

**SANTA MONICA MOUNTAINS CONSERVANCY**

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January 23, 2012

Mr. Tom Glick, Project Manager  
Los Angeles Department of City Planning, Valley Office  
6262 Van Nuys Boulevard, Room 351  
Van Nuys, California 91401

**Warner Center Regional Core Comprehensive Specific Plan  
Draft Environmental Impact Report  
ENV-2008-3471-EIR; SCH No. 1990011055**

Dear Mr. Glick:

The Santa Monica Mountains Conservancy's (Conservancy) review of the subject project and Draft Environmental Impact Report (DEIR) is limited to its interface with and potential impacts to the Los Angeles River, a waterway of regional importance and the target of shared revitalization goals for the City and the Conservancy. The proposed specific plan would extend the plan boundaries north to the Los Angeles River to create a Canoga RIO District to complement the City's approved Los Angeles River Revitalization Master Plan (LARRMP) and draft River Improvement Overlay Ordinance (RIO). The Conservancy remains strongly supportive of the City's revitalization vision and current effort to create the planning tools for implementation. The Conservancy sees three opportunities for the Specific Plan and associated mitigation measures to enhance river parkway implementation.

First, the DEIR includes a discussion of the LARRMP and its identified opportunity areas along the Canoga section of the river near its headwaters at the confluence of Bell Creek and Arroyo Calabasas, adjacent to the subject plan area. These river projects provide a key opportunity for the development of recreational amenities for residents of the planned development at Warner Center and adjacent neighborhoods. Despite the identification of this opportunity, the plan and DEIR create no direct link between construction in the specific plan area and improvements to the Los Angeles River greenway. The Conservancy suggests a revision to measure PS-21 that establishes specific nexus between development at Warner Center and creation of river parks, especially for development within the proposed Canoga RIO District expansion area. The City should whenever possible direct mitigation funding toward opportunity areas along the river to accomplish multi-benefit river parkway improvements.

Second, the City should leverage the river greenway for its transportation benefits to nonmotorized commuters. While the greenway does roughly parallel the existing Orange Line bike path, the river serves a slightly different catchment area for local commuters approaching Warner Center from the north and northeast. Ironically, the river is currently a barrier to bicyclists trying to reach the existing Orange Line facility as it forces bicyclists to take busier through streets rather than neighborhood side streets. An additional transportation mitigation measure should allow the use of the proposed Warner Center Mobility Fee for greenway and greenway access improvements to facilitate regional connections between the Los Angeles River greenway and Warner Center. Currently no transportation mitigation measures address bicyclists and pedestrians and so it is not clear that this fee would be able to be used for improvements to those modes. (Bicycle and pedestrian facility improvements are mentioned under air quality, which is appropriate but not sufficient.) New state law permits use of transportation impact fees for bicycle and pedestrian projects. A City implementation ordinance may be required and, if so, should be included in the passage of this plan.

Additionally, the project proposes to construct a through street along Variel Avenue to mitigate traffic impacts along the other north-south corridors (TRS-1). This proposed Variel Avenue Corridor Improvement should include bicycle facilities and access to the Los Angeles River greenway. The new river bridge should include construction of the future bike path undercrossing to preclude the need to reconstruct this facility upon greenway implementation. Additionally, this street should be prioritized as a bikeway connection to Warner Center because it is a smaller street and more welcoming than either De Soto or Canoga Avenues.

Third, the DEIR identifies daylighting the Arroyo Calabasas reach under the corner of the Topanga Plaza Shopping Center as an opportunity area, but does not explicitly call for its implementation. The Conservancy will stand in opposition to the project unless it includes implementation of this daylighting project as part of a comprehensive package of stormwater and water quality improvements at Warner Center. This project should be specifically addressed as a hydrology mitigation measure and included in the specific plan itself along with a corresponding implementation action.

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Thank you for your consideration of these comments. If you have any questions, please contact Paul Edelman of our staff at (310) 589-3200, ext. 128.

Sincerely,

ANTONIO GONZALEZ  
Chairperson