

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207
WWW.SMMC.CA.GOV



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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, California 90012

**Initial Study and Notice of Preparation for Bow Tie Yard Lofts Project
(Case No. ENV-2016-2862-EIR)**

Dear Mr. Chang:

The subject 5.7-acre property will soon abut the largest natural habitat block along the main stem of the Los Angeles River. The proposed project abuts a 700-foot-long section of ecologically significant soft bottom river channel and has a 600-foot-long interface with State Park property. It is also situated across the river from Marsh Street Park owned by the Mountains Recreation and Conservation Authority (MRCA). The City only gets one chance to approve a project that maximizes permanent public benefit and minimizes permanent detrimental effects to the above-described regionally significant cluster of public resources. The City should be patient to get a near-ideal project in exchange for the requested Zone Changes and General Plan Amendments.

The proposed project provides virtually no permanent public benefit and would result in numerous unmitigable, permanent, significant adverse environmental impacts to a host of public areas and public trust resources. The below addressed impacts can only be avoided by reducing the project footprint. If the project applicant cannot put forth a much more site sensitive project, then the City has the option to let the status quo remain until such a high public benefit - reduced impact project is brought forth. The width of publically-owned river bank is wide in that location so the development of public riverside amenities and habitat restoration can proceed regardless of the status of the subject property.

The proposed project is located in such a publically important zone that it must be designed to buffer, complement, and blend in with public natural and recreation areas. The surrounding public properties are investments that have been acquired over a couple of decades at the cost of millions of public dollars. The most obvious important project changes to include are minimum fifty-foot-wide building and lighting setbacks from both

the Los Angeles River public right-of-way and the State Parks boundary. The attached figure shows such requested setbacks on two sides of the property. Such minimum horizontal setbacks are critical to limit degradation of both existing and future restored habitat on high value urban public lands.

Such set back areas must have native vegetation but can also accommodate both public and private non-motorized vehicle pathways. Any pathway lighting must be low, ground-based, shielded, and downward directed, without exception. To guarantee both the permanence and ecological function of the proposed fifty-foot-wide setback areas, recordation of either permanent deed restrictions or conservation easements over the whole of the setback area is imperative prior to the issuance of any building permits.

The Conservancy urges a broad range of Draft Environmental Impact Report (DEIR) alternatives. No alternative should have less setback acreage than the above-requested “Minimum 50-Foot River and State Park Setback” alternative. At least one alternative must have twice that amount of contiguous River and State Park acreage setback to achieve a no significant biological and visual impact project. It is hoped that a Minimum 50-Foot River and State Park Setback alternative can include mitigation measures-such as selective building height reduction and tall native landscaping--to reduce biological and visual impacts to a level less than significant. The DEIR must include analyses of how the proposed six story residential buildings and seven story parking facility would affect resources, views, and light availability on multiple adjacent public lands, including Marsh Street Park.

Per both the proposed public land uses in all relevant existing public planning documents and the habitat restoration potential of adjacent public land, the DEIR must address how noise and light from the project and its DEIR alternatives would adversely affect birds, amphibians, and all other relevant wildlife. The DEIR must also address wildlife movement on the flat river terrace areas outside of the concrete river channel walls.

The DEIR must address how well the proposed project and each of its DEIR alternatives integrates with all adjoining public land and rights-of-ways.

The DEIR must address how much storm water runoff can be infiltrated on site and how that level of infiltration can be substantially increased with project changes and features. Those analyses should include scenarios where drainage and infiltration areas and systems work with existing public lands and most importantly broad setback areas that abut the river and State Park property.

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Ideally the subject project should include solar panels on all potential roof tops.

Please address any future documents, notices, and questions to Paul Edelman of our staff at the above letterhead address, by phone at 310-589-3200 ext. 128, and email at edelman@smmc.ca.gov.

Sincerely,

IRMA MUÑOZ
Chairperson