

Appendix A

NOP and Responses

**DEPARTMENT OF
CITY PLANNING**

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**NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT
AND NOTICE OF SCOPING MEETING FOR
UPDATES TO THE CORNFIELD ARROYO SECO SPECIFIC PLAN (CASP)**

TO: Agencies, Organizations, and Interested Parties

DATE: April 8, 2021

The City of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA) and will prepare an Environmental Impact Report (EIR) for a project involving updates to the Cornfield Arroyo Seco Specific Plan ("CASP Update" or "Proposed Project" or "Project"). The CASP Update would amend the text, maps, and tables of the CASP, including new land use and zoning regulations, incentives, and boundaries, for the purpose of encouraging affordable and mixed-income housing production. More details on the Project are provided below.

The City is requesting identification of environmental issues, environmental impacts, and information that you or your organization believes needs to be considered and analyzed in the EIR, including environmental impacts, mitigation measures, and alternatives.

NOTICE OF SCOPING MEETING

Pursuant to California Public Resources Code Section 21083.9 and California Code of Regulations, Title 14, Chapter 3, ("CEQA Guidelines") Section 15082, the Lead Agency will conduct a scoping meeting for the purpose of soliciting oral and written comments from interested parties requesting notice, responsible agencies, agencies with jurisdiction by law, trustee agencies, and involved federal agencies, as to the appropriate scope and content of the EIR.

The Public Scoping Meeting will be held virtually in an online format using Zoom to share information regarding the Project and the environmental review process and to provide information on how interested parties can provide written comments. City staff and environmental consultants will be available during this virtual meeting which will begin with a pre-recorded presentation. After the Public Scoping Meeting has ended, a copy of the pre-recorded presentation will be posted to the Department's website at <https://planning.lacity.org/development-services/eir>.

The City encourages all interested individuals and organizations to attend this virtual meeting. Questions may be submitted via the chat box in the control panel or verbally for participants joining by telephone during the Question and Answer session. Interested parties wishing to provide comments or public testimony in response to the NOP should provide them in writing, as described under "Submittal of Written Comments," below. No decisions about the Project will be made at the Public Scoping Meeting. A separate

public hearing for the CASP Update, along with other public engagement activities, will be scheduled at a later date. The date, time, and virtual location of the Public Scoping Meeting are as follows:

Date: Thursday, April 22, 2021
Time: 4:00 PM
Virtual Location: Join Zoom Meeting <https://planning-lacity-org.zoom.us/j/84993793018>
Meeting ID: 849 9379 3018
Password: 912684

Instructions for joining by telephone:
Dial by your location
+1 213 338 8477 US (Los Angeles)
+1 669 900 9128 US (San Jose)
Meeting ID: 849 9379 3018

Participants will be asked for a Meeting ID, enter "(Meeting ID listed above)", followed by "#" (pound sign).
Participants will be asked to enter a participant ID, enter "#" (pound sign) to continue.

ACCOMMODATIONS: As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate. Closed captioning or other assistive services may be provided upon request. Other services, such as translation between English and other languages, may also be provided upon request. To ensure availability of services, please make your request no later than three working days (72 hours) prior to the meeting by contacting Clare Kelley at (213) 978-1207 or clare.kelley@lacity.org.

RESPONSIBLE AND TRUSTEE AGENCIES

The City requests your agency's views on the scope and content of the environmental information relevant to your agency's statutory responsibilities in connection with the project, in accordance with the CEQA Guidelines, Section 15082(b). Your agency will need to use the EIR prepared by the City when considering any permits or other project approvals that your agency must issue. As such, your responses to this Notice of Preparation (NOP), at a minimum should identify: (1) The significant environmental issues and reasonable alternatives and mitigation measures that your agency will need to have explored in the EIR; and (2) Whether your agency will be a responsible or trustee agency for this project.

REVIEW AND RESPONSE PERIOD

April 8, 2021 to May 8, 2021

Pursuant to CEQA Guidelines, Section 15082(b), responses to this NOP must be provided during this response period.

PROJECT LOCATION

The Project location is the Cornfield Arroyo Seco Specific Plan Area ("CASP Area" or "Project Area"), a geographically contiguous, approximately 660-acre (1.0 square mile) area located within portions of the Central City North, Northeast Los Angeles, and Silver Lake-Echo Park-Elysian Valley Community Plan Areas. The Project Area encompasses the Los Angeles State Historic Park, segments of the Los Angeles River and Arroyo Seco, segments of Interstate 5 and California State Route 110, and the Lincoln/Cypress Metro L Line station. Approximately 6,201 individuals (1,814 households) reside within the Project Area, which is bordered by the neighborhoods of Chinatown to the west, Lincoln Heights to the east, and Cypress Park to the north. The regional context of the CASP is shown on **Figure 1**. The CASP Area boundaries are shown in **Figure 2**.

PROJECT BACKGROUND

On June 28, 2013, the City adopted the CASP and certified its Environmental Impact Report (ENV-2009-599-EIR, SCH No. 2009031002). The CASP involved substantial revisions to portions of the Central City North, Northeast Los Angeles, and Silver Lake-Echo Park-Elysian Valley Community Plans and the establishment of a specific plan to guide the future development of the predominantly industrial, approximately 660-acre area. Broadly, the CASP includes the following:

- The designation of new mixed-use zoning districts that replace former industrial zoning, and the identification of the types and intensities of uses permitted within these districts, as well as building height, massing, and façade standards,
- The establishment of new affordable housing land use incentives,
- The designation of new open spaces and parks and the establishment of open space requirements for new developments,
- Circulation and parking standards,
- Revised street designations and standards,
- Resource conservation standards, and
- Mitigation measures for subsequent development projects.

The intent of the adopted CASP is to guide the transition of an underserved, vehicular-oriented industrial and public facility area into a cluster of mixed-use, pedestrian-oriented neighborhoods. Policies in the CASP support a range of housing options, new public spaces, opportunities for walking and bicycling, and the retention of land for existing industrial businesses and the clean technology businesses of the future. Among its numerous goals, a key priority of the CASP is to facilitate the production and continued provision of affordable housing for Extremely Low Income and Very Low Income households.

However, since the CASP's adoption, housing production of any kind has been extremely limited. Among the projects proposed and approved, all involved discretionary actions from the City Planning Commission or Area Planning Commission to deviate from the CASP, with less than one percent of total units reserved for low-income households. The limited supply of available housing units (0.9 percent residential vacancy rate), together with the low average household income and strong demand for housing in the area, creates growing displacement pressure for existing residents and disproportionately in communities of color. The Project Area has seen rents increase at a higher rate than in nearby neighborhoods that have experienced greater increases to their housing supply.

In light of the present housing situation, and in response to a City Council Motion (Council File No. 13-0078-S2) calling for the evaluation and amendment of the Specific Plan, the City of Los Angeles is updating the CASP with the goal of further bolstering the production of affordable and mixed-income housing in the Project Area. The Proposed Project will entail updates to the CASP's zoning regulations, land use incentives, boundaries, and other key provisions to facilitate the production of housing, in a manner consistent with the underlying vision and purpose of the adopted CASP.

PROJECT DESCRIPTION

The Proposed Project is the update of the CASP and the adoption of necessary revisions and any other amendments necessary to implement this update, including amendments to General Plan elements (such as the Framework Element), Community Plans, the LAMC (Chapter 1 and Chapter 1A), specific plans, and other ordinances to implement those updates. The primary objective of the Proposed Project is to encourage affordable and mixed-income housing production in the Project Area.

The Proposed Project would accommodate additional housing in the Project Area by expanding the residential Urban Village zoning designation to more parcels within the CASP and allowing 100% affordable housing developments in the Urban Innovation and Urban Center zones where they are not currently

permitted. The changes would result in a more even split between Urban Village and Urban Innovation zoning compared to the existing CASP. Additionally, the existing 10% non-residential use requirement for projects in the Urban Village zone would be removed. At the same time, the CASP's affordable housing zoning incentives would be recalibrated and updated for those development projects seeking additional FAR rights.

The Proposed Project would also update the building form, urban design, open space, parking, conservation, performance, and sign standards of the CASP as necessary to support housing production, and amend the CASP text with technical revisions that ensure consistency, clarity, and ease of implementation and reflect current and future demographic, regulatory, environmental, and economic conditions. The CASP boundaries would be revised to exclude parcels that currently do not contain CASP zoning, such as RD zones. The Project would retain the existing ministerial review process for subsequent development projects.

Project Objectives

The primary objectives of the Project will be to:

- Increase the production of affordable and mixed-income housing within the Project Area,
- Protect residents, especially low-income households, from indirect and direct displacement, and ensure stability of existing vulnerable communities,
- Design and regulate housing to promote health and well-being, increase access to amenities such as parks and public transit, contribute to a sense of place, foster community and belonging, and plan for a sustainable future,
- Build, operate, and maintain welcoming and accessible housing for Angelenos with unique needs, including those with disabilities, large families, older adults, and other people facing housing barriers and food insecurity,
- Refine Plan standards, processes, and procedures to be more intuitive and transparent, with the goal of enhancing development certainty for both market-rate and affordable developers, and
- Preserve employment areas that show a concentration of jobs, while supporting small and/or legacy businesses, local employment, new productive uses, and employment spaces, such as light industrial and general commercial uses.

ISSUES TO BE ADDRESSED IN THE EIR

Based on the project description and the Lead Agency's understanding of the environmental issues associated with the CASP update, the following topics will be analyzed in the EIR:

- | | |
|-----------------------------------|---------------------------------|
| ● Aesthetics | ● Land Use and Planning |
| ● Air Quality | ● Mineral Resources |
| ● Biological Resources | ● Noise |
| ● Cultural Resources | ● Population and Housing |
| ● Energy | ● Public Services |
| ● Geology and Soils | ● Recreation |
| ● Greenhouse Gas Emissions | ● Transportation |
| ● Hazards and Hazardous Materials | ● Tribal Cultural Resources |
| ● Hydrology and Water Quality | ● Utilities and Service Systems |
| | ● Wildfire |

The EIR will analyze the reasonably foreseeable indirect physical changes to the environment in the above topic areas caused by the project, including the updates to the CASP and any other necessary amendments to the General Plan or the LAMC.

The Hazards and Hazardous Materials section of the Draft EIR will discuss the potential impacts associated with housing development on sites identified as hazardous materials sites, known as the Cortese List, pursuant to Government Code Section 65962.5. The Project area includes hundreds of sites, some of which are on the Cortese List. Interested parties can view the Cortese List sites within the CASP Area at the following link: <https://planning4la.org/odoc/corteseList>.

Alternatives to be analyzed in the EIR are to be defined and analyzed consistent with the requirements of CEQA Guidelines, Section 15126.6. The specific alternatives to be evaluated will include a "No Project" alternative, as required by CEQA, and may include alternative land use configurations.

DOCUMENT AVAILABILITY

The NOP can be viewed on the City of Los Angeles Department of City Planning website at: <https://planning.lacity.org/development-services/environmental-review/published-documents>.

To request an appointment to view a hard copy of the documents, please contact Clare Kelley at (213) 978-1207 or clare.kelley@lacity.org.

SUBMITTAL OF WRITTEN COMMENTS

The Lead Agency solicits comments regarding the scope, content and specificity of the EIR from all interested parties requesting notice, responsible agencies, agencies with jurisdiction by law, trustee agencies, and involved agencies. Please send written/typed comments (including a name, telephone number, and contact information) electronically or by mail to the following:

City of Los Angeles, Department of City Planning
ATTN: Clare Kelley, City Planner
Case Numbers: CPC-2021-2642-SP; ENV-2021-2643-EIR
200 N. Spring Street, Room 667, Los Angeles, CA 90012

E-mail: clare.kelley@lacity.org
Phone: (213) 978-1207

In accordance with CEQA Section 15082, this Notice of Preparation is being circulated for a 30-day comment period. **The City of Los Angeles requests that written comments be provided at the earliest possible date, but no later than 5:00 p.m. on May 8, 2021.**

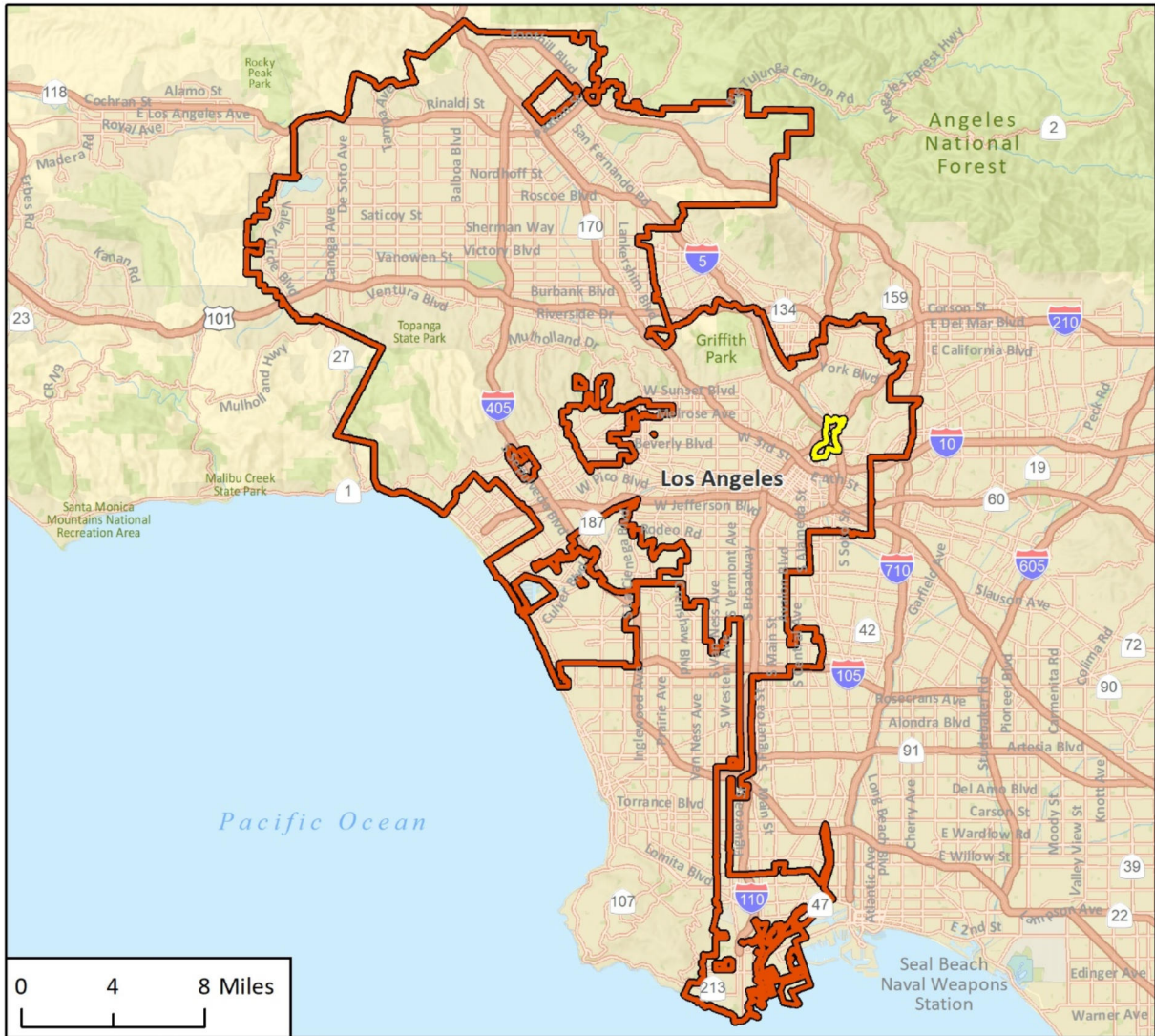
For more information about the CASP Update, please visit Planning4LA.org/casp-update.

ALL INTERESTED PARTIES ARE INVITED TO ATTEND THE PUBLIC SCOPING MEETING TO ASSIST IN IDENTIFYING ISSUES TO BE ADDRESSED IN THE EIR. ATTENDEES WILL HAVE AN OPPORTUNITY TO PROVIDE INPUT TO THE CONSULTANTS PREPARING THE EIR.




Clare Kelley, City Planner
City of Los Angeles Department of City Planning

Attachments
Figure 1: Regional Context Map
Figure 2: CASP Area Boundaries Map

Figure 1 Regional Context Map



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-  Plan Boundary
-  Los Angeles City Boundary

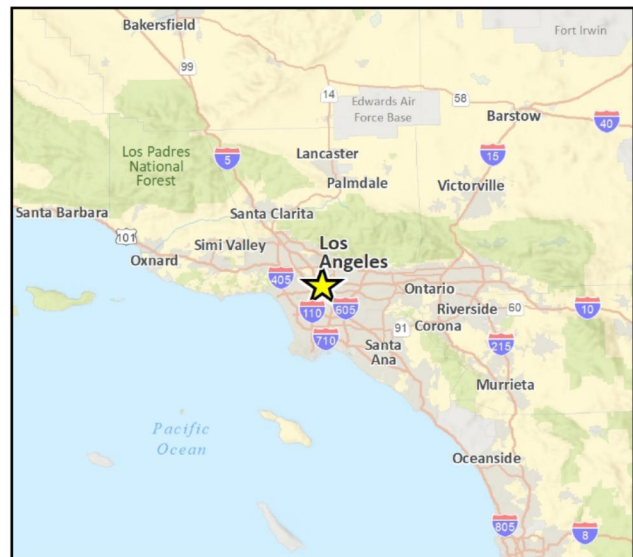


Figure 2 CASP Area Boundaries Map



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Fig 2 Project Location

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0067
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TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

April 22, 2021

City of Los Angeles, Department of City Planning
ATTN: Clare Kelley, City Planner
Case Numbers: CPC-2021-2642-SP; ENV-2021-2643-EIR
200 N. Spring Street, Room 667,
Los Angeles, CA 90012

RE: Cornfield Arroyo Seco Specific Plan (CASP)
Update – Notice of Preparation (NOP)
SCH# 2021040206
GTS# 07-LA-2021-03543
Vic. LA-Multiple

Dear Clare Kelley,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Proposed Project is an update of the CASP. The primary objective of the Proposed Project is to encourage affordable and mixed-income housing production in the Project Area by expanding the residential Urban Village zoning designation to more parcels within the CASP and allowing 100% affordable housing developments in the Urban Innovation and Urban Center zones where they are not currently permitted. The changes would result in a more even split between Urban Village and Urban Innovation zoning compared to the existing CASP. Additionally, the existing 10% non-residential use requirement for projects in the Urban Village zone would be removed. At the same time, the CASP's affordable housing zoning incentives would be recalibrated and updated for those development projects seeking additional FAR rights. The Proposed Project would also update the building form, urban design, open space, parking, conservation, performance, and sign standards of the CASP as necessary to support housing production, and amend the CASP text with technical revisions that ensure consistency, clarity, and ease of implementation and reflect current and future demographic, regulatory, environmental, and economic conditions. The CASP boundaries would be revised to exclude parcels that currently do not contain CASP zoning, such as RD zones. The Project would retain the existing ministerial review process for subsequent development projects.

The nearest State facilities to the proposed project are SR 110 and I-5. After reviewing the NOP, Caltrans has the following comments:

Caltrans acknowledges and supports mixed-use, infill development that prioritizes affordable housing, like the proposed Specific Plan aims to facilitate. The primary goals of the updated CASP are in direct alignment with State-level sustainable transportation policy goals which seek to

reduce the number of trips made by driving, reduce Greenhouse Gas (GHG) emissions, and encourage alternative modes of travel. Caltrans' Strategic Management Plan has set targets of tripling trips made by bicycle and doubling trips made by walking and public transit, as well as achieving a reduction in statewide, per capita, vehicle miles traveled (VMT). Similar goals are embedded in the California Transportation Plan 2040, California Transportation Plan 2050, and Southern California Association of Governments (SCAG) Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). Statewide legislation such as AB 32 and SB 375, as well as Executive Order S-3-05 and N-19-19, echo the need to pursue more sustainable development. Projects, like the one proposed, can help California meet these goals.

Caltrans has the following recommendations for two of the Specific Plan sections outlined in the NOP that should be addressed while developing the Draft Environmental Impact Report:

1. Street Designations and Standards:

Caltrans recommends creating the safest streetscape possible for pedestrians and people on bikes. Wide roadways with numerous travel lanes are associated with higher vehicle speeds and less safe conditions for people walking and biking. Elements should be considered to create the most comfortable environment possible for all the people who will be walking and biking within the specific plan area. The most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics. These methods include the construction of physically separated facilities such as Class IV bike lanes, curb extensions or bulb-outs, sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing. Visual indicators such as, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage, and striping should be used in addition to physical design improvements to indicate to motorists that they can expect to see and yield to pedestrians and people on bikes.

2. Circulation and Parking Standards:

Caltrans encourages the lead agency to seriously consider eliminating car parking requirements altogether. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. Additionally, Rates of car ownership and vehicle miles traveled (VMT) are significantly lower for low-income households than they are for high-income households. Seeing as one of the primary objectives of this specific plan update is to encourage affordable housing, including developments with 100% affordable housing, this should be taken into serious consideration. There is sufficient justification to consider eliminating parking requirements to promote affordability and achieve the project's goals.

Caltrans also recommends that at least one long-term bicycle parking space be provided per residential unit, allowing residents to take advantage of the Specific Plan's central location and choose the bicycle as their mode of travel more easily. Long-term bicycle parking should be located onsite, indoors, on the ground floor, and within 200 feet of primary pedestrian entrances.

While Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities, the Cornfield Arroyo Seco Specific Plan area is immediately adjacent to SR 110 and I-5, so an encroachment permit will be required for any project work proposed on or in the vicinity of the Caltrans right-of-way and all environmental concerns must be adequately addressed. Please note that any modifications to State facilities will be subject to additional review by the Office of Permits prior to issuance of the permit.

Caltrans looks forward to the forthcoming Draft Environmental Impact Report to confirm that the Project will result in a net reduction in Vehicle Miles Traveled.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2021-03543.

Sincerely,



MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



Metro

May 8, 2021

Clare Kelley, City Planner
Department of City Planning
City of Los Angeles
200 N. Spring St.
Los Angeles, CA 90012
Sent by Email: clare.kelley@lacity.org

RE: Cornfield Arroyo Seco Specific Plan Area – Case No. CPC-2021-2642-SP; ENV 2021-2643-EIR
Notice of Preparation of Environmental Impact Report (EIR)

Dear Ms. Kelley:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Cornfield Arroyo Seco Specific Plan Update (Plan) located in the City of Los Angeles (City). Metro's mission is to provide a world-class transportation system that enhances quality of life for all who live, work, and play within Los Angeles County. As the County's mass transportation planner, builder and 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, and access to opportunities.

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 City with specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Project. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.¹

Project Description

The Cornfield Arroyo Specific Plan Update include updates to the building form, urban design, open space, parking, conservation, performance, and sign standards of the Plan as necessary to support housing production, and amend the Plan text with technical revisions that ensure consistency. The Plan would retain the existing ministerial review process for subsequent development projects.

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

Comments

Transit Services and Facilities

The Plan and EIR should include updated information on existing and planned transit services and facilities within the Plan area. Metro encourages the City to continue providing for additional density for developments surrounding major transit stops which should include, without limitation, high-frequency bus stops and Metro Rail stations (as currently defined in the City's Transit Oriented Communities Affordable Housing Incentive Guidelines). Metro's NextGen Bus Plan should be used as a resource to determine the location of high-frequency bus stops within the Plan area. For more information, visit the NextGen Bus Plan's website at <https://www.metro.net/projects/nextgen/>. In addition, the Plan and EIR should include stations for all rail lines that are existing and under construction. Please refer to Metro's 2020 Long Range Transportation Plan and Measure M Expenditure Plan.

Metro's LA River Path Project

Funded by Measure M, Metro is evaluating a new bicycle and pedestrian path along an approximately eight-mile stretch of the Los Angeles River from Elysian Valley through Downtown Los Angeles to the City of Maywood. Metro released a Notice of Preparation for this project in October 2019 with a target operation date by 2027. More information may be found online at: <https://www.metro.net/projects/lariverpath/>.

Connect US Action Plan

Completed in 2015 and adopted by the City Planning Commission as part of the Downtown Design Guide in 2017, 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 adjacent historic neighborhoods. Enhancing walkability and bikeability will facilitate a second goal of connecting people who live and work in adjacent neighborhoods to one another. The City should review this plan and explore the possibility of carrying through the recommended mobility improvements into the Plan from adjacent corridors. More information is available at: <https://www.metro.net/about/union-station/connect-us-action-plan/>.

Adjacency to Metro-owned Right-of-Way (ROW) and Facilities

The Plan area includes Metro-owned ROW and transit facilities for Metro Rail and Metro Bus. In particular, these lines include the L Line (Gold). In addition, the Metrolink commuter rail service is adjacent to parts of the Plan area. Metrolink is operated by the Southern California Regional Rail Authority (SCRRA), portions of which use Metro-owned ROW. Buses and trains operate 24 hours a day, seven days a week in these facilities.

The EIR's transportation section should analyze potential impacts on Metro and Metrolink facilities within the Plan area, and identify mitigation measures or project design features as appropriate. Metro recommends reviewing the Metro Adjacent Development Handbook (available at <https://www.metro.net/devreview>) to identify issues and best practices for development standards arising from adjacency to Metro infrastructure. In addition, Metro recommends that the Plan include a policy encouraging applicants to coordinate with Metro during City Planning review if the subject parcel is within a 100-foot buffer of Metro infrastructure (per Zoning Information 1117). Such projects should also comply with the Adjacent Development Handbook.

Transit Supportive Planning: Recommendations and Resources

Considering the Plan area's inclusion or proximity to the Chinatown, Lincoln/Cypress, and Heritage Square Stations as well as several key bus lines, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Transit Supportive Planning Toolkit: Metro strongly recommends that the City review the Transit Supportive Planning Toolkit which identifies 10 elements of transit-supportive places and, applied collectively, has been shown to reduce vehicle miles traveled by establishing community-scaled density, diverse land use mix, combination of affordable housing, and infrastructure projects for pedestrians, bicyclists, and people of all ages and abilities. This resource is available at <https://www.metro.net/projects/tod-toolkit>.
2. Land Use: Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City to be mindful of proposed developments in proximity to Metro Rail stations, including orienting pedestrian pathways towards the station.
3. Transit Connections and Access: Metro strongly encourages the City to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the proposed development site and nearby destinations. The City should consider requiring the installation of such features as part of the Plan's development standards, including:
 - a. Walkability: The provision of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access Metro Rail stations and Metro Bus stops.
 - b. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged. The City should also coordinate with the Metro Bike Share program to explore potential Bike Share stations in the Plan area.
 - c. First & Last Mile Access: The City should address first-last mile connections to transit and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf.
4. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and

the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

5. Wayfinding: Wayfinding signage should be considered as part of the Plan to help people navigate through the Plan area to all modes of transportation. Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as Metro Bus or Rail pictograms) requires review and approval by Metro Signage and Environmental Graphic Design.
6. Art: Metro encourages the thoughtful integration of art and culture into public spaces and will need to review any proposals for public art and/or placemaking facing a Metro ROW. Please contact Metro Arts & Design staff for additional information.

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

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

Sincerely,



Shine Ling, AICP
Manager, Transit Oriented Communities

Attachments and links:

- Adjacent Development Handbook: <https://www.metro.net/projects/devreview/>

DATE: 05/07/2021

TO: Los Angeles Department of City Planning
200 N. Spring Street, Room 667 Los Angeles, CA 90012

ATTN: Clare Kelley City Planner, CASP Update PM clare.kelley@lacity.org 213-978-1207

CC: Michael Sin City Plnr.Assoc. michael.sin@lacity.org 213-978-1345
Valerie Watson Snr City Planner valerie.watson@lacity.org
CD1 Snr Plan.Dir., Gerald Gubatan gerald.gubatan@lacity.org
Lincoln Heights Neigh.Cncl Richard Larsen PLU Comte
RWLarsen.LAPA@gmail.com
Historic-Cultural North NC Lau Mai Wah VP-NC mxl056@gmail.com
Valerie Hanley

FROM: Dr. Tom Williams, 323-528-9682 ctwilliams2012@yahoo.com
LA-32 NC Director, President Citizens Coalition for A Safe Community

SUBJECT: Cornfield Arroyo Seco Specific Plan Update
EIR Scoping Meeting CPC-2021-2642-SP; ENV-2021-2643-EIR

RE: Notice of Preparation (NOP) & Scoping Review Public Comments

After review of the many pages, I find the NOP and “initial studies” to be incomplete and inadequate for scoping of the proposed “update” of the Cornfields Arroyo Seco Specific Plan (CASP). I have prepared more than 400 CEQA/EIR+ and NEPA/EIS+ worldwide and in the US, since I prepared my first EIR in 1972 for the City of San Jose. I am experienced in preparation and review of CEQA/NEPA documents and their contents. I and a few others contributed to the initial 2010 CASP development and commented on such.

As a Specific Plan, the process is different from that of a General/Community Plan update and must achieve greater clarity, quantification, and informative content for public/community participation, review, and comments. I recommend that the LACity Dept.City Planning withdraw current documents, revise and supplement based on the attached comments and recommendations, and recirculate for post-Covid review and comment by stakeholder and the Public. DCP must also involve Dept.Publ.Wrks.-Bur.of Engineering because of the many infrastructure facilities involved in such a major transformation from industrial/public related facilities and systems to residential and commercial land uses.

The CASP was adopted in 2013 but the problems were known and arose immediately:
Large parcel sizes and corporate ownerships without resources to profit from housing conversions;
Prop-13 ownerships (LLP/LLCs) of parcels and need for owners to participate in partnerships;
Century of industrial direct and groundwater expanded contamination and potential costs of remediation;
Historic housing protections and considerations; and
Lack of and expense for housing infrastructure – drains, sewers, cabling/transformers.

