Appendix J **KPFF Memo – CDFW Comments**



MEMO

DATE: August 18, 2022

TO: Mike Harden, ESA

FROM: Doug Conlon, KPFF

RE: California Department of Fish and Wildlife letter dated April 25, 2022

In response to "Comment Number 2" and Mitigation Measure "MM-BIO-4-Hydrology Report" of the California Department of Fish and Wildlife (CDFW) letter "Comments on the Draft Environmental Impact Report for Harvard-Westlake River Park Project, SCH #2020090536, Los Angeles County "dated April 25, 2022, KPFF studied the potential impacts of the project to the flow within the Los Angeles River adjacent to the project site and at the Glendale Narrows located approximately seven miles downstream. The analysis was – shared with Los Angeles City Planning Staff and CDFW Staff on May 20, 2022, via teleconference. This memo outlines what was presented and the findings of the study.

KPFF obtained Mean Daily Flow Data for Station F300-R Los Angeles River at Tujunga Ave for the dates between April 2021 and April 2022 from Los Angeles County Public Works. Using the data, KPFF studied the potential impacts of the project to the flow within the Los Angeles River. Both the highest measure flow rate and the average dry weather flow were considered. See Exhibit 1, for the study and data points.

The study first looked at impacts of the project during the raining season. Using the previously mentioned LA County flow data for a rain event on December 30, 2021, the highest flow rate measured adjacent to the Project Site was estimated to be 3,200 cubic feet per second (cfs). Based on Los Angeles County Hydrology manual and rain gauge data, the measured storm event was very similar to a 2-year event or a mean storm. The maximum flow diverted from the adjacent neighborhood for this event and any other rain event would be 25.97 cfs. The potential project impact would result in a less than 1% reduction in flow to the channel from the project site and adjacent neighborhood.

For the purposes of this memo, the dry weather season is defined as between April 15th and October 15th of any given year. Per Los Angeles County provided data, the Average Dry Weather Flow in the Los Angeles River channel adjacent to the site is approximately 30 (cfs). The primary source of the flow to the Los Angeles River during the dry season is discharge from wastewater reclamation plants, which the project will not interrupt or abate whatsoever. Based on measured dry weather season rainfall data from September 2011 to June 2022, the average daily rain fall is approximately 0.0036 inches per day, which would equate to an Average Dry Weather Flow for the project site and the adjacent neighborhood of 0.0075 (cfs). Diverting this runoff would result in 0.03% reduction of flow

Mike Harden, ESA
California Department of Fish and Wildlife letter dated April 25, 2022
KPFF Job #1800807
August 18, 2022
Page 2 of 2

in the LA river. For this reason, diverting runoff flow during the dry weather season from the project site or the adjacent neighborhood would not impact the LA River during the dry weather season.

During the meeting, CDFW asked about potential impacts of the project to the Glendale Narrows, where the river becomes a natural bottom watercourse. The team studied the potential impacts. As discussed earlier, the project impact results in a less than 1% reduction in flow to the channel adjacent to the project site. The Glendale Narrows is located approximately 7 seven miles downstream of the project, which means the impact of the project at this location would be even less than adjacent to the project due to the additional tributaries to the river entering downstream of the project, greatly reducing the impact.

For storm events larger than the 2-Year event (5, 10, 25, 50 and 100-Year events), flow reduction within the Los Angeles due to the project storm water capture and re-use system will be even less than 1%.

The hydrology study shows there will not be a significant impact to the flow in the LA River concrete channel as a result of the project. It was discussed that a positive impact of the project, is that stormwater runoff from the project site and adjacent neighborhood will be captured, cleaned and reused on site, rather than rushed directly to the Pacific Ocean.

EXHIBIT 1 Google Maps

Google Maps

ESTIMATED FLOW REDUCTION BASED ON LA COUNTY FLOW DATA RAIN EVENT DATED 12/30/2021 IS LESS THAN 1%.

