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Sent via email

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Re: 2021 LA River Master Plan Draft Program Environmental Impact Report

Dear Ms. Komjakraphan-Tek:

These comments are submitted on behalf of the Center for Biological Diversity (“Center”) on the Draft of a CEQA Program Environmental Impact Report (“EIR” or “DEIR”) for the 2020 LA River Master Plan. These comments are submitted to assist the Department of Public Works (“DPW”) in review and approval of these environmental documents.

As the EIR acknowledges, the Project covers the 51-mile-long, 2-mile-wide corridor of the LA River in Los Angeles County and spans through 18 total jurisdictions. Today, 1 million people live within 1 mile of the river. The Center requests that special consideration be placed on the biological resources, hydrology and water quality, gentrification and homelessness, and equitable access.

I. Background on the Center

The Center is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States, including residents of Los Angeles County. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life.

II. Background on the EIR Process

An EIR is a detailed statement, prepared under the California Environmental Quality Act, Public Resources Code §§ 21000-21178 (“CEQA”), describing and analyzing all significant impacts on the environment of a proposed project and discussing ways of mitigating or avoiding those effects. (Pub. Res. Code §21100; Cal. Code Regs. tit. 14, § 15362.) The purpose of an EIR “is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made.” (*Laurel Heights Improvement Association v. Regents of*

University of California (1993) 6 Cal.4th 1112, 1123 [emphasis in original and citations omitted].) An EIR should provide decision making bodies and the public with detailed information about the effect a proposed project is likely to have on the environment, to list ways in which the significant effects of a project might be avoided or minimized, and to indicate alternatives to the project. (Pub. Res. Code § 21061; Cal. Code Regs. tit. 14, § 15002.) California courts have emphasized that an EIR should: disclose all relevant facts; provide a balancing mechanism whereby decision makers and the public can weigh the costs and benefits of a project; provide a means for public participation; provide increased public awareness of environmental issues; provide for agency accountability; and provide substantive environmental protection.

CEQA compels agencies to refrain from approving projects with significant environmental impacts if feasible mitigation measures or alternatives exists that can alleviate or avoid such adverse effects. (*Mountain Lion Foundation v. Fish & Game Com.* (1997) 16 Cal.4th 105, 134.) Pursuant to this substantive mandate, the DPW should consider all feasible mitigation measures and alternatives in its EIR analysis, which should be quantitative, objective, rigorous, and most of all, complete.

III. General Comments

The Center is supportive of the 2020 LA River Master Plan nine objectives that promote the protection and enhancement of the river's natural and cultural resources. These goals reflect the multi-benefit opportunities that exist along the river and if achieved, could transform this central area into a community hub for both people and wildlife. However, achieving these goals will require a clearly defined and articulated vision that includes specific guidelines for all future projects. Unfortunately, the DEIR does not provide that framework.

Below we outline the inconsistencies present in the DEIR as compared with the stated objectives and we provide additions that we believe will make the Master Plan significantly more successful at achieving ecosystem and community health for all Angelinos. A summary of our recommendations for the DEIR are as follows:

3.3.2.1 Geography

- Enhance habitat connectivity for both large ranging and small ranging species in the San Gabriel, Santa Monica, and Santa Susana Mountains at the headwaters near Canoga Park, as well as the stated corridor between Griffith Park and the Verdugo Mountains at the Glendale Narrows [Figure 3.3-25; Wildlife Movement and Connectivity 3.3-36].

3.3.3.3 Impacts and Mitigation Measures

- Implement a minimum 300-foot setback from all perennial and intermittent streams and wetlands (including vernal pools) [Mitigation Measure BIO-4: Identify Work Areas and Environmentally Sensitive Areas].
- Develop a comprehensive invasive plant, insect and animal management plan that includes non-toxic methods of control [Mitigation Measure BIO-5: Prepare and Implement Weed Abatement Plan].

- Re-assess the cumulative effects analysis of the proposed kits of parts for biological resources, as described under CEQA Guidelines section 15130.

In addition to the amendments listed above, these additional analyses should be added to the Impacts and Mitigation Measures Section of the EIR.

- Replace all non-native trees removed as a result of the proposed work activities with at least a 1:1 ratio with native trees and replacing native trees at least a 3:1 ratio with a combination of native trees and/or appropriate understory and lower canopy plantings.
- Conduct an analysis of impacts from land use designations and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions and discuss possible conflicts and mitigation measures to reduce these conflicts.

IV. Section 2: Project Description

Overall, the project, as described in the DEIR, does not provide the specifics necessary to accurately assess impacts. The project description includes a menu of options, but no clear definition or even priority of how these options would be implemented. In addition, there is no project or location-specific information when we know that location, type and number of projects greatly influences environmental impact, and with no specifics, the project scope is incomplete.

