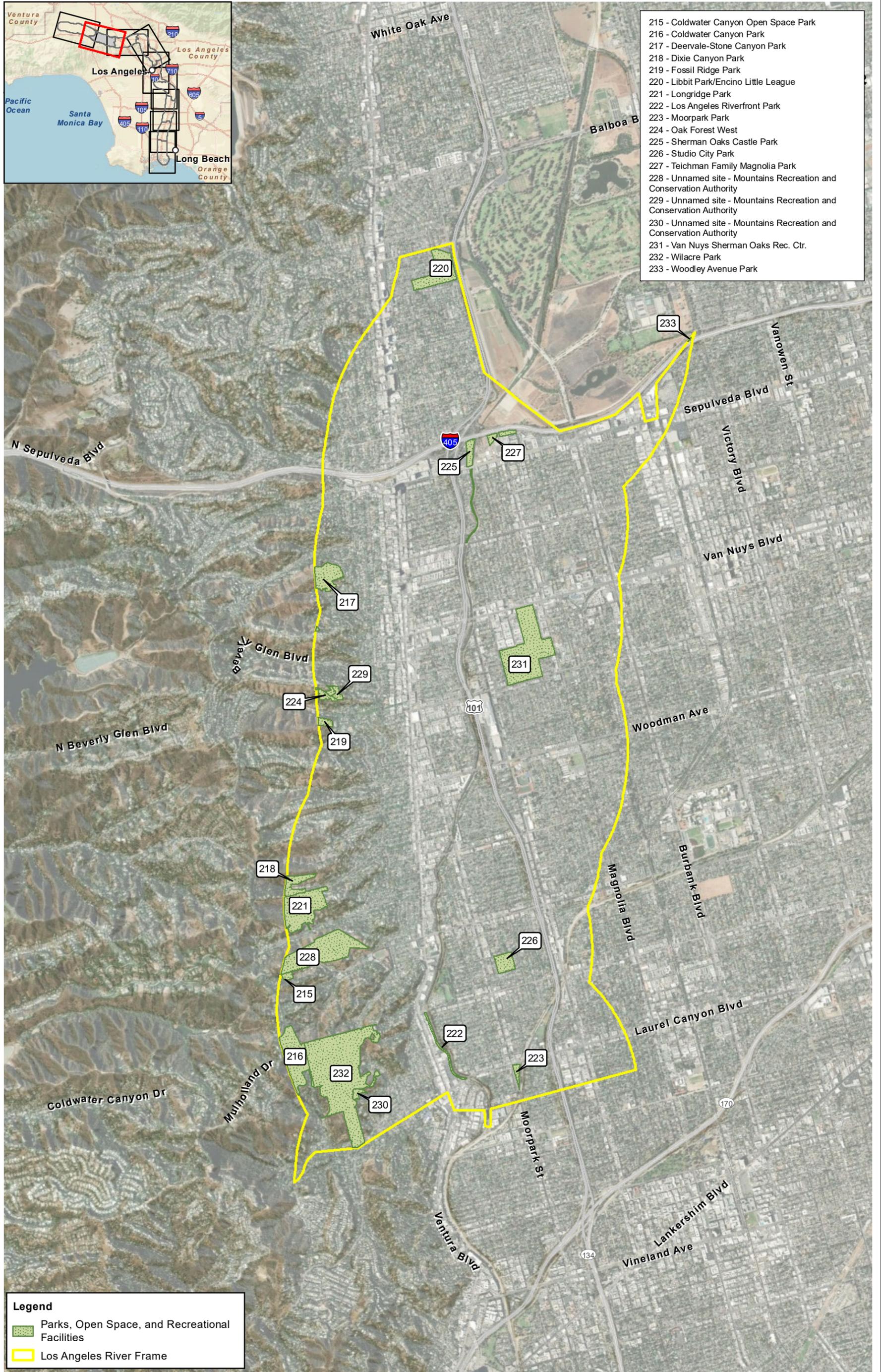


Figure 3.15-1.6 - Frame 6
Parks, Open Space, and Recreational Facilities
2020 LA River Master Plan PEIR

Source: County of Los Angeles; ESRI



- 215 - Coldwater Canyon Open Space Park
- 216 - Coldwater Canyon Park
- 217 - Deervale-Stone Canyon Park
- 218 - Dixie Canyon Park
- 219 - Fossil Ridge Park
- 220 - Libbit Park/Encino Little League
- 221 - Longridge Park
- 222 - Los Angeles Riverfront Park
- 223 - Moorpark Park
- 224 - Oak Forest West
- 225 - Sherman Oaks Castle Park
- 226 - Studio City Park
- 227 - Teichman Family Magnolia Park
- 228 - Unnamed site - Mountains Recreation and Conservation Authority
- 229 - Unnamed site - Mountains Recreation and Conservation Authority
- 230 - Unnamed site - Mountains Recreation and Conservation Authority
- 231 - Van Nuys Sherman Oaks Rec. Ctr.
- 232 - Wilacre Park
- 233 - Woodley Avenue Park



Legend

- Parks, Open Space, and Recreational Facilities
- Los Angeles River Frame

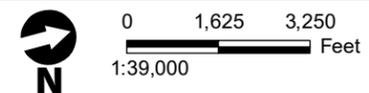
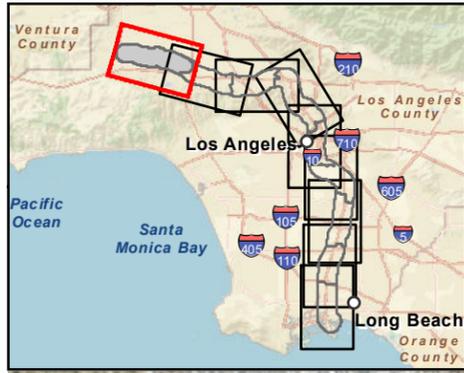


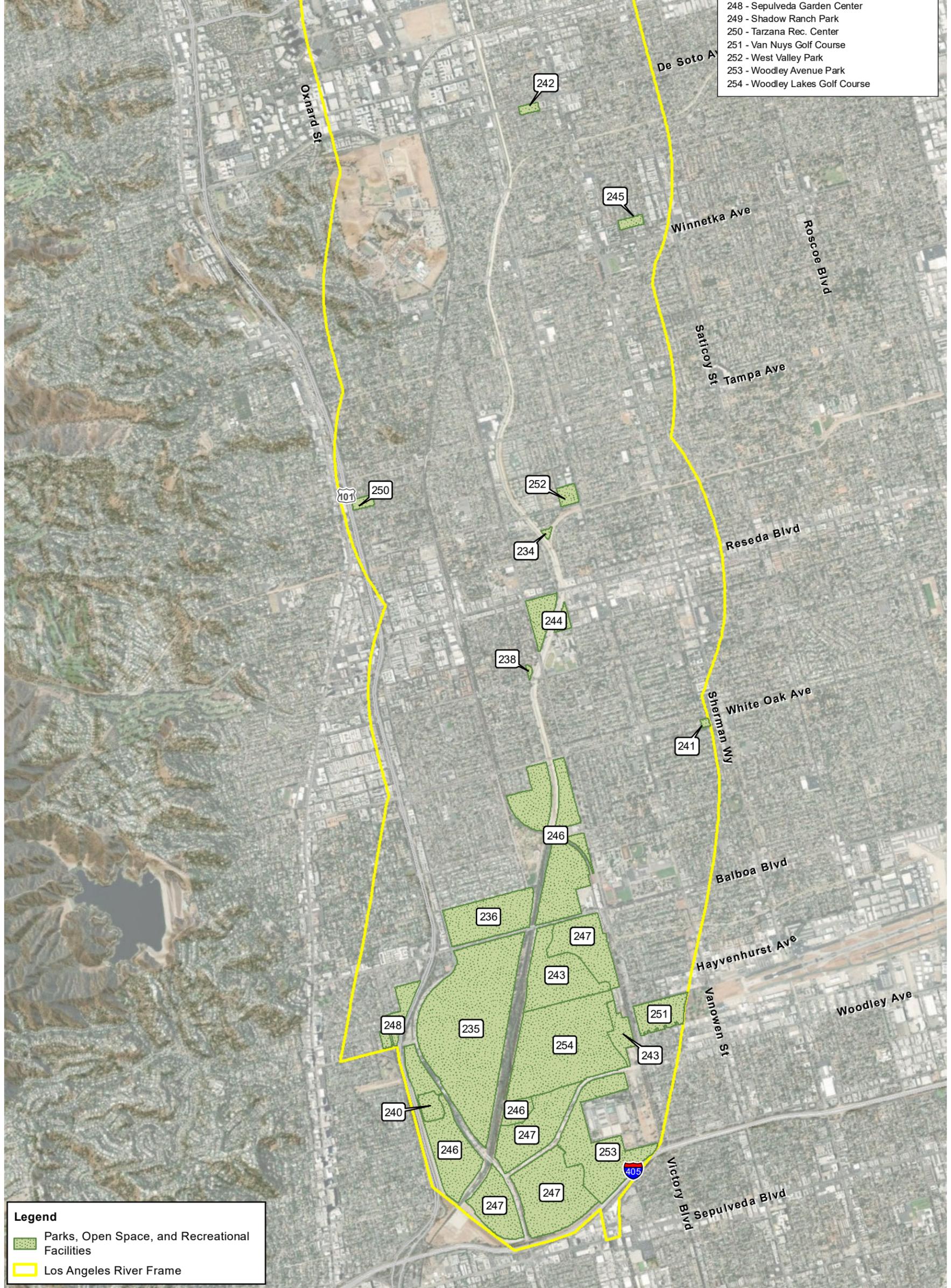
Figure 3.15-1.8 - Frame 8
Parks, Open Space, and Recreational Facilities
2020 LA River Master Plan PEIR

