



DEPARTMENT OF PARKS AND RECREATION
Angeles District
1925 Las Virgenes Road
Calabasas, CA 91302

Lisa Ann L. Mangat, Director

Agenda Item 10(b) SMMC 3/27/17

March 13, 2017

Jon Chang, Planning Assistant
Major Projects and Environmental Analysis Section
City of Los Angeles Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

RE: Initial Study and Notice of Preparation for Bow Tie Yard Lofts Project (Case Number ENV-2016-2862-EIR)

Dear Mr. Chang:

California State Parks, Angeles District, has reviewed the Initial Study and Notice of Preparation for the Bow Tie Yard Lofts Project and would like to provide the following comments:

3. Environmental Setting (Page A-8):

The Bowtie parcel should be described as “open space” rather than “vacant land.” The parcel is part of the 57 acre Rio de Los Angeles State Park, which includes the 17 acre Bowtie parcel and the nearby 40 acre parcel on San Fernando Road. A General Plan for Rio de Los Angeles State Park was completed in 2005.

A key consideration when California State Parks purchased the 57 acres along the Los Angeles River was the potential to restore one of the largest undeveloped contiguous parcels along the Los Angeles River. California State Parks is committed to increasing wildlife habitat, open space, flood storage, and recreational space in one of the nation’s most park-deficient urban regions—metropolitan Los Angeles.

We would also like to point out that the Plains All American Pipeline operates a crude oil pipeline through the Bowtie Parcel in close proximity to this proposed mixed use development.

Conceptual Plant Palette (Figure 7, 8): The conceptual plant palette includes plants that are not native to the Los Angeles River. All landscape plants should be native plants appropriate for riparian upland habitats, and grown from locally-collected seeds. The non-native plants listed in the conceptual plant palette can become harmful invasive plants in the adjacent Los Angeles River riparian habitat and the State Park.

I. Aesthetics (Page B-2)

Response c: The development's height will increase its impact on views from the California State Park Bowtie parcel and the Los Angeles River. Alternatives that minimize this impact should be considered.

Response d: Options for night lighting that reduce the impact on the State Park Bowtie parcel and the Los Angeles River should be considered. See Biological Resources below.

IV. Biological Resources (Page B-6, Response b)

A more thorough review of wildlife habitat within the adjacent Los Angeles River is needed. At this location the Los Angeles River, although channelized, has a soft bottom with riparian habitat that provides valuable wildlife habitat. Native trees and habitat, and native wildlife are present along this stretch of the river. Bats are present in this area, and are sensitive to habitat changes such as fragmentation and changes in land use. The Los Angeles River is within the Pacific Flyway, an important migratory route for birds. Upland sites adjacent to the river provide vital habitat for wildlife. The Bowtie parcel and Los Angeles River provide wildlife linkages to nearby and larger regional habitat areas, which increase the survival of native wildlife.

The impact of high density development is greater than that of light manufacturing. The study should address the impact of increased density, noise, and night lighting on wildlife. Noise and light sources can disorient nocturnal wildlife and act as a barrier to movement. The proposed development should consider a setback from the river and the State Park to create a buffer between the dense development and the habitat. Options to buffer impacts of night lighting along these boundaries should also be considered.

V. Cultural Resources

Page B-8, Response b – The correct term is “unconsolidated fill material” not “undocumented.”

Page B-24, first full paragraph – The correct term is “unconsolidated fill material” not “undocumented.”

Page B-9, MM A-1 – The SOPA organization disbanded several years ago. The correct designation is Register of Professional Archaeologist (RPA).

Page B-10, Response d – The correct term is “interment” or “burial” sites, not “internment sites.”

VIII. Hazards and Hazardous Materials (Page B-12, response a-d)

The project site is adjacent to the Bowtie parcel, which has been identified as a Brownfield site by the Department of Toxic Substances Control (DTSC). Any development plans should not impact future remediation efforts at the Bowtie parcel.

X. Land Use and Planning (Page B-17)

The EIR should address prior planning documents for the Los Angeles River (Los Angeles River Revitalization Master Plan; Water Supply and Habitat Resiliency for a Future Los Angeles River, Rio de Los Angeles State Park General Plan) to ensure consistency with these plans. For example, one plan recommendation is that the landscaping and hydrology of the river adjacent sites should be designed to provide a value-added role to the habitat functions of the Los Angeles River ecosystem.

XIV: Public Services (Page B-22, Parks)

California State Parks purchased two parcels, totaling 57 acres on the Los Angeles River to restore natural resources and to provide much-needed open space in the nation's most park-deficient urban regions—metropolitan Los Angeles. Prior to the purchase, the area surrounding Rio de Los Angeles State Park provided less than 1.3 acres of public open space per 1,000 residents, well below the City of Los Angeles objective to provide 4 acres per 1,000 residents (Rio de Los Angeles General Plan 2005), and significantly below the 6.25 to 10.5 acres per 1,000 people recommendation from the National Recreation and Park Association (Rio de Los Angeles General Plan 2005). The increased density from the proposed development would impact the State Parks, and Quimby Fees would not provide assistance to State Parks.

XV. Recreation (Pages B-22-23)

See Public Services comment above.

XVII. Tribal Cultural Resources (Pages B-26 and B-27, Response b)

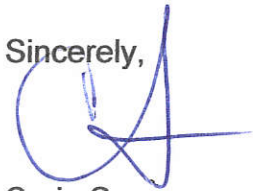
Under AB52, a list of appropriate tribal contacts should be requested from the California Native American Heritage Commission. This would provide a much more comprehensive list than the three groups mentioned. It should also be noted that the Soboba Band of Luiseno Indians have a tribal interest area in Riverside County in the vicinity of Hemet, so it is unclear why they were contacted for a project located in central Los Angeles.

Records search and tribal consultation documents refer to Appendix B, but this appendix was not provided for this review.

XIX. Mandatory Findings of Significance (Page B-29)

In addition to the potential significant impacts listed as mandatory findings of significance (aesthetics; air quality; geology and soils; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; public services; transportation/circulation; and utilities), the EIR should analyze impacts to parks and biological resources due to the project's location adjacent to the Los Angeles River and Rio de Los Angeles State Park.

Sincerely,



Craig Sap
Angeles District Superintendent