The Department of Public Work’s use of a program EIR, as opposed to a project-specific EIR, does not excuse the obligation to provide clear and detailed information to the public. “The ultimate inquiry . . . is whether the EIR includes enough detail ‘to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.’” (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 516.) As circulated, the DEIR does not include the requisite detail.

The Court of Appeal has provided guidance about the distinctions between program and project EIRs:

Designating an EIR as a program EIR . . . does not by itself decrease the level of analysis otherwise required in the EIR. [I]n considering a challenge to a program EIR, 'it is unconstructive to ask whether the EIR provided ‘project-level’ as opposed to ‘program-level’ detail and analysis. Instead, we focus on whether the EIR provided ‘decisionmakers with sufficient analysis to intelligently consider the environmental consequences of [the] project.’

(*Cleveland National Forest Foundation v. SANDAG* (2017) 17 Cal.App.5th 413, 426.). Even if more precise information may be available during project-specific review, the DPW “must still provide reasonably obtainable information, or explain (supported by substantial evidence) why it

cannot do so. ‘[I]f known impacts are not analyzed and addressed in a program EIR, they may potentially escape analysis in a later-tier EIR.’ (17 Cal.App.5th at p. 440.)

The menu based approach that the DEIR takes in its description of the program does not lend itself to accurate assessment and threatens to not account for significant environmental impacts by relying on later-tier EIR analysis. This oversight could be detrimental to the region as this program is described as covering the entire 51-miles of the Los Angeles River. To not accurately assess the potential impacts and provide clear and specific guidance to all future projects upfront ensures that the nine objectives will not be met.

An example of this conflict appears in the description of the platform parks (22 acres decked at Rio Hondo confluence), which is language obviously informed by Gehry programming and planning, but the Gehry-proposed projects are absent from the analysis. If the DPW is serious about meeting its objectives, this DEIR needs to be significantly revised to direct all future projects to ensure that their individual and cumulative impact not only does “not significantly impact the environment,” but that their project positively contributes to the achievement of one or more of the stated objectives and has an at least neutral impact to all other objectives.

V. Section 3.3: Biological Resources

a. 3.3.2.1 Geography

i. Figure 3.3-25; Wildlife Movement and Connectivity 3.3-36

Roads and development create barriers that lead to habitat loss and fragmentation, which harms native wildlife, plants, and people. As barriers to wildlife movement, poorly-planned development and roads can affect an animal’s behavior, movement patterns, reproductive success, and physiological state, which can lead to significant impacts on individual wildlife, populations, communities, landscapes, and ecosystem function (Mitsch and Wilson 1996; Trombulak and Frissell 2000; van der Ree et al. 2011; Brehme et al. 2013; Haddad et al. 2015; Marsh and Jaeger 2015; Ceia-Hasse et al. 2018).

Habitat fragmentation from roads and development has been shown to cause mortalities and harmful genetic isolation in mountain lions in southern California (Ernest et al. 2014; Riley et al. 2014; Vickers et al. 2015), increase local extinction risk in amphibians and reptiles (Cushman 2006; Brehme et al. 2018), cause high levels of avoidance behavior and mortality in birds and insects (Benítez-López et al. 2010; Loss et al. 2014; Kantola et al. 2019), and alter pollinator behavior and degrade habitats (Trombulak and Frissell 2000; Goverde et al. 2002; Aguilar et al. 2008).

Habitat fragmentation also severely impacts plant communities. An 18-year study found that reconnected landscapes had nearly 14% more plant species compared to fragmented habitats, and that number is likely to continue to rise as time passes (Damschen et al. 2019). The authors conclude that efforts to preserve and enhance connectivity will pay off over the long-term (Damschen et al. 2019). In addition, connectivity between high quality habitat areas in

heterogeneous landscapes is important to allow for range shifts and species migrations as climate changes (Heller and Zavaleta 2009; Cushman et al. 2006; Krosby et al. 2018). Loss of wildlife connectivity decreases biodiversity and degrades ecosystems.

Edge effects of development in and adjacent to open space will likely impact key, wide-ranging predators, such as mountain lions and bobcats (Crooks 2002; Riley et al. 2006; Delaney et al. 2010; Lee et al. 2012; Smith et al. 2015; Vickers et al. 2015; Smith et al. 2017; Wang et al. 2017), as well as smaller species with poor dispersal abilities, such as song birds, small mammals, and herpetofauna (Cushman 2006; Slabbekoorn and Ripmeester 2008; Benítez-López et al. 2010; Kociolek et al. 2011). Limiting movement and dispersal can affect species' ability to find food, shelter, mates, and refugia after disturbances like fires or floods. Individuals can die off, populations can become isolated, sensitive species can become locally extinct, and important ecological processes like plant pollination and nutrient cycling can be lost. Negative edge effects from human activity, such as traffic, lighting, noise, domestic pets, pollutants, invasive weeds, and increased fire frequency, have been found to be biologically significant up to 300 meters (~1000 feet) away from anthropogenic features in terrestrial systems (Environmental Law Institute 2003)

