

SANTA MONICA MOUNTAINS CONSERVANCY

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Ms. Shoukoufe Marashi, Environmental Supervisor
City of Los Angeles Department of Public Works
Bureau of Engineering, EMG
1149 S. Broadway, Suite 600, Mail Stop 939
Los Angeles, California 90015

**Comments on the Initial Study/Mitigated Negative Declaration (MND/IS) for the
Taylor Yard River Parcel G2 Project**

Dear Ms. Marashi:

The Santa Monica Mountains Conservancy (Conservancy) appreciates the opportunity to comment on the proposed Initial Study/Mitigated Negative Declaration (MND/IS) for the 41-acre G-2 Parcel at Taylor Yard adjacent to the Los Angeles River (River).

The Conservancy and partner agency, Mountains Recreation and Conservation Authority (MRCA) are dedicated to the protection, management, and creation of natural parkland and open space in Los Angeles and have been active members of the multi-agency, ongoing effort to revitalize the Los Angeles River. Like our partner organizations, the Conservancy sees the subject property, Taylor Yard Parcel G2, as being central to plan to naturalize portions of the River and create new parklands in the heart of urban Los Angeles. The 41-acre site includes nearly one-mile of river frontage along the soft-bottom portion of the River. In many ways the revitalization effort was born out of community efforts to create the Rio de Los Angeles State Park on another portion of Taylor Yard. The Los Angeles River Revitalization Master Plan (LARRMP) identified the subject property as one of the highest priority acquisitions that would allow for demonstration of concrete removal as a restoration strategy and the *San Gabriel and Los Angeles River Watershed and Open Space Plan* designated the property as a prime restoration site for habitat and water quality improvement.

The location of this parcel and River hydrology support the use of the approximately 41-acre G-2 parcel as a major treatment wetland, which has the potential to treat regional stormwater flows and therefore can impact the long-term water quality of the River. Its proximity to existing open space and new riverly development – Rio de Los Angeles State Park, Bowtie Parcel, Marsh Park, Elysian Park, urban riparian zone in the river channel, pocket watershed

parks along the opposite bank of the River, and Los Angeles River High School – means that G-2 will connect these amenities to create a regional multiple-benefit space, enhancing habitat connectivity, passive recreation and the water quality of the LA River watershed. Furthermore, the Draft Los Angeles River Ecosystem Restoration Integrated Feasibility Report (LA River IFR) considers ecological restoration of the G-2 site as a vital element to approval and implementation of the plan.

The Conservancy has a significant stake in this portion of the Los Angeles River having invested in many park sites along the River opposite Taylor Yard in Elysian Valley. In 2011, the Conservancy allocated grant funding to the Los Angeles River Revitalization Corporation (LARRC) for project planning and design to develop an acquisition strategy for the G-2 parcel, which was critical to initiate the current acquisition negotiations with the City of Los Angeles (City) and owner, Union Pacific. Additionally, Conservancy and MRCA staff have been involved in planning efforts that involved the G-2 parcel including, the 1996 County's Los Angeles River Master Plan, 2002 State Coastal Conservancy Feasibility Study and Technical Advisory Committee (TAC), and various TACs for the LA River IFR over the last decade.

MND/IS Scope

In reviewing the MND/IS, the Conservancy understands that land purchase negotiations between the City and Union Pacific, are currently on-going. The MND/IS details that the City is interested in acquisition of the G-2 parcel to remediate the site to standards consistent with future publicly-accessible uses including water quality improvements consistent with Proposition O guidelines and multi-benefit public parkland and open space. The MND/IS outlines the scope of the proposed project as Phase I, which includes changing the zoning to open space for the development of parkland and public facilities, targeted remediation, and implementation of water quality improvements on approximately 10-acres of the property. Remediation cleanup goals for water quality improvements and parkland/open space development are proposed to meet applicable standards for recreational use. Within the proposed Phase I scope, soil/soil vapor within the remaining 31-acres would be treated to meet standards for industrial use. Development of the remaining 31-acres would occur after future land use is determined in Phase II.

The Conservancy looks forward to working with the City to further conserve and enhance the river resources. The Conservancy supports the acquisition and restoration of the G-2 parcel, however we would like the City to take careful note the following comments/deficiencies in the proposed MND/IS.

Remediation

The Conservancy understands that there is a significant cost born on the City associated with remediation work above industrial standards, but recommends that a watershed perspective be employed when planning future uses for the site and that the highest and best use would be to allow the site to hydrologically reconnect to the River, as proposed in the LA River IFR Alternate 20. Site development should coordinate closely with Alternate 20 recommendations in order to maximize allocated public resources instead of developing temporary improvements that will later necessitate removal for the Alternate 20 improvements. Additionally, it would be helpful to explain the definition of “remediated to applicable recreation use standards”, so as to delineate whether the proposed cleanup goals would meet the land use needs required for Alternate 20 ecological improvements. The Conservancy urges that areas directly adjacent to the River in the G-2 parcel be given the highest priority for development of parkland and open space improvements. This will require cleanup goals above residential or industrial standards to allow for ecological restoration and the hydrological connection. The Conservancy strongly recommends that the entire G-2 parcel be remediated to allow restoration and/or recreation at the entire site, and questions whether a phased strategy is the best approach for the site given the significant investments from federal, state, and local sources for the River.

Water Quality Improvements

The MND/IS proposes that water quality improvements may direct dry and wet weather stormwater flows to the G-2 parcel for treatment and infiltration, utilizing natural treatment systems that may include bioswales, detention basins, and treatment wetlands in addition to other best management practices (BMPs). The Conservancy supports stormwater treatment and capture methods for the site, which are broadly consistent with the recommendations of the aforementioned plans and are protective of the River, but reiterates that all improvements should not interfere with or delay the implementation of the Alternate 20 recommendations which require remediation and restoration of the entire site. As a priority, the Conservancy recommends that a commitment be made to balance water quality opportunities with public access, recreation, and restoration, so that water quality treatment does not come at the expense of the latter.

Parkland and Open Space Improvements

Additionally, the MND/IS proposes park and open space improvements for the 10-acre area bisecting the middle of the site to include landscape buffers, greenways, gateways, park amenities, and integrated spaces for people and habitat. The Conservancy has a long history of developing numerous similar River improvements and, along with MRCA, is interested to partner with the City on both phases of park development to create amenities that synchronize with work

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throughout the River watershed. As a primary goal of the LA River IFR Alternative 20 is to hydrologically connect the Bowtie and G-2 parcels to in-channel restoration work, it remains critical that the Phase I improvements are understood to potentially be temporary and to not handcuff long-range River restoration work. The Conservancy urges that areas directly adjacent to the River in the G-2 parcel be given the highest priority for development of parkland and open space improvements. As specified above, the Conservancy strongly advocates that the entire G-2 parcel be remediated to allow improvements supporting restoration and recreation, and recommends discussion of the efficacy of a phased approach.

The Conservancy looks forward to working with the City as this process continues. Please send all future notices and documents to Brian Baldauf, brian.baldauf@mrca.ca.gov, (323) 221-9944, extension 110, or Paul Edelman, edelman@smmc.ca.gov, (310) 589-3200, extension 128.

Sincerely,

LINDA PARKS
Chairperson