SEE attached also/below

COMMENTS:

Update to the CASP will also include:

- Explore ways to encourage affordable and mixed-income housing production in the Plan Area, such as:
- Expanding the Urban Village zoning designation to more parcels;
- Allowing 100% affordable housing developments in Urban Innovation and Urban Center zones, where they are not currently permitted;
- Eliminating the existing 10% non-residential use requirement in the Urban Village zone; and/or
- Recalibrating affordable housing incentives.

The primary objectives

- Increase the production of affordable and mixed-income housing within the Project Area;
- Prevent displacement and promote housing stability;
- Design and regulate housing to promote health and well-being, increased access to amenities such as parks and public transit, and sustainability;
- Promote welcoming and accessible housing for Angelenos with unique needs;
- Refine Plan standards, processes, and procedures to be more intuitive and transparent; and
- Preserve existing employment areas that show a concentration of jobs, while supporting small and/or legacy businesses, local employment, new productive uses, and employment spaces

SCAG 2020-45 Projections of population, households (dwelling units required) and jobs and employees commutes

Discretionary City Approvals –
Amendment of the CASP

- Certification of an EIR
- Adoption of necessary revisions and any other amendments necessary to implement this update, such as amendments to
General Plan elements (such as the Framework Element),
Community Plans,
the LAMC,
specific plans, and
other ordinances to implement those updates

Cornfield Arroyo Seco Specific Plan (CASP) Update | Los Angeles City Planning (lacity.org)

Key Provisions

A key feature of the CASP is its groundbreaking value capture incentive zoning system, ...additional floor area rights in exchange for setting aside affordable units for low-income households. to make targeted revisions to the CASP, including its incentive zoning system...further strengthen the original vision and intent of the Specific Plan.

Update Components:

- Recalibrating zoning regulations and incentives to incentivize affordable housing development more strongly;
- Identifying additional opportunity areas that could allow for affordable and mixed-income housing development;
- Updating the Specific Plan to reflect current and future demographic, regulatory, environmental, and economic conditions; and
- Updating the Specific Plan's standards, processes, and procedures to be more intuitive and transparent.

The NOP uses the “standard” alphabetic content list for environmental sectors which leads to an arbitrary unconnected description and assessment of environmental sectors without ecosystem/environmental associations and relationships between the sectors and the project’s environment, qualities, and impacts. I recommend the NOP/Initial Studies be reorganized as follows:

- Aesthetics - Provide viewsheds, conflicting images, and River views/use
- Noise (Tunnels, UP/ATSFRR, freeways, warehouse/reflectance and hills) - Provide traffic noise assessment with model, including RR uses
- Air Quality - Greenhouse Gas Emissions - Energy
Provide SR-110 tunnel emissions and modeling of cold NOX
Delineate TOCs for the CASP area and within 1000ft of boundary
- Biological Resources - Provide river flyways, closest wildfire risk area (ZIMAS), and vegetated hills
- Cultural Resources - Tribal Cultural Resources
Provide thorough, complete review for endemic peoples – especially for the river confluence and summer water sources for villages
Review of historic documents, ground and aerial photos, and assess potential for subsurface remains as found in Union Station during Red Line construction
- Geology and Soils - Mineral Resources
Provide Fault zones maps of entire CASP and within 1000ft of boundary (ZIMAS)
Provide the historic seismicity (>0.1 RM) North Spring and Avenue 18 north edge of fault zone
Confirm/Provide current LA Oil Field and related wells and EDR Aerial Photos
- Hazards and Hazardous Materials
Provide historic hazardous materials from industries with storage tanks and from LA Oil Field for fueling engines and tankers in Cornfields Yard
Provide review of historic hazardous materials from railroad/trains liquids and dumping contamination including hydraulic fluids with dioxane
Provide HazWaste inventory based on historic photography and accounts. Locate and prioritize contamination related to residential land use development and guidelines
Provide for program and zoning requirements for borings, exhaust stacks, and vapor recovery/extraction for all residential structures and zoning areas. Zero (0.00000 ppm) tolerance for all VOCs and all H2S in soil vadose zones.

- Hydrology and Water Quality
Provide current and planned Storm Water runoff projections and infiltration/recharge for Low Impact Development compliance.
Provide groundwater surveys and modeling for contamination by LA Oil Field, leakage along fault zones, industrial/railroad use/spillage into alluvium, and human wastes/septage and anaerobic decomposition with H2S formation in contaminated groundwater.
Provide geologic borings for at least three E-W geological cross-section from the bottom of the alluvial groundwater to its upper limits and the vadose zones above.
Provide inventory of ground gaseous emissions confined by extensive asphaltting/paving of surface with sand bed storage/conveyance.
Provide CASP wide groundwater probe-boring and liquid/gases levels monitoring and flow modeling from 2022 to completion of development.
Provide CASP wide boring, sampling, testing, source locating, and remediation of vadose and saturated soil/geologic zones.

- Land Use / Planning
Provide transition zones (150ft zones) between public facilities, commercial, industrial, and residential uses/zonings.
Provide a planning development model for parcellation of current plots of >220,000 sqft.

- Population / Housing (and Economics)
Provide SCAG projections through 2045 for all TAZs in CASP and within 30min (5-miles) commutes/bus trips during AM/PM commutes.
Provide current home ownership, home rentals, and R2-R5 rental levels and costs for 2010-2020 and 2020-current.

Provide economic and household financial summaries for CASP and included TAZs Incomes affordable housing.

Provide definitions/enumerations for economic status and affordability (quarterly levels – Median/50%ile 25%ile 75%ile 90%ile) and estimated % of Income for rental rates by status-group, of all included TAZs (SCAG) in and within 5280ft of the CASP boundaries.

- Public Services - Recreation - Transportation - Utilities / Service Systems

Provide a program and schedule for major services and support improvements/upgrades required for changes from industrial land uses to housing/residential services.

Provide services availabilities for R3-R5 averaged for the city, then apply same service levels to all TAZs in Specific Plan and those immediately adjacent to the CASP and provide for differentials during the CASP upgrade implementation period.

- Mandatory Findings of Significance

Provide numerical/quantified level of findings and of significance and their statutory sources.

- Cumulative impacts consists of **impacts** that are created by a combination of the project evaluated in the environmental **impact** report (**EIR**) together with other projects causing related **impacts**.

Provide transportation, sewage, and power/water improvements leading to and supporting/inducing land use upgrades requiring/inducing increased social/medical services.

Provide an air quality modeling (for, NOX, PM1, and CO) for current conditions and those projected for 2045 and any exceedances of current or assumed future air quality parameters.

- EIR requires an analysis of a “**reasonable** range” of **feasible** alternatives

Provide definitions and specific examples for reasonable and feasible alternatives.

Provide an economic review and models for projected zoning/land use changes, since feasible usually includes economic considerations.

- Project alternatives to be determined based on Draft EIR analysis, and include the required “No Project” alternative

Provide alternative including only 66% and 33% of current non-residential properties developed for R3-5 residential uses.

Provide alternative with 100% Mixed C+R uses for all parcels other than for recreational uses and public facilities..

THEN ALSO

Provide Draft Mitigation Monitoring and REPORTING Plan in the DEIR.

Provide account for gentrification pressure that current residents and small businesses.

Provide strategies to retain and support small community-serving businesses.

Provide preservation of industrial land remain a goal of the CASP.

Provide demand for industrial land use

Provide areas targeting to mixed use

target current pollution issues - SR-110 Tunnel Exhausts, RR exhausts Tier 4

Provide SCAG 2045 projections for Population, Households, and Jobs within CASP Transportation Analysis Zones (TAZ).

Provide estimates of AM/PM commutes to/from area based on populations, households, expected employed, and jobs within CASP and with 30min commute/bus trips.

Provide EIR Alternatives - doubling of William Mead Homes (as done in the Rose Hill Courts project underway).

Provide any new or updated incentives result in deeply affordable units that serve current residents, and include community benefits such as parks and community spaces.
Provide CASP limits Floor Area Ratio (FAR) of housing.
Provide the existing Option A and Option B bonus structure
Provide allow additional incentives to create more affordable and mixed-income units via FAR and Height
Provide additional housing be attainment paths

Provide the questions asked in this Q&A on your web page
Provide update accommodate people of all income levels \$25-75K, \$75-\$125K, \$125 and above
Provide the City CASP market study.
Provide updated CASP for TOC and/or state density bonus options and those incentives in the CASP, thus allowing additional housing

Provide inventory of current, permitted/zoned, and projected housing in the plan area and within 30 min commute.

Provide historic inventory of all structures built in part or wholly pre-1930.
Provide review/analyses of all historic aerial and surface photos of structures within the CASP.
Provide archaeological review of the area for potential endemic, Spanish, and Mexican buried/subsurface cultural remains (e.g., 1000ft of the confluence of the Arroyo Seco and LA River).

Provide planning and permit fees in the CASP to help offset the current high development and remediation costs.

Provide CASP area-wide hazardous material/wastes/contamination review/study/inventory for the area due to historic railroad and industrial development and the Los Angeles oil fields.

Provide information about the height restrictions for each building.

Specific NOP Comments - No pagination makes references difficult for public.

ALTERNATIVES

1/2 The City is requesting identification of environmental issues, environmental impacts, and information that you or your organization believes needs to be considered and analyzed in the EIR, including environmental impacts, mitigation measures, and **alternatives**.

2/3 RESPONSIBLE AND TRUSTEE AGENCIES The City requests your agency's views on the scope and content of the environmental information relevant to your agency's statutory responsibilities in connection with the project, in accordance with the CEQA Guidelines, Section 15082(b)....

(1) The significant environmental issues and **reasonable alternatives** and mitigation measures that your agency will need to have explored in the EIR; and

NOP 2/5 **Alternatives** to be analyzed in the EIR are to be defined and analyzed consistent with the requirements of CEQA Guidelines, Section 15126.6. The **specific alternatives** to be evaluated will include a "No Project" alternative, as required by CEQA, and may include alternative land use configurations.

In order to propose alternatives, the NOP/Scoping Docs must provide clear and numerical "Goals" and "Objectives" for the CASP Update and how applied to alternatives.

In order to present "reasonable alternatives" and "specific alternatives", parameters and definitions must be provided but have not been, thereby restricting the public from proposing such alternatives. Provide definitions and differentiations and general examples for public consideration and submissions for alternatives, reasonable alternatives, and specific alternatives for the CASP

NOP 3/2 The intent of the adopted CASP is to guide the transition of an underserved, vehicular-oriented industrial and public facility area into a cluster of mixed-use, pedestrian-oriented neighborhoods. **Policies**

in the CASP support a range of housing options, new public spaces, opportunities for walking and bicycling, and the retention of land for existing industrial businesses and the clean technology businesses of the future. Among **its numerous goals**, a key priority of the CASP is to facilitate the production and continued provision of affordable housing for Extremely Low Income and Very Low Income households.

No basis is provided for alternatives to be provided compared to “Do-Nothing”.

Provide appropriate reasonable, specific, numerous, and feasible Goals, Objectives, Policies for which the public can provide appropriate alternatives.

Provide definitions, differences, and examples of policies and goals as referenced herein.

Provide definition and numbers for affordability, median/averaged/separated household incomes for the CASP areas.

NOP 4/2 The Proposed Project would also update the **building form, urban design, open space, parking, conservation, performance, and sign standards** of the CASP as necessary to support housing production, and amend the CASP text with technical revisions that ensure consistency, clarity, and **ease of implementation** and

reflect current and future demographic, regulatory, environmental, and economic conditions.

The Project would retain the **existing ministerial review process for subsequent development projects**.

Provide specific tables indicating the parcel(s) new (2021) zoning designations and specific numerical definitions for building form, urban design, open space, parking, conservation, performance, and sign standards.

Provide specific existing 2013, current 2021, and any post-2021 review processes for implementation of the updated Specific Plan ministerial and discretionary processes.

Upgrade does not provide for/include public utilities, services, and facilities nor roads and parkways. Provide projected populations, households, jobs, required dwelling units, and all appropriate facilities, services, and utilities commensurate with the community.

4/3 **Project Objectives** The **primary objectives** of the Project will be to:

- Increase the production of affordable and mixed-income housing within the Project Area,
- Protect residents, especially low-income households, from indirect and direct displacement, and ensure stability of existing vulnerable communities,
- Design and regulate housing to promote health and well-being, increase access to **amenities such as parks and public transit**, contribute to a sense of place, foster community and belonging, and plan for a sustainable future,
- Build, operate, and maintain welcoming and accessible housing for Angelenos with unique needs, including those with disabilities, large families, older adults, and other people facing housing barriers and food insecurity,
- Refine Plan standards, processes, and procedures to be more intuitive and transparent, with the goal of enhancing development certainty for both market-rate and affordable developers, and
- Preserve **employment areas** that show a **concentration of jobs**, while supporting small and/or **legacy** businesses, local employment, new productive uses, and employment spaces, such as light industrial and general commercial uses.

Provide all, primary and secondary objectives. Provide enumeration/quantification, and numerical parameters for such and the methods by which they will fulfil the Goals of the CASP.

Provide clear, direct, and enumerated relationships (“model”) between Goals, Policies, and objectives, which has not been included in available document.

Provide actual/projected population, households, and jobs for all SCAG-TAZ in CASP for 2010 to 2025.

Provide definition of concentration, employment/jobs, and definitions of small, medium, and large businesses.

Provide listing of any “legacy businesses” other than railroads.

Provide existing City examples of standards, processes, and procedures which are sufficiently intuitive/transparent and enhance development certainty for both market-rate and affordable housing and proponents.

More Coming 050821



State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

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www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



April 27, 2021

Clare Kelley
City of Los Angeles
200 N. Spring St, Room 667
Los Angeles, CA 90012
Clare.Kelley@lacity.org

Subject: Notice of Preparation of a Draft Environmental Impact Report for Updates to the Cornfield Arroyo Seco Specific Plan, SCH #2021040206, City of Los Angeles, Los Angeles County

Dear Ms. Kelley:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the City of Los Angeles (City; Lead Agency) for the Updates to the Cornfield Arroyo Seco Specific Plan (Project; CASP). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

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.

Conserving California's Wildlife Since 1870

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Project Description and Summary

Objective: The intent of the adopted CASP is to guide the transition of an underserved, vehicular-oriented industrial and public facility area into a cluster of mixed-use, pedestrian-oriented neighborhoods. Policies in the CASP support a range of housing options, new public spaces, opportunities for walking and bicycling, and the retention of land for existing industrial businesses and the clean technology businesses of the future. Among its numerous goals, a key priority of the CASP is to facilitate the production and continued provision of affordable housing for Extremely Low Income and Very Low-Income households. The City of Los Angeles is updating the CASP with the goal of further production of affordable and mixed-income housing in the Project Area. The proposed Project will entail updates to the CASP's zoning regulations, land use incentives, boundaries, and other key provisions to facilitate the production of housing, in a manner consistent with the underlying vision and purpose of the adopted CASP. The primary objectives of the Project will be to:

- Increase the production of affordable and mixed-income housing within the Project Area;
- Protect residents, especially low-income households, from indirect and direct displacement, and ensure stability of existing vulnerable communities;
- Design and regulate housing to promote health and well-being, increase access to amenities such as parks and public transit, contribute to a sense of place, foster community and belonging, and plan for a sustainable future;
- Build, operate, and maintain welcoming and accessible housing for people with unique needs, including those with disabilities, large families, older adults, and other people facing housing barriers and food insecurity;
- Refine CASP standards, processes, and procedures to be more intuitive and transparent, with the goal of enhancing development certainty for both market-rate and affordable developers; and
- Preserve employment areas that show a concentration of jobs, while supporting small and/or legacy businesses, local employment, new productive uses, and employment spaces, such as light industrial and general commercial uses.

Location: The Project location is a geographically contiguous, approximately 660-acre (1.0 square mile) area located within portions of the Central City North, Northeast Los Angeles, and Silver Lake-Echo Park-Elysian Valley Community Plan Areas. The Project area encompasses the Los Angeles State Historic Park, segments of the Los Angeles River and Arroyo Seco, segments of Interstate 5 and California State Route 110, and the Lincoln/Cypress Metro L Line station. The Project area is bordered by the neighborhoods of Chinatown to the west, Lincoln Heights to the east, and Cypress Park to the north.

Comments and Recommendations

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

Specific Comments

- 1) California Protected Areas. CDFW recommends the City consider the Project's potential

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impacts on the following areas within or adjacent to the Project boundary: Arroyo Seco, Los Angeles River, Los Angeles State Historic Park, Confluence Park, Downey Playground and Recreation Center, Albion Riverside Park, and Elysian Park. All these areas are a part of the California Protected Areas Database (CPAD). The CPAD contains data on lands owned in fee by governments, non-profits, and some private entities that are protected for open space purposes. Data includes all such areas in California, from small urban parks to large national parks and forests (CPAD 2020).

CDFW recommends the City avoid development that may have an adverse direct or indirect impact on CPAD sites. CDFW recommends the DEIR include measures where any future development facilitated by the Project mitigate (avoid if feasible) for impacts on biological resources occurring within these CPAD sites, as well as mitigate for impacts on wildlife, sensitive natural communities, and aquatic and riparian resources. CDFW also recommends new development occur in areas that are not adjacent to CPAD sites, if feasible. CDFW recommends the City consider configuring Project construction and activities, as well as the development footprint to fully avoid impacts to areas, such as CPAD sites, that may provide habitat for wildlife (see General Comment #7.d). Lastly, CDFW recommends effective setbacks be established to where building adjacent to these sites is infeasible. The environmental document should provide a justification for the effectiveness of the chosen distance for the setback.

- 2) Jurisdictional Waters. Figure 2 of the NOP shows that the Los Angeles River and the Arroyo Seco flow through the Project area. As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to CDFW pursuant to Fish and Game Code Section 1600 *et seq.*
 - a) CDFW's issuance of a Lake and Streambed Alteration (LSA) Agreement for a 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 environmental document of the local jurisdiction (Lead Agency) for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the environmental 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. Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for information about LSA Notification (CDFWa 2020).
 - b) In the event the Project area may support aquatic, riparian, and wetland habitats; a preliminary delineation of the streams and their associated riparian habitats should be included in the environmental document. The delineation should be conducted pursuant to the U.S. Fish and Wildlife Service (USFWS) wetland definition adopted by CDFW (Cowardin et al. 1970). Be advised that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification.

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- c) In Project areas which may support ephemeral or episodic streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of these resources and help maintain natural sedimentation processes. Therefore, CDFW recommends effective setbacks be established to maintain appropriately sized vegetated buffer areas adjoining ephemeral drainages. The environmental document should provide a justification for the effectiveness of the chosen distance for the setback.
 - d) Project-related changes in upstream and downstream drainage patterns, runoff, and sedimentation should be included and evaluated in the environmental document.
 - e) As part of the LSA Notification process, CDFW requests a hydrological evaluation of the 200, 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions. CDFW recommends the environmental document evaluate the results and address avoidance, minimization, and/or mitigation measures that may be necessary to reduce potential significant impacts.
- 3) Nesting Birds. CDFW recommends the DEIR include measures where future development facilitated by the Project avoids potential impacts to nesting birds. These avoidance measure should especially consider any development that may occur adjacent to parks and open space, such as the Los Angeles State Historic Park or Elysian Park. Project activities occurring during the bird and raptor breeding and nesting season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment.
- a) Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). It is unlawful to take, possess, or needlessly destroy the nest or eggs of any raptor.
 - b) CDFW recommends that measures be taken to fully avoid impacts to nesting birds and raptors. Ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal should occur outside of the avian breeding season which generally runs from February 15 through September 15 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs.
 - c) If impacts to nesting birds and raptors cannot be avoided, CDFW recommends the DEIR include measures where future development facilitated by the Project mitigates for impacts. CDFW recommends surveys by a qualified biologist with experience conducting breeding bird and raptor surveys. Surveys are needed to detect protected native birds and raptors occurring in suitable nesting habitat that may be disturbed and any other such habitat within 300 feet of the Project disturbance area, to the extent allowable and accessible. For raptors, this radius should be expanded to 500 feet and 0.5 mile for special status species, if feasible. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

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- 4) Loss of Bird and Raptor Nesting Habitat. The Project site has potential for nesting bird habitat in areas such as Los Angeles State Historic Park and in and around the Los Angeles River and Arroyo Seco. According to ebird, raptors such as the red-tailed hawk (*Buteo jamaicensis*) and American kestrel (*Falco sparverius*) have been recorded within the Project area. The biggest threat to birds is habitat loss and conversion of natural vegetation into another land use such as development (e.g., commercial, residential, industrial). In the greater Los Angeles, urban forests and street trees, both native and some non-native species, provide habitat for a high diversity of birds (Wood and Esaian 2020). Some species of raptors have adapted to and exploited urban areas for breeding and nesting (Cooper et al. 2020). For example, raptors (*Accipitridae*, *Falconidae*) such as red-tailed hawks and Cooper's hawks (*Accipiter cooperii*) can nest successfully in urban sites. Red-tailed hawks commonly nest in ornamental vegetation such as eucalyptus (Cooper et al. 2020).
- a) CDFW recommends the DEIR provide measures where future development facilitated by the Project avoids removal of any native trees, large and dense-canopied native and non-native trees, and trees occurring in high density (Wood and Esaian 2020). CDFW also recommends avoiding impacts to trees protected by the City's Protected Tree Ordinance. CDFW also recommends avoiding impacts to understory vegetation (e.g., ground cover, subshrubs, shrubs, and trees).
 - b) If impacts to trees cannot be avoided, trees should be replaced to compensate for the temporal or permanent loss habitat within a project site. Depending on the status of the bird or raptor species impacted, replacement habitat acres should increase with the occurrence of a California Species of Special Concern. Replacement habitat acres should further increase with the occurrence of a CESA-listed threatened or endangered species.
 - c) CDFW recommends planting native tree species preferred by birds. This includes coast live oak (*Quercus agrifolia*) and California sycamore (*Platanus racemosa*) (Wood and Esaian 2020). CDFW recommends Audubon Society's [Plants for Birds](#) for more information on selecting native plants and trees beneficial to birds (Audubon Society 2020).
- 5) Loss of Wading Bird Habitat. The Project proposes to increase housing production within the Project area. This increase in residences may increase human presence in and adjacent to the Los Angeles River or Arroyo Seco. This population increase could require the need for new infrastructure for recreational uses within or adjacent to the Los Angeles River or Arroyo Seco. It will be necessary to consider the impacts on wading bird habitat with any new development in or along the Los Angeles River or Arroyo Seco. Aerial photography indicates the presence of algal mats within the Los Angeles River. Any activity that may disturb or cover areas where algal mats form may prevent birds from utilizing the area for foraging. Algal mats along with other herbaceous vegetation might no longer persist in that portion of the river.

In these concrete-lined rivers, 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, such as black necked stilts (*Himantopus mexicanus*). In addition, wading birds, such as mallards (*Anas platyrhynchos*), also feed on herbaceous vegetation. Stilts and mallards are

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just some of the wading birds that have been identified in this stretch of the Los Angeles River.

- a) Changes to hydrology through new infrastructure installation are reasonable potential direct and indirect physical changes in the environment. Changes in the occurrence, distribution, movement, and increases/reductions in water flow should be considered with new infrastructure installation. These changes and their potential impacts on biological resources should be analyzed and disclosed in an environmental document.
 - b) CDFW recommends the City include an analysis of potential impacts on biological resources within the river resulting from the Project. At a minimum, an analysis should include:
 - i. A map of plant communities and important bird foraging habitat occurring in the Project area, namely within the Los Angeles River. 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).
 - ii. A comprehensive list of sensitive and special status plant and wildlife species, and sensitive plant communities, occurring in the Los Angeles River and Arroyo Seco within the Project site. For each biological resource, provide:
 1. A summary of species-specific habitat requirements;
 2. 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), hydraulics (water depth, wetted perimeter, velocity), and sunlight exposure (photosynthetic ability of plants and algae); and,
 3. A quantitative analysis and/or adequate discussion to evaluate whether the Project would result in those significant impacts.
 - iii. A discussion of whether construction, operations, and maintenance of any development within or adjacent to the river would have direct and/or indirect, permanent, or temporal impact on biological resources.
 - iv. An adequate discussion of Project-related impacts on biological resources in relation to cumulative changes to the hydrologic regime.
- 6) Bats. Numerous bat species are known to roost in trees and structures throughout Los Angeles County (Remington and Cooper 2014). In urbanized areas, bats use trees and man-made structures for daytime and nighttime roosts. Accordingly, CDFW recommends the DEIR provide measures where future increases in development, such as in areas in and adjacent to the Los Angeles State Historic Park, Elysian Park, or other parks and open space, facilitated by the Project avoids potential impacts to bats.
- a) Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs., § 251.1). Project

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construction and activities, including (but not limited to) ground disturbance, vegetation removal, and any activities leading to increased noise levels may have direct and/or indirect impacts on bats and roosts.

- b) CDFW recommends a project-level biological resources survey provide a thorough discussion and adequate disclosure of potential impacts to bats and roosts from Project construction and activities including (but not limited to) ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal. If necessary, to reduce impacts to less than significant, a project-level environmental document should provide bat-specific avoidance and/or mitigation measures [CEQA Guidelines, § 15126.4(a)(1)].

General Comments

- 1) Disclosure. An environmental document should provide an adequate, complete, and detailed disclosure about the effect which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, §15151). Adequate disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).
- 2) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures [CEQA Guidelines, §§ 15002(a)(3), 15021]. Pursuant to CEQA Guidelines section 15126.4, an environmental document shall describe feasible measures which could mitigate for impacts below a significant level under CEQA.
 - a) Level of Detail. Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, §§ 15126.4, 15041). A public agency shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures (Pub. Resources Code, § 21081.6). CDFW recommends that the City prepare 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). Adequate disclosure is necessary so CDFW may provide comments on the adequacy and feasibility of proposed mitigation measures.
 - b) Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the Project as proposed, the environmental document should include a discussion of the effects of proposed mitigation measures [CEQA Guidelines, § 15126.4(a)(1)]. In that regard, the environmental document should provide an adequate, complete, and detailed disclosure about a project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.

Clare Kelley
City of Los Angeles
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- 3) Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to a Project site and where a Project may result in ground disturbance. The assessment and analysis should place emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to a Project. CDFW also considers impacts to Species of Special Concern a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures. A Project-level environmental document should include the following information:
- a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. An environmental document should include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, S3 and S4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting [Vegetation Classification and Mapping Program - Natural Communities](#) webpage (CDFWb 2020);
 - b) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#) (CDFW 2018). Adjoining habitat areas should be included where Project construction and activities could lead to direct or indirect impacts off site;
 - c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at a Project site and within the neighboring vicinity. The [Manual of California Vegetation](#) (MCV), second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2009). Adjoining habitat areas should be included in this assessment where Project activities could lead to direct or indirect impacts off site. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
 - d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by a Project. CDFW's [California Natural Diversity Database](#) (CNDDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat (CDFWc 2020). An assessment should include a nine-quadrangle search of the CNDDDB to determine a list of species potentially present at a Project site. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur in the Project site. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(i)];
 - e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California

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Species of Special Concern, and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of a Project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's [Survey and Monitoring Protocols and Guidelines](#) for established survey protocol for select species (CDFWd 2020). Acceptable species-specific survey procedures may be developed in consultation with CDFW and the U.S. Fish and Wildlife Service;

- f) A recent wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of a proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame or in phases; and,
 - g) A biological resources survey should include identification and delineation of any rivers, streams, and lakes and their associated natural plant communities/habitats. This includes any culverts, ditches, storm channels that may transport water, sediment, pollutants, and discharge into rivers, streams, and lakes.
- 4) Wetland Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's (Commission) policies. The [Wetlands Resources](#) policy the Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement and expansion of wetland habitat in California. Further, it is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, Project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values" (CFGF 2005).
- a) The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, a Project must include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions for the benefit to on-site and off-site wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in an environmental document and

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these measures should compensate for the loss of function and value.

- b) The Fish and Game Commission's [Water policy](#) guides CDFW on the quantity and quality of the waters of this State that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this State; prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife (CFGF 1994). CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).
- 5) Data. CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and natural communities detected by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2020e). The City should ensure data collected at a Project-level has been properly submitted, with all data fields applicable filled out. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred.
- 6) Biological Direct, Indirect, and Cumulative Impacts. CDFW recommends providing a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. The DEIR should address the following:
- a) A discussion regarding Project-related indirect impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (NCCP, Fish & G. Code, § 2800 et. seq.)]. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR;
 - b) A discussion of both the short-term and long-term effects to species population distribution and concentration and alterations of the ecosystem supporting the species impacted [CEQA Guidelines, § 15126.2(a)];
 - c) A discussion of potential adverse impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures;
 - d) A discussion on Project-related changes on drainage patterns; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and, post-Project fate of runoff from the Project sites. The discussion should also address the potential water extraction activities and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included;

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- e) An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation 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 DEIR; and,
 - f) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant and wildlife species, habitat, and vegetation communities. If the City determines that the Project would not have a cumulative impact, the environmental document should indicate why the cumulative impact is not significant. The City's conclusion should be supported by facts and analyses [CEQA Guidelines, § 15130(a)(2)].
- 7) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:
- a) A complete discussion of the purpose and need for, and description of, the proposed Project;
 - b) CEQA Guidelines section 15126.6(a) states that an environmental document shall describe a reasonable range of potentially feasible 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. CEQA Guidelines section 15126.6(f)(2) states if the Lead Agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion and should include reasons in the environmental document; and,
 - c) A range of feasible alternatives to Project component location and design features to avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas. CDFW recommends the City consider configuring Project construction and activities, as well as the development footprint, in such a way as to fully avoid impacts to sensitive and special status plants and wildlife species, habitat, and sensitive vegetation communities. CDFW also recommends the City consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes for the duration of the Project and from any future development. As a general rule, CDFW recommends reducing or clustering the development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.

Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6).

- d) Where the Project may impact aquatic and riparian resources, CDFW recommends the City consider alternatives that would fully avoid impacts to such resources. CDFW also recommends alternatives that would allow not impede, alter, or otherwise modify existing

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surface flow; watercourse and meander; and water-dependent ecosystems and vegetation communities. Project-related designs should consider elevated crossings to avoid channelizing or narrowing of streams. Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level and cause the stream to alter its course of flow.

- 8) CESA. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or CESA-listed plant species that results from the Project is prohibited, except as authorized by state law (Fish & G. Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
- 9) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of moving an individual from a project site and permanently moving it to a new location. CDFW generally does not support the use of, translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.
- 10) Compensatory Mitigation. An environmental document should include mitigation measures for adverse Project related direct or indirect impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project-related impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement, financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code, section 65967, the Lead Agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.
- 11) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration,

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an environmental document should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.

Conclusion

We appreciate the opportunity to comment on the NOP for the Updates to the Cornfield Arroyo Seco Specific Plan to assist the City of Los Angeles in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at Felicia.Silva@wildlife.ca.gov.

Sincerely,

DocuSigned by:

Erinn Wilson-Olgin

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Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

ec: CDFW

Erinn Wilson-Olgin, Los Alamitos – Erinn.Wilson-Olgin@wildlife.ca.gov
Victoria Tang, Los Alamitos – Victoria.Tang@wildlife.ca.gov
Ruby Kwan-Davis, Los Alamitos – Ruby.Kwan-Davis@wildlife.ca.gov
Andrew Valand, Los Alamitos – Andrew.Valand@wildlife.ca.gov
Felicia Silva, Los Alamitos – Felicia.Silva@wildlife.ca.gov
Frederic Reiman, Los Alamitos – Frederic.Reiman@wildlife.ca.gov
Susan Howell, San Diego – Susan.Howell@wildlife.ca.gov
CEQA Program Coordinator, Sacramento – CEQACommentLetters@wildlife.ca.gov

State Clearinghouse, Sacramento – State.Clearinghouse@opr.ca.gov

References:

- Audubon Society. 2020. Plants for Birds. Available from:
<https://www.audubon.org/PLANTSFORBIRDS>
- [CDFWa] California Department of Fish and Wildlife. 2020. Lake and Streambed Alteration Program. Available from: <https://wildlife.ca.gov/Conservation/LSA>.
- [CDFWb] California Department of Fish and Wildlife. 2020. Natural Communities. Accessed at: <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities>.
- [CDFWc] California Department of Fish and Wildlife. 2020. California Natural Diversity Database. Available from: <https://wildlife.ca.gov/Data/CNDDb>
- [CDFWd] California Department of Fish and Wildlife. 2020. Survey and Monitoring Protocols and Guidelines. Available from: <https://wildlife.ca.gov/conservation/survey-protocols>

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- [CDFWE] California Department of Fish and Wildlife. 2020. Submitting Data to the CNDDDB. Available from: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>
- [CDFW] California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Accessed at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>.
- [CFGCC] California Fish and Game Commission. 2005. Policies. Retention of Wetland Acreage and Habitat Values. Accessed: <https://fgc.ca.gov/About/Policies/Miscellaneous#Wetlands>.
- [CFGCC] California Fish and Game Commission. 1994. Policies. Miscellaneous: Water. Accessed: <https://fgc.ca.gov/About/Policies/Miscellaneous#Water>
- [CNPS] California Native Plant Society. 2020. Rare Plant ranks. Available from: <https://www.cnps.org/rare-plants/cnps-rare-plant-ranks>.
- [CPAD] California Protected Areas Database (CPAD) – www.calands.org/cpad/ (December 2020)
- Cooper D.S., Yeh, P.J., and D.T. Blumstein. 2020. Tolerance and avoidance of urban cover in a southern California suburban raptor community over five decades. Urban Ecosystems. doi.org/10.1007/s11252-020-01035-w
- Sawyer, J. O., Keeler-Wolf, T., and Evens J.M. 2009. A Manual of California Vegetation, 2nd ed. ISBN 978-0-943460-49-9.
- [USFWS] U.S. Fish and Wildlife Service. 2020. USFWS Threatened & Endangered Species Active Critical Habitat Report. Online Mapper. Available from: <https://ecos.fws.gov/ecp/report/table/critical-habitat.html>
- Wood, E.M. and S. Esaian. 2020. The importance of street trees to urban avifauna. Ecological Applications 30(7): e02149.



Clare Kelley <clare.kelley@lacity.org>

Caltrans District 7 Comment Letter - Cornfield Arroyo Seco Specific Plan Update - NOP - SCH# 2021040206 - GTS# 07-LA-2021-03543

3 messages

Higgins, Anthony@DOT <Anthony.Higgins@dot.ca.gov>

Thu, Apr 22, 2021 at 6:01 PM

To: "clare.kelley@lacity.org" <clare.kelley@lacity.org>

Cc: "state.clearinghouse@opr.ca.gov" <state.clearinghouse@opr.ca.gov>

Greetings,

Please see the attached Caltrans comment letter for the following project:

Cornfield Arroyo Seco Specific Plan Update – NOP

SCH# 2021040206

GTS# 07-LA-2021-03543

Best,

Anthony Higgins

Associate Transportation Planner

Caltrans District 7, Division of Planning

[100 S. Main Street](#), MS-16

Los Angeles, CA 90012

(213) 266-3574

anthony.higgins@dot.ca.gov

 **07-LA-2021-03543 Cornfield Arroyo Seco Specific Plan update - NOP - SIGNED.pdf**
137K**Clare Kelley** <clare.kelley@lacity.org>

Fri, Apr 23, 2021 at 10:33 AM

To: Valerie Watson <valerie.watson@lacity.org>, Michael Sin <michael.sin@lacity.org>

FYI

[Quoted text hidden]

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Clare Kelley



She, Her, Hers

City Planner

Los Angeles City Planning

200 N. Spring St., Room 667

Los Angeles, CA 90012

Planning4LA.org

T: (213) 978-1207



07-LA-2021-03543 Cornfield Arroyo Seco Specific Plan update - NOP - SIGNED.pdf

137K

Clare Kelley <clare.kelley@lacity.org>

Fri, Apr 23, 2021 at 10:39 AM

To: Anthony.Higgins@dot.ca.gov

Good morning,

Thank you for your email. We are in receipt of your comments on the Notice of Preparation (NOP) of the Draft EIR for the CASP Update.

Regards,

[Quoted text hidden]

[Quoted text hidden]



Clare Kelley <clare.kelley@lacity.org>

CASP Update - 4 p.m. Scoping Meeting

2 messages

Phyllis Ling <pling.hcnnc@gmail.com>

Mon, Apr 12, 2021 at 1:26 PM

To: Clare Kelley <clare.kelley@lacity.org>, michael.sin@lacity.org, valerie.watson@lacity.org

Hi Ms. Kelley, Mr. Sin, Ms. Watson,

I'm writing in regard to a CASP Update EIR scoping meeting that is scheduled for April 22 at 4 p.m.

I am curious how 4 p.m. was selected as the time for this public meeting. This is during typical business hours, and many stakeholders will still be at work, and unable to participate.

The Historic Cultural North Neighborhood Council, which represents the CASP area, has its regular board meetings at 4 p.m., but this is something that occurred with a lot of controversy and outcry, and is also the subject of a grievance against the neighborhood council.

I am writing to make sure you are aware that 4 p.m. public meetings will exclude a large number of stakeholders from participating. I hope you will consider rescheduling the meeting or holding a second scoping meeting at a time that is reasonably accessible to the public, such as 5:30pm or 6pm.

The opinions expressed are my own, and do not represent any official position of the board of HCNNC.

Sincerely,

Phyllis Ling
Outreach Committee Chair, Historic Cultural North Neighborhood Council
Solano Canyon Resident Representative
Email: pling.hcnnc@gmail.com
Website: hcnnc.org
Subscribe: hcnnc.org/subscribe

Clare Kelley <clare.kelley@lacity.org>

Wed, Apr 14, 2021 at 3:18 PM

To: Phyllis Ling <pling.hcnnc@gmail.com>

Cc: Michael Sin <michael.sin@lacity.org>, Valerie Watson <valerie.watson@lacity.org>

Good afternoon Ms. Ling,

We are in receipt of your comments on the Scoping Meeting for the CASP Update. We understand and appreciate your concerns regarding meeting scheduling.

City Planning will record the Scoping Meeting and will post that recording, as well as other meeting materials, to the [project website](#) after the meeting. Additionally, we will be hosting open houses and other outreach events for this effort in the coming months, and anticipate offering these participation opportunities during a variety of times.

Best regards,

[Quoted text hidden]

--

Clare Kelley
She, Her, Hers



City Planner

Los Angeles City Planning

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Planning4LA.org

T: (213) 978-1207





Clare Kelley <clare.kelley@lacity.org>

CASP Update ENV-2021-2643-EIR NOP Public Comments #12 messages

Tom Williams <ctwilliams2012@yahoo.com>

Fri, May 7, 2021 at 4:50 PM

To: "clare.kelley@lacity.org" <clare.kelley@lacity.org>, "michael.sin@lacity.org" <michael.sin@lacity.org>,
"valerie.watson@lacity.org" <valerie.watson@lacity.org>

Cc: "mxl056@gmail.com" <mxl056@gmail.com>, Richard Larsen <rwlarsen.lhnc@gmail.com>, Gerald Gubatan <gerald.gubatan@lacity.org>

DATE: 05/05/2021**TO:** Los Angeles Department of City Planning

200 N. Spring Street, Room 667 Los Angeles, CA 90012

ATTN: Clare Kelley City Planner, CASP Update PM clare.kelley@lacity.org 213-978-1207**CC:** Michael Sin City Plnr.Assoc. michael.sin@lacity.org 213-978-1345

Valerie Watson Snr City Planner valerie.watson@lacity.org

CD1 Snr Plan.Dir., Gerald Gubatan gerald.gubatan@lacity.org

Lincoln Heights Neigh.Cncl Richard Larsen PLU Comte

RWLarsen.LAPA@gmail.comHistoric-Cultural North NC Lau Mai Wah VP-NC mxl056@gmail.com

Valerie Hanley

FROM: Dr. Tom Williams, 323-528-9682 ctwilliams2012@yahoo.com
LA-32 NC Director, President Citizens Coalition for A Safe Community**SUBJECT:** Cornfield Arroyo Seco Specific Plan Update

EIR Scoping Meeting CPC-2021-2642-SP; ENV-2021-2643-EIR

RE: Notice of Preparation (NOP) & Scoping Review Public Comments

After review of the many pages, I find the NOP and "initial studies" to be incomplete and inadequate for scoping of the proposed "update" of the Cornfields Arroyo Seco Specific Plan (CASP). I have

prepared more than 400 CEQA/EIR+ and NEPA/EIS+ worldwide and in the US, since I prepared my first EIR in 1972 for the City of San Jose. I am experienced in preparation and review of CEQA/NEPA documents and their contents. I and a few others contributed to the initial 2010 CASP development and commented on such.

As a Specific Plan, the process is different from that of a General/Community Plan update and must achieve greater clarity, quantification, and informative content for public/community participation, review, and comments. I recommend that the LACity Dept.City Planning withdraw current documents, revise and supplement based on the attached comments and recommendations, and recirculate for post-Covid review and comment by stakeholder and the Public. DCP must also involve Dept.Publ.Wrks.-Bur.of Engineering because of the many infrastructure facilities involved in such a major transformation from industrial/public related facilities and systems to residential and commercial land uses.

The CASP was adopted in 2013 but the problems were known and arose immediately:

Large parcel sizes and corporate ownerships without resources to profit from housing conversions;

Prop-13 ownerships (LLP/LLCs) of parcels and need for owners to participate in partnerships;

Century of industrial direct and groundwater expanded contamination and potential costs of remediation;

Historic housing protections and considerations; and

Lack of and expense for housing infrastructure – drains, sewers, cabling/transformers.

SEE attached also/below. More to Come

 **CASP0508Cmts0507Sbmt.d.docx**
29K

Clare Kelley <clare.kelley@lacity.org>

Mon, May 10, 2021 at 5:19 PM

To: Tom Williams <ctwilliams2012@yahoo.com>

Cc: "michael.sin@lacity.org" <michael.sin@lacity.org>, "valerie.watson@lacity.org" <valerie.watson@lacity.org>

Dr. Williams,

Thank you for your email. We are in receipt of your comments on the Notice of Preparation (NOP) of the Draft EIR for the CASP Update.

Regards,

[Quoted text hidden]

--

Clare Kelley
She, Her, Hers



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Clare Kelley <clare.kelley@lacity.org>

CDFW comments on Cornfield Arroyo Seco Specific Plan NOP

2 messages

Silva, Felicia@Wildlife <Felicia.Silva@wildlife.ca.gov>

Tue, Apr 27, 2021 at 12:18 PM

To: "Clare.Kelley@lacity.org" <Clare.Kelley@lacity.org>

Cc: "Tang, Victoria@Wildlife" <Victoria.Tang@wildlife.ca.gov>, "Wilson-Olgin, Erinn@Wildlife" <Erinn.Wilson-Olgin@wildlife.ca.gov>, "Valand, Andrew@Wildlife" <Andrew.Valand@wildlife.ca.gov>, "Kwan-Davis, Ruby@Wildlife" <Ruby.Kwan-Davis@wildlife.ca.gov>, "Rieman, Frederic@Wildlife" <Frederic.Rieman@wildlife.ca.gov>, "state.clearinghouse@opr.ca.gov" <state.clearinghouse@opr.ca.gov>, "Howell, Susan@Wildlife" <Susan.Howell@wildlife.ca.gov>

Good afternoon Ms. Kelley,

Please see the attached letter regarding CDFW's comments on the Notice of Preparation for the Draft Environmental Impact Report for the Updates to the Cornfield Arroyo Seco Specific Plan for the City of Los Angeles. If you have any questions or concerns relating to this letter, please feel free to contact CDFW at your convenience. Thank you for the opportunity to comment and have a good day.

Regards,

Felicia Silva

Environmental Scientist | California Department of Fish and Wildlife

South Coast | Region 5 | Habitat Conservation Planning Program

4665 Lampson Ave, Suite C | Los Alamitos, CA 90720

Temporary office number (562) 292-8105 | Felicia.Silva@wildlife.ca.gov**CDFW comments on Cornfield Arroyo Seco NOP.pdf**

811K

Clare Kelley <clare.kelley@lacity.org>

Tue, Apr 27, 2021 at 12:42 PM

To: Felicia.Silva@wildlife.ca.gov

Cc: "Tang, Victoria@Wildlife" <Victoria.Tang@wildlife.ca.gov>, "Wilson-Olgin, Erinn@Wildlife" <Erinn.Wilson-Olgin@wildlife.ca.gov>, "Valand, Andrew@Wildlife" <Andrew.Valand@wildlife.ca.gov>, "Kwan-Davis, Ruby@Wildlife" <Ruby.Kwan-Davis@wildlife.ca.gov>, "Rieman, Frederic@Wildlife" <Frederic.Rieman@wildlife.ca.gov>, "state.clearinghouse@opr.ca.gov" <state.clearinghouse@opr.ca.gov>, "Howell, Susan@Wildlife" <Susan.Howell@wildlife.ca.gov>, Michael Sin <michael.sin@lacity.org>, Valerie Watson <valerie.watson@lacity.org>

Good afternoon,

Thank you for your email. We are in receipt of your comments on the Notice of Preparation (NOP) of the Draft EIR for the CASP Update.

Regards,

[Quoted text hidden]

--



Clare Kelley

She, Her, Hers

City Planner

Los Angeles City Planning

200 N. Spring St., Room 667

Los Angeles, CA 90012

Planning4LA.org

T: (213) 978-1207





Clare Kelley <clare.kelley@lacity.org>

Cornfield Arroyo Seco Specific Plan Comments

2 messages

Erik Van Breene <vanbreene@laconservancy.org>
To: "clare.kelley@lacity.org" <clare.kelley@lacity.org>
Cc: Adrian Fine <afine@laconservancy.org>

Sat, May 8, 2021 at 2:12 PM

Ms. Kelley,

Please find the Conservancy's comments for the Notice of Preparation for the Arroyo Seco Specific Plan attached to this email. Should you have any questions please do not hesitate to reach out.

Best,

Erik

Erik Van Breene

Preservation Coordinator

Los Angeles Conservancy

523 West Sixth Street, Suite 826

Los Angeles, CA 90014

(213) 430-4206 | vanbreene@laconservancy.org

Pronouns: He / His / Him / Mr.

laconservancy.org

[E-News](#) – [Facebook](#) – [Twitter](#) – [Instagram](#)

Membership starts at just \$40

[Join the Conservancy today](#)

 **LAC_Comments-CASP-NOP-2021.5.7.pdf**
271K

5/10/2021

City of Los Angeles Mail - Cornfield Arroyo Seco Specific Plan Comments

Clare Kelley <clare.kelley@lacity.org>

Mon, May 10, 2021 at 5:22 PM

To: Erik Van Breene <vanbreene@laconservancy.org>

Cc: Adrian Fine <afine@laconservancy.org>, Michael Sin <michael.sin@lacity.org>, Valerie Watson <valerie.watson@lacity.org>

Good afternoon,

Thank you for your email. We are in receipt of your comments on the Notice of Preparation (NOP) of the Draft EIR for the CASP Update.

Regards,

[Quoted text hidden]

--



Clare Kelley

She, Her, Hers

City Planner

Los Angeles City Planning

200 N. Spring St., Room 667

Los Angeles, CA 90012

Planning4LA.org

T: (213) 978-1207





ENV-2021-2463-EIR fo single parcel on Ave. 18 or for update of Cornfields AND Scoping Comments

5 messages

Tom Williams <ctwilliams2012@yahoo.com>

Sun, Apr 11, 2021 at 2:29 PM

To: "Michael Sin" <micheal.sin@lacity.org>, "clare.kelley@lacity.org" <clare.kelley@lacity.org>

Cc: Richard Larsen <rlarsen.lhnc@gmail.com>, PlanCheckNCLA news and comments <plancheckncla@gmail.com>

Case Number: ENV-2021-2643-EIR

Case Filed On: 03/31/2021

Staff Assigned: MICHAEL SIN

EIR Notice of Prep. Start Date: EIR

Notice of Prep. End Date: Scoping

Meeting Date:

Draft EIR Notice of Completion

Date:

Draft EIR Circulation Start Date:

Draft EIR Circulation End Date:

Final EIR Distribution Date:

Termination Date:

End of Appeal Period:

Appealed: No

Case on Hold?: No

Primary Address

Address	CNC	CD
157 N AVENUE 18 90031	Lincoln Heights	1

OR

[2021-04-08 CASP Update NOP_signed.pdf](#) ...Clare Kelley, City Planner Case Numbers: CPC-2021-2642-SP; ENV-2021-2643-EIR [200 N. Spring Street, Room 667, Los Angeles, CA 90012](#) ...

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT AND NOTICE OF SCOPING MEETING FOR UPDATES TO THE CORNFIELD ARROYO SECO SPECIFIC PLAN (CASP) Apr. 22, 2021

[2021-04-08 CASP Update NOP_signed.pdf \(lacity.org\)](#)

Who is in charge and for what???

Why the parcel # if for Spec.Plan?

I did review of the original CASP, ask Claire B.

Due to confusion created by these please continue the Scoping Comments til 042921.

Dr. Tom Williams, 323-528-9682 ctwilliams2012@yahoo.com LA-32 NC Director

Tom Williams <ctwilliams2012@yahoo.com>

Sun, Apr 11, 2021 at 3:06 PM

To: "clare.kelley@lacity.org" <clare.kelley@lacity.org>, "claire.bowin@lacity.org" <claire.bowin@lacity.org>

Cc: Richard Larsen <rlarsen.lhnc@gmail.com>, PlanCheckNCLA news and comments <plancheckncla@gmail.com>

Claire:

CPC-2021-2642-SP - Who is the applicant?? Sin had a bounce back...= not in [lacity.org](#) = applicant WHO Is the applicant - LACity Planning?? For specific Plan update??

Who is in charge and for what???

Why the parcel # if for Spec.Plan?

I did review of the original CASP, ask Claire Bowin. I was also Env.Controls Supervisor for Constr.Mgmt./PDCD of MTA-Red Line Phase 1.

SCs: Scoping must provide a complete list of ALL Goals/Purposes and Objectives/Needs of the Project in order for reviewers to submit Alternatives and Mitigation.

p.3/2 Among its numerous GOALS, a key priority of the CASP is to facilitate the production and continued provision of affordable housing for Extremely Low Income and Very Low Income households.

Provide a listing of all goals objectives, purposes, and needs for project, especially related to methane gas, railroads and contaminations, and LARiver.

Provide Memorandum of Agreement as to Lead Agency as DWP, BoE, DCP, DOT, LAFD/RyLAN, LACo-DPW, LACo-FD/HazMat, MTA, Cal-GEM and other state, county, and city agencies are involved.

Provide a Mitigation, Monitoring, AND REPORTING PLAN in the DEIR.

SC: Due to confusion created by earlier and these comments, please continue the Scoping Comments til 050321.

Dr. Tom Williams, 323-528-9682 ctwilliams2012@yahoo.com LA-32 NC Director

Tom

=====

Certified Neighborhood Council -- Lincoln Heights

Application Date Case Number Address CD# Community Plan Area Project Description Request Type Applicant Contact

03/31/2021 CPC-2021-2642-SP 157 N AVENUE 18 90031 1 Northeast Los Angeles

PLEASE UPDATE THE PROJECT SHORT DESCRIPTION SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)

Applicant: MICHAEL SIN (213) 978-1345

03/31/2021 **ENV-2021-2643-EIR** 157 N AVENUE 18 90031 1 Northeast Los Angeles

PLEASE UPDATE THE PROJECT SHORT DESCRIPTION EIR-ENVIRONMENTAL IMPACT REPORT

Applicant: MICHAEL SIN (213)978-1345

[Quoted text hidden]

Tom Williams <ctwilliams2012@yahoo.com>

Sun, Apr 11, 2021 at 11:09 PM

To: "clare.kelley@lacity.org" <clare.kelley@lacity.org>

Cc: Richard Larsen <rlarsen.lhnc@gmail.com>, PlanCheckNCLA news and comments <plancheckncla@gmail.com>

On Sunday, April 11, 2021, 03:06:35 PM PDT, Tom Williams <ctwilliams2012@yahoo.com> wrote:

Claire:

CPC-2021-2642-SP - Who is the applicant?? Sin had a bounce back...= not in lacity.org = applicant WHO Is the applicant - LACity Planning?? For specific Plan update??

Who is in charge and for what???

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I did review of the original CASP, ask Claire Bowin. I was also Env.Controls Supervisor for Constr.Mgmt./PDCD of MTA-Red Line Phase 1.

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Provide a Mitigation, Monitoring, AND REPORTING PLAN in the DEIR.

SC: Due to confusion created by earlier and these comments, please continue the Scoping Comments til changed to 051721.

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

Tom Williams <ctwilliams2012@yahoo.com>

Sun, Apr 11, 2021 at 11:17 PM

To: "clare.kelley@lacity.org" <clare.kelley@lacity.org>, "michael.sin@lacity.org" <michael.sin@lacity.org>, "valerie.watson@lacity.org" <valerie.watson@lacity.org>

Cc: Richard Larsen <rlarsen.lhnc@gmail.com>

Valerie Watson
Senior City Planner, Section Head
valerie.watson@lacity.org

Clare Kelley
City Planner, CASP Update Project Manager
clare.kelley@lacity.org
(213) 978-1207

Michael Sin
City Planning Associate
michael.sin@lacity.org
(213) 978-1345

On Sunday, April 11, 2021, 11:09:24 PM PDT, Tom Williams <ctwilliams2012@yahoo.com> wrote:

Clare:

CPC-2021-2642-SP - Who is the applicant?? Sin had a bounce back...= not in lacity.org = applicant WHO Is the applicant - LACity Planning?? For specific Plan update??

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p.3/2 Among its numerous GOALS, a key priority of the CASP is to facilitate the production and continued provision of affordable housing for Extremely Low Income and Very Low Income households.

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Provide a Mitigation, Monitoring, AND REPORTING PLAN in the DEIR.

SC: Due to confusion created by earlier and these comments, please continue the Scoping Comments til provisions have been made and changed to

052421.

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

Clare Kelley <clare.kelley@lacity.org>

To: Tom Williams <ctwilliams2012@yahoo.com>

Wed, Apr 14, 2021 at 3:07 PM

Cc: "michael.sin@lacity.org" <michael.sin@lacity.org>, "valerie.watson@lacity.org" <valerie.watson@lacity.org>

Dr. Williams,

We are in receipt of your comments on the Notice of Preparation (NOP) of the Draft EIR for the CASP Update.

To clarify, the CASP Update will apply to the entire geographic area located within the boundaries of the Cornfield Arroyo Seco Specific Plan, which encompasses approximately 660 acres. We have worked with our systems division to remove reference to any specific parcels that were previously shown on the Planning Document Information System (PDIS) for that case number.

The City of Los Angeles has initiated the CASP Update (Council File No. 13-0078-S2), not a private entity, and the City is the lead agency for the Project. Detailed information on the Project, including project location, objectives, and contact information, can be found in [the NOP](#) released April 8, 2021. Please refer to Page 4 of the NOP for a list of all Project Objectives and Figures 1 and 2 showing the boundaries of the Project Area.

You can also learn more about the CASP Update, including the staff members involved in the Project, on our website: Planning4LA.org/casp-update.

Regards,

[Quoted text hidden]

--



Clare Kelley

She, Her, Hers

City Planner

Los Angeles City Planning

200 N. Spring St., Room 667

Los Angeles, CA 90012

Planning4LA.org

T: (213) 978-1207





Clare Kelley <clare.kelley@lacity.org>

Follow Up: CASP Update EIR Scoping Meeting

3 messages

Michael Sin <michael.sin@lacity.org>
To: Clare Kelley <clare.kelley@lacity.org>

Wed, May 5, 2021 at 3:05 PM

Thanks for joining the CASP Update EIR Scoping Meeting. Comment period closes May 8, 2021.

Thank you for those who were able to participate in the virtual public scoping meeting for the Cornfield Arroyo Seco Specific Plan (CASP) Update on April 22, 2021.

To view and listen to a recording of the meeting, including the full Question & Answer session, please visit the project website at: [Planning4LA.org/casp-update](https://planning4la.org/casp-update). You will find a copy of the presentation slides from the meeting, along with other materials describing the project. The recorded presentation can also be viewed on [City Planning's YouTube channel](#), which allows for captioning in multiple languages.

City Planning released a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the CASP Update on April 8, 2021, to begin what is known as the scoping period. There is still time to submit a public comment for the project to help inform the scope of environmental review as we prepare the DEIR. The NOP public comment period is open from April 8, 2021 through May 8, 2021.

To submit a public comment, please mail or email written comments no later than May 8, 2021, to:

Los Angeles Department of City Planning
ATTN: Clare Kelley
[200 N. Spring Street, Room 667](#)
Los Angeles, CA 90012
Email: clare.kelley@lacity.org

If you have any questions, please do not hesitate to contact us.

--



Michael Sin (he/him)
City Planning Associate
Los Angeles City Planning
[200 N. Spring St., Room 621](#)
Los Angeles, CA 90012
T: (213) 978-1345 | [Planning4LA.org](https://planning4la.org)



Benjamin Abrams <babrams@mapsre.com>
To: Clare Kelley <clare.kelley@lacity.org>

Sat, May 8, 2021 at 11:59 PM

Hello Clare,

As I understand, one of if not the main reasons for the updated CASP is to increase the much needed housing in the area. In an effort to support this goal, I recommend the following:

1. Work off of the existing Option B density bonus with the following modifications.
 - A. Increase the allowable FAR similar to what's mentioned within the TOC guidelines or similar to the Hollywood proposed updates near the metro stations.
 - B. Increase the allowable building height
 - C. Increase the allowable Density
2. Upzone the current underlying zoning to RAS4, RAS3 or R5 density where appropriate.

If parking is required/needed, allow for at/above grade parking and increase building heights to allow for the parking.

All of these items together will allow for additional affordable and mixed-income housing along with the addition of adding commercial space where appropriate.

...Benjamin

From: Michael Sin <michael.sin@lacity.org>
Sent: Wednesday, May 5, 2021, 3:06 PM
To: Clare Kelley
Subject: Follow Up: CASP Update EIR Scoping Meeting
[Quoted text hidden]

Clare Kelley <clare.kelley@lacity.org>
To: Benjamin Abrams <babrams@mapsre.com>

Mon, May 10, 2021 at 5:21 PM

Good afternoon,

Thank you for your email. We are in receipt of your comments on the Notice of Preparation (NOP) of the Draft EIR for the CASP Update.

Regards,

[Quoted text hidden]

--



Clare Kelley
She, Her, Hers
City Planner
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1207





Clare Kelley <clare.kelley@lacity.org>

LA Metro: Cornfield Arroyo Specific Plan Area - NOP Comments

2 messages

Truong, Cassie <TruongC@metro.net>

Fri, May 7, 2021 at 4:33 PM

To: "clare.kelley@lacity.org" <clare.kelley@lacity.org>

Greetings,

Thank you for the opportunity to comment on the Cornfield Arroyo Specific Plan Area in the City of Los Angeles. Attached are Metro's comments. Please kindly reply to confirm receipt.