It is important that the EIR consider corridor redundancy (*i.e.* the availability of alternative pathways for movement) because it allows for improved functional connectivity and resilience. Compared to a single pathway, multiple connections between habitat patches increase the probability of movement across landscapes by a wider variety of species, and they provide more habitat for low-mobility species while still allowing for their dispersal (Mcrae et al., 2012; Olson & Burnett, 2008; Pinto & Keitt, 2008). In addition, corridor redundancy provides resilience to uncertainty, impacts of climate change, and extreme events, like flooding or wildfires, by providing alternate escape routes or refugia for animals seeking safety (Cushman et al., 2013; Mcrae et al., 2008; Mcrae et al., 2012; Olson & Burnett, 2008; Pinto & Keitt, 2008). It is widely recognized that the continuing fragmentation of habitat by humans threatens biodiversity and diminishes our (humans, plants, and animals) ability to adapt to climate change. Genes are changing, species' physiology and physical features such as body size are changing, species are moving to try to keep pace with suitable climate space, species are shifting their timing of breeding and migration, and entire ecosystems are under stress (Parmesan and Yohe 2003; Root et al. 2003; Parmesan 2006; Chen et al. 2011; Maclean and Wilson 2011; Warren et al. 2011; Cahill et al. 2012). In a report for the International Union for Conservation of Nature (IUCN), world-renown scientists from around the world stated that “[s]cience overwhelmingly shows that interconnected protected areas and other areas for biological diversity conservation are much more effective than disconnected areas in human-dominated systems, especially in the face of climate change” and “[i]t is imperative that the world moves toward a coherent global approach for ecological connectivity conservation, and begins to measure and monitor the effectiveness of efforts to protect connectivity and thereby achieve functional ecological networks” (Hilty et al. 2020).

When assessing impacts to wildlife movement and habitat connectivity, DPW must analyze the Project's potential impacts to riparian corridors. Riparian ecosystems have long been recognized as biodiversity hotspots performing important ecological functions in a transition zone between freshwater systems and upland habitats. Many species that rely on these aquatic

habitats also rely on the adjacent upland habitats (*e.g.*, riparian areas along streams, and grassland habitat adjacent to wetlands). In fact, 60% of amphibian species, 16% of reptiles, 34% of birds and 12% of mammals in the Pacific Coast ecoregion depend on riparian-stream systems for survival (Kelsey and West 1998). Many other species, including mountain lions and bobcats, often use riparian areas and natural ridgelines as migration corridors or foraging habitat (Dickson et al, 2005; Hilty & Merenlender, 2004; Jennings & Lewison, 2013; Jennings & Zeller, 2017). Additionally, fish rely on healthy upland areas to influence suitable spawning habitat (Lohse et al. 2008), and agricultural encroachment on these habitats and over-aggressive removal of riparian areas have been identified as a major driver of declines in freshwater and anadromous fish (*e.g.*, Stillwater Sciences 2002; Lohse et al. 2008; Moyle et al. 2011). Therefore, buffers that allow for connectivity between the aquatic resource and upland habitat is vital for many species to persist.

In order to preserve and protect Los Angeles' native wildlife against climate change and development, the Kit of Parts should also be implemented with an eye towards **enhancing and interconnecting larger habitat areas in the San Gabriel, Santa Monica, and Santa Susana Mountains at the headwaters near Canoga Park**, as well as the stated corridor between Griffith Park and the Verdugo Mountains at the Glendale Narrows, so that plant and animal species endemic to the River are more likely to survive and thrive. In addition to these known habitat corridors, it is imperative that standards are set across all projects to ensure wildlife movement is possible, even in the more urbanized areas. These standards should include best practices for different taxa, such as mammals (large, medium and small), reptiles and amphibians, birds, insects and fish. Smaller species with poor dispersal abilities, like rodents and herpetofauna, would require more frequent intervals of crossings compared to larger wide-ranging species, like mountain lions or coyotes, to increase their chances of finding a crossing. Gunson et al. (2016) recommend that crossing structures generally be spaced about 300m (~0.19mi) apart for small animals when transportation infrastructure bisects large expanses of continuous habitat, though they recognize that some amphibians may need more frequent crossings no more than 50m (~0.03mi) apart. And for many amphibian and reptile species, undercrossings should have grated tops so that the light and moisture inside the crossings are similar to that of the ambient environment. Therefore, multiple crossings designed for different target species may be required. **In-depth analyses that include on-the-ground movement studies of which species are moving in the area and their home range area, habitat use, and patterns of movement are needed to determine how to best implement such crossings.** In addition, associated crossing infrastructure (*e.g.*, exclusionary fencing appropriate for target species, berms to buffer crossings from sound and light) should be included to improve chances of wildlife using crossings, and such crossings and associated infrastructure should be designed and built in consultation with local and regional experts, including agency biologists (Shilling 2020; Vickers 2020).