Source: County of Los Angeles; ESRI

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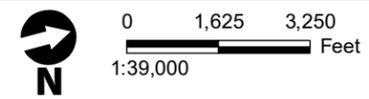


- 234 - Aliso Creek Park
- 235 - Balboa Golf Course & Encino Golf Course
- 236 - Balboa Sports Center
- 237 - Bell Creek Park
- 238 - Caballero Creek Park
- 239 - Canoga Park Senior Citizen Center
- 240 - Hjelte Sports Center
- 241 - Jesse Owens Mini Park
- 242 - John Quimby Park
- 243 - Lake Balboa Park
- 244 - Reseda Park and Rec Center
- 245 - Runnymede Rec. Center
- 246 - Sepulveda Basin Rec. Area
- 247 - Sepulveda Basin Wildlife Reserve
- 248 - Sepulveda Garden Center
- 249 - Shadow Ranch Park
- 250 - Tarzana Rec. Center
- 251 - Van Nuys Golf Course
- 252 - West Valley Park
- 253 - Woodley Avenue Park
- 254 - Woodley Lakes Golf Course



Legend

- Parks, Open Space, and Recreational Facilities
- Los Angeles River Frame



**Figure 3.15-1.9 - Frame 9
Parks, Open Space, and Recreational Facilities
2020 LA River Master Plan PEIR**

Source: County of Los Angeles; ESRI

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3.2.21 Changes to Section 3.16, Transportation

Changes to Section 3.16.2.1, Page 3.16-3

Existing Public Transit Service and Freight Rail Service

The regional public transit system includes heavy rail transit operations, regional commuter rail services, regional and municipal bus operations, and local shuttles. The Los Angeles County Metropolitan Transportation Authority (Metro) is the largest provider of public transit service in the study area, and its service is supplemented by numerous municipal transit lines and local shuttle services.

Figures 3.16-4 through 3.16-6 present the existing transit routes within the study area. The study area is served by eight transit providers on 188 routes, including by Metro, DASH (Los Angeles Department of Transportation), Antelope Valley Transit Authority, Santa Clarita Transit, Big Blue Bus (Santa Monica), Foothill Transit, Torrance Transit, and Long Beach Transit. Metro rail and bus rapid transit service within the study area includes the A Line (formerly, the Blue Line) within the Long Beach area, the C Line (formerly, the Green Line) in South Los Angeles, and the G Line (formerly, the Orange Line) in the San Fernando Valley.

The NextGen Bus Plan is a comprehensive restructuring of Metro's transit service to improve service and accessibility for riders. The project was begun in 2018 and developed through consideration of both technical data and all the priorities and personal experiences of residents. The Plan was approved by the Metro Board of Directors in October 2020 and is being implemented in phases ending in late 2021. When fully deployed the NextGen Bus Plan will give LA County a bus system that is fast, frequent, reliable and accessible. The improvements will double the number of frequent Metro bus lines, provide more than 80% of current bus riders with 10 minute or better frequency, improve and expand service throughout the day, ensure a one-quarter mile walk to a bus stop for 99% of current riders, and create a more comfortable and safer waiting environment. Within the overall framework, transit access to the LA River and other destinations in the region will be improved.

National and regional passenger rail service in the study area is operated by Amtrak and Metrolink. The two services, in some places, share use of tracks with the Union Pacific Railroad (UPRR), which operates a vast rail network that extends throughout the State and the nation. Planning is underway for development of a high-speed rail line that will link Southern California with Central California and the Bay Area, and portions of the alignments under study include segments that lie adjacent to the LA River.

Existing Streets and Freeways

Figures 3.16-7 through 3.16-9 present the existing roadway network within the study area, including freeways, arterials, secondary streets, and local roads. The network of freeways and State highways supports high-capacity limited-access travel, whereas the arterial network provides high levels of signalized street capacity and serves as a feeder system for the regional freeways and local street system. The freeway and highway system is the primary means of regional movement of people and goods, providing for direct vehicular access to river access points, places of employment, services such as healthcare and recreation, and goods~~primary means of regional person and goods~~

~~movement, providing for direct vehicular access to river access points, and to employment, services, and goods.~~

In many locations, arterial streets provide the only local access crossing points over the LA River, with many secondary and especially local roads dead-ending at the river's fence line.

~~Los Angeles County, and the City of Los Angeles, and the City of Long Beach both~~ have Vision Zero plans, which aim to reduce traffic fatalities and/or injuries to zero. Each agency has identified specific roadway corridors that experience higher than average collisions, injuries, and fatalities.

Changes to Section 3.16.2.2, Page 3.16-9

Metro's Our Next LA Long Range Transportation Plan

Metro's Long Range Transportation Plan (LRTP), titled Our Next LA, was adopted by the Metro Board of Directors on September 24, 2020 and is the first update to the LRTP since 2009, and provides a vision for transportation in Los Angeles County through 2047. The plan aims to address population growth, changing mobility needs and preferences, technological advances, equitable access to opportunity, and adaptation to a changing environment. The plan details construction of an additional 100 miles of fixed-guideway transit, investments in arterial and freeway projects to reduce congestion, and construction of regional-scale bicycle and pedestrian projects to increase active transportation, including the 5.6-mile long Rail to Rail Active Transportation Corridor Segment A, and the final two additional segments of the LA River Path. Together the 8-mile Central LA gap closure project and the 13-mile San Fernando Valley extension will result in a continuous 52-mile long bicycle path from Long Beach to Warner Center. Other efforts detailed in the plan include traffic management practices for congested roadways (e.g., Express Lanes toll lanes), maintaining and upgrading the existing transportation system for all modes, and partnering with local, State, and federal agencies, and the private sector. Our Next LA includes transit and highway improvements funded by Measure M, as well as expansions of off-peak transit service, of the active transportation network, and of programs such as Express Lanes, partnerships to provide bus only lanes and freight management policies, and bold policy proposals, including free transit, faster bus trips, and sub-regional congestion pricing. (Metro 2020.)

~~Metro's 2020 Long Range Transportation Plan (LRTP), titled Our Next LA, was adopted by the Metro Board of Directors on September 24, 2020 and is the first update to the LRTP since 2009, and provides a vision for transportation in Los Angeles County through 2047. The plan aims to address population growth, changing mobility needs and preferences, technological advances, equitable access to opportunity, and adaptation to a changing environment. The plan details construction of an additional 100 miles of fixed-guideway transit, investments in arterial and freeway projects to reduce congestion, and construction of regional-scale bicycle and pedestrian projects to increase active transportation, including the Rail to Rail Active Transportation Corridor and the LA River Path. Other efforts detailed in the plan include traffic management practices for congested roadways (e.g., Express Lanes toll lanes), maintaining and upgrading the existing transportation system for all modes, and partnering with local, State, and federal agencies, and the private sector. Our Next LA includes transit and highway improvements funded by Measure M, as well as expansions of off-peak transit service, of the active transportation network, and of programs such as Express Lanes, partnerships to provide bus only lanes and freight management policies, and bold policy proposals, including free transit, faster bus trips, and sub-regional congestion pricing. (Metro 2020.)~~

Active Transportation Strategic Plan (2016)

The Active Transportation Strategic Plan (Metro) identifies a countywide active transportation network and provides clarity on the process of implementation. It presents best practice design resources and examples of how to integrate them into projects that improve station access. Its three main components that will help Metro and partners plan and implement improvements to the active transportation network are (1) First last mile station area access improvements, (2) Regional Active Transportation Network and (3) Support Programs, including performance metrics and monitoring.

First/Last Mile Strategic Plan (2014)

The First/Last Mile Strategic Plan (Metro and SCAG) presents planning guidelines that outline specific strategies to facilitate access to the Metro system. It introduces the “pathway” concept and shows how it can be used to focus investments and improvements to maximize multi-modal benefits around Metro Rail stations and Rapid Bus stations. The plan includes an extensive “toolbox” of possible components of for improving pathways, including crossing enhancements, signage and wayfinding, safety and comfort elements (such as street furniture, landscaping, shade, and street lighting), and others.