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

Best,

Cassie Truong

LA Metro

Transportation Associate II
Transit Oriented Communities
213.418.3489

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

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

2 attachments

**210507_Cornfield Arroyo_Final.pdf**

171K

**DevReview-Handbook.pdf**

19946K

Clare Kelley <clare.kelley@lacity.org>

Mon, May 10, 2021 at 5:22 PM

To: "Truong, Cassie" <TruongC@metro.net>

Cc: Michael Sin <michael.sin@lacity.org>, Valerie Watson <valerie.watson@lacity.org>

Good afternoon,

Thank you for your email. We are in receipt of your comments on the Notice of Preparation (NOP) of the Draft EIR for the CASP Update.

Regards,

[Quoted text hidden]

--

Clare Kelley

5/10/2021

City of Los Angeles Mail - LA Metro: Cornfield Arroyo Specific Plan Area - NOP Comments



She, Her, Hers

City Planner

Los Angeles City Planning

200 N. Spring St., Room 667

Los Angeles, CA 90012

Planning4LA.org

T: (213) 978-1207





Clare Kelley <clare.kelley@lacity.org>

LADWP Comments on Cornfield Arroyo Seco Specific Plan NOP

2 messages

Laudeman, Kathryn <Kathryn.Laudeman@ladwp.com>

Fri, May 7, 2021 at 12:55 PM

To: "clare.kelley@lacity.org" <clare.kelley@lacity.org>

Cc: "Parker, Nadia" <Nadia.Parker@ladwp.com>

Hello Ms. Kelley,

Please see LADWP's comments on the Cornfield Arroyo Seco Specific Plan Notice of Preparation of a Draft Environmental Impact Report. Thank you for allowing us to review and comment.

If you have any questions, please let me know.

Thank you,

Kathryn Laudeman

Environmental Planning and Assessment

Los Angeles Department of Water and Power

111 N. Hope Street, Room 1044

Los Angeles, CA 90012

213-367-6376

kathryn.laudeman@ladwp.com

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2 attachments

 **Cornfield Arroyo Seco Specific Plan NOP.pdf**
684K

 **2021-04-08 CASP Update NOP_signed.pdf**
2075K

Clare Kelley <clare.kelley@lacity.org>

Mon, May 10, 2021 at 5:26 PM

5/10/2021

City of Los Angeles Mail - LADWP Comments on Cornfield Arroyo Seco Specific Plan NOP

To: "Laudeman, Kathryn" <Kathryn.Laudeman@ladwp.com>

Cc: "Parker, Nadia" <Nadia.Parker@ladwp.com>, Valerie Watson <valerie.watson@lacity.org>, Michael Sin <michael.sin@lacity.org>

Good afternoon,

Thank you for your email. We are in receipt of your comments on the Notice of Preparation (NOP) of the Draft EIR for the CASP Update.

Regards,

[Quoted text hidden]

--



Clare Kelley

She, Her, Hers

City Planner

Los Angeles City Planning

200 N. Spring St., Room 667

Los Angeles, CA 90012

Planning4LA.org

T: (213) 978-1207





Clare Kelley <clare.kelley@lacity.org>

Notification Request - CASP Update (CPC-2021-2642-SP; ENV-2021-2643-EIR)

2 messages

Yelena Zeltser <yelena@seaca-la.org>

Tue, Apr 13, 2021 at 11:45 AM

To: clare.kelley@lacity.org, michael.sin@lacity.org

Dear Ms. Kelley and Mr. Sin

I request that you please add me to the list of interested parties for the CASP Update (CPC-2021-2642-SP; ENV-2021-2643-EIR) project to ensure notification of all actions, approvals, determinations, notices, hearings, and any other matters related to the Project's land use approvals and compliance with the California Environmental Quality Act, Pub. Res. Code § 21000 et seq.

Please send notices electronically to yelena@seaca-la.org. If you have any questions regarding this request, please contact me at (310) 463-8714.

Thank you

--

Yelena Zeltser (she/her)
Southeast Asian Community Alliance
[840 N. Broadway, Suite 203E](http://840.N.Broadway,Suite.203E)
[Los Angeles, CA 90012](http://Los.Angeles,CA.90012)
(310) 463-8714
www.seaca-la.org

Clare Kelley <clare.kelley@lacity.org>

Tue, Apr 13, 2021 at 1:03 PM

To: Yelena Zeltser <yelena@seaca-la.org>

Cc: Michael Sin <michael.sin@lacity.org>

Dear Ms. Zeltser,

Thank you for your interest in the CASP Update, you will be added to the interested parties list.

Best,

[Quoted text hidden]

--

**Clare Kelley**

She, Her, Hers

City Planner

Los Angeles City Planning

200 N. Spring St., Room 667

Los Angeles, CA 90012

Planning4LA.org

T: (213) 978-1207





Clare Kelley <clare.kelley@lacity.org>

South Coast AQMD Staff NOP Comments for the Cornfield Arroyo Seco Specific Plan

2 messages

Lijin Sun <LSun@aqmd.gov>

Tue, May 4, 2021 at 9:31 AM

To: "clare.kelley@lacity.org" <clare.kelley@lacity.org>

Dear Ms. Kelley,

Attached are South Coast AQMD staff's comments on the Notice of Preparation of a Draft Environmental Impact Report for the Cornfield Arroyo Seco Specific Plan (South Coast AQMD Control Number: LAC210420-02). Please contact me if you have any questions regarding these comments.

Thank you,

Lijin Sun

Program Supervisor, CEQA IGR

South Coast Air Quality Management District

[21865 Copley Drive, Diamond Bar, CA 91765](#)

Direct: (909) 396-3308

Fax: (909) 396-3324

 **LAC210420-02 NOP Cornfield Arroyo Seco Specific Plan_20210504.pdf**
137K

Clare Kelley <clare.kelley@lacity.org>

Mon, May 10, 2021 at 5:29 PM

To: Lijin Sun <LSun@aqmd.gov>

Cc: Michael Sin <michael.sin@lacity.org>, Valerie Watson <valerie.watson@lacity.org>

Good afternoon,

Thank you for your email. We are in receipt of your comments on the Notice of Preparation (NOP) of the Draft EIR for the CASP Update.

Regards,

[Quoted text hidden]

--

Clare Kelley

5/10/2021

City of Los Angeles Mail - South Coast AQMD Staff NOP Comments for the Cornfield Arroyo Seco Specific Plan



She, Her, Hers

City Planner

Los Angeles City Planning

200 N. Spring St., Room 667

Los Angeles, CA 90012

Planning4LA.org

T: (213) 978-1207





Clare Kelley <clare.kelley@lacity.org>

CASP Scoping Notice of Preparation (NOP) & Scoping Review Public Comments for Groundwater and Hazardous Contaminations

2 messages

Tom Williams <ctwilliams2012@yahoo.com>

Sat, May 8, 2021 at 12:49 PM

To: "clare.kelley@lacity.org" <clare.kelley@lacity.org>, "michael.sin@lacity.org" <michael.sin@lacity.org>, "valerie.watson@lacity.org" <valerie.watson@lacity.org>

Cc: "gerald.gubatan@lacity.org" <gerald.gubatan@lacity.org>, Richard Larsen <rwlarsen.lhnc@gmail.com>, "mxl056@gmail.com" <mxl056@gmail.com>, "vhanley.hcnnc@gmail.com" <vhanley.hcnnc@gmail.com>

DATE: 05/08/2021**TO:** Los Angeles Department of City Planning
200 N. Spring Street, Room 667 Los Angeles, CA 90012**ATTN:** Clare Kelley City Planner, CASP Update PM clare.kelley@lacity.org 213-978-1207**CC:** Michael Sin City Plnr.Assoc. michael.sin@lacity.org 213-978-1345

Valerie Watson Snr City Planner valerie.watson@lacity.org

CD1 Snr Plan.Dir., Gerald Gubatan gerald.gubatan@lacity.org

Lincoln Heights Neigh.Cncl Richard Larsen PLU Comte

RWLarsen.LAPA@gmail.comHistoric-Cultural North NC Lau Mai Wah VP-NC mxl056@gmail.comValerie Hanley vhanley.hcnnc@gmail.com**FROM:** Dr. Tom Williams, 323-528-9682 ctwilliams2012@yahoo.com LA-32 NC
Director, President Citizens Coalition for A Safe Community**SUBJECT:** Cornfield Arroyo Seco Specific Plan Update EIR Scoping Meeting CPC-2021-2642-SP; ENV-2021-2643-EIR**RE:** Notice of Preparation (NOP) & Scoping Review Public Comments for Groundwater and Hazardous Contaminations

After review of the many pages, I find the NOP and "initial studies" to be incomplete and inadequate for scoping of the proposed "update" of the Cornfields Arroyo Seco Specific Plan (CASP).

The CASP was adopted in 2013 but the problems were known and arose immediately:
Century-plus of industrial direct and groundwater expanded contamination;
Large parcel sizes and corporate ownerships without resources to profit from housing conversions;
Prop-13 ownerships (LLP/LLCs) of parcels and need for owners to participate in partnerships;
Historic housing protections and considerations; and
Lack of and expense for housing infrastructure – drains, sewers, cabling/transformers.

Following review of scoping documents and other materials, the DEIR must include a CASP Groundwater Model for entire Specific Plan area to locate and provide plan-wide groundwater flows, depths, and thicknesses. Such environmental description must be provided to assess environmental impacts of such upon existing and future impacts subjecting land uses and residents

to upward spreading contamination and degassing from oil rich geology and historic/current industrial contamination west of Avenue 18/Daly (I-5).

Based on the description and assessment of contaminations, impacts can be mitigated and compensated for by the City and major developments.

Proposed structural development over the contaminated soils/alluvium may contain the contamination and promoting downstream movement of contaminated liquids and gases.

Mitigation/compensation by the City should include borings and well fields along Main, Spring, and Bolera and any public facilities along the CASP southerly boundaries. Some evidence of contamination was encountered during construction of Red Line Phase 1 south of Chavez Av.

Historic aerial photos of 1923, -27, -28, -31, and -38 may provide evidence of historic contamination by RR and tankage and focus additional borings and investigations to locate and evaluate levels of industrial and railroad contaminations. Such information must become the basis for describing contamination, evaluations of such, and mitigation measures for decontamination and exposures of residents to toxic gases out gassing into overlying new land uses.

Assessments and mitigation of significant toxic gases/liquids must include any increase in downward recharging of storm waters and leaching of contaminations through 20ft of soil/alluvium/vadose into the underlying groundwater and then compressing of the vadose zone and entrapped toxic gases above a rising groundwater table, augmented by increased stormwater recharge.

Eastside of river and I-5, the CASP has thinner alluvium/soils and thereby contamination maybe more local and static with thinner alluvium with easier/cheaper studies to find and remove. Mitigation measures for west of I-5 must be far larger and expensive than those east of I-5. Any mitigation studies and measures must reflect initial geological/soil studies. The EIR must describe and assess the effects of the LA Oil Field, including a Methane Zone related to the field. EIR must include a CalGEM map of the underground oil field and all leases include therein. This must be further directly related to the oil/gas producing zones and the geological structure of the Upper Elysian Park Fault across the easterly end of the oil field. Soil/alluvial borings and gas sampling must be included as methane/sulphide/toxic gas mitigation to locate, remove, and treat for methane and other gases. Such mitigation must be incorporated into parcel development regarding surface recharging/barriers and gas collection-treatment-release.

The EIR must include a complete groundwater setting and river along with surface recharge, passage southward of the Bolera Lane and westward extension of "Alhambra Ave." (=railroad). Overall application of Low Impact Development requirements must consider and mitigate any recharge reductions and/or increases across the entire CASP and releases.

The LA River lined channel was rendered generally impervious by concreting, but constructed channel designs incorporated in channel "weep-holes" (>15 from upstream concrete margin south to Chavez/US-101) which establishes a local base groundwater level of >20ft below the surface (west of Channel).

Clare Kelley <clare.kelley@lacity.org>

To: Tom Williams <ctwilliams2012@yahoo.com>

Cc: "michael.sin@lacity.org" <michael.sin@lacity.org>, "valerie.watson@lacity.org" <valerie.watson@lacity.org>

Mon, May 10, 2021 at 5:18 PM

Dr. Williams,

Thank you for your email. We are in receipt of your comments on the Notice of Preparation (NOP) of the Draft EIR for the CASP Update.

Regards,

[Quoted text hidden]

--



LOS ANGELES
CITY PLANNING

Clare Kelley

She, Her, Hers

City Planner

Los Angeles City Planning

200 N. Spring St., Room 667

Los Angeles, CA 90012

Planning4LA.org

T: (213) 978-1207



May 8, 2021

City of Los Angeles, Department of City Planning
ATTN: Clare Kelley, City Planner
Case Numbers: CPC-202102642-SP; ENV-2021-2643-EIR
200 North Spring Street, Room 667
Los Angeles, CA 90012

Dear Ms. Kelley:

Subject: Comment Letter Regarding the Cornfield Arroyo Seco Specific Plan

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide comments on the Notice of Preparation (NOP) for the Draft Environmental Impact Report (Draft EIR) for the Cornfield Arroyo Seco Specific Plan (Project). The mission of LADWP is to provide clean, reliable water and power to the City of Los Angeles. In reviewing the Draft EIR, the LADWP has determined that the Project may have impacts to Water and Power Systems' infrastructure or facilities and respectfully submits the comments below:

POWER SYSTEM COMMENTS

- 1) Planning referenced herein shall pertain to its employees, agents, consultants, contractors, officers, patrons or invitees of the Planning, or by any other of the Planning's affiliated entities.
- 2) The information provided, to date, is inadequate for properly reviewing the proposed improvements within sections of LADWP's FACILITIES. We therefore reserve the right to comment until more detailed information is provided regarding the proposed project. Provide plans illustrating the LADWP FACILITIES boundaries within the proposed project. Include towers and clearances from the proposed transmission line. Also, provide grading plan and utility plans, including any other plans illustrating the impacts to LADWP's FACILITIES. If access roads are proposed, provide plans illustrating impacts to LADWP's access roads. The plans should include APNs, state plane coordinates, or use the Public Land Survey System to locate the developments impacting LADWP's FACILITIES.

Conditions:

1. Planning shall acknowledge the LADWP Transmission Line Rights-of-Way are integral components of the transmission line system, which provides electric power to the City of Los Angeles and other local communities. Their use is under the jurisdiction of the Federal North American Electric Reliability Corporation (NERC), an organization of the Federal Energy Regulatory Commission (FERC). Safety and protection of critical facilities are the primary factors used to evaluate secondary land use proposals.

The rights-of-way serve as platforms for access, construction, maintenance, facility expansion and emergency operations. Therefore, the proposed use may, from time to time, be subject to temporary disruption caused by such operations.

2. No excavations are allowed within 50 feet around the base of tower footings.
3. No improvements or construction activities of any kind whatsoever will be allowed within the LADWP FACILITIES without the prior written approval of the LADWP.
4. No equipment taller than 14-feet shall be used under the LADWP FACILITIES. It is the Planning's responsibility to comply with all applicable standards and safety regulations while working near or under high voltage overhead transmission lines.
5. No grading or structures shall be constructed within the LADWP FACILITIES without prior written approval of the LADWP.
6. Provide the location and elevations (heights) of all above and below ground structures, including the cross sections of existing and proposed project improvements within and adjacent to the LADWP FACILITIES. All ground elevations are to remain unchanged from existing conditions after construction associated with the City proposed project is completed. Cut and fill slopes inside the LADWP FACILITIES steeper than two horizontal to one vertical require retaining structures or geotechnical report approval.

Note: Grading activity resulting in a vertical clearance between the ground and the transmission line conductor elevation less than thirty-five (35) feet or as noted in the State of California, PUC, General Order 95 within the LADWP FACILITIES is unacceptable.

7. Ground cover for all below ground utilities shall not be less than four (4) feet.
8. No grading is allowed below the top of tower footings within the LADWP FACILITIES, located in the immediate vicinity of the towers.
9. All aboveground metal structures including, but not limited to, pipes, drainage devices, fences, and bridge structures located within or adjoining the right of way shall be properly grounded, and shall be insulated from any fencing or other conductive materials located outside of the right of way. For safety of personnel and equipment, all equipment and structures shall be grounded in accordance with the National Electric Code, Article 250.
10. The right of way contains high-voltage electrical conductors; therefore, Planning shall utilize only such equipment, material, and construction techniques that are permitted under applicable safety ordinances and statutes, including the following: State of California Code of Regulations, Title 8, Industrial Relations, Chapter 4, Division of Industrial Safety, Subchapter 5, Electrical Safety Orders, California Public Utilities Commission, General Order No. 95, Rules for Overhead Electric Line Construction.
11. An area at least 100 feet around the base of each tower must remain open and unobstructed for necessary maintenance, including periodic washing of insulators by high pressure water spray.

12. Additional conditions may be required following review of detailed site plans, grading/drainage plans, etc.
13. If any excavations are required, utility agencies within the proposed excavation sites shall be notified of impending work. Planning shall be responsible for coordinating relocation of utilities, if any, within the project boundaries. Before commencing any excavations, Underground Service Alert (a.k.a. DigAlert) shall be notified.
14. This reply shall in no way be construed as an approval of any project.

WATER SYSTEM COMMENTS

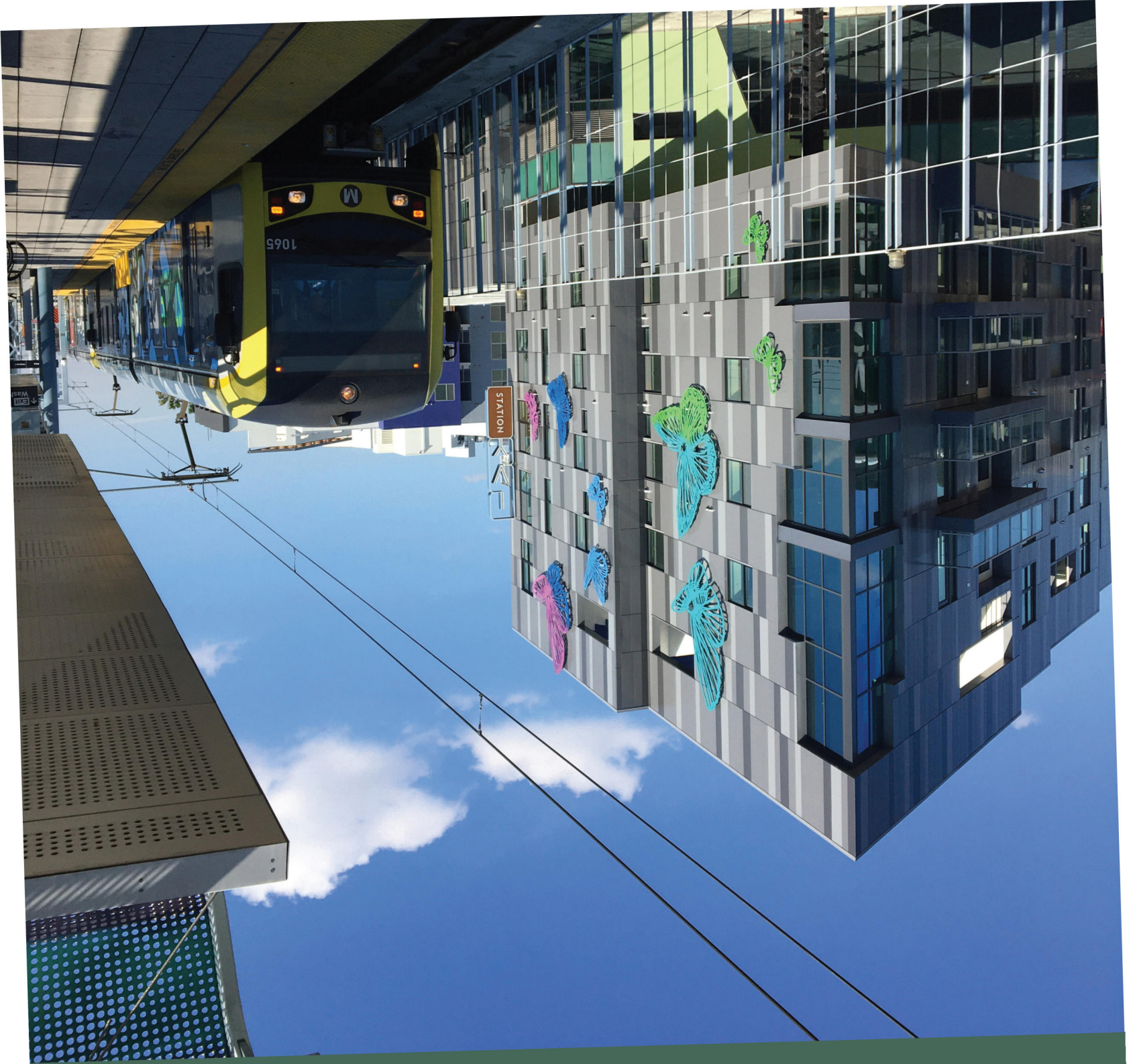
- 1) The Cornfield Arroyo Seco Specific Plan Water Supply Assessment (WSA) was approved by the Board of Water and Power Commissioners on April 6, 2010 (Resolution 010 260). Per the NOP's project description, a new WSA shall be required if any of the following changes occurs under California Water Code section 10910(h):
 1. Changes in the project that result in a substantial increase in water demand for the project.
 2. Changes in the circumstances or conditions substantially affecting the ability of the public water system, or the city or county if either is required to comply with this part pursuant to subdivision (b), to provide a sufficient supply of water for the project.
 3. Significant new information becomes available that was not known and could not have been known at the time when the assessment was prepared.
- 2) Water System maintains and operates the water distribution system in the area. Developments in the area that affect the water distribution system must be reviewed and approved by LADWP. Developer is responsible for any costs associated with relocations or modifications to the system.

For any questions regarding the above comments, please contact Ms. Kathryn Laudeman of my staff at (213) 367-6376 or at kathryn.laudeman@ladwp.com.

Sincerely,

Charles C. Holloway
Manager of Environmental Planning and Assessment

KL:rs
Enclosure
c/enc.: Ms. Kathryn Laudeman



February 2021

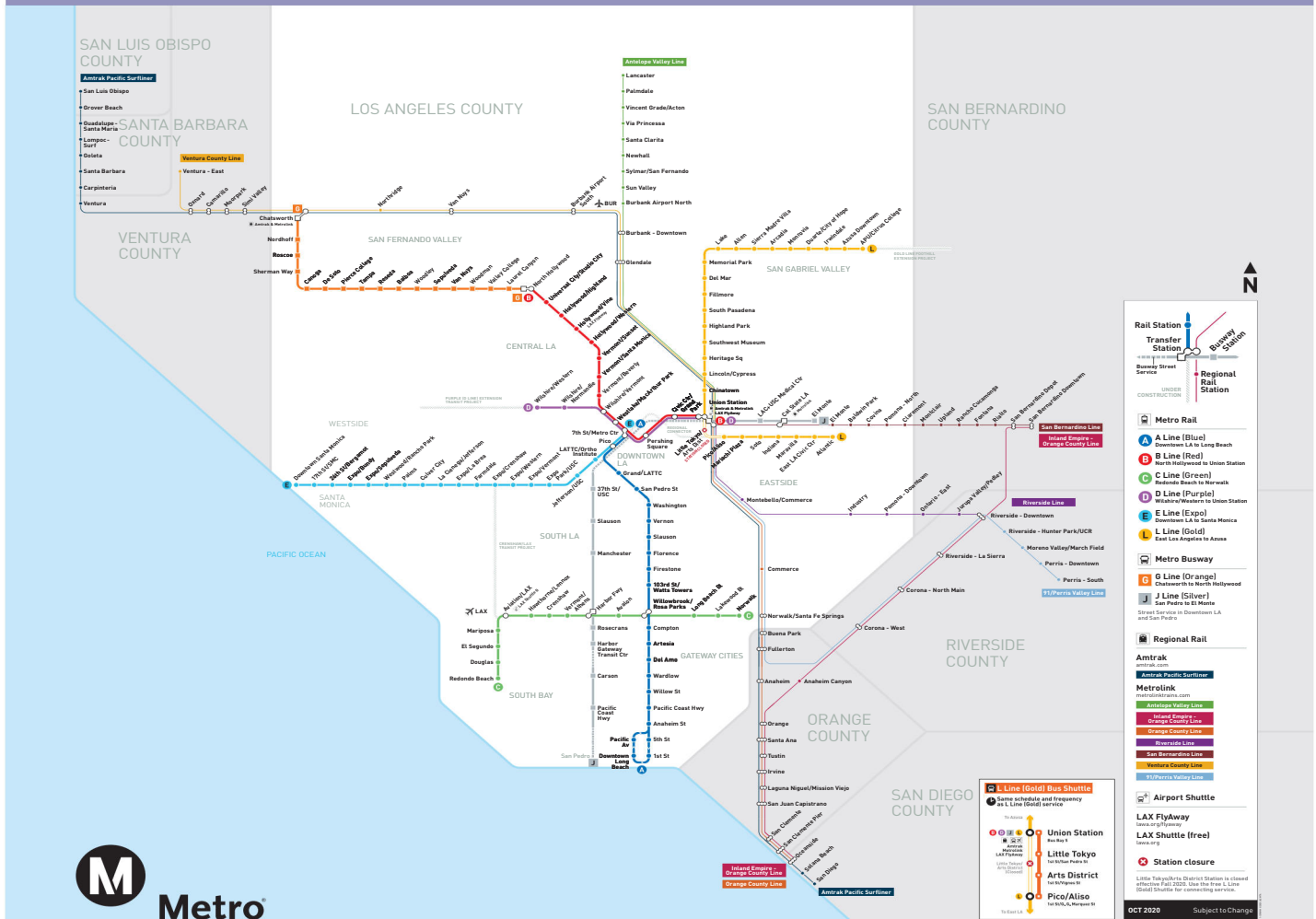
**METRO ADJACENT
DEVELOPMENT HANDBOOK**
A GUIDE FOR CITIES AND DEVELOPERS

Los Angeles County
Metropolitan Transportation Authority

Metro and Regional Rail Map

Metro & Regional Rail

metro.net
pacificsurfliner.com
metrolinktrains.com



Metro is currently undertaking the largest rail infrastructure expansion effort in the United States. A growing transit network presents new opportunities to catalyze land use investment and shape livable communities.

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Purpose of Handbook

The Metro Adjacent Development Handbook (Handbook) is intended to provide information and guide coordination for projects adjacent to, below, or above Metro transit facilities (e.g. right-of-way, stations, bus stops) and services.

Overarching Goal

By providing information and encouraging early coordination, Metro seeks to reduce potential conflicts with transit services and facilities, and identify potential synergies to expand mobility and improve access to transit.

Intended Audience

The Handbook is a resource for multiple stakeholder groups engaged in the development process, including:

- Local jurisdictions who review, entitle, and permit development projects,
- Developers,
- Property owners,
- Architects, engineers, and other technical consultants,
- Builders/contractors,
- Utility companies, and
- other Third Parties.

Handbook Content

The Handbook includes:

- **Introduction** of Metro's Development Review coordination process, common concerns, and typical stages of review.
- **Information** on best practices during three key coordination phases to avoid potential conflicts or create compatibility with the Metro transit system:
 - Planning & Conceptual Design,
 - Engineering & Technical Review, and
 - Construction Safety & Monitoring.
- **Glossary** with definitions for key terms used throughout the Handbook.

RULE OF THUMB: 100 FEET

Metro's Development Review process applies to projects that are within 100 feet of Metro transit facilities.

While the Handbook summarizes key concerns and best practices for adjacency conditions, it does not replace Metro's technical requirements and standards.

Prior to receiving approval for any construction activities adjacent to, above, or below Metro facilities, Third Parties must comply with the Metro Adjacent Construction Design Manual, available on Metro's website.

Contact Us

For questions, contact the Development Review Team:

- Email: devreview@metro.net
- Phone: 213.418.3484
- Online In-take Form: <https://jpublic.metro.net/in-take-form>

Additional Information & Resources

- Metro Development & Construction Coordination website: <https://www.metro.net/devreview>
- Metro GIS/KML ROW Files: <https://developer.metro.net/portfolio-item/metro-right-of-way-gis-data>
- Metrolink Standards and Procedures: <https://www.metrolinktrains.com/about/agency/engineering--construction>

Metro will continue to revise the Handbook, as needed, to reflect updates to best practices in safety, operations, and transit-supportive development.

Who is Metro?

The Los Angeles County Metropolitan Transportation Authority (Metro) plans, funds, builds, and operates rail, bus, and other mobility services (e.g. bikeshare, microtransit) throughout Los Angeles County (LA County). On average, Metro moves 1.3 million people each day on buses and trains. With funding from the passage of Measure R (2008) and Measure M (2016), the Metro system is expanding. Over the next 40 years, Metro will build over 60 new stations and over 100 miles of transit right-of-way (ROW). New and expanded transit lines will improve mobility across LA County, connecting riders to more destinations and expanding opportunities for development that supports transit ridership. Metro facilities include:



Metro Rail: Metro operates heavy rail (HRT) and light rail (LRT) transit lines in underground tunnels, along streets, off-street in dedicated ROW, and above street level on elevated structures. Heavy rail trains are powered by a “third rail” along the tracks. Light rail vehicles are powered by overhead catenary systems (OCS). To support rail operations, Metro owns and maintains traction power substations (TPSS), maintenance yards, and other infrastructure.



Metrolink/Regional Rail: Metro owns a majority of the ROW within LA County on which the Southern California Regional Rail Authority (SCRRA) operates Metrolink service. Metrolink is a commuter rail system with seven lines that span 388 miles across five counties, including: Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego. As a SCRRA member agency and property owner, Metro reviews development activity adjacent to Metro-owned ROW on which Metrolink operates, and coordinates with Metrolink on any comments or concerns. Metrolink has its own set of standards and processes, see link on page 1.