b. 3.3.3.3 Impacts and Mitigation Measures

i. Special Status Plan and Wildlife Species

The LA River watershed sits within one of the world's most diverse Mediterranean biodiversity hotspots. Today, the entire 52-mile river is designated as warm freshwater habitat,

while the upper portion of the river and mouth are designated as wildlife habitat, used by rare, threatened, or endangered species. These species range from large mammals to small reptiles and fish as well as important pollinators, all with different habitat and environmental needs. To preserve the native biodiversity that for so long has defined our region, comprehensive assessment and strategic restoration plans have to be implemented that reflect the diverse needs of our native species.

For those species with the largest ranges and least tolerance for urban development, such as the mountain lion (*Puma concolor*), conservation depends on maintenance of the connections between and within the regional system of large reserves. Use of such wildlife corridors through the urban-wildland interface may depend on the quality of the habitat in the linkage, but also on the absence of artificial lighting. Pumas will avoid nocturnal movement through lighted areas and may miss landscape linkages because of this tendency. Conservation strategies for native small mammal diversity on the other hand, should concentrate less on connectivity across marginal habitats and more on habitat quality and size as well as exotic species (Longcore 2006).

For birds, providing habitat blocks with minimized edge effects as well as habitat blocks for human-intolerant species is essential. Raptors can accommodate dispersed habitat elements that cumulatively support their needs within an urban matrix as long as there are trees to connect reserve areas. However, for more sensitive species, specialized habitats, such as wetlands, oak woodlands, grasslands, and sage scrub are critical and minimizing human recreation these parts of natural areas will allow disturbance-intolerant species to persist. Finally, songbird biodiversity is dependent on the effective management of populations of feral cats as well as programs to minimize bird collisions with windows and vehicles. In order to minimize impact, proposed project activities including (but not limited to) staging and disturbances to native and non-native vegetation, structures, and substrates should occur outside of the avian breeding season which generally runs from February 1 through September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs (Longcore 2006).

Reptiles and amphibians often require corridors between different habitat types because of their different life cycles. Specifically, wide corridors are needed around riparian zones for species like turtles, that have nest sites up to 400m away from streams (Spinks et al. 2003). While alligator lizards and fence lizards are considered urban tolerant species, most snakes, legless lizards, and horned lizards, are urban intolerant and have been impacted by a combination of direct habitat destruction and edge effects. For example, horned lizards, which once were common in the San Fernando Valley, have all but disappeared because of the loss of their preferred prey item, harvester ants (Suarez et al. 2000) that were displaced by invasive Argentine ants (Erickson 1971; Holway 1998a, 1998b; Human et al. 1998). Finally, native soils should be protected for burrowing species (e.g., legless lizard) (Longcore 2006).

Virtually no native fish remain in the upper Los Angeles River watershed. Speckled dace, arroyo chub, Pacific lamprey, unarmored threespine stickleback, Santa Ana sucker, and southern steelhead have all been extirpated. Restoration of elements of the former hydrology of the Los Angeles River and its tributaries, combined with massive pollution control, would be necessary for recovery of these species. A conservation strategy leading in that direction under current conditions would be to increase infiltration in the watershed so that peak flows in the main stem

are reduced and future projects will have a margin of safety to engineer a solution (Longcore 2006).

Insects and other arthropods constitute the majority of earth's biodiversity and exist across many different habitat types. Thus, protecting diverse ecosystems, especially encompassing diversity in soil and natural disturbance regimes is critical to maintaining insect diversity. Insects also benefit from networks of small reserves in urban areas to complement large reserves in the urban wildland area. Such small habitats, while fragmented, help support rare butterflies move through the urban core. However, it should be noted that more species are found in large fragments than small, so protecting both is critical. Finally, providing suitable habitat elements outside of reserves through the use of native landscaping provides stepping-stones for these species to move between the larger reserves (Longcore 2006).