Changes to Section 3.16.2.2, Page 3.16-13

Los Angeles County Vision Zero Action Plan

The *Vision Zero Los Angeles County: A Plan for Safer Roadways*, published in November 2019 and adopted by the Los Angeles County Board of Supervisors in August 2020, focuses County efforts for the years 2020–2025 to achieve the goal of eliminating traffic-related fatalities on unincorporated County roadways by 2035. The plan includes a vision for the future, objectives, and actions to enhance traffic safety. It is guided by principles of health equity, data driven processes, and transparency. It identifies Collision Concentration Corridors throughout the unincorporated areas of the County, any half-mile roadway segment on which three or more fatal or severe injury collisions occurred over a 5-year period from 2013–2017. Strategies to enhance roadway safety and reduce collisions include a wide range of roadway enhancements, such as lighting, curb extensions, and pedestrian signal timing, and a commitment to collaborate on data analysis and develop partnerships across jurisdictions. The plan is structured around five objectives: enhancing County processes and collaboration; addressing health inequities and protecting vulnerable users; collaborating with communities to enhance roadway safety; fostering a culture of traffic safety; and transparency, responsiveness, and accountability. (Los Angeles County 2019.)

Safe Streets Long Beach, A Vision Zero Action Plan (2020)

This is a plan that strives to eliminate traffic-related fatalities and serious injuries in Long Beach by 2026 through multiple strategies, such as modifying streets to better serve vulnerable road users. The plan uses data analysis, community input, and best practice research to identify programs and policies that can make the streets safer for everyone. The plan was adopted by the City of Long Beach in July 2020 and covers part of the area within Frames 1 and 2. Specifically, the plan includes detailed mapping of a high-injury network in Long Beach, which is composed of streets and intersections where higher numbers of collisions or more severe collisions occur than at others. The study area for the 2020 Los Angeles River Master Plan extends one mile on each side of the riverbed.

Within that area, the portions of the following streets are identified as corridors on the high-injury network: Santa Fe Avenue, Magnolia Avenue, Pine Avenue, Long Beach Boulevard, Artesia Boulevard, Market Street, Wardlow Road, Willow Street, Pacific Coast Highway, Anaheim Street, 7th Street, 6th Street, and Ocean Avenue.

Municipal General Plans, Bicycle Master Plans, and Climate Actions Plans

The 18 jurisdictions (17 cities and unincorporated area) within the study area set transportation policy through the circulation or mobility element of their general plans, and through other policy documents such as bicycle master plans or climate action plans. While it is good practice for these documents to be updated regularly, there is no regulatory timeframe governing their update, and some cities have not updated their general plans or circulation elements since the early 1990s. Additionally, while almost all of the cities identify specific policy goals surrounding transportation along the LA River, not all do, and in most cases, there is little framework in place for interjurisdictional coordination between river cities toward LA River development.

The relevant policies from each city's regulatory documents are provided below.

Frame 1

City of Long Beach

Mobility Element of the City's General Plan (City of Long Beach 2013)

- **Strategy No. 1** – Establish a network of complete streets that complements the related street type.
 - **MOP Policy 1-9** – Increase mode shift of transit, pedestrians, and bicycles.
- **Strategy No. 2** – Reconfigure streets to emphasize their modal priorities.
 - **MOP Policy 2-16** – Close gaps in the existing bikeway system².
- **Strategy No. 5** – Reduce the environmental impacts of the transportation system.
 - **MOP Policy 5-2** – Reduce vehicle miles traveled (VMT) and vehicle trips through the use of alternative modes of transportation and TDM.

Bicycle Master Plan 2040 (City of Long Beach 2017)

- **Strategy 1** – Develop a comprehensive bikeway network.
 - **1.1** – Expand, improve, and connect the bikeway network to provide a viable transportation option for all levels of bicycling abilities.
 - **1.4** – Upgrade bridges, intersections, freeway ramps, tunnels, and any other obstacles that impede safe and convenient bicycle passage.

Safe Streets Long Beach, A Vision Zero Action Plan (2020)

This is a plan that strives to eliminate traffic-related fatalities and serious injuries in Long Beach by 2026 through multiple strategies, such as modifying streets to better serve vulnerable road users. The plan uses data analysis, community input, and best practice research to identify programs and policies that can make the streets safer for everyone. The plan was adopted by the City of Long Beach in July 2020 and covers part of the area within Frames 1 and 2. Specifically, the plan includes

² The Mobility Element planned seven bike/ped bridges across the LA River.

detailed mapping of a high-injury network in Long Beach, which is composed of streets and intersections where higher numbers of collisions or more severe collisions occur than at others. The study area for the 2020 Los Angeles River Master Plan extends one mile on each side of the riverbed. Within that area, the portions of the following streets are identified as corridors on the high-injury network: Santa Fe Avenue, Magnolia Avenue, Pine Avenue, Long Beach Boulevard, Artesia Boulevard, Market Street, Wardlow Road, Willow Street, Pacific Coast Highway, Anaheim Street, 7th Street, 6th Street, and Ocean Avenue.

Los Angeles County

Los Angeles County General Plan (Los Angeles County 2015a)

- **Goal M2** – Interconnected and safe bicycle- and pedestrian-friendly streets, sidewalks, paths, and trails that promote active transportation and transit use.
 - **Policy M2.5** – Ensure a comfortable bicycling environment by implementing the following, whenever appropriate and feasible:
 - Appropriate lighting on all bikeways, including those in rural areas.
 - **Policy M2.7** – Require sidewalks, trails, and bikeways to accommodate the existing and projected volume of pedestrian, equestrian, and bicycle activity, consider both the paved width and the unobstructed width available for walking.
 - **Policy M2.8** – Connect trails and pedestrian and bicycle paths to schools, public transportation, major employment centers, shopping centers, government buildings, residential neighborhoods, and other destinations.
- **Goal M4** – An efficient multimodal transportation system that serves the needs of all residents.
 - **Policy M4.1** – Expand transportation options that reduce automobile dependence.
 - **Policy M4.10** – Support the linkage of regional and community-level transportation systems, including multimodal networks.
 - **Policy M4.12** – Work with adjacent jurisdictions to ensure connectivity and the creation of an integrated regional network.
- **Goal M7** – Transportation networks that minimize negative impacts to the environment and communities.
 - **Policy M7.1** – Minimize roadway runoff through the use of permeable surface materials, and other low impact designs, wherever feasible.

Connect US Action Plan

The Connect US Action Plan (Metro 2015) is a strategy for encouraging people to walk and bicycle to Los Angeles Union Station and 1st/Central Regional Connector Station from the historic/cultural neighborhoods that surround them. The project concepts include esplanades, cycle tracks, and bicycle lanes to unify the historic/cultural neighborhoods of El Pueblo, Chinatown, Cornfield Arroyo Seco, Boyle Heights, Arts District, Little Tokyo, and Civic Center. The study area is a 1-mile radius around the LRT station at First Street and Central Avenue. Almost all of the mobility projects presented in the plan also include infill street trees and measures to collect and infiltrate stormwater into the soil. This plan affects areas that lie within Frame 5 of the 2020 LA River Master Plan. The plan’s objectives include “improve access to open spaces, including the Los Angeles River, parks, plazas and public spaces the project area” and “contribute to a more environmentally sustainable Los Angeles.”

Changes to Section 3.16.2.2, Page 3.16-20

Frame 7

City of Los Angeles

Applicable regulations are described above.

City of Burbank

City of Burbank Bicycle Master Plan (City of Burbank 2009)

- **Objective B** – Identify and implement a network of bikeways that is feasible, fundable, and that serves all bicyclists’ needs, especially for travel to employment centers, schools, commercial and retail districts, transit stations, and institutions, while not excluding the needs of recreational cyclists.
- **Objective B Policy Action 8** – Create strong connections between the regional Class I bike paths (Los Angeles River, Chandler, and San Fernando), as well as Metrolink Stations.

Burbank2035 General Plan – Mobility Element 2035 (City of Burbank 2013a)

- **Goal 2** – Sustainability
 - **Policy 2.1** – Improve Burbank’s alternative transportation access to local and regional destinations through land use decisions that support multimodal transportation.
 - **Policy 2.3** – Prioritize investments in transportation projects and programs that support viable alternatives to automobile use.
- **Goal 5** – Bicycle and Pedestrian Mobility
 - **Policy 5.2** – Implement the Bicycle Master Plan by maintaining and expanding the bicycle network, providing end-of-trip facilities, improving bicycle/transit integration, encouraging bicycle use, and making bicycling safer.

The LA River bike bridge is a funded project.