Metro Bus Rapid Transit (BRT): Metro operates accelerated bus transit, which acts as a hybrid between rail and traditional bus service. Metro BRT may operate in a dedicated travel lane within a street or freeway, or off-street along dedicated ROW. Metro BRT stations may be located on sidewalks within the public right-of-way, along a median in the center of streets, or off-street on Metro-owned property.



Metro Bus: Metro operates 170 bus lines across more than 1,400 square miles in LA County. The fleet serves over 15,000 bus stops with approximately 2,000 buses. Metro operates “Local” and “Rapid” bus service within the street, typically alongside vehicular traffic, though occasionally in “bus-only” lanes. Metro bus stops are typically located on sidewalks within the public right-of-way, which is owned and maintained by local jurisdictions. Metro’s [NextGen Bus Plan](#) re-visions bus service across LA County to make service improvements that better serve riders.

Why is Metro interested in adjacent development?

Metro Supports Transit Oriented Communities: Metro is redefining the role of the transit agency by expanding mobility options, promoting sustainable urban design, and helping transform communities throughout LA County. Metro seeks to partner with local, state, and federal jurisdictions, developers, property owners and other stakeholders across LA County on transit-supportive planning and developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Adjacent Development Leads to Transit Oriented Communities: Metro supports private development adjacent to transit as this presents a mutually beneficial opportunity to enrich the built environment and expand mobility options. By connecting communities, destinations, and amenities through improved access to public transit, adjacent developments have the potential to:

- reduce auto dependency,
- reduce greenhouse gas emissions,
- promote walkable and bikeable communities that accommodate more healthy and active lifestyles,
- improve access to jobs and economic opportunities, and
- create more opportunities for mobility – highly desirable features in an increasingly urbanized environment.

Opportunity: Acknowledging an unprecedented opportunity to influence how the built environment develops along and around transit and its facilities, Metro has created this document. The Handbook helps ensure compatibility between private development and Metro's transit infrastructure to minimize operational, safety, and maintenance issues. It serves as a crucial first step to encourage early and active collaboration with local stakeholders and identify potential partnerships that leverage Metro initiatives and support TOCs across LA County.



Metro Purview for Review & Coordination

Metro is interested in reviewing development, construction, and utility projects within 100 feet of Metro transit facilities, real estate assets, and ROW – as measured from the edge of the ROW outward – both to ensure the structural safety of existing or planned transit infrastructure and to maximize integration opportunities with adjacent development. The Handbook seeks to:

- Improve communication and coordination between developers, jurisdictions, and Metro.
- Identify common concerns associated with developments adjacent to Metro ROW.
- Highlight Metro operational needs and requirements to ensure safe, continuous service.
- Prevent potential impacts to Metro transit service or infrastructure.
- Maintain access to Metro facilities for riders and operational staff.
- Avoid preventable conflicts resulting in increased development costs, construction delays, and safety impacts.
- Streamline the review process to be transparent, clear, and efficient.
- Assist in the creation of overall marketable and desirable developments.

Key Audiences for Handbook

The Handbook is intended to be used by:

- Local jurisdictions who review, entitle, and permit development projects and/or develop policies related to land use, development standards, and mobility,
- Developers, property owners,
- Architects, engineers, design consultants,
- Builders/contractors,
- Entitlement consultants,
- Environmental consultants,
- Utility companies, and
- other Third Parties.

Metro Assets & Common Concerns for Adjacent Development

The table on the facing page outlines common concerns for development projects and/or construction activities adjacent to Metro transit facilities and assets. These concerns are discussed in greater detail in the following chapters of the Handbook.

METRO ASSETS

COMMON ADJACENCY CONCERNS



UNDERGROUND ROW

Transit operates below ground in tunnels.

- Excavation near tunnels and infrastructure
- Clearance from support structures (e.g. tiebacks, shoring, etc)
- Coordination with utilities
- Clearance from ventilation shafts, surface penetrations (e.g. emergency exits)
- Surcharge loading of adjacent construction
- Explosions
- Noise and vibration/ground movement
- Storm water drainage



AERIAL ROW

Transit operates on elevated guideway, typically supported by columns.

- Excavation near columns and support structures
- Column foundations
- Clearance from OCS
- Overhead protection and crane swings
- Setbacks from property line for maintenance activities to occur without entering ROW
- Coordination with utilities
- Noise reduction (e.g. double-paned windows)



AT-GRADE ROW

Transit operates in dedicated ROW at street level; in some cases tracks are separated from adjacent property by fence or wall.

- Pedestrian and bicycle movements and safety
- Operator site distance/cone of visibility
- Clearance from OCS
- Crane swings and overhead protection
- Trackbed stability
- Storm water drainage
- Noise/vibration
- Driveways near rail crossings
- Setbacks from property line for maintenance activities to occur without entering ROW
- Utility coordination



BUS STOPS

Metro operates bus service on city streets. Bus stops are located on public sidewalks.

- Lane closures and re-routing service during construction
- Temporary relocation of bus stops
- Impacts to access to bus stops



NON-REVENUE/OPERATIONAL

Metro owns and maintains property to support operations (e.g. bus and rail maintenance facilities, transit plazas, traction power substations, park-and-ride parking lots).

- Excavation and clearance from support structures (e.g. tiebacks, shoring, etc)
- Ground movement
- Drainage
- Utility coordination
- Access to property

Typical Stages of Metro Review and Coordination

Early coordination helps avoid conflicts between construction activities and transit operations and maximizes opportunities to identify synergies between the development project and Metro transit services that are mutually beneficial.



*Phases above may include fees for permits and reimbursement of Metro staff time for review and coordination.

Coordination Goal: Metro encourages developers to consult with the Development Review Team early in the design process to ensure compatibility with transit infrastructure and minimize operational, safety, and maintenance issues with adjacent development. The Development Review team will serve as a case manager to developers and other Third Parties to facilitate the review of plans and construction documents across key Metro departments.

Level of Review: Not all adjacent projects will require significant review and coordination with Metro. The level of review depends on the Project's proximity to Metro, adjacency conditions, and the potential to impact Metro facilities and/or services. For example, development projects that are excavating near Metro ROW or using cranes near transit facilities require a greater level of review and coordination. Where technical review and construction monitoring is needed, Metro charges fees for staff time, as indicated by asterisk in the above diagram.

Permit Clearance: Within the City of Los Angeles, Metro reviews and clears Building & Safety permits for projects within 100 feet of Metro ROW, pursuant to [Zoning Information 1117](#). To ensure timely clearance of these permits, Metro encourages early coordination as noted above.

To begin consultation, submit project information via an online [In-Take Form](#), found on Metro's website. Metro staff will review project information and drawings to screen the project for any potential impacts to transit facilities or services, and determine if require further review and coordination is required. The sample sections on the facing page illustrate adjacency condition information that helps Metro complete project screening.

Contact:

Metro Development Review Team

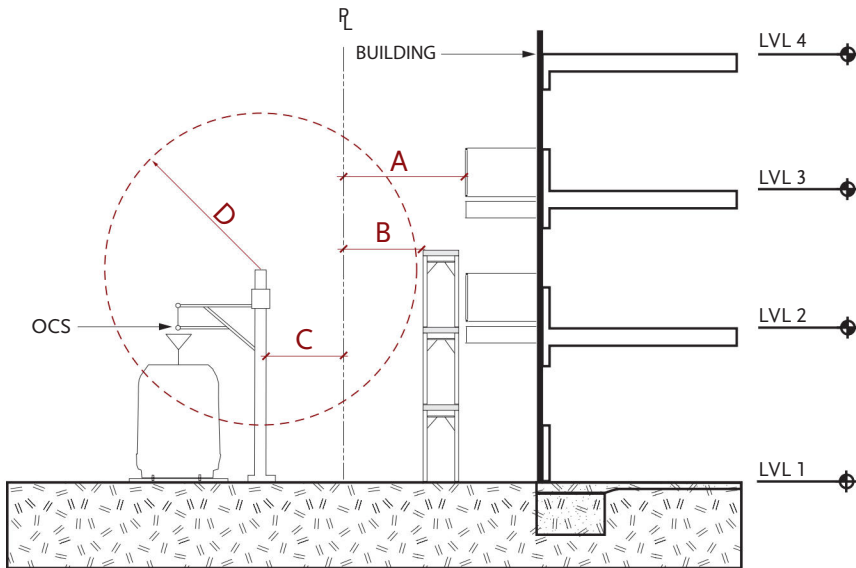
Website: <https://www.metro.net/devreview>

Online In-take Form: <https://jpublic.metro.net/in-take-form>

Email: devreview@metro.net

Phone: 213.418.3484

Sample Section: Adjacency Conditions



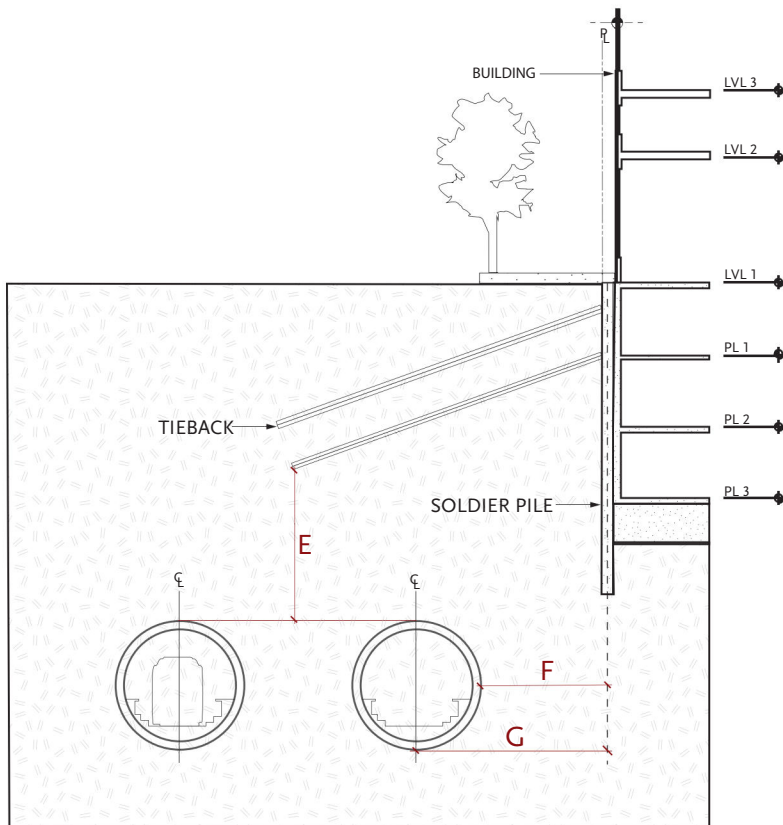
AT-GRADE CONDITION

A. Distance from property line to nearest permanent structure (e.g. building facade, balconies, terraces). Refer to Section 1.3 Building Setback of Handbook.

B. Distance from property line to nearest temporary construction structures (e.g. scaffolding).

C. Distance from property line to nearest Metro facility.

D. Clearance from nearest temporary and/or permanent structure to overhead catenary system (OCS). Refer to Section 1.4, OCS Clearance of Handbook.



BELOW-GRADE CONDITION

E. Vertical distance from top of Metro tunnel to closest temporary and/or permanent structure (e.g. tiebacks, foundation). Refer to Section 2.2, Proximity to Tunnels & Underground Infrastructure of Handbook.

F. Horizontal distance from exterior tunnel wall to nearest structure.

G. Horizontal distance from Metro track centerline to nearest structure.

Best Practices for Developer Coordination

Metro encourages developers of projects adjacent to Metro ROW and/or Real Estate Assets to take the following steps to facilitate Metro project review and approval:

1. **Review Metro resources and policies:** The Metro Development & Construction Coordination website and Handbook provide important information for those interested in constructing on, adjacent, over, or under Metro ROW, non-revenue property, or transit facilities. Developers and other Third Parties should familiarize themselves with these resources and keep in mind common adjacency concerns when planning a project.
2. **Contact Metro early during design process:** Metro welcomes the opportunity to provide feedback early in project design, allowing for detection and resolution of important adjacency issues, identification of urban design and system integration opportunities, and facilitation of permit approval. Metro encourages project submittal through the online [In-Take Form](#) to begin consultation.
3. **Maintain communication:** Frequent communication with Metro during project design and construction will reinforce relationships and allow for timely project completion. Contact us at devreview@metro.net or at 213.418.3484.

Best Practices for Local Jurisdiction Notification

To improve communication between Metro and the development community, Metro suggests that local jurisdictions take the following steps to notify property owners of coordination needs for properties adjacent to Metro ROW by:

- **Updating GIS and parcel data:** Integrate Metro ROW files into the City/County GIS and/or Google Earth Files for key departments (e.g. Planning, Public Works, Building & Safety) to notify staff of Metro adjacency and need for coordination during development approval process. Download Metro's ROW files [here](#).
- **Flag Parcels:** Create an overlay zone as part of local Specific Plan(s) and/or Zoning Ordinance(s) to tag parcels that are within 100 feet Metro ROW and require coordination with Metro early during the development process [e.g. City of Los Angeles Zone Information and Map Access System (ZI-1117)].
- **Provide Resources:** Direct all property owners and developers interested in parcels within 100 feet of Metro ROW to Metro's resources (e.g. website, Handbook).



M

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santamonica.com



Site Plan & Conceptual Design

Site Plan & Conceptual Design

1.1 Supporting Transit Oriented Communities

Transit-oriented communities (TOCs) are places that, by their design, make it more convenient to take transit, walk, bike or roll than to drive. By working closely with the development community and local jurisdictions, Metro seeks to ensure safe construction near Metro facilities and improve compatibility with adjacent development to increase transit ridership.

RECOMMENDATION: Consider site planning and building design strategies to that support transit ridership, such as:

- Leveraging planning policies and development incentives to design a more compelling project that capitalizes on transit adjacency and economy of scales.
- Programming a mix of uses to create lively, vibrant places that are active day and night.
- Utilizing Metro policies and programs that support a healthy, sustainable, and welcoming environment around transit service and facilities.
- Prioritizing pedestrian-scaled elements to create spaces that are comfortable, safe, and enjoyable.
- Activating ground floor with retail and outdoor seating/activities to bring life to the public environment.
- Reducing and screening parking to focus on pedestrian activity.
- Incorporating environmental design elements that help reduce crime (e.g. windows and doors that face public spaces, lighting).



The Wilshire/Vermont Metro Joint Development project leveraged existing transit infrastructure to catalyze a dynamic and accessible urban environment. This project accommodates portal access into the Metro Rail system and on-street bus facilities.

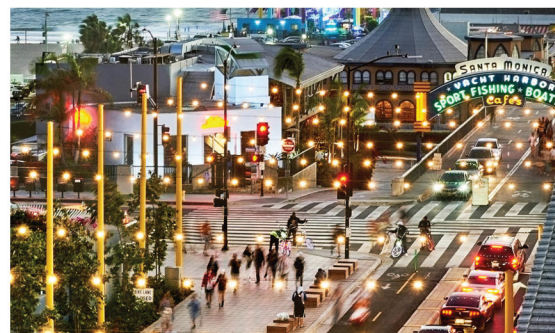


1.2 Enhancing Access to Transit

Metro seeks to create a comprehensive, integrated transportation network and supports infrastructure and design that allows safe and convenient access to its multi-modal services. Projects in close proximity to Metro's services and facilities present an opportunity to enhance the public realm and connections to/from these services for transit riders as well as users of the developments.

RECOMMENDATION: Design projects with transit access in mind. Project teams should capitalize on the opportunity to improve the built environment and enhance the public realm for pedestrians, bicyclists, persons with disabilities, seniors, children, and users of green modes. Metro recommends that projects:

- Orient major entrances to transit service, making access and travel safe, intuitive, and convenient.
- Plan for a continuous canopy of shade trees along all public right-of-way frontages to improve pedestrian comfort to transit facilities.
- Add pedestrian lighting along paths to transit facilities and nearby destinations.
- Integrate wayfinding and signage into project design.
- Enhance nearby crosswalks and ramps.
- Ensure new walkways and sidewalks are clear of any obstructions, including utilities, traffic control devices, trees, and furniture.
- Design for seamless, multi-modal pedestrian connections, making access easy, direct, and comfortable.



The City of Santa Monica leveraged investments in rail transit and reconfigured Colorado Avenue to form a multi-modal first/last mile gateway to the waterfront from the Downtown Santa Monica Station. Photo by PWP Landscape Architecture

1.3 Building Setback

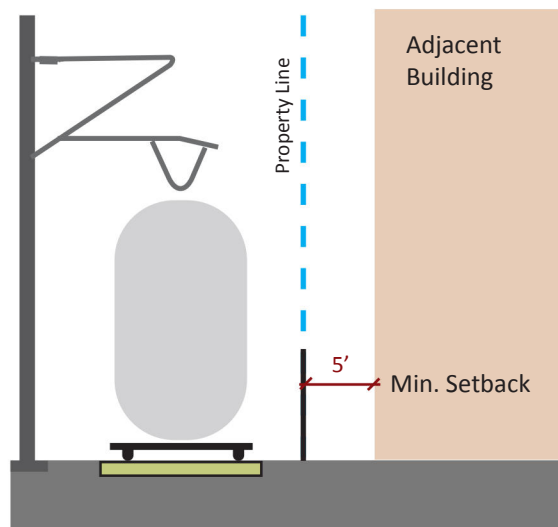
Buildings and structures with a zero lot setback that closely abut Metro ROW can pose concerns to Metro during construction. Encroachment onto Metro property to construct or maintain buildings is strongly discouraged as this presents safety hazards and may disrupt transit service and/or damage Metro infrastructure.

RECOMMENDATION: Include a minimum setback of five (5) feet from the property line to building facade to accommodate the construction and maintenance of structures without the need to encroach upon Metro property. As local jurisdictions also have building setback requirements, new developments should comply with the greater of the two requirements.

Entry into the ROW by parties other than Metro and its affiliated partners requires written approval. Should construction or maintenance of a development necessitate temporary or ongoing access to Metro ROW, a Metro Right of Entry Permit must be requested and obtained from Metro Real Estate for every instance access is required. Permission to enter the ROW is granted solely at Metro's discretion.

Coordination between property owners of fences, walls, and other barriers along property line is recommended. See Section 1.5.

Refer to Section 3.2 – Track Access and Safety for additional information pertaining to ROW access in preparation for construction activities.



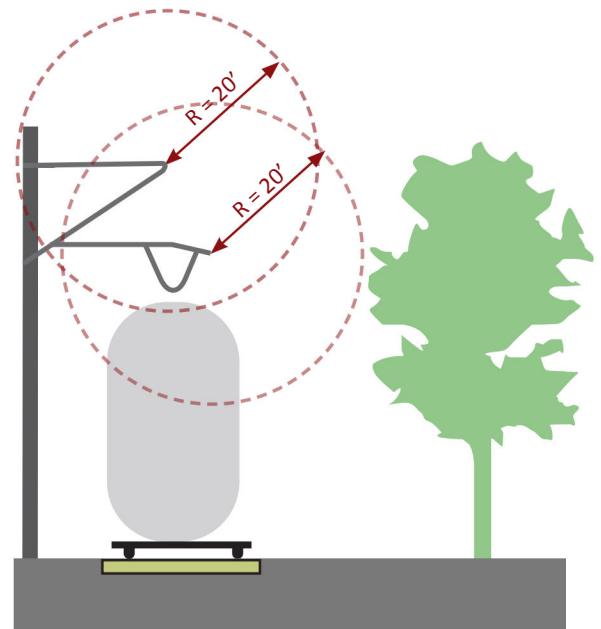
A minimum setback of five (5) feet between an adjacent structure and Metro ROW is strongly encouraged to allow project construction and ongoing maintenance without encroaching on Metro property.

1.4 Overhead Catenary System (OCS) Clearance

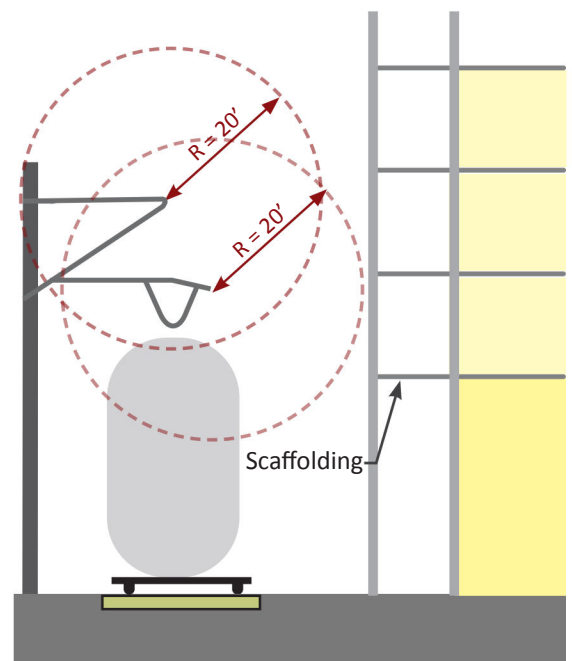
Landscaping and tree canopies can grow into the OCS above light rail lines, creating electrical safety hazards as well as visual and physical impediments for trains. Building appurtenances facing rail ROW, such as balconies, may also pose safety concerns to Metro operations as objects could fall onto the OCS.

RECOMMENDATION: Design project elements facing the ROW to avoid potential conflicts with Metro transit vehicles and infrastructure. Metro recommends that projects:

- Plan for landscape maintenance from private property and prevent growth into Metro ROW. Property owners will not be permitted to access Metro property to maintain private development.
- Design buildings such that balconies do not provide building users direct access to Metro ROW.
- Maintain building appurtenances and landscaping at a minimum distance of ten (10) feet from the OCS and support structures. If Transmission Power (TP) feeder cable is present, twenty (20) feet from the OCS and support structures is required. Different standards will apply for Metro Trolley Wires, Feeder Cables (wires) and Span Wires.



Adjacent structures and landscaping should be sited and maintained to avoid conflicts with the rail OCS.



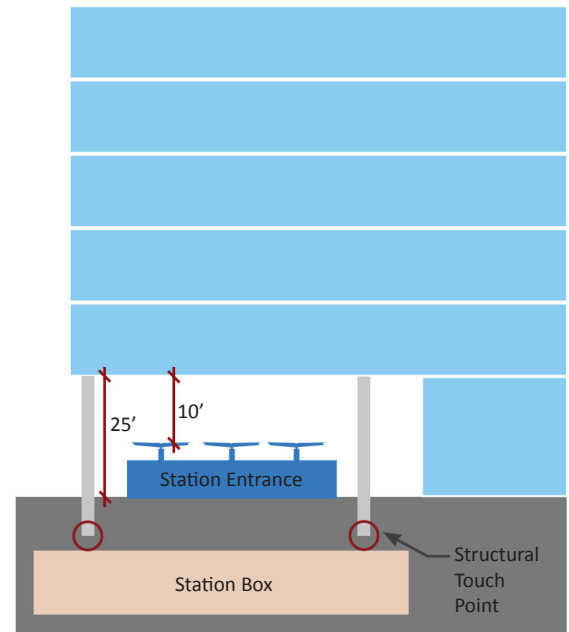
Scaffolding and construction equipment should be staged to avoid conflicts with the rail OCS.

1.5 Underground Station Portal Clearance

Metro encourages transit-oriented development. Where development is planned above station entrances, close coordination is needed for structural safety as well as access for patrons, operations, and maintenance. Below are key design rules of thumb for development planned to cantilever over an entrance to an underground Metro Rail station.

RECOMMENDATION:

1. Preserve 25 feet clearance at minimum from plaza grade and the building structure above.
2. Preserve 10 feet clearance at minimum between portal roof and building structure above.
3. Coordinate structural support system and touchdown points to ensure a safe transfer of the building loads above the station portal.
4. Coordinate placement of structural columns and amenities (e.g. signage, lighting, furnishings) at plaza level to facilitate direct and safe connections for people of all mobile abilities to and from station entrance(s).
5. Develop a maintenance plan for the plaza in coordination with Metro.



Projects that propose to cantilever over Metro subway portals require close coordination with Metro Engineering.

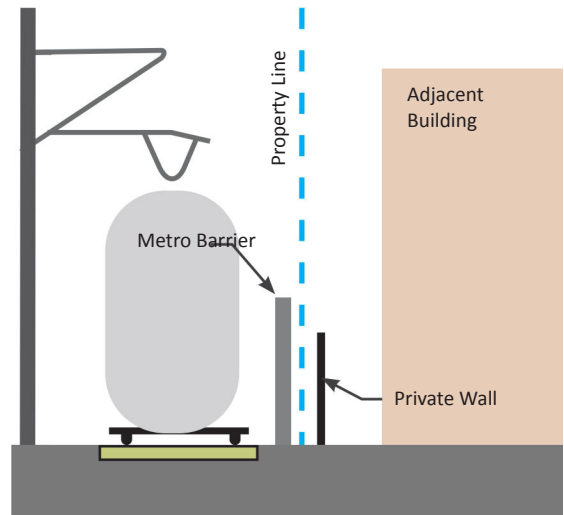
1.6 Shared Barrier Construction & Maintenance

In areas where Metro ROW abuts private property, barrier construction and maintenance responsibilities can be a point of contention with property owners. When double barriers are constructed, the gap created between the Metro-constructed fence and a private property owner's fence can accumulate trash and make regular maintenance challenging without accessing the other party's property.

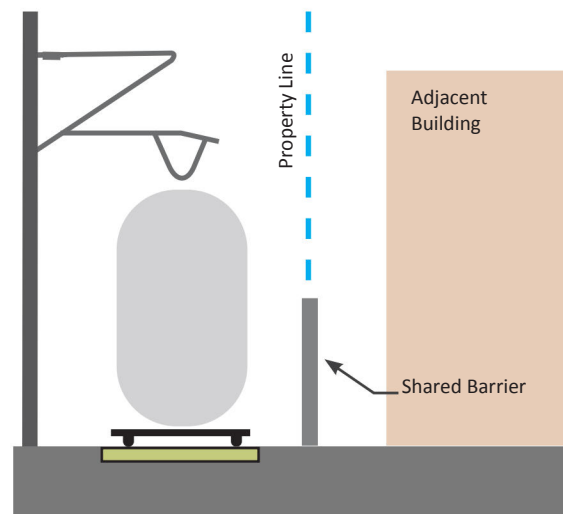
RECOMMENDATION: Coordinate with Metro Real Estate to create a single barrier condition along the ROW property line. With an understanding that existing conditions along ROW boundaries vary throughout LA County, Metro recommends the following, in order of preference:

- **Enhance existing Metro barrier:** if structural capacity allows, private property owners and developers should consider physically affixing improvements onto and building upon Metro's existing barrier. Metro is amenable to barrier enhancements such as increasing barrier height and allowing private property owners to apply architectural finishes to their side of Metro's barrier.
- **Replace existing barrier(s):** if conditions are not desirable, remove and replace any existing barrier(s), including Metro's, with a new single "shared" barrier built on the property line.

Metro is amenable to sharing costs for certain improvements that allow for clarity in responsibilities and adequate ongoing maintenance from adjacent property owners without entering Metro's property. Metro Real Estate should be contacted with case-specific questions and will need to approve shared barrier design, shared financing, and construction.



Double barrier conditions allow trash accumulation and create maintenance challenges for Metro and adjacent property owners.



Metro prefers a single barrier condition along its ROW property line.

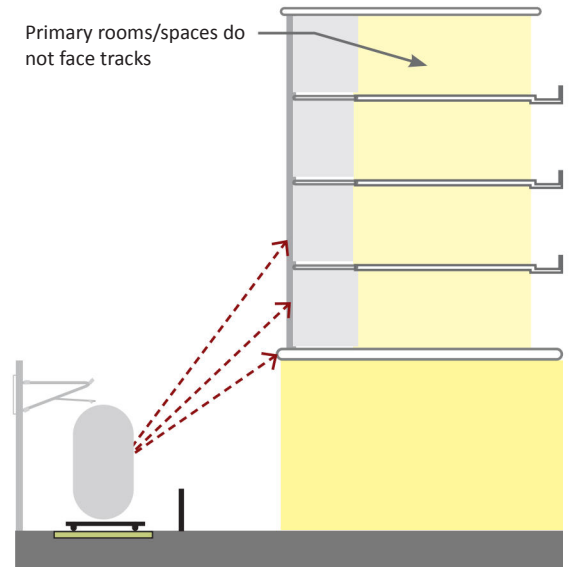
1.7 Project Orientation & Noise Mitigation

Metro may operate in and out of revenue service 24 hours per day, every day of the year, which can create noise and vibration (i.e. horns, power washing). Transit service and maintenance schedules cannot be altered to avoid noise for adjacent developments. However, noise and vibration impacts can be reduced through building design and orientation.

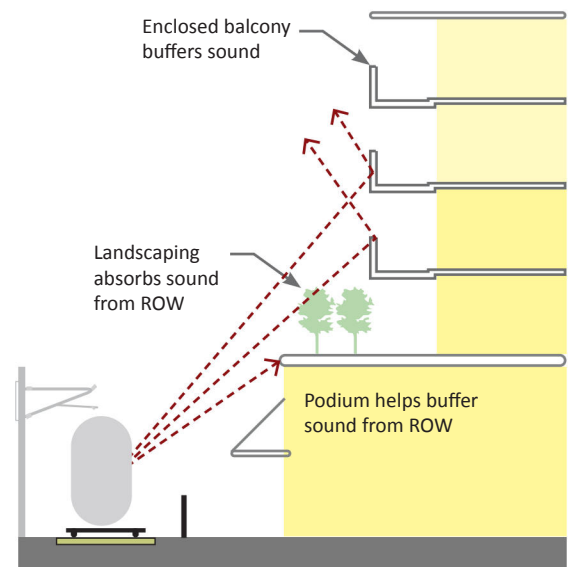
RECOMMENDATION: Use building orientation, programming, and design techniques to reduce noise and vibration for buildings along Metro ROW:

- Locate secondary or “back of house” rooms (e.g. bathrooms, stairways, laundry rooms) along ROW, rather than primary living spaces that are noise sensitive (e.g. bedrooms and family rooms).
- Use upper level setbacks and locate living spaces away from ROW.
- Enclose balconies.
- Install double-pane windows.
- Include language disclosing potential for noise, vibration, and other impacts due to transit proximity in terms and conditions for building lease or sale agreements to protect building owners/sellers from tenant/buyer complaints.