Plant communities have been heavily degraded from development and invasion of non-native species. Research on the vegetation condition of remnant urban vegetation in a similar environment to Los Angeles (Perth, Australia) showed that small reserves were highly fragmented and infested by exotic weeds, but that these reserves should be preserved and managed because "they are highly valuable for representing the vegetation types that once occurred there" (Longcore 2006). Thus, native plant communities require a heavy investment in management, but that this investment is worth it for the long-term preservation of these native ecosystems. To address these issues, **the DEIR should include a comprehensive invasive plant, insect and animal management plan that includes non-toxic methods of control** in the Mitigation Measure BIO-5: Prepare and Implement Weed Abatement Plan section. In addition, **we recommend replacing all non-native trees removed as a result of the proposed work activities with at least a 1:1 ratio with native trees and replacing native trees at least a 3:1 ratio with a combination of native trees and/or appropriate understory and lower canopy plantings.**

Plants also depend on mutualisms wherein animals disperse and "plant" seeds. These relationships range from ants to scrub jays. Elimination of large seed dispersing ants by invasive Argentine ants has negative consequences for those plants whose seeds are dispersed by the native ants. Invasion of exotic insects can alter the dominance of the plant community away from large-seeded species favored by ants. Vegetation communities, therefore, depend on protection of the wildlife communities that inhabit them for well known services such as pollination, and lesser known functions such as seed dispersal (Longcore 2006).

Effective conservation efforts must account for the interdependencies between and within species in these groups. Ecosystems are characterized by complex food webs, which are networks of energy transfer that connect even peripherally related species. They are also characterized by many groups not discussed here that play integral roles in ecosystem function — lichens, mosses, soil microorganisms, bacteria, algae, viruses, and an almost incomprehensible array of other species. Urban conservation must strike a balance between the desire to protect intact ecosystems and the demonstrated benefits of smaller fragments to the overall maintenance of biodiversity (Longcore 2006).

ii. Mitigation Measure BIO-4: Identify Work Areas and Environmentally Sensitive Areas

As of 1989 (over 30 years ago), Southern California had already lost between 95 and 97 percent of riparian habitat in floodplain areas (Faber, et al. 1989). These areas that have historically defined our region, continue to provide habitat for a variety of native species as well as support the health and resilience of our local water supply.

To protect what remains of these important habitats adequate buffers throughout the watershed is the most effective strategy to reducing pollutants and sedimentation (Norris 1993). Larger buffer zones along streams and wetlands can provide more stream bank stabilization, water quality protection, groundwater recharge, and flood control both locally and throughout the watershed (Sabater et al. 2000). They would also protect surrounding communities from impacts due to climate change by buffering them from storms, minimizing impacts of floods, and providing water storage during drought.

Because of these benefits to ecosystem and community health, other municipalities have implemented setback requirements, including in the San Francisco Bay Area, where stream setbacks range between 30 – 200 feet, depending on the type of land use (*i.e.*, urban versus rural), or the quality or type of existing habitat. For example, Sonoma County implements some of the more stringent setbacks, with requirements for a 200-foot buffer in the Russian River Riparian Corridor, a 100-foot buffer for flatland riparian stream corridors, and a 50-foot buffer for other riparian stream corridors.¹

Although smaller buffers may be locally adequate to alleviate water quality concerns in the short-term, they are often insufficient for wildlife (Kilgo et al. 1998). Streams (perennial and intermittent), wetlands (including vernal pools and salt marshes), and reservoirs throughout the County support numerous special-status flora and fauna, including Southern California steelhead and California red-legged frog. Many species that rely on these aquatic habitats also rely on the adjacent upland habitats (*e.g.*, riparian areas along streams, and grassland habitat adjacent to wetlands). In fact, 60% of amphibian species, 16% of reptiles, 34% of birds and 12% of mammals in the Pacific Coast ecoregion depend on riparian-stream systems for survival. Many other species, including mountain lions and bobcats, often use riparian areas and natural ridgelines as migration corridors or foraging habitat (Dickson et al. 2005). Additionally, fish rely on healthy upland areas to influence suitable spawning habitat,² and agricultural encroachment on these habitats and over-aggressive removal of riparian areas have been identified as a major driver of declines in freshwater and anadromous fish (Moyle et al. 2011). Loss of biodiversity due to lack of habitat contributes to ecosystem degradation, which will diminish a multitude of ecosystem services in the long-term. Thus, to preserve Los Angeles County's valuable biodiversity in these habitats, it is important to develop and implement effective buffer widths informed by the best available science.

¹ County of Sonoma (2008) General Plan 2020. Available at: <https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/General-Plan/>

² Lohse KA, Newburn DA, Opperman JJ, Merenlender AM (2008) Forecasting relative impacts of land use on anadromous fish habitat to guide conservation planning. *Ecol Appl* 18:467–482 . doi: 10.1890/07-0354.1.