Greenhouse Gas Reduction Plan (City of Burbank 2013b)

- **Measure T-1.4** – Bicycle Infrastructure Expansion

The bicycle master plan identifies an additional 12.0 miles of Class I and Class II facilities as top priority projects. Approximately 5.0 miles of these top priority projects have already received funding and are currently in various stages of development, including the South Channel Bikeway, the San Fernando Bikeway, extension of the Verdugo bike lanes, the Keystone Bicycle Boulevard project, and the LA River Bike Bridge project. Future bicycle lane expansion should focus on connecting high-visitation sites (e.g., dense residential areas, commercial and employment centers, transit hubs, parks and recreation areas) with Class I and II facilities to encourage a travel mode shift from cars to bicycles, especially for non-commute trips.

City of Burbank Complete Streets Plan (City of Burbank 2020)

The City of Burbank’s Complete Streets Plan provides a flexible mechanism to meet all transportation needs, including active transportation and transit. Funded through California Senate Bill 1, the plan aims to maintain and integrate the State’s multi-modal transportation system and further State and regional transportation goals.

- Goal 1 – Balance
 - Policy 1.6 - Use technology and intelligent transportation systems to increase street system capacity and efficiency as an alternative to street widening
 - Policy 1.7 – Ensure that the transportation system enables Burbank residents, employees, and visitors opportunity to live, work, and play throughout the community.
- Goal 2 – Sustainability
 - Policy 2.1 – Improve Burbank’s alternative transportation access to local and regional destinations through land use decisions that support multi-modal transportation.
 - Policy 2.2: Weigh the benefits of transportation improvements, policies, and programs against the likely external costs.
 - Policy 2.3: Prioritize investments in transportation projects and programs that support viable alternatives to automobile use.
 - Policy 2.4: Require new projects to contribute to the City’s transit and/or non-motorized transportation network in proportion to its expected traffic generation.
 - Policy 2.5: Consult with local, regional, and state agencies to improve air quality and limit greenhouse gas emissions from transportation and goods movement.
- Goal 3- Complete Streets
 - Policy 3.1: Use multi-modal transportation standards to assess the performance of the City street system.
 - Policy 3.2: Complete City streets by providing facilities for all transportation modes.
 - Policy 3.3: Provide attractive, safe street designs that improve transit, bicycle, pedestrian, and equestrian connections between homes and other destinations.
 - Policy 3.4: All street improvements should be implemented within the existing right-of-way. Consider street widening and right-of-way acquisition as methods of last resort.
 - Policy 3.5: Design street improvements so they preserve opportunities to maintain or expand bicycle, pedestrian, and transit systems.
- Goal 4 – Transit
 - Policy 4.1: Ensure that local transit service is reliable, safe, and provides high-quality service to major employment centers, shopping districts, regional transit centers, and residential areas.
 - Policy 4.2: Use best-available transit technology to better link local destinations and improve rider convenience and safety, including specialized services for youth and the elderly.
 - Policy 4.3: Improve and expand transit centers; create a new transit center in the Media District.
 - Policy 4.4: Advocate for improved regional bus transit, bus rapid transit, light rail, or heavy rail services linking Burbank’s employment and residential centers to the rest of the region.
 - Policy 4.5: Improve transit connections with nearby communities and connections to Downtown Los Angeles, West San Fernando Valley, Hollywood, and the Westside.
 - Policy 4.6: Proactively plan for transit deficiencies should Los Angeles County Metropolitan Transportation Authority (MTA) make cutbacks to local service.
 - Policy 4.7: Integrate transit nodes and connection points with adjacent land uses and public pedestrian spaces to make them more convenient to transit users.
- Goal 6 – Neighborhood Protection

- Policy 6.1: Maintain arterial street efficiency to discourage spillover traffic into residential neighborhoods.
- Policy 6.2: Consider reconfiguring travel lanes and introducing reduced speed limits as part of comprehensive efforts to calm traffic.
- Policy 6.3: Pursue comprehensive neighborhood protection programs to avoid diverting unwanted traffic to adjacent streets and neighborhoods.
- Goal 7 – Parking
 - Policy 7.3: Reconfigure or remove underutilized street parking when needed to accommodate safer bicycle travel, increase walkability, improve transit operation, or improve vehicle safety.
- Goal 8 – Transportation Demand Management
 - Policy 8.1: Update and expand the Citywide transportation demand management requirements to improve individual economic incentives and change traveler choice.
 - Policy 8.2: Strengthen partnerships with transit management organizations to develop Citywide demand management programs and incentives to encourage alternative transportation options.
 - Policy 8.3: Require multi-family and commercial development standards that strengthen connections to transit and promote walking to neighborhood services.
- Goal 9 – Safety, Accessibility, Equity
 - Policy 9.1: Ensure safe interaction between all modes of travel that use the street network, specifically the interaction of bicyclists, pedestrians, and equestrians with motor vehicles.
 - Policy 9.2: Address the needs of people with disabilities and comply with the requirements of the Americans with Disabilities Act during the planning and implementation of transportation improvement projects.
 - Policy 9.3: Provide access to transportation alternatives for all users, including senior, disabled, youth, and other transit-dependent residents.
 - Policy 9.4: Preserve and promote safe riding for equestrians to access public riding trails.

Changes to Section 3.16.3.3, Page 3.16-24

Apply the following mitigation measure, which is described in Section 3.10, *Land Use and Planning*.

Mitigation Measure LU-1: ~~Prepare and Implement~~ Construction Management Plan.

Changes to Section 3.16.3.3, Page 3.16-28

Apply the following mitigation measure, which is described in Section 3.10, *Land Use and Planning*.

Mitigation Measure LU-1: ~~Prepare and Implement~~ Construction Management Plan.

Changes to Section 3.16.3.3, Page 3.16-29

Apply the following mitigation measure, which is described in Section 3.10, *Land Use and Planning*.

Mitigation Measure LU-1: ~~Prepare and Implement~~ Construction Management Plan.

Changes to Section 3.16.3.3, Page 3.16-33

Apply the following mitigation measure, which is described in Section 3.10, *Land Use and Planning*.

Mitigation Measure LU-1: ~~Prepare and Implement~~ Construction Management Plan.

Changes to Section 3.16.3.3, Page 3.16-36

The following changes represent a minor clarification to mitigation in the Draft PEIR by reiterating that mitigation measures apply to all 2020 LA River Master Plan development and include bicycle parking in the suggested VMT mitigation strategies. These changes merely clarify the mitigation described in the Draft PEIR. Additionally, as concluded in the Draft PEIR, the impact would be significant and unavoidable. These clarifications are not substantive (i.e., the change to the mitigation does not result in a new or worsened impact), and the significance conclusion would remain the same.

Mitigation Measure TRA-1a: Determine VMT Based on Type of Subsequent Project.

For any subsequent projects that include project elements that are identified in the VMT Impact Evaluation Matrix as having the potential to generate a significant VMT impact, the implementing agency will conduct the following two-step screening process:

- **Step 1.** Conduct a trip generation analysis to determine whether a project would generate a net increase of 110 or more daily trips, or determine whether the location is located within one-half mile of a major transit stop or high-quality transit corridor based on its County Transportation Impact Analysis Guidelines Sections 3.1.2.1 and 3.1.2.3. If the subsequent project is screened out once project design and location details are known, then no further actions are required.

If the subsequent project is not screened out after Step 1, the implementing agency will move on to Step 2.

- **Step 2.** Perform a VMT analysis for the subsequent project using the County's VMT impact criteria that have been developed based on guidance from OPR and CARB. Per the criteria, project VMT impact thresholds vary depending on the project type, as follows:
 - For residential development land use projects, the project would generate residential VMT per capita exceeding 16.8 percent below the existing residential VMT per capita for the Baseline Area in which the project is located.

- For office land use projects, the project would generate employment VMT per employee exceeding 16.8 percent below the existing employment VMT per employee for the Baseline Area in which the project is located.
- For regional serving retail land use projects, entertainment projects, and/or event center land uses, the project would result in a net increase in existing Total VMT. Trips associated with these land uses are typically discretionary trips, which may be either substitute trips to other, closer destinations, or new trips entirely. A project-specific customized approach will be required to estimate VMT for such projects. The methodology should be developed in consultation with and approved by Public Works staff at the outset of the study.
- For unique land uses in which a land use project does not fit into any of the above categories, a project-specific customized approach may be required to estimate daily trips and VMT, but may be based on the existing employment trip element using an approach similar to that for office projects, above. The methodology and thresholds to be used in such cases should be developed in consultation with and approved by Public Works staff at the outset of the study.

If the subsequent project cannot be screened out but the VMT is determined to not exceed the threshold based on the applicable guideline and project type, then no further action is needed.

~~If the subsequent project cannot be screened out and the VMT is determined to exceed the threshold based on the applicable guideline and project type, then Mitigation Measure TRA-1b will be implemented:~~

If the subsequent project cannot be screened out and the VMT is determined to exceed the threshold based on the applicable guideline and project type, then Mitigation Measure TRA-1b will be required and implemented.

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

The implementing agency (~~County or other jurisdictional agency~~) will implement a subsequent project-specific program utilizing transportation demand management (TDM) strategies and neighborhood or site enhancements to reduce VMT, and any other appropriate strategies to address identified impacts and reduce VMT to the River Corridor.