Developers are responsible for any noise mitigation required, which may include engineering designs for mitigation recommended by Metro or otherwise required by local municipalities. A recorded Noise Easement Deed in favor of Metro may be required for projects within 100 feet of Metro ROW to ensure notification to tenants and owners of any proximity issues.



Building orientation can be designed to face away from tracks, reducing the noise and vibration impacts.



Strategic placement of podiums and upper-level setbacks on developments near Metro ROW can reduce noise and vibration impacts.

1.8 At-Grade Rail Crossings

New development is likely to increase pedestrian activity at rail crossings. Safety enhancements may be needed to upgrade existing rail crossings to better protect pedestrians.

RECOMMENDATION: Coordinate with Metro, the California Public Utilities Commission (CPUC), and any other transit operators using the crossing (e.g. Metrolink) to determine if safety enhancements are needed for nearby rail crossings.

While Metro owns and operates the rail ROW, the CPUC regulates all rail crossings. Contact the CPUC early in the design process to determine if they will require any upgrades to existing rail crossings. The CPUC may request to review development plans and hold a site visit to understand future pedestrian activity. Metro’s Corporate Safety Department can support the developer in coordination with the CPUC.



Gates and pedestrian arms are common types of safety elements for pedestrians at rail crossings.



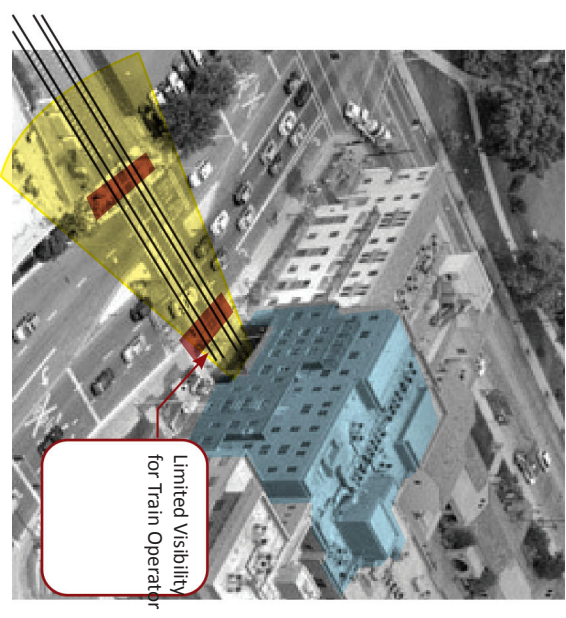
Safety elements of a gate and pedestrian arms have been constructed at the Monrovia Station.

1.9 Sight-Lines at Crossings

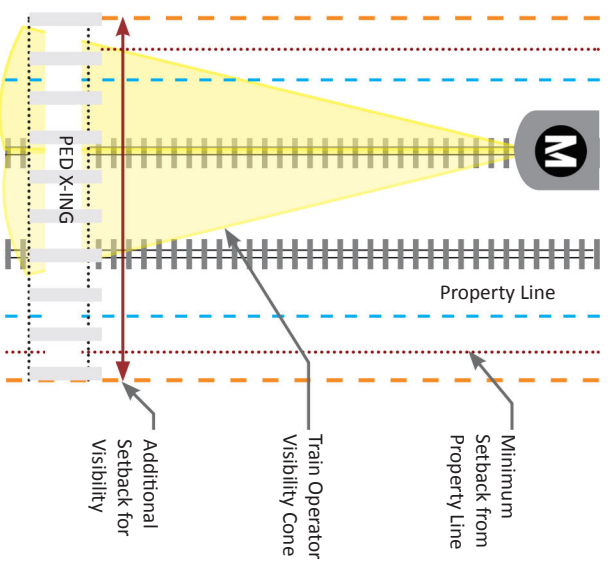
Developments adjacent to Metro ROW can present visual barriers to transit operators approaching vehicular and pedestrian crossings. Buildings and structures in close proximity to transit corridors can reduce sight-lines and create blind corners where operators cannot see pedestrians. This requires operations to reduce train speeds, which decreases efficiency of transit service.

RECOMMENDATION: Design buildings to maximize transit service sight-lines at crossings, leaving a clear cone of visibility to oncoming vehicles and pedestrians.

Metro Rail Operations will review, provide guidance, and determine the extent of operator visibility for safe operations. If the building envelope overlaps with the visibility cone near pedestrian and vehicular crossings, a building setback may be necessary to ensure safe transit service. The cone of visibility at crossings and required setback will be determined based on vehicle approach speed.



Limited sight-lines for trains approaching street crossings create unsafe conditions.



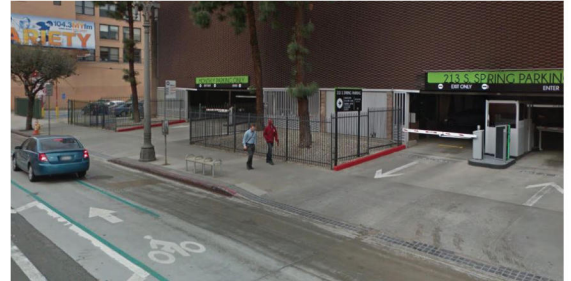
Visibility cones allow train operators to respond to safety hazards.

1.10 Driveway/Access Management

Driveways adjacent to on-street bus stops can create conflict for pedestrians walking to/from or waiting for transit. Additionally, driveways accessing parking lots and loading zones at project sites near Metro Rail and BRT crossings can create queuing issues along city streets and put vehicles in close proximity to fast moving trains and buses, which pose safety concerns.

RECOMMENDATION: Site driveways and other vehicular entrances to avoid conflicts with pedestrians, bicycles, and transit vehicles by:

- Placing driveways along side streets and alleys, away from on-street bus stops and transit crossings to minimize safety conflicts between active ROW, transit vehicles, and people, as well as queuing on streets.
- Locating vehicular driveways away from transit crossings or areas that are likely to be used as waiting areas for transit services.
- Placing loading docks away from sidewalks where transit bus stop activity is/will be present.
- Consolidating vehicular entrances and reduce width of driveways.
- Using speed tables to slow entering/exiting automobiles near pedestrians.
- Separating pedestrian walkways to minimize conflict with vehicles.
- Encouraging safe non-motorized travel.



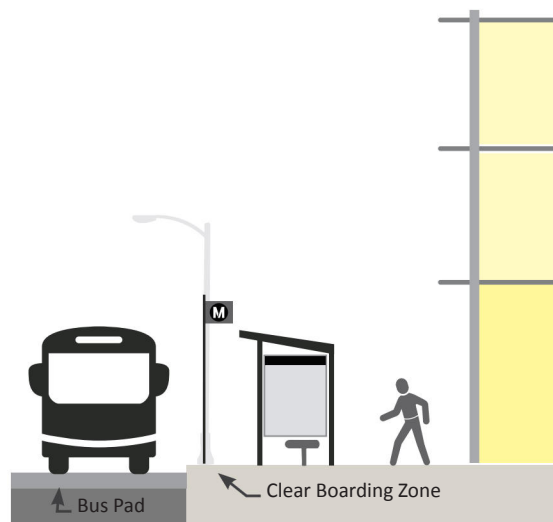
Driveways in close proximity to each other compromise safety for those walking to/from transit and increase the potential for vehicle-pedestrian conflicts.

1.11 Bus Stop & Zones Design

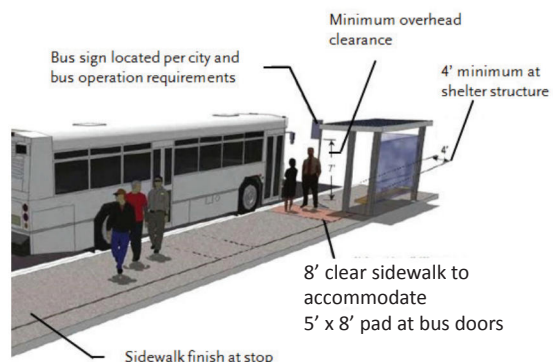
Metro Bus serves over 15,000 bus stops throughout the diverse landscape that is LA County. Typically located on sidewalks within public right-of-way owned and maintained by local jurisdictions, existing bus stop conditions vary from well-lit and sheltered spaces to uncomfortable and unwelcoming zones. Metro is interested in working with developers and local jurisdictions to create a vibrant public realm around new developments by strengthening multi-modal access to/from Metro transit stops and enhancing the pedestrian experience.

RECOMMENDATION: When designing around existing or proposed bus stops:

- Review Metro’s Transit Service Policy, which provides standards for design and operation of bus stops and zones for near-side, far-side, and mid-block stops.
- Review Metro’s Transfers Design Guide for more information at <https://www.metro.net/projects/station-design-projects/>
- Accommodate 5’ x 8’ landing pads at bus doors (front and back door, which are typically 23 to 25 feet apart).
- Locate streetscape elements (e.g. tree planters, street lamps, benches, shelters, trash receptacles and newspaper stands) outside of bus door zones to protect transit access and ensure a clear path of travel.
- Install a concrete bus pad within each bus stop zone to avoid street asphalt damage.
- Replace stand-alone bus stop signs with bus shelters that include benches and adequate lighting.
- Design wide sidewalks (15’ preferred) that accommodate bus landing pads as well as street furniture, landscape, and user travel space.
- Consider tree species, height, and canopy shape (higher than 14’ preferred) to avoid vehicle conflicts at bus stops. Trees should be set back from the curb and adequately maintained to prevent visual and physical impediments for buses when trees reach maturity. Avoid planting of trees that have an invasive and shallow root system.



A concrete bus pad should be located at bus stops and bus shelters should be located along sidewalks to ensure an accessible path of travel to a clear boarding area.



Well-designed and accessible bus stops are beneficial amenities for both transit riders and users of adjacent developments.

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DANGER DO NOT EXCEED RATED CAPACITY





Engineering & Technical Review

Engineering & Technical Review

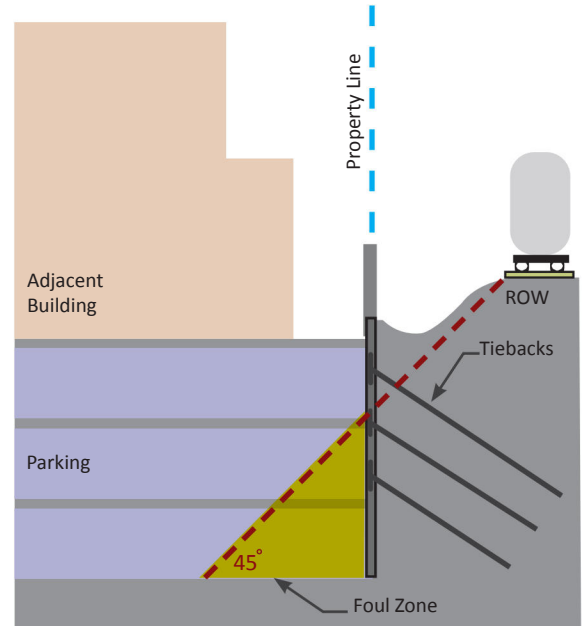
2.1 Excavation Support System Design

Excavation near Metro ROW has the potential to disturb adjoining soils and jeopardize support of existing Metro infrastructure. Any excavation which occurs within the geotechnical foul zone relative to Metro infrastructure is subject to Metro review and approval and meet Cal/OSHA requirements. This foul zone or geotechnical zone of influence shall be defined as the area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast. Construction within this vulnerable area poses a potential risk to Metro service and requires additional Metro Engineering review.

RECOMMENDATION: Coordinate with Metro Engineering staff for review and approval of the excavation support system drawings and calculations prior to the start of excavation or construction. Tiebacks encroaching into Metro ROW may require a tieback easement or license, at Metro's discretion.

Any excavation/shoring within Metrolink operated and maintained ROW will require compliance with SCRRRA Engineering standards and guidelines.

See page 7 for a sample section showing Metro adjacent conditions.



An underground structure located within the ROW foul zone would require additional review by Metro.



2.2 Proximity to Tunnels & Underground Infrastructure

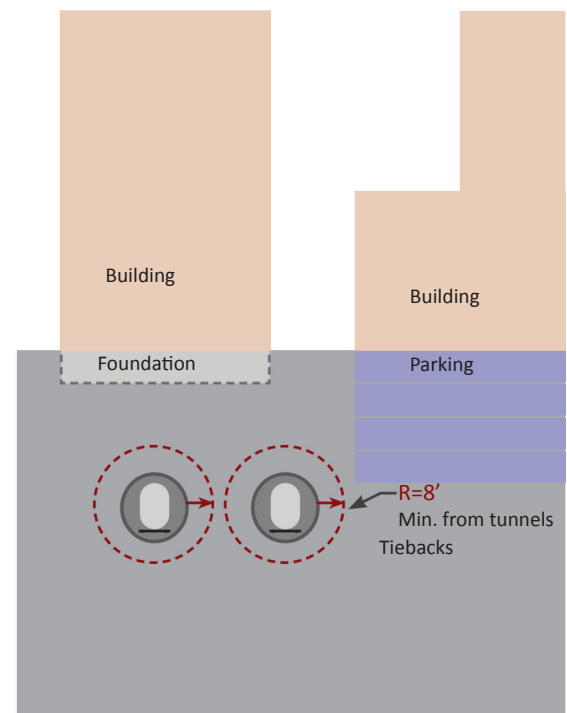
Construction adjacent to, over, or below underground Metro facilities (tunnels, stations and appendages) is of great concern and should be coordinated closely with Metro Engineering.

RECOMMENDATION: Coordinate with Metro early in the design process when proposing to build near underground Metro infrastructure. Metro typically seeks to maintain a minimum eight (8) foot clearance from existing Metro facilities to new construction (shoring or tiebacks). It will be incumbent upon the developer to demonstrate, to Metro's satisfaction, that both the temporary support of construction and the permanent works do not adversely affect the structural integrity, safety, or continued efficient operation of Metro facilities.

Dependent on the nature of the adjacent construction, Metro will need to review the geotechnical report, structural foundation plans, sections, shoring plan sections and calculations.

Metro may require monitoring where such work will either increase or decrease the existing overburden (i.e. weight) to which the tunnels or facilities are subjected. When required, the monitoring will serve as an early indication of excessive structural strain or movement. See Section 3.4, Excavation Drilling/Monitoring for additional information regarding monitoring requirements.

See page 7 for a sample section showing Metro adjacent conditions.

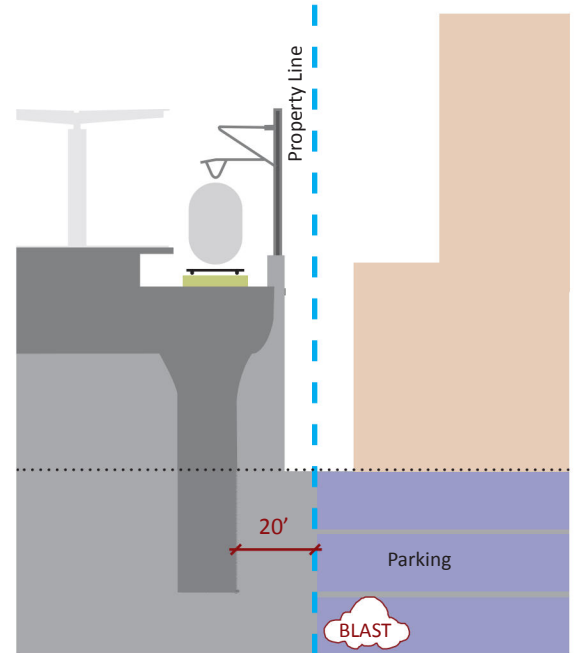


Adjacent project structures in close proximity to underground Metro infrastructure will require additional review by Metro.

2.3 Protection from Explosion/Blast

Metro is obligated to ensure the safety of public transit infrastructure from potential explosive sources which could originate from adjacent underground structures or from at-grade locations, situated below elevated guideways or near stations. Blast protection setbacks or mitigation may be required for large projects constructed near critical Metro facilities.

RECOMMENDATION: Avoid locating underground parking or basement structures within twenty (20) feet from an existing Metro tunnel or facility (exterior face of wall to exterior face of wall). Adjacent developments within this 20-foot envelope may be required to submit a Threat Assessment and Blast/Explosion Study for Metro review and approval.



An underground structure proposed within twenty (20) feet of a Metro structure may require a Threat Assessment and Blast/Explosion Study.

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Construction Safety & Management

Construction Safety & Management

3.1 Pre-Construction Coordination

Metro is concerned with impacts to service requiring rail single line tracking, line closures, speed restrictions, and bus bridging occurring as a result of adjacent project construction. Projects that will require work over, under, adjacent, or on Metro property or ROW and include operation of machinery, scaffolding, or any other potentially hazardous work are subject to evaluation in preparation for and during construction to maintain safe transit operations and passenger well-being.

RECOMMENDATION: Following an initial screening of the project, Metro may determine that additional on-site coordination may be necessary. Dependent on the nature of the adjacent construction, developers may be requested to perform the following as determined on a case-by-case basis:

- Submit a construction work plan and related project drawings and specifications for Metro review.
- Submit a contingency plan, show proof of insurance coverage, and issue current certificates.
- Provide documentation of contractor qualifications.
- Complete pre-construction surveys, perform baseline readings, and install movement instrumentation.
- Complete readiness review and perform practice run of transit service shutdown per contingency plan.
- Designate a ROW observer or other safety personnel and an inspector from the project's construction team.
- Establish a coordination process for access and work in or adjacent to ROW for the duration of construction.

Project teams will be responsible for the costs of adverse impacts to Metro transit operations caused by work on adjacent developments, including remedial work to repair damage to Metro property, facilities, or systems. Additionally, a Construction Monitoring fee may be assessed based on an estimate of required level of effort provided by Metro.

All projects adjacent to Metrolink infrastructure will require compliance with SCRRRA Engineering Standards and Guidelines.



Metro may need to monitor development construction near Metro facilities.



3.2 Track Access and Safety

Permission from Metro is required to enter Metro property for rail construction and maintenance along, above, or under Metro ROW as these activities can interfere with Metro utilities and service and pose a safety hazard to construction teams and transit riders. Track access is solely at Metro's discretion and is discouraged to prevent electrocution and collisions with construction workers or machines.

RECOMMENDATION: Obtain and/or complete the following to work in or adjacent to Metro Rail ROW:

1. **Construction Work Plan:** Dependent on the nature of adjacent construction, Metro may request a construction work plan, which describes means and methods and other construction plan details, to ensure the safety of transit operators and riders.
2. **Safety Training:** All members of the project construction team will be required to attend Metro Rail Safety Training before commencing work activity. Training provides resources and procedures when working near active rail ROW.
3. **Right of Entry Permit/Temporary Construction Easement:** All access to and activity on Metro property, including easements necessary for construction of adjacent projects, must be approved through a Right-of-Entry Permit and/or a Temporary Construction Easement obtained from Metro Real Estate and may require a fee.
4. **Track Allocation:** All work on Metro Rail ROW must receive prior approval from Metro Rail Operations Control. Track Allocation identifies, reserves, and requests changes to normal operations for a specific track section, line, station, location, or piece of equipment to allow for safe use by a non-Metro entity. If adjacent construction is planned in close proximity to active ROW, flaggers must be used to ensure safety of construction workers and transit riders.



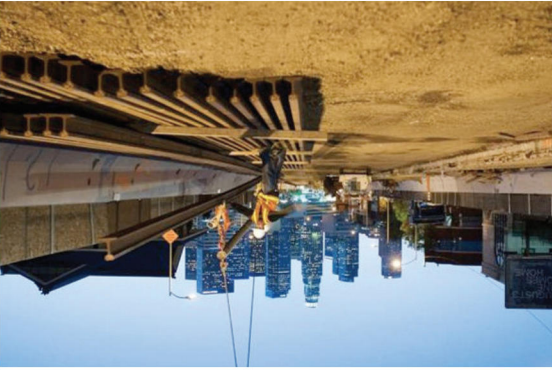
Trained flaggers ensure the safe crossing of pedestrians and workers of an adjacent development.

3.3 Construction Hours

Building near active Metro ROW poses safety concerns and may require limiting hours of construction which impact Metro ROW to night or off-peak hours so as not to interfere with Metro revenue service. To maintain public safety and access for Metro riders, construction should be planned, scheduled, and carried out in a way to avoid impacts to Metro service and maintenance.

RECOMMENDATION: In addition to receiving necessary construction approvals from the local jurisdiction, all construction work on or in close proximity to Metro ROW must be scheduled through the Track Allocation Process, detailed in Section 3.2.

Metro prefers that adjacent construction with potential to impact normal, continuous Metro operations take place during non-revenue hours (approximately 1am-4am) or during non-peak hours to minimize impacts to service. The developer may be responsible for additional operating costs resulting from disruption to normal Metro service.



Construction during approved hours ensures the steady progress of adjacent development and minimizes impacts to Metro's transit service.

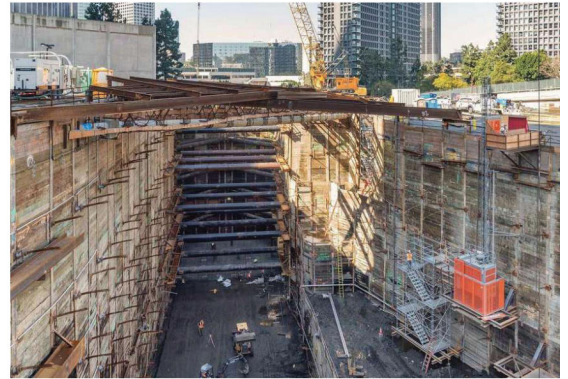
3.4 Excavation/Drilling Monitoring

Excavation is among the most hazardous construction activities and can pose threats to the structural integrity of Metro’s transit infrastructure.

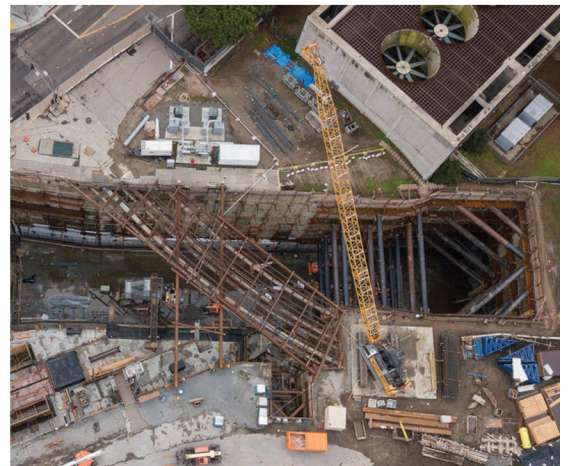
RECOMMENDATION: Coordinate with Metro Engineering to review and approve excavation and shoring plans during design and development, and well in advance of construction (see Sections 2.1 and 2.2).

Geotechnical instrumentation and monitoring will be required for all excavations occurring within Metro’s geotechnical zone of influence, where there is potential for adversely affecting the safe and efficient operation of transit vehicles. Monitoring of Metro facilities due to adjacent construction may include the following as determined on a case-by-case basis:

- Pre- and post-construction condition surveys
- Extensometers
- Inclinometers
- Settlement reference points
- Tilt-meters
- Groundwater observation wells
- Movement arrays
- Vibration monitoring



Excavation and shoring plans must be reviewed by Metro to ensure structural compatibility with Metro infrastructure and safety during adjacent development construction.



A soldier pile wall used for Regional Connector station at 2nd/Hope.

3.5 Crane Operations

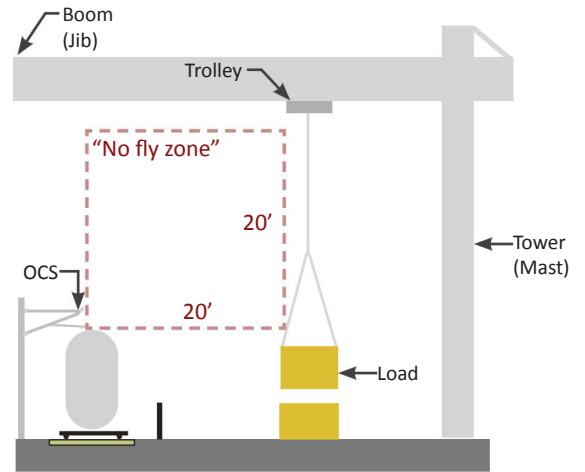
Construction activities adjacent to Metro ROW may require moving large, heavy loads of building materials and machinery using cranes. Cranes referenced here include all power-operated equipment that can hoist, lower, and horizontally move a suspended load. To ensure safety for Metro riders, operators, and transit facilities, crane operations adjacent to Metro ROW must follow the safety regulations and precautions below and are subject to California Occupational Safety and Health Administration (Cal/OSHA) standards.

RECOMMENDATION:

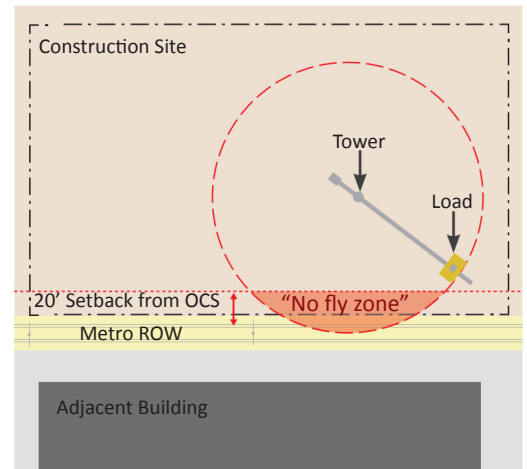
Coordinate with Metro to discuss construction methods and confirm if a crane work plan is required. Generally, crane safety near Metro’s ROW and facilities largely depends on the following factors: 1) Metro’s operational hours and 2) swinging a load over or near Metro power lines and facilities. Note:

1. Clearance: A crane boom may travel over energized Metro OCS only if it maintains a vertical 20-foot clearance and the load maintain a horizontal 20-foot clearance.
2. Power: Swinging a crane boom with a load over Metro facilities or passenger areas is strictly prohibited during revenue hours. To swing a load in the “no fly zone” (see diagrams to right), the construction team must coordinate with Metro to de-energize the OCS.
3. Weathervaning: When not in use, the crane boom may swing 360 degrees with the movement of the wind, including over energized Metro OCS, only if the trolley is fully retracted towards the crane tower and not carrying any loads.
4. Process: Developers and contractors must attend Metro Track Allocation (detailed in Section 3.2) to determine if Metro staff support is necessary during crane erection and load movement.
5. Permit: Developers must apply for a Metro Right-of-Entry permit to swing over Metro facilities.

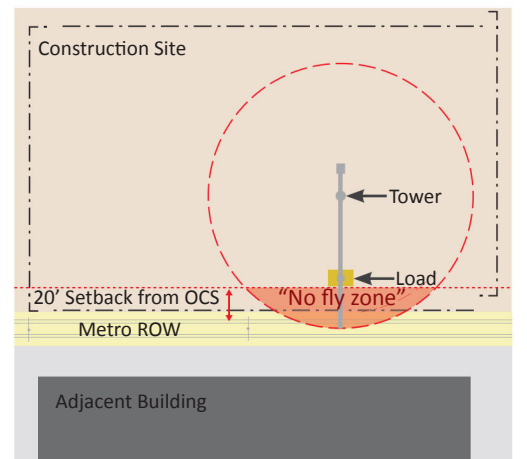
Project teams will bear all costs associated with impacts to Metro Rail operations and maintenance.



Cranes and construction equipment should be staged to avoid conflicts with the rail OCS.



Plan View: Crane swing and load are restricted near Metro ROW.



Plan View: While crane boom swings over “no fly zone,” the trolley and load are retracted to maintain clearance from OCS.

3.6 Construction Barriers & Overhead Protection

During construction, falling objects can damage Metro facilities and pose a safety concern to the riders accessing them.

RECOMMENDATION: Erect vertical construction barriers and overhead protection compliant with Metro and Cal/OSHA requirements to prevent objects from falling into Metro ROW or areas designed for public access to Metro facilities. A protection barrier shall be constructed to cover the full height of an adjacent project and overhead protection from falling objects shall be provided over Metro ROW as necessary. Erection of the construction barriers and overhead protection for these areas shall be done during Metro non-revenue hours.



Overhead protection is required when moving heavy objects over Metro ROW or in areas designated for public use.



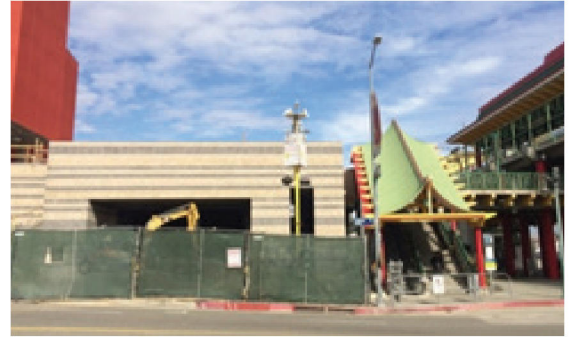
Constructed above is a wooden box over the entrance portal for overhead protection at the 4th/Hill Station.

3.7 Pedestrian & Emergency Access

Metro’s riders rely on the consistency and reliability of access and wayfinding to and from stations, stops, and facilities. Construction on adjacent property must not obstruct pedestrian access, fire department access, emergency egress, or otherwise present a safety hazard to Metro operations, its employees, riders, and the general public. Fire access and safe escape routes within all Metro stations, stops, and facilities must be maintained at all times.