A literature review found that recommended buffers for wildlife often far exceeded 100 meters (~325 feet), well beyond the largest buffers implemented in practice. For example, Kilgo et al. (1998) recommend more than 1,600 feet of riparian buffer to sustain bird diversity. In addition, amphibians, which are considered environmental health indicators, have been found to migrate over 1,000 feet between aquatic and terrestrial habitats through multiple life stages (Semlitsch and Bodie 2003). Specifically, the California red-legged frog, a threatened species that occurs and has designated critical habitat within Los Angeles County, was found to migrate about 600 feet between breeding ponds and non-breeding upland habitat and streams, with some individuals roaming over 4,500 feet from the water (Fellers and Kleeman 2007). Other sensitive species known to occur in Los Angeles County, such as western pond turtles (*Actinemys marmorata*, a candidate species under the Endangered Species Act) have been found to migrate over 1,300 feet from breeding ponds and streams (Trenham and Shaffer 2005). Accommodating the more long-range dispersers is vital for continued survival of species populations and/or recolonization following a local extinction (Cushman 2006). In addition, more extensive buffers provide resiliency in the face of climate change-driven alterations to these habitats, which will cause shifts in species ranges and distributions (Cushman et al. 2013). This emphasizes the need for sizeable riparian and upland buffers around streams and wetlands in Los Angeles County, as well as connectivity corridors between heterogeneous habitats.

To protect Los Angeles County's highly diverse ecosystems and the services they provide, the **LA River Master Plan EIR should implement a minimum 300-foot setback** from all perennial and intermittent streams and wetlands (including vernal pools) that are within designated critical habitat, support or have the potential to support special-status and/or sensitive species, or provide connectivity and linkages to support multiple species. If the streams or wetlands are not located within designated critical habitat, do not support or have the potential to support special-status or sensitive species, and do not provide essential habitat connectivity, as determined by a qualified biologist, then a minimum 200-foot buffer should be required. The EIR should also include measures to **protect these riparian areas from direct and indirect negative impacts in perpetuity.**

c. Cumulative Impacts

The **cumulative effects analysis, as described under CEQA Guidelines section 15130, needs to be re-assessed.** The conclusion stated in the DEIR that "implementation of the 2020 LA River Master Plan would not result in a cumulatively considerable contribution to biological impacts," but rather "would increase habitat" assumes that because preserving biological resources is a listed objective, that the net impact across all projects and project areas will be positive. However, of the listed project potentials in the kit of parts, only nine out of 68 would prioritize biological resources and given that this is a menu based approach, there is no guarantee that those nine will all be implemented.

Ecological systems have tipping points and when there are multiple affronts from multiple projects, the cumulative effect can be significantly greater than expected, unless the interactions of such projects are accounted for beforehand. To meet the stated goal of "healthy connected ecosystems," the EIR must conduct a cumulative effects analysis that considers the possible impact of all kit of parts that do not prioritize biological resources. This would

determine the true scope and scale of significant environmental impact on the biological resources of the region and provide an **avenue for implementation of the common elements and kit of parts that maximizes benefits for biological resources.**

d. Recommendations

In addition to the recommendations listed above, we urge the county to **complete an analysis of impacts from land use designations 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 EIR.

VI. Section 3.9: Hydrology and Water Quality

a. The DEIR Should Adequately Analyze and Mitigate Potential Impacts on Water Quality.

Preserving regional water quality is essential to environmental and public health, especially as the City and County pivot towards 100% local water supply. To ensure this natural resource is protected, the DEIR should clearly articulate the environmental benefits of increasing enforcement of water permit violations and remediating industrial and commercial contamination as part of the Master Plan. The DEIR should also assess and mitigate the potential impacts the Master Plan could have on the River's ability to maintain its original "Rec 1" beneficial use designation.³ **Common elements and Kit of Parts should be implemented in a manner that will someday restore the River to a fishable and swimmable river again.**

The DEIR should also assess the prioritization of regional water quality improvement projects in areas of greatest need and should clearly state the increasing environmental benefits that would result from the most restorative actions that remove impervious surfaces and restore wetlands and green spaces.

b. The DEIR Must Assess Water Supply Impacts.

Understanding the impacts of the LARMP on the region's water supply must be a priority, as it needs to be integrated into planning policies before implementation to ensure that the cumulative impact does not threaten our region's ability to achieve water independence from external sources. The EIR should consider the benefits from increased groundwater replenishment and efforts to capture flows in the Upper and Lower LA River watershed for groundwater discharge in the San Fernando Basin and Central Basin must be prioritized.

Project-related changes in drainage patterns, runoff, and sedimentation should be included and evaluated in the EIR as well. As part of the LSA Notification process, CDFW requests a hydrological evaluation of the 100-, 50-, 25-, 10-, 5-, and 2-year frequency storm

³ Los Angeles River Revitalization Master Plan (2007), available at: <http://boe.lacity.org/lariverrmp/CommunityOutreach/pdf/04Chapter3-IssuesAffectingthePlan42407.pdf>.

event for existing and proposed conditions. CDFW recommends the DEIR evaluate the results and address avoidance, minimization, and/or mitigation measures that may be necessary to reduce potential significant impacts.