The program to reduce VMT will be based on the suite of eligible TDM strategies included in the County Guidelines or other measures with substantial evidence, or, if the subsequent project is located in an incorporated city, the program will be based on ~~that city's mitigation measures~~ (these apply to all project elements, i.e., both Typical Projects, six KOP categories, and overall 2020 LA River Master Plan, unless specified otherwise) on the local jurisdiction's list of qualifying VMT mitigation strategies. Specific measures can include but are not limited to:

- Increasing transit accessibility
- Relocating a project in order to be adjacent to transit
- Pricing any provided parking at river access sites to discourage vehicle trips to the River Corridor
- Providing bicycle parking

- Implementation of neighborhood or site enhancements such as pedestrian network improvements (for example, high-visibility crosswalks, continuous sidewalks, and Americans with Disabilities Act [ADA]-compliant directional curb cuts at intersections), and traffic calming measures such as speed humps or chicanes

Changes to Section 3.16.3.3, Page 3.16-37

Apply the following mitigation measure, which is described in Section 3.10, *Land Use and Planning*.

Mitigation Measure LU-1: ~~Prepare and Implement~~ Construction Management Plan.

Changes to Section 3.16.3.3, Page 3.16-38

Apply the following mitigation measure, which is described in Section 3.10, *Land Use and Planning*.

Mitigation Measure LU-1: ~~Prepare and Implement~~ Construction Management Plan.

Changes to Section 3.16.3.3, Page 3.16-52

Apply the following mitigation measure, which is described in Section 3.10, *Land Use and Planning*.

Mitigation Measure LU-1: ~~Prepare and Implement~~ Construction Management Plan.

Changes to Section 3.16.3.3, Page 3.16-53

Apply the following mitigation measure, which is described in Section 3.10, *Land Use and Planning*.

Mitigation Measure LU-1: ~~Prepare and Implement~~ Construction Management Plan.

Changes to Section 3.16.3.3, Page 3.16-55

Apply the following mitigation measure, which is described in Section 3.10, *Land Use and Planning*.

Mitigation Measure LU-1: ~~Prepare and Implement~~ Construction Management Plan.

Changes to Section 3.16.3.3, Page 3.16-56

Apply the following mitigation measure, which is described in Section 3.10, *Land Use and Planning*.

Mitigation Measure LU-1: ~~Prepare and Implement~~ Construction Management Plan.

Changes to Section 3.16.3.3, Page 3.16-61

This change represents a minor clarification to the Draft PEIR by reiterating that because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. These changes are not substantive (i.e., new significant information not previously analyzed).

3.16.3.3 Cumulative Impacts

The geographic context for an analysis of cumulative transportation impacts is the greater Los Angeles region to encompass the entire roadway/freeway system that could be affected by cumulative projects. A description of the regulatory setting and approach to cumulative impacts analysis is provided in Section 3.0.2.

Additionally, as described in Section 3.0.1.4 of this Draft PEIR, because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. Therefore, where this PEIR concludes a less-than-significant impact with mitigation for later activities carried out by the County, the impact has been identified as significant and unavoidable when these activities are not carried out by the County.

The County has committed to adopt the mitigation in regard to later activities carried out by the County; other public agencies similarly can and should adopt the mitigation because it is feasible and is in their best interest to reduce potentially significant impacts with mitigation on later activities. In particular, those agencies that utilize the PEIR for later CEQA analyses can reasonably be expected to implement the mitigation or, if they do not, to prepare a subsequent EIR that explains why the mitigation is infeasible.

Criteria for Determining Significance of Cumulative Impacts

The proposed Project would have the potential to result in a cumulatively considerable impact on transportation/traffic, if, in combination with other projects within the greater Los Angeles region, it would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b); substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or result in inadequate emergency access.

Baseline Cumulative Condition

Past projects in Los Angeles County (cities and unincorporated areas) have converted undeveloped and agricultural land to urban uses, resulting in residential and employment population increases and associated demand for expansions of roadway systems. The cumulative traffic impact of the County's and individual jurisdictions' general plan build-out will be largely mitigated through a combination of regional programs that are the responsibility of agencies such as cities and Caltrans.

The 2020 RTP/SCS, in addition to other projects from other regional plans (e.g., RTPs of adjacent jurisdictions), could result in additional impacts in the greater Los Angeles and SCAG regions. Recent

County modeling efforts completed during the County process to develop SB 743-compliant CEQA thresholds and guidelines utilized the SCAG transportation demand forecasting model to forecast 2040 conditions. While the horizon year of the County's modeling efforts for that project is 5 years before the 2045 horizon year for the proposed Project, it is likely that the long-term VMT trends identified in that effort would continue in the years between 2040 and 2045. In general, VMT on a per capita basis is projected to go down throughout the SCAG region due to increasing population and job density, infill development, and greater active transportation and transit usage. Within the study area, the percent of land area with residential VMT below the County baseline is forecast to increase from 10 percent today to 24 percent in 2040, with the percentage within some river frames increasing by almost 30 percent, and no frames experiencing a decrease in the percentage of land area with residential VMT below the County baseline. Similarly, percentage of total land area with employee VMT below the County baseline is forecast to increase between 2020 and 2040 by 10 percent, from 8 percent today to 18 percent in the future, with no frames experiencing a decrease in percent land area with employee VMT below the County baseline and one frame experiencing an increase of more than 25 percent in the percentage of land area that meets this metric. Table 3.16-4 presents the change in percent land area with residential and employee VMT below the County baseline by river frame and for the study area overall. Based on this information, there would be no baseline cumulative condition with respect to transportation.

Table 3.16-4. Percent Change in Land Area with VMT Below the County Baseline

River Frame ID	Name	Residential VMT Below the County Baseline			Employee VMT Below the County Baseline		
		% Land Area			% Land Area		
		2020	2040 ¹	% Change	2020	2040 ¹	% Change
1	Estuary	6%	6%	0%	3%	7%	3%
2	South Plain	3%	8%	6%	6%	10%	4%
3	Central Plain	5%	5%	0%	3%	8%	5%
4	North Plain	36%	65%	29%	11%	26%	15%
5	Heights	23%	43%	21%	3%	9%	5%
6	Narrows	2%	28%	27%	2%	29%	27%
7	East Valley	6%	14%	9%	0%	11%	11%
8	Mid Valley	11%	12%	1%	1%	13%	12%
9	West Valley	9%	33%	25%	33%	33%	0%
	Total	10%	24%	14%	8%	18%	10%

¹ Data based on modeling done to support development of County SB 743 Guidelines. Model horizon year for that project was 2040; the 2020 LA River Master Plan horizon year is 2045.

Contribution of the Project to Cumulative Impacts

As noted implementation of the 2020 LA River Master Plan will allow for an increased share of trips to be completed via active transportation instead of by private vehicle. Mitigation Measures LU-1, TRA-1a, and TRA-1b would reduce all potential impacts of the proposed Project to less than significant, when carried out by the County. As described in Chapter 3, CEQA Environmental Impact Assessment, because some later activities under the 2020 LA River Master Plan would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be

incorporated. Cumulative impacts on transportation would be significant and unavoidable for later activities that are not carried out by the County.

As there is no baseline cumulative condition with respect to transportation, the proposed Project would not make a cumulatively considerable contribution to transportation impacts when later activities are carried out by the County. Cumulative impacts on transportation would be significant and unavoidable for later activities that are not carried out by the County.

3.2.22 Changes to Section 3.17, Tribal Cultural Resources

Changes to Section 3.18.4.3, Page 3.17-19

Baseline Cumulative Condition

TCRs in the region are protected by state and regional laws and projects are required to comply with related federal, state, and local regulations. City, County, and regional goals and policies also aim to preserve and protect tribal cultural resources to the extent practicable. Even with regulations in place, individual tribal cultural resources could still be affected or degraded (e.g., from demolition, destruction, alteration, structural relocation) as a result of new private or public development or redevelopment and implementation of land use strategies under cumulative plans and projects. Cumulative growth and development within the region have the potential to result in the loss or disturbance of historical and archaeological resources, including TCRs. Although these potential impacts are normally addressed on a project-specific basis through the formal consultation process, some projects are unable to fully avoid or fully mitigate potential impacts. Impacts related to the loss and/or disturbance of known or unknown archaeological sites (including TCRs) within the greater Los Angeles area, such that the significance of such resources would be materially impaired, are considered to be cumulatively significant due to the large number of TCRs within the greater Los Angeles region and the likelihood of yielding these resources. Therefore, a baseline cumulative condition exists for tribal cultural resources.