RECOMMENDATION: Ensure pedestrian and emergency access from Metro stations, stops, and transit facilities is compliant with the Americans with Disabilities Act (ADA) and maintained during construction:

- Temporary fences, barricades, and lighting should be installed and watchmen provided for the protection of public travel, the construction site, adjacent public spaces, and existing Metro facilities.
- Temporary signage should be installed where necessary and in compliance with the latest California Manual on Uniform Traffic Control Devices (MUTCD) and in coordination with Metro Art and Design Standards.
- Emergency exits shall be provided and be clear of obstructions at all times.
- Access shall be maintained for utilities such as fire hydrants, stand pipes/connections, and fire alarm boxes as well as Metro-specific infrastructure such as fan and vent shafts.



Sidewalk access is blocked for a construction project, forcing pedestrians into the street or to use less direct paths to the Metro facility.

3.8 Impacts to Bus Routes & Stops

During construction, bus stop zones and routes may need to be temporarily relocated. Metro needs to be informed of activities that require stop relocation or route adjustments in order to ensure uninterrupted service.

RECOMMENDATION: During construction, maintain or relocate existing bus stops consistent with the needs of Metro Bus Operations. Design of temporary and permanent bus stops and surrounding sidewalk areas must be compliant with the ADA and allow passengers with disabilities a clear path of travel to the transit service. Existing bus stops must be maintained as part of the final project. Metro Bus Operations Control Special Events Department and Metro Stops & Zones Department should be contacted at least 30 days before initiating construction activities.



Temporary and permanent relocation of bus stops and layover zones will require coordination between developers, Metro, and other municipal bus operators and local jurisdictions.

3.9 Utility Coordination

Construction has the potential to interrupt utilities that Metro relies on for safe operations and maintenance. Utilities of concern to Metro include, but are not limited to, condenser water piping, potable/fire water, storm and sanitary sewer lines, and electrical/telecommunication services.

RECOMMENDATION: Coordinate with Metro Real Estate during project design to gauge temporary and permanent utility impacts and avoid conflicts during construction.

The contractor shall protect existing above-ground and underground Metro utilities during construction and coordinate with Metro to receive written approval for any utilities pertinent to Metro facilities that may be used, interrupted, or disturbed.

When electrical power outages or support functions are required, approval must be obtained through Metro Track Allocation in coordination with Metro Real Estate for a Right of Entry Permit.

To begin coordination with Metro Real Estate, visit www.metro.net/devreview and select the drop-down “Utility Project Coordination.”

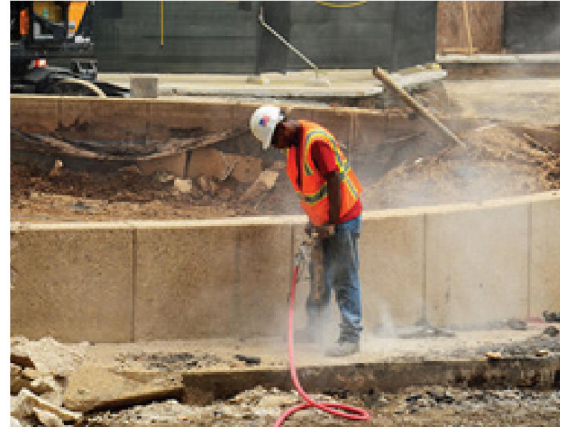


Coordination of underground utilities is critical to safely and efficiently operate Metro service.

3.10 Air Quality & Ventilation Protection

Hot or foul air, fumes, smoke, steam, and dust from adjacent construction activities can negatively impact Metro facilities, service, and users.

RECOMMENDATION: Ensure that hot or foul air, fumes, smoke, and steam from adjacent facilities are discharged beyond 40 feet from existing Metro facilities, including but not limited to ventilation system intake shafts and station entrances. Should fumes be discharged within 40 feet of Metro intake shafts, a protection panel around each shaft shall be required.



A worker breaks up concrete creating a cloud of silica dust.

Cone of Visibility

A conical space at the front of moving transit vehicles allowing for clear visibility of travel way and/or conflicts.

Construction Work Plan (CWP)

Project management document outlining the definition of work tasks, choice of technology, estimation of required resources and duration of individual tasks, and identification of interactions among the different work tasks.

Flagger/Flagman

Person who controls traffic on and through a construction project. Flaggers must be trained and certified by Metro Rail Operations prior to any work commencing in or adjacent to Metro ROW.

Geotechnical Foul Zone

Area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast.

Guideway

A channel, track, or structure along which a transit vehicle moves.

Heavy Rail Transit (HRT)

Metro HRT systems include exclusive ROW (mostly subway) trains up to six (6) cars long (450') and utilize a contact rail for traction power distribution (e.g. Metro Red Line).

Joint Development (JD)

JD is the asset management and real estate development program through which Metro collaborates with developers to build housing, retail, and other amenities on Metro properties near transit, typically through ground lease. JD projects directly link transit riders with destinations and services throughout LA County.

Light Rail Transit (LRT)

Metro LRT systems include exclusive, semi-exclusive, or street ROW trains up to three (3) cars long (270') and utilize OCS for traction power distribution (e.g. Metro Blue Line).

Measure R

Half-cent sales tax for LA County approved in November 2008 to finance new transportation projects and programs. The tax expires in 2039.

Measure M

Half-cent sales tax for LA County approved in November 2016 to fund transportation improvements, operations and programs, and accelerate projects already in the pipeline. The tax will increase to one percent in 2039 when Measure R expires.

Metrolink

A commuter rail system with seven lines throughout Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego counties governed by the Southern California Regional Rail Authority (SCRRA).

Metro Adjacent Construction Design Manual

Volume III of the Metro Design Criteria & Standards, which outlines the Metro adjacent review procedure as well as operational requirements when constructing over, under, or adjacent to Metro facilities, structures, and property.

Metro Bus

Metro "Local" and "Rapid" bus service runs within the street, typically alongside vehicular traffic, though occasionally in "bus-only" lanes.

Metro Bus Rapid Transit (BRT)

High quality bus service that provides faster and convenient service through the use of dedicated ROW, branded vehicles and stations, high frequency and intelligent transportation systems, all-door boarding, and intersection crossing priority. Metro BRT may run within dedicated ROW or in mixed flow traffic on streets.

Metro Design Criteria and Standards

A compilation of documents that govern how Metro transit service and facilities are designed, constructed, operated, and maintained.

Metro Rail

Urban rail system serving LA County consisting of six lines, including two subway lines and four light rail lines.

Metro Rail Design Criteria (MRDC)

Volume IV of the Metro Design Criteria & Standards which establishes design criteria for preliminary engineering and final design of a Metro Rail Project.

Metro Transit Oriented Communities

Land use planning and community development program that seeks to maximize access to transportation as a key organizing principle and promote equity and sustainable living by offering a mix of uses close to transit to support households at all income levels, as well as building densities, parking policies, urban design elements, and first/last mile facilities that support ridership and reduce auto dependency.

Noise Easement Deed

Easement granted by property owners abutting Metro ROW acknowledging noise due to transit operations and maintenance.

Overhead Catenary System (OCS)

One or more electrified wires situated over a transit ROW that transmit power to light rail trains via pantograph, a current collector mounted on the roof of an electric vehicle. Metro OCS is supported by hollow poles placed between tracks or on the outer edge of parallel tracks.

Right of Entry Permit

Written approval granted by Metro Real Estate to enter Metro ROW and property.

Right of Way (ROW)

Legal right over property reserved for transportation purposes to construct, protect, maintain and operate transit services.

Southern California Regional Rail Authority (SCRRA)

A joint powers authority made up of an 11-member board representing the transportation commissions of Los Angeles, Orange, Riverside, San Bernardino and Ventura counties. SCRRA governs and operates Metrolink service.

Threat Assessment and Blast/Explosion Study

Analysis performed when adjacent developments are proposed within twenty (20) feet from an existing Metro tunnel or facility.

Track Allocation/Work Permit

Permit granted by Metro Rail Operations Control to allocate a section of track and perform work on or adjacent to Metro Rail ROW. This permit should be submitted for any work that could potentially foul the envelope of a train.

Wayfinding

Signs, maps, and other graphic or audible methods used to convey location and directions to travelers.

metro.net/projects/devreview/



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May 7, 2021

File Number: 0010-308326

VIA ELECTRONIC MAIL ONLY

Clare Kelley
City Planner
Los Angeles Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012
E-Mail: clare.kelley@lacity.org

Re: Notice of Preparation for the Cornfield Arroyo Seco Specific Plan ("CASP") Update
(Case Numbers: CPC-2021-2642-SP; ENV-2021-2643-EIR)

Dear Ms. Kelley:

On behalf of our client, Goodwill Industries of Southern California ("Goodwill"), we respectfully submit this comment letter on the City's proposed update to the Cornfield Arroyo Seco Specific Plan ("CASP Update"). Goodwill owns property at 342 N. San Fernando Road in the City of Los Angeles ("City"). The Goodwill property is located within the CASP area and the Northeast Los Angeles Community Plan. Goodwill considers its property an ideal location for redevelopment, which could deliver new affordable housing and other mixed-uses to the area. This type of redevelopment would also complement Goodwill's existing commercial operations. As you know, however, the CASP constrains the site and prevents Goodwill from developing affordable housing. Therefore, Goodwill requests that the City modify the zoning on the site during the CASP Update.

Goodwill's redevelopment intentions and the CASP Update appear aligned. The CASP Update has the primary goal of incentivizing the development of more affordable and mixed-income housing in the CASP area. Currently, only six dwelling units in the CASP would be reserved as affordable units for Extremely Low Income households pursuant to the CASP's affordable housing incentives. The majority of land in the CASP has been zoned to not allow predominantly residential development. A limited number of parcels, comprising 25 percent of land in the CASP, are zoned Urban Village which allows for residential projects. Furthermore, the CASP Update can encourage affordable and mixed-income housing production more broadly by easing development restrictions on new residential projects. Specifically, Goodwill requests that the City apply the Urban Village zoning designation to the Goodwill site and study it accordingly in the forthcoming Environmental Impact Report ("EIR") for the CASP Update.

I. CASP Existing Zoning

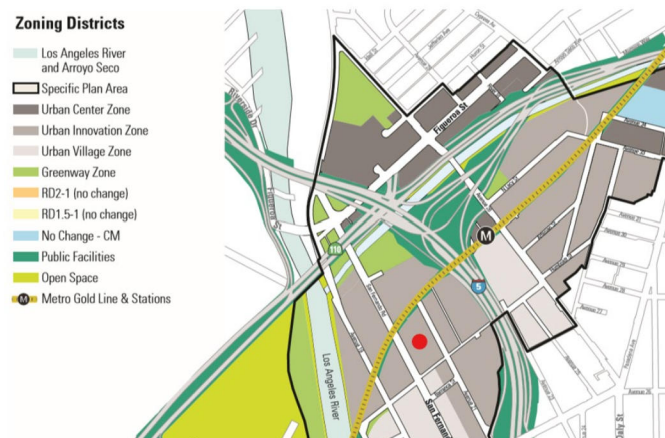
The CASP's existing zoning classification identifies the Goodwill site as Urban Innovation ("UI"). The Urban Innovation zoning designation includes as permitted uses, multi-family residential, public parking, corporate headquarters, commercial office, light manufacturing, and warehousing. The CASP also allows for certain permitted ancillary uses in the Urban Innovation zone. Permitted ancillary uses include restaurant, retail, entertainment and recreation facilities. Ancillary uses are limited to 10% of the Base Floor Area Ratio ("Base FAR") of the site.

Residential multi-family uses in the Urban Innovation zone are limited to a maximum of 15% of the applicable Floor Area Ratio ("FAR").¹ The Base FAR of the Goodwill site is 3:1. The 15% FAR cap required by the Urban Innovation zoning unreasonably hinders the ability to construct affordable and mixed-income developments. The CASP Update provides an opportunity to remedy this constraint.

II. CASP Update – Proposed Zoning

The CASP Update would accommodate additional housing in the CASP area by expanding the residential Urban Village ("UV") zoning to more parcels. Goodwill agrees that that UV zoning is more appropriate for the Goodwill site and would provide greater development potential for much needed affordable housing units. Parcels zoned as UV are located directly south and southwest of the site. Residential multi-family uses in the UV zone are only limited to a maximum of 90% of the applicable FAR. Figure 1 below indicates the areas that Goodwill is requesting be changed to UV zoning.

Figure 1 – Proposed CASP Zoning District Map



The UV zone, compared to the existing UI zone, would improve the possibility of developing affordable housing as a component of the redevelopment of the Goodwill site. Assuming a Base

¹ CASP Section 2.1 E.

FAR of 1.5:1, the Goodwill site (if zoned Urban Village) could produce approximately three times the residential square footage compared to the more limited Urban Innovation zone. Thus, Goodwill believes the City should change the zoning on the Goodwill site from UI to UV as part of the CASP Update.

In addition, Goodwill supports the CASP Update proposal to remove the existing 10% non-residential use requirement for projects in the UV zone. The removal of the 10% non-residential restriction will further incentivize the development of housing in the CASP. Also note, that Goodwill is currently analyzing other land use mechanisms (such as increasing base FAR, adjusting development regulations, and/or modifying land use designations) to facilitate robust redevelopment opportunities on the Goodwill site. Goodwill anticipates sharing these additional comments and suggestions with the City during the CASP Update process. As an example, the CASP Update proposes changes to various development standards including building form, urban design, open space, parking, conservation, performance, and sign standards to further support housing production. Goodwill looks forward to working with the City to craft development standards that facilitate streamlined development opportunities on the site to provide a mix of land uses and affordable housing units.

III. Conclusion

Thank you for the opportunity to comment on the Notice of Preparation for the CASP Update EIR. Goodwill plans to stay involved with the CASP Update process. Please consider the zone change request in this letter as the planning process proceeds.

Respectfully,



James E. Pugh
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

SMRH:4816-0513-8920.3

cc: Valerie Watson, Senior Planner
Michael Sin, Planning Associate



Michael Sin <michael.sin@lacity.org>

FW: CASP Update Comment Letter

2 messages

Justin Mahramas <JMahramas@sheppardmullin.com>

Fri, May 7, 2021 at 11:33 AM

To: "michael.sin@lacity.org" <michael.sin@lacity.org>

Cc: James Pugh <JPugh@sheppardmullin.com>

Hi Michael,

I hope that you are doing well. I'm forward you this email as I know Clare is out of the office until Monday. Please let me know if you have any questions.

Best,

Justin

Justin Mahramas
SheppardMullin | Los Angeles
+1 213-617-4101 | ext. 14101

From: Justin Mahramas <JMahramas@sheppardmullin.com>

Sent: Friday, May 7, 2021 10:14 AM

To: clare.kelley@lacity.org

Cc: James Pugh <JPugh@sheppardmullin.com>

Subject: CASP Update Comment Letter

Good morning Clare,

On behalf of our client Goodwill Industries of Southern California, please find attached a comment letter to the NOP for the proposed CASP Update. Please do not hesitate to reach out should you have any questions.

Best,

Justin

Justin J. Mahramas
+1 213-617-4101 | direct
JMahramas@sheppardmullin.com | Bio

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Attention: This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.

 **CASP Update Comment Letter.pdf**
275K

Michael Sin <michael.sin@lacity.org>
To: Justin Mahramas <JMahramas@sheppardmullin.com>
Cc: James Pugh <JPugh@sheppardmullin.com>

Fri, May 7, 2021 at 1:19 PM

Received, thank you.

[Quoted text hidden]

--



Michael Sin (he/him)
City Planning Associate
Los Angeles City Planning
200 N. Spring St., Room 621
Los Angeles, CA 90012
T: (213) 978-1345 | Planning4LA.org





May 7, 2021

Ms. Clare Kelley, City Planner
City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, California 90012
Phone: (213) 978-1207
E-mail: clare.kelley@lacity.org

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Updates to the Cornfield Arroyo Seco Specific Plan [SCAG NO. IGR10380]

Dear Ms. Kelley,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Updates to the Cornfield Arroyo Seco Specific Plan (“proposed project”) to the Southern California Association of Governments (SCAG) for review and comment. SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG’s adopted regional plans, to be determined by the lead agencies.¹

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG’s feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies. Finally, SCAG is also the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Updates to the Cornfield Arroyo Seco Specific Plan in Los Angeles County. The proposed project is an update of the Cornfield Arroyo Seco Specific Plan (CASP) that amends the text, maps, and tables of the CASP, including new land use and zoning regulations, incentives, and boundaries for the purpose of encouraging affordable and mixed-income housing production in the 660-acre specific plan area.

When available, please email environmental documentation to IGR@scag.ca.gov providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Senior Regional Planner, at (213) 236-1874 or IGR@scag.ca.gov. Thank you.

Sincerely,

Rongsheng Luo
Acting Manager, Compliance and Performance Monitoring

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project’s consistency with the 2020 RTP/SCS (Connect SoCal) for the purpose of determining consistency for CEQA.

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**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
UPDATES TO THE CORNFIELD ARROYO SECO SPECIFIC PLAN [SCAG NO. IGR10380]**

CONSISTENCY WITH CONNECT SOCIAL

SCAG provides informational resources to facilitate the consistency of the proposed project with the adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with Connect SoCal.

CONNECT SOCIAL GOALS

The SCAG Regional Council fully adopted [Connect SoCal](#) in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCIAL GOALS	
Goal #1:	<i>Encourage regional economic prosperity and global competitiveness</i>
Goal #2:	<i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>
Goal #3:	<i>Enhance the preservation, security, and resilience of the regional transportation system</i>
Goal #4:	<i>Increase person and goods movement and travel choices within the transportation system</i>
Goal #5:	<i>Reduce greenhouse gas emissions and improve air quality</i>
Goal #6:	<i>Support healthy and equitable communities</i>
Goal #7:	<i>Adapt to a changing climate and support an integrated regional development pattern and transportation network</i>
Goal #8:	<i>Leverage new transportation technologies and data-driven solutions that result in more efficient travel</i>
Goal #9:	<i>Encourage development of diverse housing types in areas that are supported by multiple transportation options</i>
Goal #10:	<i>Promote conservation of natural and agricultural lands and restoration of habitats</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG CONNECT SOCIAL GOALS	
Goal	Analysis
Goal #1: <i>Encourage regional economic prosperity and global competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
Goal #2: <i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

Connect SoCal Strategies

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. To view Connect SoCal and the accompanying technical reports, please visit the [Connect SoCal webpage](#). Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG's 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Connect SoCal's Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the [Connect SoCal Demographics and Growth Forecast Technical Report](#). The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts				Adopted City of Los Angeles Forecasts			
	Year 2020	Year 2030	Year 2035	Year 2045	Year 2020	Year 2030	Year 2035	Year 2045
Population	19,517,731	20,821,171	21,443,006	22,503,899	4,105,974	4,342,487	4,488,227	4,771,326
Households	6,333,458	6,902,821	7,170,110	7,633,451	1,436,882	1,578,496	1,653,948	1,793,035
Employment	8,695,427	9,303,627	9,566,384	10,048,822	1,890,709	1,998,539	2,053,048	2,135,892

MITIGATION MEASURES

SCAG staff recommends that you review the [Final Program Environmental Impact Report](#) (Final PEIR) for Connect SoCal for guidance, as appropriate. SCAG’s Regional Council certified the PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on May 7, 2020 and also adopted a PEIR Addendum and amended the MMRP on September 3, 2020 (please see the [PEIR webpage](#) and scroll to the bottom of the page for the PEIR Addendum). The PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.



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laconservancy.org

May 7, 2021

Sent Electronically

Clare Kelley, City Planner
City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012
Email: clare.kelley@lacity.org

RE: Notice of Preparation for the Cornfield Arroyo Seco Specific Plan (CASP) Environmental Impact Report

Dear Ms. Kelley:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Notice of Preparation for the Cornfield Arroyo-Seco Specific Plan Environmental Impact Report. The Cornfield Arroyo Seco Specific Plan (CASP) encompasses roughly 660-acres within the Central City North, Northeast Los Angeles, and Silver Lake-Echo Park-Elysian Valley Community Plans. Currently, the CASP is zoned predominately industrial with smaller sections of greenspace and pockets of residential zoning north of Main Street and west of the I-5 freeway as well as the William Mead Homes that are owned and operated by the Housing Authority of the City of Los Angeles.

In 2013, the City adopted the CASP and certified its Environmental Impact Report (EIR). Since that time, there has been limited housing production in the Plan Area that does not involve discretionary actions from the Planning Commission or Area Planning Commission. The City is seeking to amend the CASP for the following reasons:

- Increase the production of affordable and mixed-income housing within the Project Area
- Protect residents, especially low-income households from displacement
- Design and regulate housing to promote health and well-being with access to amenities
- Build and maintain welcoming and accessible housing for those with disabilities, large families, older adults, and others facing housing barriers and food insecurity





In addition to its significance as intact example of Los Angeles's early public housing projects, William Mead Homes are significant for its garden apartment design. Garden apartments originated from urban planning and landscape concepts in the United Kingdom during the nineteenth century. The concept prioritized human scale development with an emphasis on open space. With Los Angeles's hospitable climate, architects and planners began designing garden apartments during the Post War period as a way to bring healthy living to the masses. In 2012, Architectural Resources Group (ARG) developed an extensive historic context statement on the topic for the Conservancy. The report is available to download on the Conservancy's website.

Owned and operated by the Housing Authority of the City of Los Angeles, the 1942 William Mead Homes is among the first group of ten public housing projects developed in Los Angeles to address the urgent need for safe, sanitary housing for the working poor with access to sufficient sunlight and fresh air. With its steel casement windows and brick construction, William Mead is among the most visually distinct and intact of the remaining historic public housing complexes in Los Angeles. William Mead Homes has been identified as eligible for the National Register of Historic Places for its association with the national trend in subsidized housing program.

II. William Mead Homes

The Proposed Plan should articulate a clear understanding of the survey results to better plan for preservation and development in the future. This information is critical as a starting point in identifying potentially significant resources.

Surveys are intended to help identify eligible individual historic resources and concentrations of contributing resources that qualify as potential historic districts. The data from SurveyLA exists and should be fully incorporated into the CASP Update and made available in a user-friendly mapping format so that it is useful for long-term planning purposes and balancing preservation and development priorities.

The CASP Update shall include and fully incorporate SurveyLA findings throughout the plan area to identify resources and determine any potential conflicts with what is being proposed. The CASP includes a significant number of designated and eligible historic resources, therefore it is important to fully understand and include all known historic resources to fully assess potential impacts.

I. Inclusion of SurveyLA findings and analysis

During the previous EIR process the Conservancy raised a number of concerns regarding the effects of altering underlying zoning on historic resources, notably William Mead Homes and the Lincoln Heights Jail.

- Refine Plan Standards, processes, and procedures to be more intuitive and transparent
- Preserve employment areas that show concentration of jobs while supporting small and/or legacy businesses, and employment spaces such as light industrial and general commercial uses



In 2012 we raised concerns around the rezoning of the William Mead Home and surrounding area as it would add increased development pressures for the historic property. The current CASP Update proposes to change the zoning once more to an Urban Innovation Zone. This new zoning designation is a flex production area that allows for employment activities in close proximity to transit service and existing communities. Hotels are allowed, along with a limited amount of multifamily residential use.

Recently, Councilmember Cedillo proposed a full redevelopment of the site. Such a plan would erase this important historic resource. With over 400 units, redevelopment would displace the hundreds of families and tenants that currently occupy the housing development. As stated in the CASP goals, updates are to stop displacement of vulnerable citizens in the Plan Area.

The Draft EIR should evaluate the potential direct and indirect impacts of this zoning change with necessary mitigation measures to ensure new development surrounding the historic resource is sensitive in mass, scale, and design.

Further, the CASP should identify specific tools that can ensure the preservation and continued use of William Mead Homes as an important historic resource and source providing critical CASP update, the retention and preservation of this type of housing should be treated equally with affordable housing production goals within the plan.

III. Lincoln Heights Jail

Built in 1931, the Lincoln Heights jail was designed to accommodate 625 prisoners at full capacity. In 1949, an addition designed by local architects Gordon B. Kaufman and J.F. Stanton was constructed to accommodate the growing prisoner population. By the early 1950s, the jail was known to hold up to well over 2,000. During its operation, the jail housed a high volume of inmates who were arrested for suspicions about their sexual orientation prompting the prison to create a separate wing for gay prisoners. Since its decommission in 1965, the jail served community needs as the Los Angeles Youth Athletic Club and Bilingual Foundation of the Arts. In 1993, the jail was declared a Historic-Cultural Monument. Since 2014, the jail has sat vacant suffering from demolition by neglect while redevelopment plans failed.

In 2018, the City entered into an Exclusive Negotiation Agreement (ENA) with the Lincoln Heights Property Company and Fifteen Group who submitted plans for the property's redevelopment. Known as the Lincoln Heights Makers District, the project would adaptively reuse the site and develop on the east side of N. Avenue 19. The project incorporates commercial and manufacturing spaces, a public market, creative office space, live-work housing, green and recreation spaces. To date, the project has not gone through the environmental review process and has fallen behind schedule as the City works with the EPA to address environmental cleanup considerations.

Similar to the William Mead Home, the Lincoln Heights Jail is proposed for redevelopment and will experience a zone change from Hybrid Industrial to the Urban Innovation Zone. In an effort to aid the proposed redevelopment of the jail, a Historic-Cultural Monument, adaptive reuse

tools should be made available to ensure its survival. The Draft EIR should analyze any impacts to the historic resource, should there be any significant adverse impacts identified, it's imperative that those be mitigated to less than significant.

IV. The Los Angeles Conservancy requests a meeting with the City's CASP representatives.

The Conservancy requests a meeting with the CASP team. Given the Conservancy's concerns since the CASP's previous environmental review period and our advocacy for historic resources and legacy businesses in the plan area we hope that a meeting with the CASP team will facilitate a meaningful dialogue and help to create a more well-rounded Specific Plan.

V. Conclusion

The Conservancy remains concerned about the future of designated and eligible historic resources in the CASP plan area. Two of the Plan Area's most significant historic resources, the William Mead Homes and Lincoln Heights Jail remain threatened to redevelopment pressures. As with other Community and Specific Plans, the CASP should include SurveyLA findings and analysis as a means to limit the Project's environmental impacts to historic resources. As the County's leading preservation organization we welcome a meeting with the CASP team to craft a Specific Plan that encourages housing growth while preserving the Plan Area's significant pool of historic resources.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

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

Sincerely,



Adrian Scott Fine
Senior Director of Advocacy





South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

May 4, 2021

clare.kelley@lacity.org

Clare Kelley, City Planner
City of Los Angeles, Planning Department
200 North Spring Street, Room 667
Los Angeles, California 90012

Notice of Preparation of a Draft Environmental Impact Report for the Cornfield Arroyo Seco Specific Plan (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵.

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants and include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. The Proposed Project will include, among others, incentives and design guidelines to support future housing developments and is located in close proximity to Interstate 5 and State Route 110, and to facilitate the purpose of an EIR as an informational document, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵ to disclose the potential health risks⁶.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*⁷ is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory⁸.

The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*⁹ includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ *Ibid.*

⁷ CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>.

⁸ CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.

⁹ South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook¹, South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan¹⁰, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy¹¹.

Health Risk Reduction Strategies

Many strategies are available to reduce exposures, including, but are not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters¹², a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary and include costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy consumption that the Lead Agency should evaluate in the Draft EIR. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, replacement has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste that the Lead Agency should evaluate in the Draft EIR. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to diesel particulate matter emissions.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC210420-02
Control Number

¹⁰ South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

¹¹ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at:

https://www.connectsoocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

¹² This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <https://onlinelibrary.wiley.com/doi/10.1111/ina.12013>.



Michael Sin <michael.sin@lacity.org>

Fwd: CASP Update Scoping Comments

2 messages

Yelena Zeltser <yelena@seaca-la.org>
To: michael.sin@lacity.org

Fri, May 7, 2021 at 2:35 PM

Hello Mr. Sin,

I'm forwarding you this email submitting our scoping comments on the CASP update. I received a notification that Ms. Kelley will be out of the office and to forward communications regarding CASP to you. I want to ensure these are received into the record before the NOP deadline.

My best.

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

From: **Yelena Zeltser** <yelena@seaca-la.org>
Date: Fri, May 7, 2021 at 2:31 PM
Subject: CASP Update Scoping Comments
To: <clare.kelley@lacity.org>

Dear Ms. Kelley,

On behalf of SEACA, and with support from Public Counsel and the Natural Resources Defense Council, I'm submitting the attached scoping comments regarding the CASP update (CPC-2021-2642-SP; ENV-2021-2643-EIR 200).

Thank you.

--

Yelena Zeltser (she/her)
Southeast Asian Community Alliance
840 N. Broadway, Suite 203E
Los Angeles, CA 90012
(310) 463-8714
www.seaca-la.org

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Yelena Zeltser (she/her)
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 **SEACA NOP Comments_5.7.21.pdf**
837K

Michael Sin <michael.sin@lacity.org>
To: Yelena Zeltser <yelena@seaca-la.org>

Fri, May 7, 2021 at 2:54 PM

Received, thank you!

[Quoted text hidden]

--

Michael Sin (he/him)
City Planning Associate
Los Angeles City Planning
200 N. Spring St., Room 621

5/10/2021

City of Los Angeles Mail - Fwd: CASP Update Scoping Comments



Los Angeles, CA 90012
T: (213) 978-1345 | Planning4LA.org





May 7, 2021

Via Email (clare.kelley@lacity.org)

City of Los Angeles, Department of City Planning
ATTN: Clare Kelley, City Planner
N. Spring Street, Room 667
Los Angeles, CA 90012

Re: Southeast Asian Community Alliance Scoping Comments on the Cornfield Arroyo Seco Specific Plan Update (CPC-2021-2642-SP; ENV-2021-2643-EIR 200)

Dear Ms. Kelley,

On behalf of the Southeast Asian Community Alliance (SEACA), I respectfully submit comments on the Notice of Preparation (NOP) of the Environmental Impact Report (EIR) for the update of the Cornfield Arroyo Seco Specific Plan (CASP). These comments are also endorsed by Public Counsel, and Natural Resources Defense Council.