VII. Section 3.10: Land Use and Planning

CEQA requires an EIR to discuss any inconsistencies with applicable land use plans, not just whether it is generally consistent with these plans. (Guidelines § 15125, subd. (d); *Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 356 [“*Napa Citizens*”].) Failure to disclose any such inconsistencies violates CEQA’s information disclosure mandate, constituting a failure to “proceed in ‘a manner required by law’.” (*Napa Citizens, supra*, 91 Cal.App.4th at 386; *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 510, 514–16.)

Here, the DEIR fails to provide any analysis of the 2020 LA River Master Plan’s consistency or lack of consistency with a number of relevant and applicable land use plans. The DEIR includes a section entitled “Relevant Land Use Plans and Policies (Non-Regulatory)” that only briefly summarizes these relevant plans, but does not provide any analysis of the Project’s consistency or inconsistency with these plans and their respective goals and policies. (See DEIR at 3.10-2.) This is impermissible under CEQA, which does not contain an exemption from this requirement for “non-regulatory” but nonetheless “relevant” plans. Instead, the Guidelines specifically note that this requirement extends to regional transportation plans, habitat conservation plans, and plans for the reduction of greenhouse gases, among others.

For instance, the DEIR must include a detailed analysis of any inconsistencies with the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (“RTP/SCS”) adopted by the Southern California Association of Governments’ (“SCAG”). Currently, the EIR includes only a single half-page chart that concludes without analysis that the Project is consistent with ten broad goals in the RTP/SCS. Here, it is unclear how the Plan will “[p]romote conservation of natural and agricultural lands and restoration of habitats” (see DEIR at 3.10-50) when the Project proposes to simply leave-in place the channelization that has degraded the LA River, and the Project fails to adopt a broader watershed restoration approach.

Moreover, the RTP/SCS has numerous other goals that are not discussed at all in the DEIR, with which the Project is likely inconsistent. The RTP/SCS includes goals to “Preserve, enhance and restore regional wildlife connectivity . . .”⁴ (RTP/SCS at 49.) As discussed above, the Project will not promote this goal, and potentially will undermine it through new development in sensitive areas. Moreover, the Program EIR Addendum⁵ for the RTP/SCS contains numerous proposed mitigation measures to reduce impacts on wildlife movement. (See PMM Bio-4 at 4.0-15). The EIR should analyze consistency with these measures and require them as mitigation measures for the Project.

⁴ Connect SoCal Plan (Sept. 2020), available at https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176

⁵ Connect SoCal Program Environmental Impact Report Addendum #1 (Sept. 2020), available at https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocial_addendum_complete.pdf?1606004379.

Likewise, the DEIR contains virtually no analysis of the Project’s consistency with the Los Angeles River Revitalization Master Plan, or Lower Los Angeles River Revitalization Plan (see DEIR at 3.10-50.) Nor does the DEIR contain any analysis of whether the Project is consistent with the goals and policies of applicable climate action plans, including the Los Angeles County Community Climate Action Plan and L.A.’s Green New Deal Sustainability Plan, among others.

Perhaps most unfortunately, the DEIR does not even mention, let alone analyze consistency with, the Los Angeles Countywide Sustainability Plan.⁶ The Sustainability Plan contains numerous policies that should be applied to the Project, but are not even considered in the DEIR. For instance, Action 36 in the Sustainability Plan states “Evaluate and implement mechanisms, such as a stream protection ordinance, for the protection, preservation, and restoration of natural buffers to waterbodies, such as floodplains, streams, and wetlands” and “PW” or “Public Works” is listed as a partner. (Sustainability Plan at 58.) In order to be consistent with the Sustainability Plan, the DEIR must disclose whether and/or how the Project is meeting these goals. Action 73 contains similar requirements of “implementing a strategy to preserve and protect priority ecological sites . . . [including but not limited to . . . terrestrial streams, wetlands, and aquatic habitats.” (Sustainability Plan at 92.) It is also unclear how the Project meets Goal 6 of the Sustainability Plan: “Accessible parks, beaches, recreational waters, public lands, and public spaces that create opportunities for respite, recreation, ecological discovery, and cultural activities.”

Impact 3.10(b) in the DEIR considers whether the Project would cause a significant environmental impact due to a conflict with any applicable land use plan or policy. (DEIR at 3.10-35.) The DEIR concludes that impacts would be less than significant and that no mitigation is required for most of the “Kit of Part” categories. However, because the DEIR fails to include adequate analysis of the Project’s consistency or lack of consistency with various plans, it cannot credibly reach a conclusion on Impact 3.10(b). (See *Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935 [conclusory claims are insufficient under CEQA’s informational mandate, which requires an EIR to “contain facts and analysis, not just the agency’s bare conclusions or opinions].)