3.2.23 Changes to Section 3.18, Utilities/Service Systems

Changes to Section 3.18.2.1, Page 3.18-15

City of Burbank

The City of Burbank does not own any native groundwater rights and extracts groundwater supplies under terms outlined in the 1979 water rights Judgment for the San Fernando Basin. Burbank Water and Power (BWP) provides potable and recycled water to customers within the city. BWP also provides recycled water outside of the city via interconnections and exchange agreements with the City of Glendale and the City of Los Angeles. BWP's potable water system includes approximately ~~286-276~~ miles of pipelines ranging in size from 30 inches to 1.5 inches in diameter, ~~35-27~~ booster pumps, ~~21-22~~ tanks and reservoirs, eight wells, five MWD connections, and over 26,000 service connections. The water distribution system consists of three major pressure zones and eight smaller hillside zones. The three largest pressure zones are denoted Zones 1, 2, and 3. Zone 1 encompasses

approximately 90 percent of the total Burbank land area and represents 88 percent of the total city demand.

The potable system's tanks and reservoirs range in capacity from 13,500 gallons to 25 million gallons. The combined storage capability of all the reservoirs is approximately 60 million gallons. The storage capacity of Zone 1 is approximately 50 million gallons, 83 percent of the total system storage.

The annual potable water sales for 2011 through 2015 averaged ~~5,650-660~~ million gallons or ~~17,339~~ 338 AF. Over the same 5 years, the average water demand was 15.9 mgd. Annual maximum day demands averaged 21.9 mgd. The pump station at the Burbank Water Reclamation Plant (BWRP) distributes reclaimed water to users around Burbank. Of the ~~330-935~~ million gallons of reclaimed water distributed in 2019, 35 percent was used for power generation purposes, 7 percent was used at the DeBell Golf Course, 3 percent was used at the City of Burbank Landfill, and the remaining 55 percent was used for other purposes such as landscape irrigation and HVAC cooling. ~~50 percent was used for the cooling tower at the BWP steam power plant, 30 percent was used at Debell golf course, 10 percent was used at the City of Burbank Landfill, and 10 percent went to other uses.~~

Changes to Section 3.18.3.4, Page 3.18-45

All Utilities

Burbank Water and Power Rules and Regulations

The Burbank City Council approved the Burbank Water and Power Rules and Regulations in October 2020. This document provides rates, fees, and charges for utility services within the City of Burbank. The Rules and Regulations also mandate the usage of recycled water, when feasible, for existing and proposed projects located near existing and proposed recycled water mains. The Rules and Regulations also require the use of recycled water for construction purposes, when feasible.

Changes to Section 3.18.4.3, Page 3.18-74

The majority of water used for irrigation would likely be recycled water. Conservation efforts throughout the watershed have resulted in a reduction of the amount of wastewater going to the treatment plants. This has, in turn, resulted in a decrease in the amount of recycled water available to potential users. Decreased wastewater flows in LACSD's service areas have affected effluent production at the water reclamation plants, resulting in less recycled water being available for reuse in recent years (LACSD 2018). Cities in the study area that utilize LACSD recycled water include Bell Gardens, Compton, Cudahy, Downey, Huntington Park, Long Beach, Lynwood, Paramount, South Gate, and Vernon. The City of Burbank has its own recycled water system and would be able to supply recycled water for the proposed Project, where feasible.

Changes to Section 3.18.4.3, Page 3.18-94

Baseline Cumulative Condition

Cumulative growth and development, as well as implementation of transportation infrastructure improvements, would result in additional demands on utilities and services, such as water supplies, wastewater treatment, and solid waste disposal. As the County continues to grow, there will be a continued need for increased landfill capacities. A potential for cumulative impacts for solid waste management exists on a countywide level. Similarly, cumulative impacts could occur for wastewater treatment facilities for wastewater flows.

Due to planned transportation projects and anticipated development identified in the County's and individual jurisdictions' general plans, as well as the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), there would be potential for construction of new stormwater drainage facilities or expansion of existing facilities to be needed. The need for new or expanded facilities for plan projects in combination with other large projects outside the region—such as wastewater projects in adjacent counties or transportation projects that connect with projects to outside areas—could result in significant impacts. As such, there would be a cumulatively significant impact with regard to stormwater drainage capacity.

Drought, pollution, population growth, and land use affect the quantity and quality of local and regional water supplies. The climate in Los Angeles County is characterized by extended periods of dry weather and varying levels of rainfall, which range from an average of 27.5 inches per year in the San Gabriel Mountains to 7.8 inches in the Antelope Valley. The overall demand for water is projected to increase dramatically to 2035, and the cost, quality, and availability of water will affect future development patterns. (Los Angeles County 2015.)

The 2020 RTP/SCS would result in significant cumulative impacts on sufficient water supplies. The volume of water and water delivery infrastructure currently available within the SCAG region would not be sufficient to meet the future multiple dry year or average year water demand in 2040. Increases in population could require or result in the relocation or construction of new or expanded water facilities outside of the region. As such, the *2020 LA River Master Plan* would result in a cumulatively considerable impact. Development attributed to land use strategies would also increase water demand. Due to the uncertainties associated with water supply and management; this impact is considered cumulatively considerable. (SCAG 2020.)

Build-out of the County's and individual jurisdictions' general plans would be expected to contribute incrementally with related projects in the County to significant cumulative impacts on landfill capacity. Existing landfills are currently operating at 80 percent capacity across the SCAG region. Per capita generation of solid waste is decreasing across the SCAG region due to increased recycling and compliance with the requirements of AB 939 and other sustainable conservation measures. Additionally, transportation projects and development encouraged by land use strategies would be required to comply with AB 341, in which 75 percent of the waste stream would be recycled by the year 2020. However, the potential to exceed capacity over the planning horizon remains significant.

Cumulative growth and development in the greater Los Angeles region would result in increased consumption of electricity and natural gas. The anticipated power and natural gas demands for the buildout of the County's and individual jurisdictions' general plans, as well as the 2020 RTP/SCS,

would be cumulatively significant in the context of future growth elsewhere in Los Angeles County. A variety of energy conservation measures are being and will continue to be implemented statewide, which will reduce the demand for electricity and natural gas. While population growth will increase the demand for electricity and natural gas, programs for energy-efficiency are planned or have been developed to further increase energy-efficiency. However, despite statewide energy-efficiency programs, the baseline cumulative condition related to electricity and natural gas consumption would be significant. Therefore, there is a baseline cumulative condition with respect to utilities and service systems.

3.2.24 Changes to Section 3.19, Wildfire

Changes to Section 3.19.3.3, Page 3.19-23

The following changes represent a minor clarification to mitigation in the Draft PEIR by including consultation with all affected jurisdictions, including applicable regulatory and resource agencies. These changes merely clarify the mitigation described in the Draft PEIR. Additionally, as concluded in the Draft PEIR, the impact would be significant and unavoidable. These clarifications are not substantive (i.e., the change to the mitigation does not result in a new or worsened impact), and the significance conclusion would remain the same.

Mitigation Measure WF-3: Prepare a Fire Protection Plan.

For projects that are proposed in areas designated as Very High FHSZs, the implementing agency will prepare a fire protection plan (FPP) for the project prior to commencing operation of the facility. The FPP will be prepared to ensure that projects developed within Very High FHSZs are in compliance with current regulatory codes and that impacts resulting from wildland fire hazards are adequately mitigated. The FPP will include, but will not be limited to, the following:

- Measures to address specific location, topography, geology, level of flammable vegetation, and climate of the project site
- Measures consistent with applicable fire codes
- A vegetation management plan that includes measures such as reducing flammable vegetation around the property's structure and installing sprinklers that activate in the case of fire
- Consultation with all affected jurisdictions, including applicable regulatory and resource agencies

In addition, the following elements will be included in the FPP:

- Emergency Services – Availability and Travel Time
- Access for Emergency Services and Evacuation of Students and Faculty (primary and, if required, additional access)
- Firefighting Water Supply

- Fire Sprinkler System
- Ignition Resistant Construction
- Defensible Space, Ornamental Landscaping, and Vegetation Management

Changes to Section 3.19.3.3, Page 3.19-40

Baseline Cumulative Condition

Los Angeles County faces major wildland fire threats due to its hilly terrain, dry weather conditions, and the nature of its plant coverage. Although fires are a natural part of the wildland ecosystem, development in wildland areas increases the danger of wildfires to residents, property, and the environment. Cumulative growth and development within the Los Angeles region would increase the number of wildfire events and increase the exposure of people to risks associated with wildfires. Continued growth and development in Los Angeles County would significantly affect LACFD operations, as well as the operations of individual jurisdictions' fire departments. In an effort to reduce the threats to lives and property, LACFD in particular has instituted a variety of regulatory programs and standards for vegetation management, pre-fire management and planning, fuel modification, and brush clearance. In addition to these programs, LACFD and Public Works enforce fire and building codes related to development in Very High FHSZs. The LACFD has access requirements for single-family residential uses built in Very High FHSZs. Individual jurisdictions in the study area have similar policies and programs related to wildfire management. Any future development would be required to comply with applicable federal, State, and local regulations related to wildland fires.