SEACA is a community organization representing low-income refugee and immigrant youth and families in Chinatown, and the surrounding areas. Historically, we were a key community stakeholder that helped shape the CASP and ensure that affordable housing incentives are built into the current zoning provisions. We look forward to working with the City to ensure that the CASP update results in solutions to the affordable housing shortage that prioritize the needs of the existing low-income refugee and immigrant community, prevent the displacement of long-term residents and businesses, and results in positive racial equity and health equity outcomes for our community.

Target Community Engagement

The CASP area (Project Area) encompasses a multilingual and diverse community. In addition, the community includes many low-income seniors and adults who have limited access and proficiency with technology. Despite the limitations to in-person interaction placed on us by the coronavirus pandemic, the plan update process must be an inclusive process that specifically reaches low-income community members and those that face language and technology barriers. We appreciate the City Planning Department's (CDP) willingness to be creative and inclusive, and look forward to supporting the process and finding ways to meaningfully engage our community in the

CASP update and specifically reach residents who face language, technology, and other barriers to participation.

Ensure Deep Affordability and Community Benefits

Los Angeles is undeniably in the midst of an affordable housing crisis, which has been exacerbated by the economic recession due to the coronavirus pandemic. However the crisis is more acute for Extremely Low Income (ELI) households (those earning below 30% of AMI), 74% of which are severely rent burdened - meaning they spend more than 50% of their income on housing costs.¹ Many of our families earn \$25,000 or less, putting them at risk for displacement and homelessness. Although we agree that additional affordable housing is badly needed, we want to ensure that any recalibration of affordable housing incentives in the plan results in maximization of ELI and Deeply Low Income (DLI) units that match the affordability needs of the community. In addition any new incentives should also include a community benefits program, similar to the model program in the DTLA 2040 Plan², that incentivizes the creation of public parks and community spaces.

The new plan must also include robust anti-displacement strategies that address both direct and indirect displacement as a result of new development. Low-income tenants and those with limited English must be protected from the threat of losing their homes.

Protect Community-serving Small Businesses

Since CASP's implementation in 2013, the pressures of gentrification have become all the more pronounced for small businesses. In the past year we have lost our last full-service grocery store as the long-time owners were refused a new lease and forced to move, leaving transit-dependent residents without a place to buy groceries³. The pandemic has also had a devastating effect on Asian-owned small businesses as racist associations with the virus persisted, and federal PPP loans were disproportionately funneled to more affluent communities⁴. Although the update's stated objectives prioritize housing, the plan must continue to protect and encourage community-serving small businesses which generate the local economic base, serve the needs of transit dependent residents, and generate employment for the immigrant labor force.

Improve Health Outcomes

Chinatown and the CASP area have some of the most unhealthy air quality in Los Angeles. According to CalEnviroScreen the area covered by CASP is in the 99th Pollution Burden Percentile⁵ for LA County. At the same time, the low-income residents, youth, and the elderly rely on public transit and walking, and have much lower rates of car ownership. Out of necessity, we are a model TOC community. However, as residents and businesses are displaced and higher income

¹ <https://1p08d91kd0c03rlxhmhtydpr-wpengine.netdna-ssl.com/wp-content/uploads/2020/07/2020-Los-Angeles-County-Affordable-Housing-Outcomes-Report.pdf>

² https://planning.lacity.org/odocument/2c541d44-8b58-478b-b2af-bedcc60271f7/Community_Benefits_Summary_PH_draft.pdf

³ <https://spectrumnews1.com/ca/la-east/news/2019/11/07/chinatown-loses-its-last-chinese-grocery-store>

⁴ <https://www.washingtonpost.com/business/2020/07/31/ethnic-enclaves-gentrification-coronavirus>

⁵ <https://oehha.ca.gov/calenviroscreen/maps-data>

people take their place, car ownership rates have gone up. By incorporating anti-gentrification and anti-displacement strategies that stabilize both low-income residents and small businesses, CASP can sustain and improve upon the multi-modal transportation systems that many residents rely on, improve air quality and lead to better health outcomes. Prioritizing the needs of low-income community members can reduce GHG emissions and result in better economic and health outcomes.

Focus on Racial Equity

The CASP update provides an opportunity for DCP to deliver on its statement of solidarity with AAPI communities⁶, and the recent call for anti-racist planning that addresses the structural discrimination that communities of color have faced in Los Angeles⁷. In addition to the stated project goals, we urge DCP to center racial equity in the update process and include an outcome-focused Racial Equity Analysis, which we are currently proposing in the DTLA2040 Community plan update, in the new CASP.

SEACA appreciates the opportunity to provide these comments on the CASP NOP. We are committed to make our community a thriving and safe environment for low-income residents of color. We urge you to address the concerns raised in our comments both throughout the plan update process, and in the substance of the new CASP. We look forward to any additional dialogue and opportunities for public engagement as part of the CEQA process.

Sincerely,



Sissy Nga Trinh
Executive Director

Comments Endorsed by:
Public Counsel
Natural Resources Defense Council

⁶ “Standing in Solidarity with Asian, Asian American, and Pacific Islander Communities of Los Angeles”. Posted: March 25, 2021. <https://planning.lacity.org/resources/message-city-planning>

⁷ “Charting Our Course for a more Fair, Just, and Equitable Los Angeles” Posted: June 5, 2020. <https://planning.lacity.org/resources/message-city-planning>

DATE: 05/07/2021

TO: Los Angeles Department of City Planning
200 N. Spring Street, Room 667 Los Angeles, CA 90012

ATTN: Clare Kelley City Planner, CASP Update PM clare.kelley@lacity.org 213-978-1207

CC: Michael Sin City Plnr.Assoc. michael.sin@lacity.org 213-978-1345
Valerie Watson Snr City Planner valerie.watson@lacity.org
CD1 Snr Plan.Dir., Gerald Gubatan gerald.gubatan@lacity.org
Lincoln Heights Neigh.Cncl Richard Larsen PLU Comte
RWLarsen.LAPA@gmail.com
Historic-Cultural North NC Lau Mai Wah VP-NC mxl056@gmail.com
Valerie Hanley

FROM: Dr. Tom Williams, 323-528-9682 ctwilliams2012@yahoo.com
LA-32 NC Director, President Citizens Coalition for A Safe Community

SUBJECT: Cornfield Arroyo Seco Specific Plan Update
EIR Scoping Meeting CPC-2021-2642-SP; ENV-2021-2643-EIR

RE: Notice of Preparation (NOP) & Scoping Review Public Comments

After review of the many pages, I find the NOP and “initial studies” to be incomplete and inadequate for scoping of the proposed “update” of the Cornfields Arroyo Seco Specific Plan (CASP). I have prepared more than 400 CEQA/EIR+ and NEPA/EIS+ worldwide and in the US, since I prepared my first EIR in 1972 for the City of San Jose. I am experienced in preparation and review of CEQA/NEPA documents and their contents. I and a few others contributed to the initial 2010 CASP development and commented on such.

As a Specific Plan, the process is different from that of a General/Community Plan update and must achieve greater clarity, quantification, and informative content for public/community participation, review, and comments. I recommend that the LACity Dept.City Planning withdraw current documents, revise and supplement based on the attached comments and recommendations, and recirculate for post-Covid review and comment by stakeholder and the Public. DCP must also involve Dept.Publ.Wrks.-Bur.of Engineering because of the many infrastructure facilities involved in such a major transformation from industrial/public related facilities and systems to residential and commercial land uses.

The CASP was adopted in 2013 but the problems were known and arose immediately:

- Large parcel sizes and corporate ownerships without resources to profit from housing conversions;
- Prop-13 ownerships (LLP/LLCs) of parcels and need for owners to participate in partnerships;
- Century of industrial direct and groundwater expanded contamination and potential costs of remediation;
- Historic housing protections and considerations; and
- Lack of and expense for housing infrastructure – drains, sewers, cabling/transformers.

SEE attached also/below

COMMENTS:

Update to the CASP will also include:

- Explore ways to encourage affordable and mixed-income housing production in the Plan Area, such as:
- Expanding the Urban Village zoning designation to more parcels;
- Allowing 100% affordable housing developments in Urban Innovation and Urban Center zones, where they are not currently permitted;
- Eliminating the existing 10% non-residential use requirement in the Urban Village zone; and/or
- Recalibrating affordable housing incentives.

The primary objectives

- Increase the production of affordable and mixed-income housing within the Project Area;
- Prevent displacement and promote housing stability;
- Design and regulate housing to promote health and well-being, increased access to amenities such as parks and public transit, and sustainability;
- Promote welcoming and accessible housing for Angelenos with unique needs;
- Refine Plan standards, processes, and procedures to be more intuitive and transparent; and
- Preserve existing employment areas that show a concentration of jobs, while supporting small and/or legacy businesses, local employment, new productive uses, and employment spaces

SCAG 2020-45 Projections of population, households (dwelling units required) and jobs and employees commutes

Discretionary City Approvals –
Amendment of the CASP

- Certification of an EIR
- Adoption of necessary revisions and any other amendments necessary to implement this update, such as amendments to
General Plan elements (such as the Framework Element),
Community Plans,
the LAMC,
specific plans, and
other ordinances to implement those updates

Cornfield Arroyo Seco Specific Plan (CASP) Update | Los Angeles City Planning (lacity.org)

Key Provisions

A key feature of the CASP is its groundbreaking value capture incentive zoning system,...additional floor area rights in exchange for setting aside affordable units for low-income households. to make targeted revisions to the CASP, including its incentive zoning system...further strengthen the original vision and intent of the Specific Plan.

Update Components:

- Recalibrating zoning regulations and incentives to incentivize affordable housing development more strongly;
- Identifying additional opportunity areas that could allow for affordable and mixed-income housing development;
- Updating the Specific Plan to reflect current and future demographic, regulatory, environmental, and economic conditions; and
- Updating the Specific Plan's standards, processes, and procedures to be more intuitive and transparent.

The NOP uses the “standard” alphabetic content list for environmental sectors which leads to an arbitrary unconnected description and assessment of environmental sectors without ecosystem/environmental associations and relationships between the sectors and the project’s environment, qualities, and impacts. I recommend the NOP/Initial Studies be reorganized as follows:

- Aesthetics - Provide viewsheds, conflicting images, and River views/use
- Noise (Tunnels, UP/ATSFRR, freeways, warehouse/reflectance and hills) - Provide traffic noise assessment with model, including RR uses
- Air Quality - Greenhouse Gas Emissions - Energy
Provide SR-110 tunnel emissions and modeling of cold NOX
Delineate TOCs for the CASP area and within 1000ft of boundary
- Biological Resources - Provide river flyways, closest wildfire risk area (ZIMAS), and vegetated hills
- Cultural Resources - Tribal Cultural Resources
Provide thorough, complete review for endemic peoples – especially for the river confluence and summer water sources for villages
Review of historic documents, ground and aerial photos, and assess potential for subsurface remains as found in Union Station during Red Line construction
- Geology and Soils - Mineral Resources
Provide Fault zones maps of entire CASP and within 1000ft of boundary (ZIMAS)
Provide the historic seismicity (>0.1 RM) North Spring and Avenue 18 north edge of fault zone
Confirm/Provide current LA Oil Field and related wells and EDR Aerial Photos
- Hazards and Hazardous Materials
Provide historic hazardous materials from industries with storage tanks and from LA Oil Field for fueling engines and tankers in Cornfields Yard
Provide review of historic hazardous materials from railroad/trains liquids and dumping contamination including hydraulic fluids with dioxane
Provide HazWaste inventory based on historic photography and accounts. Locate and prioritize contamination related to residential land use development and guidelines
Provide for program and zoning requirements for borings, exhaust stacks, and vapor recovery/extraction for all residential structures and zoning areas. Zero (0.00000 ppm) tolerance for all VOCs and all H2S in soil vadose zones.

- Hydrology and Water Quality
Provide current and planned Storm Water runoff projections and infiltration/recharge for Low Impact Development compliance.
Provide groundwater surveys and modeling for contamination by LA Oil Field, leakage along fault zones, industrial/railroad use/spillage into alluvium, and human wastes/septage and anaerobic decomposition with H2S formation in contaminated groundwater.
Provide geologic borings for at least three E-W geological cross-section from the bottom of the alluvial groundwater to its upper limits and the vadose zones above.
Provide inventory of ground gaseous emissions confined by extensive asphaltting/paving of surface with sand bed storage/conveyance.
Provide CASP wide groundwater probe-boring and liquid/gases levels monitoring and flow modeling from 2022 to completion of development.
Provide CASP wide boring, sampling, testing, source locating, and remediation of vadose and saturated soil/geologic zones.

- Land Use / Planning
Provide transition zones (150ft zones) between public facilities, commercial, industrial, and residential uses/zonings.
Provide a planning development model for parcellation of current plots of >220,000 sqft.

- Population / Housing (and Economics)
Provide SCAG projections through 2045 for all TAZs in CASP and within 30min (5-miles) commutes/bus trips during AM/PM commutes.
Provide current home ownership, home rentals, and R2-R5 rental levels and costs for 2010-2020 and 2020-current.

Provide economic and household financial summaries for CASP and included TAZs Incomes affordable housing.

Provide definitions/enumerations for economic status and affordability (quarterly levels – Median/50%ile 25%ile 75%ile 90%ile) and estimated % of Income for rental rates by status-group, of all included TAZs (SCAG) in and within 5280ft of the CASP boundaries.

- Public Services - Recreation - Transportation - Utilities / Service Systems

Provide a program and schedule for major services and support improvements/upgrades required for changes from industrial land uses to housing/residential services.

Provide services availabilities for R3-R5 averaged for the city, then apply same service levels to all TAZs in Specific Plan and those immediately adjacent to the CASP and provide for differentials during the CASP upgrade implementation period.

- Mandatory Findings of Significance

Provide numerical/quantified level of findings and of significance and their statutory sources.

- Cumulative impacts consists of **impacts** that are created by a combination of the project evaluated in the environmental **impact** report (**EIR**) together with other projects causing related **impacts**.

Provide transportation, sewage, and power/water improvements leading to and supporting/inducing land use upgrades requiring/inducing increased social/medical services.

Provide an air quality modeling (for, NOX, PM1, and CO) for current conditions and those projected for 2045 and any exceedances of current or assumed future air quality parameters.

- EIR requires an analysis of a “**reasonable** range” of **feasible** alternatives

Provide definitions and specific examples for reasonable and feasible alternatives.

Provide an economic review and models for projected zoning/land use changes, since feasible usually includes economic considerations.

- Project alternatives to be determined based on Draft EIR analysis, and include the required “No Project” alternative

Provide alternative including only 66% and 33% of current non-residential properties developed for R3-5 residential uses.

Provide alternative with 100% Mixed C+R uses for all parcels other than for recreational uses and public facilities..

THEN ALSO

Provide Draft Mitigation Monitoring and REPORTING Plan in the DEIR.

Provide account for gentrification pressure that current residents and small businesses.

Provide strategies to retain and support small community-serving businesses.

Provide preservation of industrial land remain a goal of the CASP.

Provide demand for industrial land use

Provide areas targeting to mixed use

target current pollution issues - SR-110 Tunnel Exhausts, RR exhausts Tier 4

Provide SCAG 2045 projections for Population, Households, and Jobs within CASP Transportation Analysis Zones (TAZ).

Provide estimates of AM/PM commutes to/from area based on populations, households, expected employed, and jobs within CASP and with 30min commute/bus trips.

Provide EIR Alternatives - doubling of William Mead Homes (as done in the Rose Hill Courts project underway).

Provide any new or updated incentives result in deeply affordable units that serve current residents, and include community benefits such as parks and community spaces.
Provide CASP limits Floor Area Ratio (FAR) of housing.
Provide the existing Option A and Option B bonus structure
Provide allow additional incentives to create more affordable and mixed-income units via FAR and Height
Provide additional housing be attainment paths

Provide the questions asked in this Q&A on your web page
Provide update accommodate people of all income levels \$25-75K, \$75-\$125K, \$125 and above
Provide the City CASP market study.
Provide updated CASP for TOC and/or state density bonus options and those incentives in the CASP, thus allowing additional housing

Provide inventory of current, permitted/zoned, and projected housing in the plan area and within 30 min commute.

Provide historic inventory of all structures built in part or wholly pre-1930.
Provide review/analyses of all historic aerial and surface photos of structures within the CASP.
Provide archaeological review of the area for potential endemic, Spanish, and Mexican buried/subsurface cultural remains (e.g., 1000ft of the confluence of the Arroyo Seco and LA River).

Provide planning and permit fees in the CASP to help offset the current high development and remediation costs.

Provide CASP area-wide hazardous material/wastes/contamination review/study/inventory for the area due to historic railroad and industrial development and the Los Angeles oil fields.

Provide information about the height restrictions for each building.

Specific NOP Comments - No pagination makes references difficult for public.

ALTERNATIVES

1/2 The City is requesting identification of environmental issues, environmental impacts, and information that you or your organization believes needs to be considered and analyzed in the EIR, including environmental impacts, mitigation measures, and **alternatives**.

2/3 RESPONSIBLE AND TRUSTEE AGENCIES The City requests your agency's views on the scope and content of the environmental information relevant to your agency's statutory responsibilities in connection with the project, in accordance with the CEQA Guidelines, Section 15082(b)....

(1) The significant environmental issues and **reasonable alternatives** and mitigation measures that your agency will need to have explored in the EIR; and

NOP 2/5 **Alternatives** to be analyzed in the EIR are to be defined and analyzed consistent with the requirements of CEQA Guidelines, Section 15126.6. The **specific alternatives** to be evaluated will include a "No Project" alternative, as required by CEQA, and may include alternative land use configurations.

In order to propose alternatives, the NOP/Scoping Docs must provide clear and numerical "Goals" and "Objectives" for the CASP Update and how applied to alternatives.

In order to present "reasonable alternatives" and "specific alternatives", parameters and definitions must be provided but have not been, thereby restricting the public from proposing such alternatives. Provide definitions and differentiations and general examples for public consideration and submissions for alternatives, reasonable alternatives, and specific alternatives for the CASP

NOP 3/2 The intent of the adopted CASP is to guide the transition of an underserved, vehicular-oriented industrial and public facility area into a cluster of mixed-use, pedestrian-oriented neighborhoods. **Policies**

in the CASP support a range of housing options, new public spaces, opportunities for walking and bicycling, and the retention of land for existing industrial businesses and the clean technology businesses of the future. Among **its numerous goals**, a key priority of the CASP is to facilitate the production and continued provision of affordable housing for Extremely Low Income and Very Low Income households.

No basis is provided for alternatives to be provided compared to “Do-Nothing”.

Provide appropriate reasonable, specific, numerous, and feasible Goals, Objectives, Policies for which the public can provide appropriate alternatives.

Provide definitions, differences, and examples of policies and goals as referenced herein.

Provide definition and numbers for affordability, median/averaged/separated household incomes for the CASP areas.

NOP 4/2 The Proposed Project would also update the **building form, urban design, open space, parking, conservation, performance, and sign standards** of the CASP as necessary to support housing production, and amend the CASP text with technical revisions that ensure consistency, clarity, and **ease of implementation** and

reflect current and future demographic, regulatory, environmental, and economic conditions.

The Project would retain the **existing ministerial review process for subsequent development projects**.

Provide specific tables indicating the parcel(s) new (2021) zoning designations and specific numerical definitions for building form, urban design, open space, parking, conservation, performance, and sign standards.

Provide specific existing 2013, current 2021, and any post-2021 review processes for implementation of the updated Specific Plan ministerial and discretionary processes.

Upgrade does not provide for/include public utilities, services, and facilities nor roads and parkways. Provide projected populations, households, jobs, required dwelling units, and all appropriate facilities, services, and utilities commensurate with the community.

4/3 **Project Objectives** The **primary objectives** of the Project will be to:

- Increase the production of affordable and mixed-income housing within the Project Area,
- Protect residents, especially low-income households, from indirect and direct displacement, and ensure stability of existing vulnerable communities,
- Design and regulate housing to promote health and well-being, increase access to **amenities such as parks and public transit**, contribute to a sense of place, foster community and belonging, and plan for a sustainable future,
- Build, operate, and maintain welcoming and accessible housing for Angelenos with unique needs, including those with disabilities, large families, older adults, and other people facing housing barriers and food insecurity,
- Refine Plan standards, processes, and procedures to be more intuitive and transparent, with the goal of enhancing development certainty for both market-rate and affordable developers, and
- Preserve **employment areas** that show a **concentration of jobs**, while supporting small and/or **legacy** businesses, local employment, new productive uses, and employment spaces, such as light industrial and general commercial uses.

Provide all, primary and secondary objectives. Provide enumeration/quantification, and numerical parameters for such and the methods by which they will fulfil the Goals of the CASP.

Provide clear, direct, and enumerated relationships (“model”) between Goals, Policies, and objectives, which has not been included in available document.

Provide actual/projected population, households, and jobs for all SCAG-TAZ in CASP for 2010 to 2025.

Provide definition of concentration, employment/jobs, and definitions of small, medium, and large businesses.

Provide listing of any “legacy businesses” other than railroads.

Provide existing City examples of standards, processes, and procedures which are sufficiently intuitive/transparent and enhance development certainty for both market-rate and affordable housing and proponents.

More Coming 050821



Michael Sin <michael.sin@lacity.org>

CASP Update ENV-2021-2643-EIR NOP Public Comments #1

1 message

Tom Williams <ctwilliams2012@yahoo.com> Fri, May 7, 2021 at 4:50 PM
To: "clare.kelley@lacity.org" <clare.kelley@lacity.org>, "michael.sin@lacity.org" <michael.sin@lacity.org>, "valerie.watson@lacity.org" <valerie.watson@lacity.org>
Cc: "mxl056@gmail.com" <mxl056@gmail.com>, Richard Larsen <rwlarsen.lhnc@gmail.com>, Gerald Gubatan <gerald.gubatan@lacity.org>

DATE: 05/05/2021

TO: Los Angeles Department of City Planning
200 N. Spring Street, Room 667 Los Angeles, CA 90012

ATTN: Clare Kelley City Planner, CASP Update PM clare.kelley@lacity.org 213-978-1207

CC: Michael Sin City Plnr.Assoc. michael.sin@lacity.org 213-978-1345
Valerie Watson Snr City Planner valerie.watson@lacity.org
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Lincoln Heights Neigh.Cncl Richard Larsen PLU Comte
RWLarsen.LAPA@gmail.com
Historic-Cultural North NC Lau Mai Wah VP-NC mxl056@gmail.com
Valerie Hanley

FROM: Dr. Tom Williams, 323-528-9682 ctwilliams2012@yahoo.com
LA-32 NC Director, President Citizens Coalition for A Safe Community

SUBJECT: Cornfield Arroyo Seco Specific Plan Update

EIR Scoping Meeting CPC-2021-2642-SP; ENV-2021-2643-EIR

RE: Notice of Preparation (NOP) & Scoping Review Public Comments

After review of the many pages, I find the NOP and "initial studies" to be incomplete and inadequate for scoping of the proposed "update" of the Cornfields Arroyo Seco Specific Plan (CASP). I have prepared more than 400 CEQA/EIR+ and NEPA/EIS+ worldwide and in the US, since I prepared my first EIR in 1972 for the City of San Jose. I am experienced in preparation and

review of CEQA/NEPA documents and their contents. I and a few others contributed to the initial 2010 CASP development and commented on such.

As a Specific Plan, the process is different from that of a General/Community Plan update and must achieve greater clarity, quantification, and informative content for public/community participation, review, and comments. I recommend that the LACity Dept.City Planning withdraw current documents, revise and supplement based on the attached comments and recommendations, and recirculate for post-Covid review and comment by stakeholder and the Public. DCP must also involve Dept.Publ.Wrks.-Bur.of Engineering because of the many infrastructure facilities involved in such a major transformation from industrial/public related facilities and systems to residential and commercial land uses.

The CASP was adopted in 2013 but the problems were known and arose immediately:

Large parcel sizes and corporate ownerships without resources to profit from housing conversions;

Prop-13 ownerships (LLP/LLCs) of parcels and need for owners to participate in partnerships;

Century of industrial direct and groundwater expanded contamination and potential costs of remediation;

Historic housing protections and considerations; and

Lack of and expense for housing infrastructure – drains, sewers, cabling/transformers.

SEE attached also/below. More to Come

 **CASP0508Cmts0507Sbmttd.docx**
29K



Michael Sin <michael.sin@lacity.org>

CASP Scoping Notice of Preparation (NOP) & Scoping Review Public Comments for Groundwater and Hazardous Contaminations

1 message

Tom Williams <ctwilliams2012@yahoo.com> Sat, May 8, 2021 at 12:49 PM
To: "clare.kelley@lacity.org" <clare.kelley@lacity.org>, "michael.sin@lacity.org" <michael.sin@lacity.org>, "valerie.watson@lacity.org" <valerie.watson@lacity.org>
Cc: "gerald.gubatan@lacity.org" <gerald.gubatan@lacity.org>, Richard Larsen <rwlarsen.lhnc@gmail.com>, "mxl056@gmail.com" <mxl056@gmail.com>, "vhanley.hcnnc@gmail.com" <vhanley.hcnnc@gmail.com>

DATE: 05/08/2021
TO: Los Angeles Department of City Planning
200 N. Spring Street, Room 667 Los Angeles, CA 90012

ATTN: Clare Kelley City Planner, CASP Update PM clare.kelley@lacity.org 213-978-1207

CC: Michael Sin City Plnr.Assoc. michael.sin@lacity.org 213-978-1345
Valerie Watson Snr City Planner valerie.watson@lacity.org
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FROM: Dr. Tom Williams, 323-528-9682 ctwilliams2012@yahoo.com LA-32 NC
Director, President Citizens Coalition for A Safe Community

SUBJECT: Cornfield Arroyo Seco Specific Plan Update EIR Scoping Meeting CPC-2021-2642-SP; ENV-2021-2643-EIR

RE: Notice of Preparation (NOP) & Scoping Review Public Comments for Groundwater and Hazardous Contaminations

After review of the many pages, I find the NOP and "initial studies" to be incomplete and inadequate for scoping of the proposed "update" of the Cornfields Arroyo Seco Specific Plan (CASP).

The CASP was adopted in 2013 but the problems were known and arose immediately:
Century-plus of industrial direct and groundwater expanded contamination;
Large parcel sizes and corporate ownerships without resources to profit from housing conversions;
Prop-13 ownerships (LLP/LLCs) of parcels and need for owners to participate in partnerships;
Historic housing protections and considerations; and
Lack of and expense for housing infrastructure – drains, sewers, cabling/transformers.

Following review of scoping documents and other materials, the DEIR must include a CASP Groundwater Model for entire Specific Plan area to locate and provide plan-wide groundwater flows, depths, and thicknesses. Such environmental description must be provided to assess environmental impacts of such upon existing and future impacts subjecting land uses and residents to upward spreading contamination and degassing from oil rich geology and historic/current industrial contamination west of Avenue 18/Daly (I-5).

Based on the description and assessment of contaminations, impacts can be mitigated and compensated for by the City and major developments.

Proposed structural development over the contaminated soils/alluvium may contain the contamination and promoting downstream movement of contaminated liquids and gases.

Mitigation/compensation by the City should include borings and well fields along Main, Spring, and Bolera and any public facilities along the CASP southerly boundaries. Some evidence of contamination was encountered during construction of Red Line Phase 1 south of Chavez Av.

Historic aerial photos of 1923, -27, -28, -31, and -38 may provide evidence of historic contamination by RR and tankage and focus additional borings and investigations to locate and evaluate levels of industrial and railroad contaminations. Such information must become the basis for describing contamination, evaluations of such, and mitigation measures for decontamination and exposures of residents to toxic gases out gassing into overlying new land uses.

Assessments and mitigation of significant toxic gases/liquids must include any increase in downward recharging of storm waters and leaching of contaminations through 20ft of soil/alluvium/vadose into the underlying groundwater and then compressing of the vadose zone and entrapped toxic gases above a rising groundwater table, augmented by increased stormwater recharge.

Eastside of river and I-5, the CASP has thinner alluvium/soils and thereby contamination maybe more local and static with thinner alluvium with easier/cheaper studies to find and remove.

Mitigation measures for west of I-5 must be far larger and expensive than those east of I-5. Any mitigation studies and measures must reflect initial geological/soil studies.

The EIR must describe and assess the effects of the LA Oil Field, including a Methane Zone related to the field. EIR must include a CalGEM map of the underground oil field and all leases include therein. This must be further directly related to the oil/gas producing zones and the geological structure of the Upper Elysian Park Fault across the easterly end of the oil field. Soil/alluvial borings and gas sampling must be included as methane/sulphide/toxic gas mitigation to locate, remove, and treat for methane and other gases. Such mitigation must be incorporated into parcel development regarding surface recharging/barriers and gas collection-treatment-release.

The EIR must include a complete groundwater setting and river along with surface recharge, passage southward of the Bolera Lane and westward extension of "Alhambra Ave." (=railroad). Overall application of Low Impact Development requirements must consider and mitigate any recharge reductions and/or increases across the entire CASP and releases.

The LA River lined channel was rendered generally impervious by concreting, but constructed channel designs incorporated in channel "weep-holes" (>15 from upstream concrete margin south to Chavez/US-101) which establishes a local base groundwater level of >20ft below the surface (west of Channel).