For other areas of the “Kit of Parts” such as “KOP Category 6,” the DEIR concludes that impacts would be significant and unavoidable. (DEIR at 3.10-44.) The DEIR also quite confusingly compares the Project to the goals of the Project in its land use plan analysis, and concludes that projects under KOP Category 6 “could encroach on existing residential neighborhoods and result in a significant environmental impact.” (DEIR at 3.10-45.) The DEIR then states that the Project “potentially” is *not* consistent with the Project’s goal of “protection of existing residential neighborhoods from encroachment.” (*Id.*) At a minimum it is extremely confusing that the DEIR suggests that the Project is inconsistent with itself. The DEIR’s confusing analysis does not contribute to informed decision-making and public participation.

⁶ Los Angeles County Sustainability Plan, available at <https://ourcountyla.lacounty.gov/wp-content/uploads/2019/07/OurCounty-Final-Plan.pdf>

In addition, it is difficult to even assess whether the Project is consistent or inconsistent with the above-mentioned land use plans and their goals and policies because what actually constitutes the Project is extremely confusing and not properly described in the EIR.

VIII. Section 3.15: Recreation

a. The DEIR Should Prioritize Equitable Access For All Communities Along the LA River.

The DEIR should place special emphasis on the environmental and societal benefits of increasing the extent of multi-use trails that connect to the River and prioritize access near major destinations or areas that need improvements to existing access points. This should include connecting major regional trails, tributary trails and expanding regional loops primarily in the Lower LA River. The communities of highest park need along the LA River include Downtown LA, Bell Gardens, South Gate, Compton, and Long Beach. (Steering Committee Meeting #8 Summary 2019.)⁷ Increasing public access to the River should also include common elements, such as street lighting and emergency call boxes, to increase public safety along and within the River.

IX. Section 5: Alternatives

CEQA requires that an EIR adequately analyze alternatives to the proposed project. The alternatives analysis is the “core of an EIR.” (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 564 (“*Citizens II*”).) An EIR is required to analyze a range of alternatives that “would avoid or substantially lessen” any of the significant effects of the project in order to “ensure that all reasonable alternatives to proposed projects are thoroughly assessed by the responsible official.” (Pub. Resources Code § 21002, 21002.1; CEQA Guidelines § 15126.6, subd. (a).) Reasonable alternatives are feasible and must “attain most of the basic objectives” of the Project. (Pub. Resources Code § 21061.1; Guidelines § 15126.6 (a).) The reasonableness of alternatives is considered in light of the nature of the project and the nature and extent of the project’s impacts. (*San Bernardino Valley Audubon Society v. County of San Bernardino* (1984) 155 Cal.App.3d 738, 750–51.) Reasonable alternatives should only be eliminated from consideration in the EIR if the alternative would not meet most of the basic project objectives, is infeasible, or would not reduce significant environmental impacts. (Guidelines § 15126.6(c); *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1457.)

Prior to release of the DEIR, numerous groups including the Center urged DPW to consider and adopt a Watershed Restoration Alternative. (See e.g., letter of August 4, 2020 from Los Angeles Waterkeeper, Center for Biological Diversity, Friends of the LA River, and Heal the Bay.) The letter explained that such an alternative would expand the scope of the project to include the LA River watershed more formally because in order to achieve the goals of the LARMPU (including “reduce flood risk and improve resiliency,” “support healthy, connected

⁷ Los Angeles River Master Plan Update, Steering Committee Meeting #8 Summary (Dec. 19, 2019), available at <https://pw.lacounty.gov/wmd/watershed/lar/docs/LARMP-SteeringCommitteeMeeting8-Summary-and-Appendices.pdf>.

ecosystems” and “promote healthy, safe, clean water”) a system-wide approach is critical. The Center also submitted a separate letter urging adoption of the Watershed Restoration Alternative. (See letter of August 6, 2020.)

Nonetheless, the DEIR summarily dismisses the Watershed Restoration Alternative, claiming that “none of the impacts of the proposed Project would be reduced or avoided” with this alternative. (DEIR at 5-9.) This is false. The whole purpose of this alternative would be to *restore* the watershed and river, thus minimizing impacts and actually providing a net benefit to the watershed and environment. The DEIR does, however, acknowledge that the Watershed Restoration Alternative “would help meet many of the objectives of the proposed Project and specifically further the objectives of connected ecosystems and provision of equitable, inclusive, and safe parks, open space, and trails.” (*Id.*) Indeed, the DEIR fails to mention a single project objective that the Watershed Restoration Alternative would not further. Because the Watershed Restoration Alternative would *reduce* impacts and further the project’s objectives, it should have been considered and adopted by the DEIR as the preferred alternative. Based on the authorities cited above, the DEIR’s failure to even consider this alternative violates CEQA.

X. Conclusion

The Center appreciates the opportunity to submit comments on the Master Plan. Please do not hesitate to contact us with any questions.

Sincerely,



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