Implementation of the transportation projects included in the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)—when taken into consideration with related development and infrastructure projects within the SCAG region and surrounding areas, and anticipated growth and land use development patterns—would contribute to cumulative significant impacts with regard to the potential to expose people and structures to wildland fires. The 2020 RTP/SCS includes a set of regional land use strategies that are intended to guide future land development patterns to focus new growth in transit priority areas or existing infill sites, existing suburban town centers, and walkable mixed-use communities. While the specific impact of this pattern of development relative to wildland fires is unknown, it could result in cumulative significant impacts with regard to more people being exposed to the effects of effects of wildland fires (SCAG 2020). Therefore, there is a baseline cumulative condition with respect to wildfire.

Contribution of the Project to Cumulative Impacts

The proposed Project would result in development within urban or suburban areas. However, some projects would occur in areas that are designated as Very High FHSZs. Projects constructed within lands designated as Very High FHSZs are subject to additional fire safety provisions, including fuel modification plans and review by the State Fire Marshall, and they would comply with the County's Very High FHSZ Plan Review. Construction of projects under the *2020 LA River Master Plan* would not be performed near flammable materials that would exacerbate wildfire risks. Compliance with existing laws for construction sites on, adjacent to, or in the immediate vicinity of a Very High FHSZ would further minimize potential risks. The *Los Angeles County General Plan* policies and conditions

of approval for future development projects, in addition to compliance with applicable regulations, would minimize proposed Project impacts related to wildland fires. Implementation of Mitigation Measures WF-1, WF-2, WF-3, and WF-4 would reduce potential impacts on wildfire from the proposed Project, but not to a less-than-significant level. Considering the baseline cumulative condition with respect to wildfire and that the Project would be implemented in Very High FHSZs, the Project would result in a cumulatively consideration contribution to wildfire impacts, including with regard to more people being exposed to the effects of wildland fires.

3.2.25 Changes to Chapter 4, Other CEQA Considerations

No changes have been made to this chapter of the Draft PEIR.

3.2.26 Changes to Chapter 5, Alternatives

No changes have been made to this chapter of the Draft PEIR.

3.2.27 Changes to Chapter 6, List of Preparers

No changes have been made to this chapter of the Draft PEIR.

3.2.28 Changes to Chapter 7, References

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3.2.29 Changes to Appendix D, Biological Resources

Changes to Appendix D.2, Special Status Species Potential to Occur Table, Page D.2-62

Common Name (Scientific Name)	Status ^a Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA) ^b							
			Frame 1	Frame 2	Frames 3 & 4	Frame 5 ^{c, d}	Frame 6	Frame 7	Frame 8	Frame 9 ^d
Sperm Whale (<i>Physeter microcephalus</i>)	E/-/- MMPA: D/P	Found in all oceans throughout the world, but prefer deeper areas for foraging. Population's location depends on food availability and conditions that support breeding. Migratory patterns and breeding/feeding ground sites are variable and not well understood. Feeding consists of deep dives to prey on squid, sharks, skates, and other fish.	HA	HA	HA	HA	HA	HA	HA	HA
<u>Mountain Lion</u> (<u><i>Puma concolor</i></u>)	-/SC/-	<u>The evolutionary significant unit (ESU) in southern and central California accepted as a candidate for listing as threatened or endangered under the California Endangered Species Act. Mountain lions are large carnivore found in the highly fragmented landscape within the ESU. Found in rugged terrain, naturally barren areas, chaparral, coastal scrub, and grassland, sometimes in agricultural areas, desert, riparian areas and woodland and urban areas.</u>	HA	HA	HA	HA	HP	HP	HA	HA

Common Name (Scientific Name)	Status ^a Federal/ State/ California Rare Plant Rank (CRPR)	Species Description	Specific Habitat Present (HP)/Absent (HA) ^b								
			Frame 1	Frame 2	Frames 3 & 4	Frame 5 ^{c, d}	Frame 6	Frame 7	Frame 8	Frame 9 ^d	
		<u>There are approximately 95 mountain lions in and around the Santa Monica Mountains and one known male mountain lion in Griffith Park. Present in the Santa Ana Mountains. Mountain lions prey on mule deer, coyotes and raccoons.</u>									
Southern California Saltmarsh Shrew (<i>Sorex ornatus salicornicus</i>)	-/CSC/-	Occurs in coastal marshes in Los Angeles, Orange, and Ventura Counties. Based on other studies of shrews, may require dense ground cover, and nesting sites above mean high tide and free from inundation.	HA	HA	HA	HA	HA	HA	HA	HA	HA

3.2.30 Changes to Appendix H, Traffic Impact Analysis

Changes to Title Page

Draft Transportation Impact Analysis Report

January ~~November~~ 2021

Changes to Section 1.2, Page 3

The Common Elements Typical Project includes all ~~17-18~~ common elements, as follows: pavilions, cafés, hygiene facilities, restrooms, benches, emergency call boxes, water fountains, trash and recycling, bike racks, environmental graphics, lighting, planting, stairs/ramps, guardrails, fences and gates, stormwater best management practices (BMPs), ~~and~~ art/performance spaces, and recreation areas. These elements could be implemented individually or in any combination at a given site of up to 3 acres/1 mile in size (extra small/small project site). For purposes of CEQA, this analysis assumes that the Common Elements Typical Project includes implementation of all ~~17-18~~ elements at a given location and could attract up to 500 daily visitors.

Changes to Section 2.1.2, Page 11

Figures 4–6 present the existing transit routes within the study area. The study area is served by eight transit providers on 188 routes, including Metro, DASH (Los Angeles Department of Transportation), Antelope Valley Transit Authority, Santa Clarita Transit, Big Blue Bus (Santa Monica), Foothill Transit, Torrance Transit, and Long Beach Transit. Metro rail and bus rapid transit service within the study area includes the A Line (formerly, the Blue Line) within the Long Beach area, the C Line (formerly, the Green Line) in South Los Angeles, and the G Line (formerly, the Orange Line) in the San Fernando Valley.

The NextGen Bus Plan is a comprehensive restructuring of Metro’s transit service to improve service and accessibility for riders. The project was begun in 2018 and developed through consideration of both technical data and all the priorities and personal experiences of residents. The Plan was approved by the Metro Board of Directors in October 2020 and is being implemented in phases ending in late 2021. When fully deployed the NextGen Bus Plan will give LA County a bus system that is fast, frequent, reliable and accessible. The improvements will double the number of frequent Metro bus lines, provide more than 80% of current bus riders with 10 minute or better frequency, improve and expand service throughout the day, ensure a one-quarter mile walk to a bus stop for 99% of current riders, and create a more comfortable and safer waiting environment. Within the overall framework, transit access to the LA River and other destinations in the region will be improved.

National and regional passenger rail service in the study area is operated by Amtrak and Metrolink. The two services, in some places, share use of tracks with the Union Pacific Railroad (UPRR), which operates a vast rail network that extends throughout the State and the nation. Planning is underway for development of a high-speed rail line that will link Southern California with Central California and the Bay Area, and portions of the alignments under study include segments that lie adjacent to the LA River.

Changes to Section 2.2.2, Page 27

2.2.3.4 Metro Our Next LA Long Range Transportation Plan (Draft, 2020)

Metro's ~~draft~~ 2020 Long Range Transportation Plan, titled Our Next LA, is the first update to the LRTP since 2009, and provides a vision for transportation in Los Angeles County through 2047— Our Next LA was adopted by the Metro Board of Directors on September 24, 2020. The plan aims to address population growth, changing mobility needs and preferences, technological advances, equitable access to opportunity, and adaptation to a changing environment. The plan details construction of an additional 100 miles of fixed-guideway transit, investments in arterial and freeway projects to reduce congestion, and construction of regional-scale bicycle and pedestrian projects to increase active transportation, including the 5.6-mile long Rail to Rail Active Transportation Corridor Segment A and the final two segments of the LA River Trail. Together the 8-mile Central LA gap closure project and the 13-mile San Fernando Valley extension will result in a continuous 52-mile long bicycle path from Long Beach to Warner Center. Other efforts detailed in the plan include traffic management practices for congested roadways (e.g., ExpressLanes toll lanes), maintaining and upgrading the existing transportation system for all modes, and partnering with local, State, and federal agencies, and the private sector. Our Next LA includes transit and highway improvements funded by Measure M, as well as expansion of off-peak transit service, of the active transportation network, and of programs such as ExpressLanes, partnerships to provide bus only lanes and freight management policies, and bold policy proposals, including free transit, faster bus trips, and subregional congestion pricing.

2.2.3.5 Active Transportation Strategic Plan (2016)

The Active Transportation Strategic Plan (Metro) identifies a countywide active transportation network and provides clarity on the process of implementation. It presents best practice design resources and examples of how to integrate them into projects that improve station access. Its three main components that will help Metro and partners plan and implement improvements to the active transportation network are (1) First last mile station area access improvements, (2) Regional Active Transportation Network and (3) Support Programs, including performance metrics and monitoring.

2.2.3.6 First/Last Mile Strategic Plan (2014)

The First/Last Mile Strategic Plan (Metro and SCAG) presents planning guidelines that outline specific strategies to facilitate access to the Metro system. It introduces the “pathway” concept and shows how it can be used to focus investments and improvements to maximize multi-modal benefits around Metro Rail stations and Rapid Bus stations. The plan includes an extensive “toolbox” of possible components of for improving pathways, including crossing enhancements, signage and wayfinding, safety and comfort elements (such as street furniture, landscaping, shade, and street lighting), and others.

Changes to Section 2.2.3, Page 30

2.2.3.7 Los Angeles County Vision Zero Action Plan

The Vision Zero Action plan, published in 2019, focuses County efforts for the years 2020–2025 to achieve the goal of eliminating traffic-related fatalities and severe injuries on unincorporated County roadways by 2035. The plan includes a vision for the future, objectives, and actions to enhance traffic safety. It is guided by principles of health equity, data driven processes, and transparency. It identifies Collision Concentration Corridors throughout the unincorporated County areas: any half-mile roadway segment on which three or more fatal or severe injury collisions occurred over a 5-year period. Strategies to improve roadway safety and reduce collisions include a wide range of roadway enhancements, such as lighting, curb extensions, and pedestrian signal timing, and a commitment to collaborate on data analysis and develop partnerships across jurisdictions. The plan is structured around five objectives: enhancing County processes and collaboration; addressing health inequities and protecting vulnerable users; collaborating with communities to enhance roadway safety; fostering a culture of traffic safety; and transparency, responsiveness, and accountability.

2.2.3.8 Connect US Action Plan

The Connect US Action Plan (Metro, 2015) is a strategy for encouraging people to walk and bicycle to LA Union Station and 1st/Central Regional Connector Station from the historic/cultural neighborhoods that surround them. The project concepts include esplanades, cycle tracks and bicycle lanes to unify the historic/cultural neighborhoods of El Pueblo, Chinatown, Cornfield Arroyo Seco, Boyle Heights, Arts District, Little Tokyo, and Civic Center. The study area is a one-mile radius around the LRT station at First Street & Central Avenue. Almost all of the mobility projects that are presented in the plan also include infill street trees and measures to collect and infiltrate stormwater into the soil. This plan affects areas that lie within Frame 5 of the LA River Master Plan. The plan’s objectives include “improve access to open spaces, including the Los Angeles River, parks, plazas and public spaces the project area” and “contribute to a more environmentally sustainable Los Angeles.”

Changes to Section 2.2.3, Page 35

City of Long Beach

The City of Long Beach is located in River Frames 1 and 2.

Mobility Element of the City’s General Plan (2013)

- Strategy No. 1 – Establish a network of complete streets that complements the related street type.
- MOP Policy 1-9 – Increase mode shift of transit, pedestrians, and bicycles.
- Strategy No. 2 – Reconfigure streets to emphasize their modal priorities.
- MOP Policy 2-16 – Close gaps in the existing bikeway system.

- The Mobility Element planned seven bike/ped bridges across the LA River.
- Strategy No. 5 – Reduce the environmental impacts of the transportation system.
- MOP Policy 5-2 – Reduce VMT and vehicle trips through the use of alternative modes of transportation and TDM.

Bicycle Master Plan 2040 (2017)

- Strategy 1 – Develop a comprehensive bikeway network.
 - 1.1 – Expand, improve, and connect the bikeway network to provide a viable transportation option for all levels of bicycling abilities.
 - 1.4 – Upgrade bridges, intersections, freeway ramps, tunnels, and any other obstacles that impede safe and convenient bicycle passage.

Safe Streets Long Beach, A Vision Zero Action Plan (2020)

This is a plan that strives to eliminate traffic-related fatalities and serious injuries in Long Beach by 2026 through multiple strategies, such as modifying streets to better serve vulnerable road users. The plan uses data analysis, community input, and best practice research to identify programs and policies that can make the streets safer for everyone. The plan was adopted by the City of Long Beach in July 2020 and covers part of the area within Frames 1 and 2. Specifically, the plan includes detailed mapping of a high-injury network in Long Beach, which is composed of streets and intersections where higher numbers of collisions or more severe collisions occur than at others. The study area for the 2020 Los Angeles River Master Plan extends one mile on each side of the riverbed. Within that area, the portions of the following streets are identified as corridors on the high-injury network: Santa Fe Avenue, Magnolia Avenue, Pine Avenue, Long Beach Boulevard, Artesia Boulevard, Market Street, Wardlow Road, Willow Street, Pacific Coast Highway, Anaheim Street, 7th Street, 6th Street, and Ocean Avenue.

Changes to Section 3.2.2.2, Page 49

- Common Elements Typical Project
 - The Common Elements Typical Project is assumed to be inclusive of all ~~17~~18 Common Elements. Therefore, as two land use elements of the Common Elements Typical Project (pavilions and art/ performance spaces) have the potential to result in a significant VMT impact, the Common Elements Typical Project also has the potential to result in a significant VMT impact. For any future project configuration including one of the above project elements, quantitative VMT analysis will be required once a specific project location has been identified.

Changes to Section 3.2.2.2, Table 2, Page 51

**TABLE 2
2020 LA RIVER MASTER PLAN VMT IMPACT EVALUATION MATRIX
TYPICAL PROJECTS AND RELATED ELEMENTS**

Project Element	Element Location 1 – In LA River Channel 2 – Between Top of Levee and Fenceline 3 – Beyond Fenceline	Common Element or Kit of Parts Category	Project Type Transportation / Land Use / Other	Screened Out?		Potentially VMT Generating?	Potential to Result in a Significant VMT Impact?	Further Transportation Impact Analysis Required?
				Yes/No	Applicable Screening Criteria ¹			Yes/No
Pavilion	2	Common Element	Land Use	No	Not Screened Out	Yes	Yes	Yes
Café	2	Common Element	Land Use	Yes	Land Use	Yes	No	No
Art/Performance Space	2	Common Element	Land Use	No	Not Screened Out	Yes	Yes	Yes
Access Stairs	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Ramps	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
<u>Site Furnishing- Recreation</u>	<u>2</u>	<u>Common Element</u>	<u>Other (infrastructure)</u>	<u>Yes</u>	<u>Not Applicable</u>	<u>No</u>	<u>No</u>	<u>No</u>
Site Furnishings – Benches	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Hygiene Facilities and Restrooms	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Trash and Recycling	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Drinking Fountains	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Guard Rail	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Emergency Call Box	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Bike Rack	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Environmental Graphics	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Lighting	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Plantings	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Site Furnishings – Fences and Gates	2	Common Element	Other (infrastructure)	Yes	Not Applicable	No	No	No
Stormwater Best Management Practices	2	Common Element	Other (water management)	Yes	Not Applicable	No	No	No
<i>Common Elements Typical Project (inclusive of all Common Elements)</i>	<i>2</i>	<i>Common Element</i>		<i>No</i>	<i>Not Screened Out</i>	<i>Yes</i>	<i>Yes</i>	<i>Yes</i>

Project Element	Element Location 1 - In LA River Channel 2 - Between Top of Levee and Fenceline 3 - Beyond Fenceline	Common Element or Kit of Parts Category	Project Type <i>Transportation / Land Use / Other</i>	Screened Out?		Potentially VMT Generating?	Potential to Result in a Significant VMT Impact?	Further Transportation Impact Analysis Required?
				Yes/No	Applicable Screening Criteria ¹			Yes/No
River Gateway	2	Trails and Access Gateways	Transportation	Yes	Transportation	Yes	No	No
Pedestrian Trail	2	Trails and Access Gateways	Transportation	Yes	Transportation	Yes	No	No
Bike Trail	2	Trails and Access Gateways	Transportation	Yes	Transportation	Yes	No	No
Equestrian Trail	2	Trails and Access Gateways	Transportation	Yes	Transportation	Yes	No	No
Multi-Use Trail	2	Trails and Access Gateways	Transportation	Yes	Transportation	Yes	No	No
<i>Multi-Use Trails and Access Gateways Typical Project (inclusive of all Trails and Access Gateways Elements)</i>	2	<i>Trails and Access Gateways</i>		<i>Yes</i>	<i>Transportation</i>	<i>Yes</i>	<i>No</i>	<i>No</i>

Notes

1: Screening criteria are as follows:

LU 3.1.2.1 - Generation of 110 or more net daily trips.

LU 3.1.2.2 - Retail uses with gross floor area > 50,000 sf.

LU 3.1.2.3 - Adjacency to transit.

LU 3.1.2.4 - 100% affordable housing.

TRANS 3.2.1 - Conflict with CEQA Guidelines Section 15064.3, subdivision (b)(2)

TRANS 3.2.2 - Addition of through-traffic lanes.

